The North 60

Hospital Road, Nilsson Drive, Stevens Avenue, Old Saw Mill River Road
Town of Mount Pleasant, Westchester County, New York

Final Environmental Impact Statement

Applicant:
Fareri Associates / North 80 LLC

Lead Agency:
Mount Pleasant Planning Board

Prepared By:

vhb

Tax Map Designations

111.20-1-80	116.8-1-6
116.8-1-3	116.8-1-7
116.8-1-4	116.8-1-8
116.8-1-5	116.8-1-9

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Introduction and Project Summary

The following section includes a brief description of the purpose and content of the FEIS and a project history. This section also contains a description of the Proposed Action, as described in the DEIS, and detailed description of revisions to the Proposed Action since the DEIS was completed.

1.1 Purpose and Content of the FEIS

This Final Environmental Impact Statement (FEIS) has been prepared in accordance with the requirements of the New York State Environmental Quality Review Act (SEQRA) and the regulations promulgated thereunder. The Lead Agency for review of the proposed project ("The North 60") pursuant to SEQRA is the Town of Mount Pleasant Planning Board.

This FEIS incorporates by reference the Draft Environmental Impact Statement (DEIS) prepared for the project, which was accepted as complete and adequate for public review on July 2, 2020. The FEIS is divided into three sections. Section 1, Introduction, contains a brief description of the project studied in the DEIS, and a description of the refinements made to the project since the publication of the DEIS, including a revised plan that incorporates limited low-impact residential uses. Section 2 contains an index of all comments included in the FEIS, and Section 3 includes all substantive comments regarding the project received during the DEIS comment period and a response to each comment. The comments have

been organized by topic area. The Appendix contains all FEIS supporting documentation, including the minutes from the public hearings, a copy of all comment letters received, updated site plans reflecting the FEIS Proposed Action and various supporting technical studies.

1.2 Project History and Process

The Proposed Action includes rezoning the 80±-acre project site (as described in Section 2.1 of the DEIS) to OB-5, the adoption of the new zoning text and zoning map amendment, review and approval of a Master Development Plan for the project site, and site plan approval for Phase 1 of the Master Development Plan, along with obtaining Steep Slope and Wetland Permits. The zoning text amendments allow for a long-term planning process for a large parcel of property in excess of sixty acres. Under the zoning text amendment, the Town Board approves the overall Master Development Plan for the entire site based on the use, area and bulk design controls. Any site plan approvals remain subject to the Planning Board review and approval process and must be consistent with the Master Development Plan. The DEIS was compiled based on a scoping document that was adopted after a public scoping session. Chronology of the SEQRA review of the project (to date) is as follows:

5/2/19	Lead Agency Declared / Positive Declaration
6/6/19	Public Scoping session held
8/1/19	Scoping document adopted
7/2/20	DEIS accepted as complete for distribution
9/3/20 & 10/1/20	DEIS public hearings held
11/1/20	End of Public Comment Period on DEIS

1.3 Project Description

The Proposed Action, as described in the DEIS, includes the proposed development of a mixed-use community that incorporates approximately three million square feet (SF) of bio-tech/research and development related uses including medical offices, a children's science and education center, neighborhood shopping (retail), and a hotel as part of a comprehensive Master Development Plan.

As described in the DEIS, Phase 1 would include 500,000 SF of development consisting of a 120 room hotel (100,000 s. f.), 100,000 SF of medical office, 220,000 SF of bio-tech/research and 80,000 SF of neighborhood shopping space (e.g., a grocery store, health and wellness center, pharmacy with drive-through and/or other similar types of retail). Access to the Phase 1 development would be provided via two driveway connections to Hospital Road. As part of the Phase 1 development, a connection between Hospital Road and NYS Route 9A is proposed. It is anticipated that Phase 1 would be completed and occupied approximately five years after project approvals are obtained.

The Master Development Plan (Phase 2), as described in the DEIS, represents the full build-out, including Phase 1, for a total of 3,000,000 SF consisting of a 120 room hotel (100,000 SF), 400,000 SF of medical office, 2,144,000 SF of bio-tech/research, a 142,000 SF children's science and education center and 214,000 SF of neighborhood shopping space. See Table 1-1.

Table 1-1 DEIS Proposed Program

Program	Phase 1	Master Development Plan*
Medical Office	100,000 SF	400,000 SF
Bio-Tech/Research & Development	220,000 SF	2,144,000 SF
Neighborhood Shopping	80,000 SF	214,000 SF
Hotel	100,000 SF	100,000 SF
Children's Science & Education Center	Not in Phase 1	142,000 SF
TOTAL	**500,000 SF**	**3,000,000 SF**

Note: *The Master Development Plan represents full build-out including Phase 1.

Access to the full build-out development would be provided via two driveway connections to the NYS Route 9A connection and the two driveways to Hospital Road, as noted above. It is anticipated that Phase 1 construction would begin once all necessary permits and project approvals are in place. The remainder of the Master Development Plan would follow completion of Phase 1, with the total construction, subject to market conditions.

To facilitate the proposed development, the Applicant (Fareri Associates) proposes to rezone the entire project site to the OB-5 Office Business District, with a text amendment creating the OB-5 Master Plan (MP) District to provide the required mechanisms to appropriately regulate the development. Currently, the Town of Mount Pleasant Zoning Code does not have a single zoning district that regulates the types of uses proposed for The North 60. As such, the proposed OB-5 Master Plan (MP) District adds another subsection to the existing OB-5 zoning district to allow for uses focused on bio-technology and medical purposes, neighborhood shopping and other customary uses, a children's science and education center, restaurants, educational facilities, a hotel, and residential uses, among others. Additionally, the Applicant seeks review and approval of a Master Development Plan for the project site, and site plan approval for Phase 1 of the Master Development Plan, and Steep Slope and Wetland Permits. Ultimately, the Planning Board, as Lead Agency, will adopt a Findings Statement with respect to the final Zoning Amendment and Master Development Plan and the Town Board would review and accept the Findings Statement. Once the Zoning Amendment and Master Development Plan are approved by the Town Board, individual site plans for various phases of the Proposed Action would have to be reasonably consistent with the approved Master Development Plan and would be subject to approval by the Planning Board. Individual site plans will also be referred to the Westchester County DPW Commissioner for review and approval.

The DEIS analyzed six alternatives as follows:

- Alternative A: No Action Alternative assumed the Project Site would remain in its existing condition, with no site improvements and no new site development. The DEIS found that while this alternative would eliminate any potential adverse impacts of the Proposed Action, it would not yield any beneficial effects expected to result from the construction of the development, such as increase tax revenue; increased job and career opportunities; improved Route 9A connectivity to Westchester Medical Center; new public open spaces; restored wetlands; new retail amenities; new hotel; and a new Children's Science and Education Center.
- Alternative B: Alternative Plan Under the Existing Zoning includes redeveloping the Project Site as permitted under the existing zoning districts. This alternative assumes the 60-acre County-Parcel would remain in the R-20 One-Family Residential District and the 20-acre Developer-Parcel would remain in the OB-6 Office Building, Distribution, Limited Fabrication District. These existing zoning districts would yield development of 52 five-bedroom single-family homes on the County-Parcel and 292,000 square feet of office space, with 872 parking spaces, on the Developer-Parcel. This alternative would result in less soil and wetlands disturbance and less traffic. However, this alternative would result in a higher number of school-aged children and would not realize the benefits that would be provided with the Proposed Action, such as a substantial number of jobs and career opportunities, wetlands restoration, economic growth, a children's science and education center, retail, hotel, bio-tech and medical uses that complement and serve the other uses on the Grasslands Reservation, and new public open spaces. This alternative would be inconsistent with the requirements of the Lease Agreement and would not meet the goals or development objectives of the County or the Applicant.
- Alternative C: Alternative Development Program would include development of a new mixed-use community that incorporates approximately 3 million square feet of bio-tech/research and development related uses including medical offices, a children's science and education center, neighborhood retail, a hotel, and low impact residential uses that would cater to the scientific community and may include student housing, and/or micro-unit and co-living housing as part of a comprehensive Master Development Plan. Residential uses analyzed under this alternative included up to 660 units of low impact residential uses, of which 210 residential units would be constructed in Phase 1. The residential uses would likely replace approximately 660,000 square feet of bio-tech uses in the Master Development Plan. Under Alternative C, although some uses would differ from the Proposed Action, points of access, building placement, and building footprints would remain the same, therefore, impacts associated with geology and soils, wetlands, topography and slopes, visual resources and community character, vegetation and wildlife, stormwater management, historic resources, hazardous materials, noise, air quality, greenhouse gas emissions, and construction would remain the same as the Proposed Project. The DEIS determined that Alternative C would not result in significant impacts to land use and zoning, community facilities, or utilities. It was estimated that only approximately 8 school-age children would reside on the project site. It is expected that the Mount Pleasant Central School District would have capacity for these students and would receive a net benefit in tax revenue.

Alternative C would result in slightly lower trip generation in Phase 1 but higher trip generation in the overall Master Plan Development than the Proposed Project. However, Alternative C would include the same traffic mitigation as the Proposed Project and no significant adverse impacts would be expected after implementation of mitigation measures. The Town population would increase by 4.4% and higher impacts to community facilities could occur. Impacts to community facilities would be offset by taxes and no significant adverse would be expected. Alternative C would result in similar generated taxes but fewer permanent jobs than the Proposed Project. However, as established in the DEIS, the proposed residential uses that would primarily serve bio-tech employees and students are vital to the attraction and retention of bio-tech and other proposed on-site uses to the Project Site, and are therefore, vital to the success of the project.

- Alternative D: Alternative Access examines a scenario where an additional site point would be provided from West Stevens Avenue at the north end of the project site. An additional access roadway would connect from Main Street to West Stevens Avenue. In the Applicant's opinion, this Alternative was not considered viable because it would not improve access to the project site, would result in more neighborhood traffic along West Stevens Avenue and the residential neighborhood to the north, and would require substantial additional site disturbance.
- Alternative E: Alternative Phasing Program was evaluated to determine if modifications to the phasing plan would result in a reduction in adverse impacts. Both the Proposed Action phasing plan and the Alternative Phasing Program have been designed to result in the fewest adverse impacts to the natural environment while strategically achieving the Applicant's development goals. Prior to the commencement of construction, the Applicant, Applicant's engineer, contractor, and representatives of all regulatory agencies would review all aspects of the proposed construction at a pre-construction meeting at the Project Site to determine the appropriate phasing according to market conditions.
- Alternative F: Reduced Environmental Impact Alternative was developed to show the extent of the development that could occur if the Proposed Project was designed to avoid environmentally sensitive lands. This Alternative would result in disturbance of approximately 16 acres of land. Development would occur primarily at the central and southcentral portions of the project site along with certain infrastructure and parking areas. With these development restrictions, only approximately 894,300 square feet of development would occur. Connections from the center portion of the project site to the eastern and western portions of the site would not be possible. In the Applicant's opinion, this alternative is not considered viable because it is inconsistent with the requirements of the Lease Agreement and would not meet the goals or development objectives of the County or the Applicant.

1.4 New Alternative Identified Since Submittal of the DEIS

In response to comments received from the Lead Agency (Town of Mount Pleasant Planning Board), the Town Board, the Westchester County Planning Board, and the public, and in response to the findings and recommendations from the North 60 Market and Financial Feasibility Study ("Weitzman Study", see DEIS Appendix M), a new alternative has been identified: Alternative G: Alternative Development Program with Fewer Low Impact Residential Units.

Alternative G (similar to that presented in the DEIS as Alternative C: Alternative Development Program) would include a new mixed-use community that incorporates approximately 3 million square feet of bio-tech/research and development related uses including medical offices, a children's science and education center, neighborhood shopping, a hotel, and low impact residential uses. Low impact residential uses are defined as residential uses that are less auto-dependent, generate few school children, cater to the Project and area's scientific and research community, and may include student housing, and/or micro-unit housing as part of a comprehensive Master Development Plan.

With Alternative G, the total gross floor area (GFA) proposed for Phase 1 and the Master Development Plan would be the same as the Proposed Action. Phase 1 would include 500,000 SF of development and the Master Development Plan would include up to an additional 2.5 million SF of development for a maximum GFA not to exceed 3 million SF. Alternative G proposes the replacement of approximately 100,000 SF of bio-tech uses in Phase 1 with approximately 100,000 SF of low-impact residential uses. Residential uses proposed for Phase 1 would include 98 residential units with 29 studio units and 69 one-bedroom units. The following tables present the Alternative G development program for both Phase 1 and the Master Development Plan.

Table 1-2 Alternative G: Alternative Development Program with Fewer Low Impact Residential Units

Use	Phase 1	Master Development Plan
Neighborhood Shopping	80,000 sf	214,000 sf
Low Impact Residential	100,000 sf (98 units)	100,000 sf
Medical Office	100,000 sf	400,000 sf
Hotel	100,000 sf	100,000 sf
Bio-Tech/Research	120,000 sf	1,830,000 sf
Living Science Center	Not in Phase 1	142,000 sf
Other Bio-Tech Supportive Uses	Not in Phase 1	214,000 sf
Total	**500,000 sf**	**3,000,000 sf**

Note: *The Master Development Plan represents full build-out including Phase 1.

See Figure 1-1 for the Alternative G Phase 1 Development Program and Figure 1-2 for the Alternative G Phase 1 Development Program with Building Details. Figure 1-3 illustrates the Alternative G Master Development Plan Program and Figure 1-4 illustrates the Alternative G Master Development Plan Program with Building Details. Typical floorplans proposed for the residential units are shown on Figures 1-5 through 1-7.

Alternative G was developed to include low-impact residential uses as part of the bio-technology campus, in part, because through this review process it has been shown that including residential development is the most economically viable plan for the project site and the Town. This alternative incorporates low-impact residential uses, as noted above, including small units (many with home offices) for bio-technology students and young professionals, including employees of on-site and adjacent uses, and would result in the greatest overall economic benefit in terms of creating a vibrant bio-technology hub with a 24-hour community on-site. As per the conclusions and recommendations of the Weitzman Study (DEIS Appendix M), there is demand for this type of low-impact residential use as part of the Proposed Action, and residential use is essential to creating a viable and attractive living sciences complex.

For case examples of bio-tech or similar campuses across the country, see Appendix U of this FEIS. The case examples examined therein provide development details, benefits and impacts of office and research and development campuses and proposals that include campus housing. It is noted that all of the case examples recognized the importance of including residential uses in their mixed-use campuses. The benefits and impacts detailed in the case examples were gathered from both public meetings and local articles cataloging advances, changes, and community reactions to proposed developments.

Description of Proposed Residential Uses

As described in DEIS Section 4.3, Alternative C: Alternative Development Project, low-impact housing is an approach to housing development that uses various planning and design practices to conserve community resources and reduce infrastructure and municipal costs, thereby mitigating potential environmental and fiscal impacts associated with development. This type of housing, including small units with home offices/dens, is appropriate for the Proposed Project, mixed into a bio-tech complex. It is anticipated that many of these units would be occupied by either students or employees of uses on the Project Site or adjacent medical and school uses. Whereas DEIS Alternative C included 210 residential units, the new Alternative G, which has been developed since submittal of the DEIS, calls for only 98 residential units.

Potential impacts associated with Alternative G are described below.

vhb | Figure 1-1

North 60 | Town of Mount Pleasant

Alternative G: Phase 1 Development Program

Source: Torti, Gallas + Partners

vhb | Figure 1-2

North 60 | Town of Mount Pleasant
Alternative G: Phase 1 Development Program with Building Details
Source: Torti, Gallas + Partners

vhb | Figure 1-3

PROGRAM		
Neighborhood Shopping	214,000 SF	
Medical Office	400,000 SF	
Biotech/Research	1,830,000 SF	
Hotel	100,000 SF	
Living Science Center	142,000 SF	
Low-Impact Residential	100,000 SF	
Other Bio-Tech Supportive Uses	214,000 SF	
Total Program	**3,000,000 SF**	

North 60 | Town of Mount Pleasant

Alternative G: Master Development Plan Program

Source: Torti, Gallas + Partners

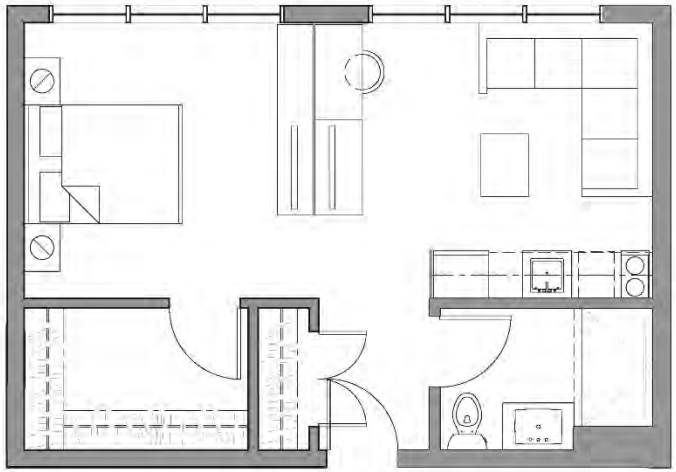
vhb | Figure 1-4

North 60 | Town of Mount Pleasant

Alternative G: Master Development Plan Program with Building Details

Source: Torti, Gallas + Partners

vhb | Figure 1-5

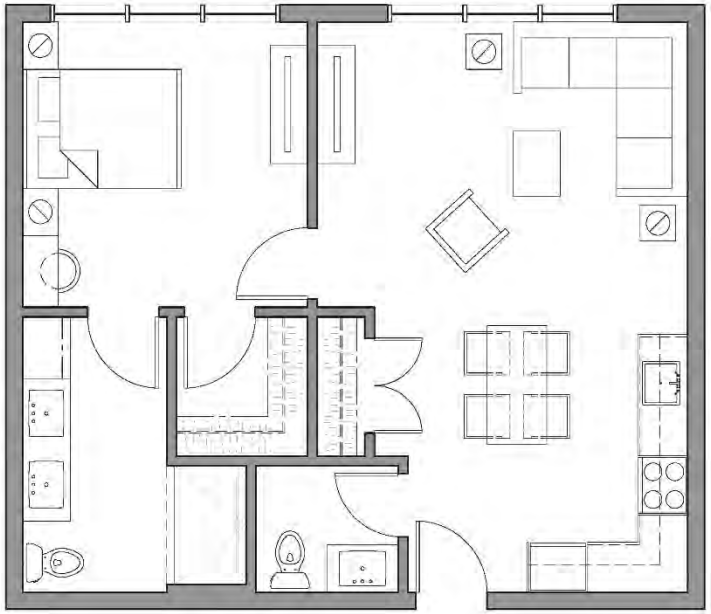


NORTH 60 SAMPLE STUDIO 542 SQ. FT.

MARCH 18, 2021

North 60 | Town of Mount Pleasant
Alternative G: Typical Floorplan – Studio
Source: Fareri Associates

vhb | Figure 1-6



NORTH 60 SAMPLE ONE BEDROOM 748 SQ. FT.

MARCH 18, 2021

North 60 | Town of Mount Pleasant

Alternative G: Typical Floorplan – One Bedroom

Source: Fareri Associates

Land Use, Zoning and Public Policy

The land use pattern on the project site would change from underutilized, mostly vacant land on the 60-acre County parcel and five single-family homes on the 20-acre Applicant parcel to a master planned mixed-use bio-technology campus with complementary uses, including low-impact residential uses which would support the proposed bio-technology facilities, as well as existing uses adjacent to the project site. The project has been designed to include community accessible open space to complement the existing surrounding suburban community character and support other medical, scientific and educational uses on the Grasslands Reservation.

The Town does not currently have a single zoning district with use, area and bulk controls designed to regulate this type of development mixed use development, allowing residential uses. Alternative G, like the proposed action described in the DEIS, includes rezoning the entire project site to the OB-5 Office Business District and a text amendment to provide the required mechanisms to appropriately regulate the development. The OB-5 Master Plan District can only apply to parcels that are "at least 60 acres and bordering a state or county highway" and, therefore, such district has limited applicability.

Alternative G is also consistent with the various local, regional, and state land use studies, plans and policies, as demonstrated in Sections 3A and 4.3 of the DEIS.

Proposed mitigation measures for Alternative G, like the DEIS Proposed Action and DEIS Alternative C, include leaving the northern portion of the site undeveloped resulting in a natural buffer between the future development and existing residential uses to the north.

Visual Resources and Community Character

The visual character of Alternative G would differ from the existing conditions by replacing a mostly vacant property with the proposed new development. The proposed architectural design would capture the intrinsic natural character of the region and embody the visionary and technological focus of the development. Building heights will vary across the project site to create an interesting blend of building forms and an engaging environment as if built over many years.

Building height, bulk and placement would be the same with Alternative G as the proposed project described in the DEIS and DEIS Alternative C, Architectural features and building amenities would vary slightly to accommodate residential uses but would not vary to a degree that would create additional impacts beyond those identified in DEIS Chapter 3B, Visual Resources and Community Character. Lighting on the project site would also be the same, or similar, to that proposed in the DEIS Proposed Action and would also comply with Dark Sky standards.

Views to and from the project site would not be adversely impacted by Alternative G, as similarly described in DEIS Alternative C.

Mitigation measures include extensive landscape buffers and an interior hardscape plan as well as a dark-sky compliant site lighting scheme, as noted. Also, the primary facades, including those of the residential uses, are envisioned to be composed of materials that

bridge between traditional and modern aesthetics sourced in a responsible way with the design conveying an innovative and advanced scientific and technological identity.

Geology and Soils

As presented in the DEIS, impacts associated with Phase 1 are 38.2 acres of disturbance and 18,464 cubic yards of cut exported from the site. With the Alternative G Master Development Plan, there would be a total of 57.47 acres of disturbance and 473,059 cubic yards of excavated material exported from the site. As there would be no change in points of access, building placement, and building footprints with Alternative G, the impacts associated with geology and soils would not change from those described for the DEIS Proposed Action and DEIS Alternative C. Thus, the mitigation measures associated with Alternative G, would be the same as those identified in DEIS Chapter 3C, Geology and Soils.

As with the DEIS Proposed Action, an Erosion and Sediment Control Plan would be maintained throughout the construction period of both Phase 1 and the overall Master Development Plan to avoid off-site discharge of soil during storm events.

Topography and Slopes

As described in the DEIS, in Phase 1, 5.7 acres of steep slopes would be impacted (3.6 acres of steep slopes, 1.2 acres of very steep slopes, and 0.9 acres of excessively steep slopes). With the Master Development Plan, 8.6 acres of steep slopes would be impacted (5.2 acres of steep slopes, 2.0 acres of very steep slopes, and 1.4 acres of excessively steep slopes). These impacts would be same for Alternative G because there would be no change in the points of access, building placement or building footprints, as described in the DEIS.

As described in DEIS Chapter 3D, Topography and Slopes, which would remain valid for Alternative G, construction on steep slopes has been minimized by working with the site's existing topography to optimize the integrated placement of buildings, streets, and infrastructure, utilizing underground parking, and incorporating existing wetlands and other natural resources into the design of the Master Development Plan. An Erosion and Sediment Control Plan would be maintained throughout the construction period of both Phase 1 and the overall Master Development Plan. Further, the use of retaining walls in select locations would limit the amount of grading necessary.

Vegetation and Wildlife

Impacts to ecological resources are described in DEIS Chapter 3E, Vegetation and Wildlife. 1,374 trees (measuring 10" DBH) would be removed from the project site: 993 during Phase I and 381 during the additional phases of the Master Development Plan. In Phase I, 44 specimen trees will be removed and following the Master Development Plan an additional 23 will be removed, totaling 67 specimen trees to be removed.

Long-term impacts from habitat fragmentation are not expected to be significant.

Mitigation measures, as described in DEIS Alternative C, would be the same for the Alternative G and include planting approximately 604 new specimen trees on the site and developing a final landscape plan that emphasizes xeriscaping with limited use of low-

nitrogen fertilizer, organic herbicides, fungicides and pesticides in a measured and disciplined manner.

Wetlands, Waterbodies and Watercourses

The proposed action will cause direct impacts to the two onsite streams and associated wetlands. However, as described in DEIS Chapter 3F, Wetlands, Waterbodies and Watercourses, to mitigate impact to such resources, the following measures, among others previously described, would be undertaken: detailed soil erosion and sediment control plan would be implemented prior to the commencement of construction; a qualified site monitor would be responsible for inspecting these controls throughout construction to ensure efficacy, areas of soil disturbance would be minimized by phasing construction activities and through the temporary stabilization of disturbed areas that are temporarily not being worked; 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; and in Phase 1, 0.4± acres of wetlands and one acre of a permanent pond would be constructed, resulting in a 100 percent replacement of lost wetlands. Mitigation will restore wetland and watercourse function and character. Because the layout of Alternative G would be similar to DEIS Proposed Action, the impacts and mitigation measures identified in the DEIS with respect to wetlands, waterbodies and watercourses would be the same.

Stormwater Management

The amount and location of land disturbance and pervious surfaces under Alternative G would be the same as the DEIS Proposed Action, as the building placement and footprints have not changed. Stormwater peak runoff rates following development will not exceed those experienced in the existing condition. As indicated in the DEIS, which would remain the same for Alternative G, stormwater runoff rates following development would have no adverse impacts on downstream properties or stormwater conveying systems. Similarly, development in accordance with Alternative G includes measures to avoid adversely impacting stormwater quality or adversely impact the water quality of any downstream reservoir, stream, wetlands or watercourses.

Even though the post-development condition under the DEIS Proposed Action and Alternative G would result in more impervious area than existing conditions, the proposed stormwater management facilities mitigate the stormwater quality impacts as per the NYSDEC Rules and Regulations.

As indicated in the DEIS, which would remain the same for Alternative G, a Stormwater Pollution Prevention Plan, which includes the applicable stormwater management practices for the development, has been prepared in accordance with the Mount Pleasant Town Code Chapter 183 – "Stormwater Management and Erosion and Sediment Control" and reflects NYSDEC recommended practices. See FEIS Appendix N for the Stormwater Pollution Prevention Plan.

Utilities

Average daily domestic water demand for Phase 1 of Alternative G would be 42,540 gallons per day (gpd) and 260,691 gpd at full build-out of the Master Development Plan (gpd; using the 20% reduction based on the use of water conservation fixtures).

Alternative G would generate an estimated 42,540 gpd sanitary sewage in Phase 1 and 140,295 gpd sanitary sewage at full build-out of the Master Development Plan. The following tables illustrate water and sewer usage for Phase I and the Master Development Plan.

Table 1-3 Average Daily Water Demand for Alternative G (potable and irrigation) – N.Y.S.D.E.C Standards

Proposed Use	Phase 1	Master Development Plan*	Usage Rate[1]	Usage Phase 1 (gpd)	Usage Master Development Plan (gpd)	Water Saving Usage Master Development Plan (gpd)
Medical Office	100,000 SF	400,000 SF	15 gpd/emp.	6,660	26,670	21,336
Bio-Tech/Research & Development	120,000 SF	1,830,000 SF	15 gpd/emp.	3,900	59,505	47,604
Neighborhood Shopping	80,000 SF	214,000 SF	0.10 gpd/sf	8,000	21,400	17,120
Hotel	100,000 SF	100,000 SF	110 gpd/bdrm	13,200	13,200	10,560
Low-Impact Residential	100,000 SF	100,000 SF	110 gpd/bdrm	10,780	10,780	8,624
Other Bio-Tech Supportive Uses	Not in Phase 1	214,000 SF	15 gpd/emp	N/A	6,960	5,568
Children's Science & Education Center	Not in Phase 1	142,000 SF	5 gpd/patrn	N/A	1,780	1,424
TOTAL	***500,000 SF***	***3,000,000 SF****		***42,540***	***140,295***	***112,236***
Irrigation of landscaped areas	N/A	971,400 (approximately)	0.089 gpd/sf	N/A	86,455	86,455[2]
Cooling Towers[3]	*500,000 SF*	3,000,000 SF			62,000	62,000[2]
TOTAL USAGE					***288,750***	***260,691***

Note: *The Master Development Plan represents full build-out including Phase 1.
**Total Floor Area of Buildings
[1] Based on recent Grocery Store Construction w/ Deli, Bakery and Butcher
[2] 20% water saving reduction is not applied to irrigation or Cooling Towers
[3] Cooling Tower usage for Master Development Plan provided by Stantec Consulting Services Inc.

Table 1-4 Average Sewer Usage for Alternative G

Proposed Use	Population	Usage Phase 1 (gpd)	Water Usage Master Development Plan (gpd)	Average Daily Flow Phase 1 (gpm)[2]	Average Daily Flow Master Development Plan (gpm)[2]	Peak Factor	Peak Flow Phase 1 (gpm)	Peak Flow Master Development (gpm)
Medical Office	444	6,660	26,670	11	44	4.00	44.40	177.81
Bio-Tech/Research & Development	260/3,967	3,900	59,505	12	99	4.10/3.34	26.68	330.90
Neighborhood Shopping	145	8,000	21,400	13	36	4.20	55.94	149.65
Hotel	120	13,200	13,200	22	22	4.22	92.86	92.86
Low Impact Residential	98	10,780	10,780	18	18	4.25	76.29	76.29
Other Bio-Tech Supportive Uses	464	N/A	6,960	N/A	12	3.99	N/A	46.29
Children's Science & Education Center	356	N/A	1,780	N/A	3	N/A / 4.05[1]	N/A	12.15
TOTAL	***1,067/5,594[1]***	***42,540***	***140,295***	***71***	***234***	***3.78 / 3.20[1]***	***268.12***	***748.12***

Note: [1]Phase 1 / Master Development Plan
[2]Average Daily Flow applied over a 10-hour day.

As with the DEIS Proposed Action, it is proposed that Alternative G would be supplied with public water via an extension of Westchester County Water District #3 located to the south of the project site. There is adequate capacity to expand Westchester County Water District #3 to accommodate Alternative G's domestic water demand. The water service area is proposed to be expanded to include limits of the project site, and all applicable regulations and procedures would be followed to accomplish this to supply water to the project site. Further, the project has been designed with features that are intended to promote water conservation, efficient energy use and protection of natural resources.

There is adequate capacity within the Town of Mount Pleasant Sewer District to accommodate Alternative G. Connection to the Town of Mount Pleasant infrastructure is available at the project site's Old Saw Mill River Road frontage. The Town of Mount Pleasant owns the sewer infrastructure assets that are not on the project site. Upon completion, the Town would own and operate the public sewer infrastructure on the project site and be responsible for the maintenance of the infrastructure. Agreements would be required

regarding maintenance and responsibility. The Applicant would pay for all project related sewer district improvements and the project would generate new taxes to the sewer district. Wastewater generated from the project site is planned to be minimized with the use of water efficient low flow fixtures and toilet facilities.

Con Ed has confirmed their network has the capacity available to support the electric and natural demands of the project. Con Ed has also indicated that they would provide interruptible natural gas service to the North 60 property.

Traffic and Transportation

As shown in the Table below, Alternative G would result in a higher overall trip generation than the DEIS Proposed Action in Phase 1, but a lower overall trip generation in the Master Development Plan. However, these estimates are conservative as the proposed residences would be located on Main Street, within walking and biking distance of other uses on the project site. The residential uses would change the expected traffic patterns with a lower weekday peak AM hour entry volume and higher exit volume.

Table 1-5 DEIS Proposed Action and Alternative G Trip Generation Volumes

DEIS Proposed Action	Alternative G
Phase 1 Trip Generation	Phase 1 Trip Generation
Weekday Peak AM	Weekday Peak AM
Entry – 412	Entry – 399
Exit – 217	Exit – 243
Total – 629	Total – 642
Weekday Peak PM	Weekday Peak PM
Entry – 272	Entry – 301
Exit – 461	Exit – 450
Total – 733	Total – 751
Master Plan Trip Generation	Master Plan Trip Generation
Weekday Peak AM	Weekday Peak AM
Entry – 1328	Entry – 1078
Exit – 526	Exit – 522
Total – 1854	Total – 1600
Weekday Peak PM	Weekday Peak PM
Entry – 574	Entry – 606
Exit – 1530	Exit – 1328
Total – 2104	Total - 1934

Source: Hourly Trip Generation Rates based on ITE Land Use 220-Multi-Family and Land Use 760 Research and Development Center

Traffic mitigation measures described in the DEIS, which would be the same for Alternative G, include:

› The opening of a new connective roadway between NYS Route 9A and Hospital Road which will significantly reduce pass-through traffic in the adjacent neighborhood and disperse traffic to the surrounding regional street network.

- Widening of Hospital Road to 4+ lanes.
- Construction of a roundabout at the intersection of Bradhurst Avenue and Hospital Road with associated modifications to the Sprain Brook Parkway northbound off-ramps.
- Integration of travel associated with the proposed action with current bus and shuttle services serving the Westchester Medical Center.
- Provision of a new shuttle service to Hawthorne and Valhalla Metro North Stations.
- Promoting ride sharing to reduce the number of single occupant trips.
- A monitoring program under the control of the Town's Planning Board is recommended to ensure that required roadway improvements are "in place" or under construction to support the proposed development.

As with the DEIS Proposed Action, with the mitigation measures implemented as part of Alternative G, traffic to and from the project site can be accommodated in a safe and efficient manner.

Community Facilities and Services

Alternative G would introduce approximately 853 employees to the project site in Phase 1 and 6,145 employees at full development of the Master Development Plan, which is less than under the DEIS Proposed Action. Residential use would introduce approximately 143 residents to the project site in Phase 1, whereas there are no residential uses, and thus no permanent population, under the DEIS Proposed Action. Potential impacts to community facilities and services that may result from residential uses have been examined in the DEIS (see DEIS Alternative C).

Police, Fire, and Emergency Services

The introduction of a new biotechnology employment center with on-site housing at the project site is expected to result in increased demand for police protection services commensurate with an estimated 0.5% increase in the Town population increase at build-out of Phase 1.

Alternative G would incorporate features to increase site safety and reduce demand for police protection, including outdoor security lighting, on-site private security, and an internal circulation system inherently designed to minimize the potential for vehicle and pedestrian accidents. The Project Applicant would continue to coordinate with the MPPD to ensure any specific site plan concerns are addressed in the final Site Plan design and project operations.

It is expected that the increase tax revenues generated by Alternative G would offset the incremental increased costs for police protection services by the MPPD and Westchester County Department of Public Safety. Therefore, it is the Applicant's finding that no significant adverse impacts on police services would result due to the development of Alternative G.

The introduction of a new biotechnology employment center with on-site housing at the project site is also expected to result in increased demand for fire and EMS services.

Alternative G would be designed to provide adequate site access to fire apparatus and emergency response vehicles. Additionally, the proposed buildings would be constructed to meet the latest New York State Uniform Fire Prevention and Building Code and would be equipped with sprinklers and fire alarms. The Project Applicant has met with the Hawthorne FC to review the project and would continue to work with the Hawthorne FC to ensure concerns regarding Alternative G are addressed in the final Site Plan design and project operations.

It is expected that the increase tax revenues would offset the incremental increased costs for fire and EMS services by the Hawthorne FC. Therefore, it is the Applicant's finding that the development of the project would have no significant adverse impacts on fire and EMS services.

Recreation and Open Space

Alternative G comprises the same site configuration, building footprints and other site plan details as the DEIS Proposed Action – only the interior uses of the building would change, in part, from bio-tech to low-impact residential units. Alternative G would provide the same public recreation and open space amenities as described in DEIS Chapter 3J, Community Services. These recreation amenities would be available not just to residents and employees of the project site, but to all area residents.

More specifically, Alternative G includes the preservation of approximately 36 acres of existing open space on the project site as illustrated in the Master Development Plan. This preservation accounts for almost half of the entire project site. Several areas would be preserved as natural open space while other areas would be designed and landscaped as active or passive open space. The open space features proposed on the project site are designed in size and program to serve the population who would work, live, and visit the project site. The open space features would be privately maintained by the Applicant but open to the public as a fully accessible recreation amenity. Although recreation and open space opportunities would be located on the project site, the introduction of a residential population of approximately 143 to the project site at the completion of Phase 1 would likely result in more use of Town facilities. Alternative G would increase the current population in the Town of Mount Pleasant by up to 0.5 in Phase I, which would potentially increase demand on Town facilities by up to 0.5 percent. The Town's current open space resources (approximately 14.8 acres per 1,000 residents, not including County or State resources) exceeds customary municipal standards (9.9 acres of parkland per 1,000 residents per the National Recreation and Park Association Park Metrics) and as a result has the capacity to accommodate the additional residents.

It is anticipated that the increase in tax revenue, as well as the mitigation measures identified in DEIS Chapter 3J, Community Services, such as private maintenance of the recreation and open space features would offset potential impacts to such features. Moreover, the active and passive on-site recreation and open space amenities would add to the open space and recreation amenities currently available to the Mount Pleasant community, which would minimize adverse impacts to the Town's Recreation and Parks Department.

Solid Waste and Recycling

As indicated in DEIS Alternative C, residential rates of solid waste generation are typically higher than medical office and biotech uses, therefore, the residential uses in Alternative G would create slightly more solid waste and recycling materials than the DEIS Proposed Action.

Alternative G uses proposed for Phase 1 are expected to generate approximately 56.12 tons per month (tpm) of solid waste. Upon completion of the Master Development Plan, 228.22 tpm of solid waste would be generated. As with the DEIS Proposed Action, a private hauler would be used, solid waste would be source-separated, and the sanitation requirements of the Town and County would be met.

Schools

As identified in DEIS Chapter 3J, Community Services, the project site is located in two different school districts: the 60-acre County parcel is located in the Mount Pleasant Central School District, and the 20-acre Applicant parcel is located in the Pocantico Hills School District. It is proposed that the residential uses included in Alternative G would be located in the buildings along the proposed Main Street so that residents can take advantage of the proposed plazas and open spaces and commercial uses while being in close proximity to the bio-tech and office uses located elsewhere on the project site and the surrounding medical and school uses. The proposed Main Street and adjacent buildings are located within the Mount Pleasant Central School District. Therefore, it is assumed that any school-age children would attend schools in the Mount Pleasant Central School District. It is also assumed, to be conservative, that all school-age children on the project site would attend public schools.

A School Student Generation Study (School Study) was prepared to estimate the number of potential school-age children that would be generated by DEIS Alternative C (see DEIS Appendix S). Using the same methodology and multipliers used in the School Study, and based on the low impact nature of the proposed housing, and the number of students and young professionals likely to occupy the project site, Alternative G would result in only approximately 3 school-age children residing on the project site and attending schools in the Mount Pleasant Central School District. It is further estimated that the cost to educate 3 students in the Mount Pleasant Central School District would be approximately $47,610 based on current programmatic costs of $15,870 per student (see DEIS Chapter 3J, Community Services). As identified in DEIS Chapter 3K, Fiscal Impacts, projected school property tax revenue would be approximately $4,918,842, resulting in a net benefit to the Mount Pleasant Central School District of approximately $4,871,232 with the Master Development Plan (as discussed below, it is assumed for purposes of analysis that taxes generated by Alternative G would be approximately the same as was estimated for the DEIS Proposed Action). It is expected that the Mount Pleasant Central School District would have capacity for an additional 3 students, who would likely be spread throughout the 13 grades.

Table 1-6 Alternative G School-Age Children Generated on the Project Site (Phase 1)

Unit Type	Number of Units	Multiplier	School-Age Children
Studio Unit	29	0.00-0.03[1]	1
One Bedroom Unit	69	0.02[2,3]	2
TOTAL	**98**		**3**

Source: [1] Studio/efficiency units: 0.00-0.03 per unit (Mix and Jiang 2009; RPM Consulting 2003; Lapkoff & Goblett, 2018).
[2] TOD One Bedroom units: 0.02 per unit (Listokin, 2006).
[3] Mid-rise mixed use small unit: 0.02 per unit (Portland Public Schools, 2013)

Proposed residential uses would be phased in over time with a maximum of 98 units proposed during Phase 1. Phase 1 is estimated to generate approximately 3 school-age children. After construction of Phase 1, the Applicant would determine the actual number of project generated children enrolled in the Mount Pleasant Central School District, assess fiscal impacts to the School District, and recalculate the anticipated number of public school children based on actual residents of Phase 1. If it is then anticipated that future phases would adversely impact the School District, the Applicant would evaluate the types and number of residential units to build in future phases of the Master Development Plan.

The Pocantico Hills Central School District would not receive any new students in Phase 1 and would see an increase in tax revenue of $1,179,475 over the current $56,936 it currently receives from the portion of the project site owned by the Applicant.

Fiscal and Market Impacts

The tables below show the potential residential unit mix of Alternative G. The exact breakdown of units is not yet known; however, all residential uses would be low impact and designed to serve the living sciences uses on the surrounding Grasslands Reservation and the new bio-tech uses. Phase 1 would include a maximum of 98 residential units. Therefore, it is estimated that the residential population of Phase 1 would be approximately 143 residents. The estimated residential population of Phase 1 is shown in the table below.

Table 1-7 Alternative G Unit Mix for North 60 (Phase 1)

Unit Type	%	Number of Units	Population
Studio Unit	30%	29	29
One Bedroom Unit	30%	69	114
TOTAL	**100%**	**98**	**143**

Source: It is assumed that studio apartments would have 1 person per unit. One bedroom units are assumed to have 1.66 persons per unit, based on Rutgers University Center for Urban policy Research, Residential Demographic Multipliers – Estimates of the Occupants of New Housing, June 2006 (for 5+ units, rent, 1 BR, all values).

Phasing of the Master Development Plan would occur over a longer period of time, with Phase 2 estimated build-out approximately 10 to 15 years after construction of Phase 1, depending on market conditions. The residential uses for the Master Development Plan would be determined as part of site plan approval. It is noted that DEIS Alternative C evaluated the impacts of up to 660 residential units on the site within the maximum three million SF development envelope.

Alternative G would result in the following fiscal benefits upon full build-out of the Master Development Plan:

- Approximately $9.3 million in estimated new real estate taxes annually to Westchester County, the Town of Mount Pleasant, the Mount Pleasant Central School District, and the Pocantico Hills School District.[1]
- Estimated $7 million annually in additional rent revenues to Westchester County.
- Approximately 1,000 new construction jobs.
- Alternative G would introduce approximately 6,145 new employees to the site at full development of the Master Development Plan with an estimated annual labor income (wages and salaries, benefits, payroll taxes, and proprietor income) of approximately $1 billion.

Historic, Archaeological and Cultural Resources

Two archeological sites (Saw Mill River Precontact Site and J. Van Tassel Historic Site) have been identified within the Project Site. Construction activities would occur at the project site impacting these archeological resources. As with the proposed action described in DEIS Chapter 3L, Historic, Archaeological and Cultural Resources, because the amount and location of land disturbance would be the same with Alternative G, it is not expected there will be any significant adverse impacts to cultural resources in the vicinity of the Project Site.

The Phase II Archeological Investigation recommends avoidance of the archeological sites or a Phase III archeological data retrieval study if avoidance is not feasible. Construction activities associated with Alternative G would incorporate any necessary mitigation measures identified by the Phase III archeological investigation.

Hazardous Materials

Alternative G would occur in the same location as that described in the DEIS, therefore, the findings of existing environmental conditions on the project site identified in the Phase I Environmental Site Assessment would remain the same as presented in DEIS Chapter 3M, Hazardous Materials. The recognized environmental conditions on the Property include:

- Six underground fuel oil tanks associated with the onsite residences are in-use on the property. Although five of the tanks were tightness tested in 2010, the tanks current condition cannot be determined.
- A 275-gallon aboveground fuel oil tank is located adjacent to the garage at 48A Saw Mill River Road. The tank appeared in good condition with no observed leaks or spills but it had no secondary containment.
- Several 55-gallon drums of ethylene glycol were observed in two garages from the former Nilsson Nurseries.

As described in the DEIS, once operational, the proposed bioscience and technology center will generate solid waste, some of which may be Regulated Medical Waste (RMW) and other

[1] The Applicant has had a preliminary meeting with the Town to discuss the possibility of a PILOT (payment in lieu of taxes). However, the Applicant has not yet made a formal application to seek a PILOT. If proposed, the IDA would be responsible for ensuring that the PILOT would not result in any adverse fiscal impacts to the taxing jurisdictions.

specialty wastes. The exact nature of the waste production and the quantities will not be known until specific tenants are identified. All waste will be managed in accordance with applicable state and federal regulations for RMW handling, storage, transport and disposal. RMW generated at these facilities will be stored on-site prior to transportation off-site by permitted vendors to regulated/permitted disposal facilities. No significant adverse impacts on human health are anticipated from the management of RMW.

Any remediation identified in DEIS Chapter 3M, Hazardous Materials, would also occur with implementation of Alternative G. Biotech and medical uses would still be present on the project site with Alternative G, therefore, any potential impacts and mitigation measures identified in DEIS Chapter 3M, Hazardous Materials, would remain the same. As noted in the DEIS, which would remain the same for Alternative G, mitigation measures to be undertaken prior to construction include the following:

- Prior to the start of construction, all drums of ethylene glycol would be removed from the two garages from the former Nilsson Nurseries.
- Prior to the start of construction, the six underground fuel oil tanks connected to the six residences would be tightness tested by a qualified tank testing contractor, if the homes remain in use. If the homes are scheduled for demolition then the tanks would be removed in accordance with applicable regulations. Secondary containment would be provided for the 275-gallon above ground tank near the garage at 48A Saw Mill River Road.
- A fill soil management plan would be developed with the Town and the WCDOH, for the three locations with elevated concentrations of semi-volatile compounds
- Existing fill piles associated with the Westchester Medical Center construction can be reused on-site. Concrete, asphalt and organic material such as tree stumps would be removed from the project site if the material cannot be recycled for use on-site.

Noise

As stated in DEIS Chapter 3N, Noise, potential noise impacts would be due to mechanical equipment, traffic generation and construction activities. Mechanical equipment required for Alternative G would be essentially the same as for the DEIS Proposed Action and will be designed, constructed and located in a manner to comply with NYSDEC policy and the Town of Mount Pleasant Noise Ordinance, no significant adverse stationary source noise impacts are anticipated for either the Alternative G Phase 1 or the full Master Development Plan.

Trips generated by both the Phase 1 and Master Development Plan of Alternative G are expected to primarily travel on already heavily-trafficked roadways and receptor locations along Stephens Avenue would not experience a substantial change in mobile source noise. And, although traffic generation would be slightly higher than the DEIS Proposed Action in Phase 1, the increase would not be significantly high enough to expect a change in the noise analysis. Based on the foregoing, there would be no significant adverse noise impact due to mobile sources.

Construction of Alternative G would be conducted in accordance with the Town of Mount Pleasant Noise Ordinance to minimize potential impact.

The selection of specific HVAC equipment has not yet been defined at this phase of the project. As needed, approaches to mitigating operational noise may include specifying low-noise equipment, noise attenuation equipment and/or introducing a rooftop screening wall and will be incorporated throughout the design process and subject to approval by the Town's Building Department. The mechanical equipment will be designed, constructed and located in a manner so as not to result in a significant adverse noise impact per NYSDEC policy and to comply with the Town of Mount Pleasant Noise Ordinance.

As described in the DEIS, specific construction noise best management practices will be incorporated into the construction plan for Alternative G to minimize temporary noise impacts.

Air Quality

Construction activities associated with the Phase 1 and Master Development Plan in accordance with Alternative G could result in temporary increases of air quality pollutants. However, as the Phase 1 and Master Development Plan of Alternative G become operational, no new impacts would be created and, therefore, no adverse air quality impacts are expected.

Mitigation measures, described in the DEIS, which would be the same for Alternative G, include best construction practices, such as vehicle emission controls, vehicle maintenance, and on-site dust control.

Greenhouse Gas Emissions, Energy Conservation, Green Building and Sustainability

Alternative G is not anticipated to create any additional impacts to greenhouse gas emissions beyond those described for the DEIS Proposed Action. Alternative G would meet all applicable NYS building codes including the NYS Energy Conservation Construction Code, which regulates the design and construction of energy-efficient building envelopes and the installation of energy-efficient mechanical, lighting and power.

Specific preliminary measures to decrease the GHG emissions of the Project include:

- A combination of LED and CFL lighting would be used to minimize electric usage.
- High efficiency tankless water heaters can be installed to provide on-demand hot water to save on energy consumption.
- Energy Star compliant appliances would be installed.
- Insulation to reduce heat loss in the winter and heat gain in the summer.
- The windows would be double glazed, insulating glass for winter heating and low emissivity for summer cooling.

Like the proposed action described in the DEIS and DEIS Alternative C, Alternative G has been conceived as a model of environmental sustainability from the conception of a plan that responds to the existing natural features to buildings that are envisioned as models of energy efficiency. Sustainable Strategies described in the DEIS and which would be incorporated into Alternative G include:

- A mix of uses with a diversity of peak hour demand, incorporation of shuttles to mass transit stations and promoting utilization of the County bus system would reduce the number of vehicle trips and miles traveled.
- The development pattern has been designed to promote pedestrian use.
- Street trees line all streets to provide shade and reduce the heat island effect.
- Buildings and streets have been sited to adapt to the varied existing topography.
- New detention ponds, water quality measures and wetlands are planned to address storm water management by including native aquatic and terrestrial vegetation to support managing run-off water quality. This would also provide greater biodiversity for the project site.
- Bio-swales and pervious paving would be strategically deployed to promote infiltration of rainwater into the subsoil.
- Pervious surface products would be used in plazas to provide for rainwater infiltration into the subsoil.
- Disturbed woodland edges would be planted with native understory trees and shrubs to both increase biodiversity and create naturalized visual enhancements.
- Most buildings have been oriented with short facades facing west and/or are oriented to minimize solar heat gain in summer months and to reduce cooling loads.
- Some buildings are anticipated to include green roofs elements to aid in storm water quantity and quality management.
- Solar energy would be examined as an energy source for some of the project needs.
- Conveniently located internal bus stops would be provided to encourage access to the project via shuttles connecting to the Hawthorne and Valhalla commuter rail stations.
- Interpretive walking trails will provide educational opportunities about the ecosystem and about our role in the environment.
- The Children's Science and Education Center provides educational opportunities for the region.

The specific energy saving measures would be incorporated into the final Project design as it advances through the site plan approval process but, at a minimum, would include the measures identified above. The GHG emission due to the implementation of Alternative G is not expected to significantly impact regional GHG and therefore no mitigation measures are proposed.

Consistent with LEED Silver Standards that serve as guidance, Alternative G would be designed to employ optimal energy utilization to further reduce energy consumption.

Additionally the project will employ optimal energy utilization with modern technological systems to further reduce energy consumption.

Construction

Construction phasing and activities for Alternative G would be the same as those associated with the DEIS Proposed Action because the project site access, building placement, and building footprints would be the same. Only the uses in the buildings would differ.

As described in DEIS Chapter 3Q, Construction, similar to the DEIS Proposed Action, construction of Alternative G would likely result in several temporary environmental impacts typical to site development. Impacts generally associated with construction consist of the following: noise from the operation of construction equipment; fugitive dust and emissions from the excavation and grading operation of construction equipment; construction traffic relating to employee arrival/departure and material deliveries; and soil erosion from on-going earthwork operations.

It is anticipated that construction of Phase 1 of Alternative G would take approximately 60 months to complete.

A construction management and sequencing plan, rock removal plan, Sediment and Erosion Control Plan, dust control strategies and Stormwater Pollution Prevention Plan are anticipated to mitigate any significant impacts that could result from construction activities. These plans as described in the DEIS would be incorporated into the application for Site Building Permit.

The following table provides a summary of impacts from the DEIS Proposed Action and impacts from Alternative G.

Table 1-8 Impacts from the DEIS Proposed Action and Alternative G

	DEIS Proposed Action	Alternative G
Land Use, Zoning and Public Policy	The land use pattern on the Project Site would transform from mostly vacant land on the 60 acre parcel and five single-family homes on the 20 acre developer parcel to a master planned mixed-use bio-technology campus with complementary uses. The Project Site has not been designed to function as an isolated campus but rather to be open and integrated with the surrounding community and to complement the existing surrounding suburban community character. The Town does not currently have a single zoning district with use, area and bulk controls designed to regulate this type of development. The DEIS Proposed Action includes rezoning the entire project site to the OB-5 Office Business District and a text amendment to provide the required mechanisms to appropriately regulate the development. The OB-5 Master Plan District has limited applicability and is consistent with the purpose and intent of the OB districts. The DEIS Proposed Action is also consistent with the various local, regional, and state land use studies, plans and policies.	The land use pattern on the project site would be the same as the DEIS Proposed Action, but would replace 100,000 sf of bio-tech with 100,000 sf of low-impact residential uses which would support the proposed bio-technology facilities, as well as existing uses adjacent to the project site. The project has been designed to include community accessible open space to complement the existing surrounding suburban community character and support other medical, scientific and educational uses on the Grasslands Reservation. Alternative G, similar to the DEIS Proposed Action, is consistent with the various local, regional, and state land use studies, plans and policies, as demonstrated in Sections 3A and 4.3 of the DEIS.
Visual Resources and Community Character	The visual character of the DEIS Proposed Action would be different from the existing conditions. The DEIS Proposed Action would replace a mostly vacant property. The	The visual character of Alternative G would maintain the goals outlined in the DEIS.

	DEIS Proposed Action	Alternative G
	architectural design of the DEIS Proposed Action would capture the intrinsic natural character of the region and also embody the visionary and technological focus of the development. Building heights will vary across the Project Site to create an interesting blend of heights and engaging environment as if built over many years. Lighting will comply with Dark Sky standards. Views to and from the Project Site would not be adversely impacted.	Building height, bulk and placement would be the same with Alternative G as described in the DEIS. Architectural features and building amenities would vary slightly to accommodate residential uses but would not vary to a degree that would create additional impacts beyond those identified in DEIS Chapter 3B, Visual Resources and Community Character. Lighting on the project site would also be the same, or similar, to that proposed in the DEIS Proposed Action and would also comply with Dark Sky standards. Views to and from the project site would not be adversely impacted by Alternative G. Mitigation measures include extensive landscape buffers and an interior hardscape plan as well as a dark-sky compliant site lighting scheme, as noted. Also, the primary facades, including those of the residential uses, are envisioned to be composed of materials that bridge between traditional and modern aesthetics sourced in a responsible way with the design conveying an innovative and advanced scientific and technological identity.
Geology and Soils	<u>Phase 1</u> 38.2 acres of disturbance 18,464 cu. yds cut exported from site <u>Master Plan</u> ▪ 57.47 acres of disturbance ▪ 473,059 cu. yds cut exported from site	<u>Phase 1</u> 38.2 acres of disturbance 18,464 cu. yds cut exported from site <u>Master Plan</u> ▪ 57.47 acres of disturbance ▪ 473,059 cu. yds cut exported from site Impacts would be equal to the DEIS Proposed Action.
Topography and Slopes	<u>Phase 1</u> 5.7 acres of steep slopes would be impacted (3.6 acres of steep slopes, 1.2 acres of very steep slopes, and 0.9 acres of excessively steep slopes). <u>Master Plan</u> 8.6 acres of steep slopes would be impacted (5.2 acres of steep slopes, 2.0 acres of very steep slopes, and 1.4 acres of excessively steep slopes).	<u>Phase 1</u> 5.7 acres of steep slopes would be impacted (3.6 acres of steep slopes, 1.2 acres of very steep slopes, and 0.9 acres of excessively steep slopes). <u>Master Plan</u> 8.6 acres of steep slopes would be impacted (5.2 acres of steep slopes, 2.0 acres of very steep slopes, and 1.4 acres of excessively steep slopes). Impacts would be equal to the DEIS Proposed Action.

	DEIS Proposed Action	Alternative G
Vegetation and Wildlife	1,374 trees (measuring 10" DBH) will be removed from the Project Site: 993 during Phase I and 381 during the Master Development Plan. There are 94 specimen trees onsite: 20 in good condition and 74 in fair condition. Specimen trees account for 4% of the total inventoried tree population onsite. In Phase I, 44 specimen trees will be removed and following the Master Development Plan an additional 23 will be removed, totaling 67 specimen trees to be removed. Of the 1,374 trees to be removed to complete all phases of the project, 1,307 (or 95 percent) are non-specimen trees. Long-term impacts from habitat fragmentation are not expected to be significant.	1,374 trees (measuring 10" DBH) will be removed from the project site: 993 during Phase I and 381 during the Master Development Plan. Impacts would be equal to the DEIS Proposed Action.
Wetlands, Waterbodies and Watercourses	The DEIS Proposed Action will cause direct impacts to the two onsite streams and associated wetlands. Mitigation will restore wetland and watercourse character and function.	Amount and location of disturbance to wetlands would be the same as the DEIS Proposed Action, therefore, potential impacts to wetland, as well as mitigation measures, would be the same.
Stormwater Management	Stormwater peak runoff rates following development will not exceed those in the existing condition. As proposed, stormwater runoff rates following development would have no adverse impacts on downstream properties or stormwater conveying systems. Similarly, considering the nature of the existing site conditions and the level of stormwater treatment proposed in the post-development condition, it is predicted that this development will not represent a negative impact to stormwater quantity or degradation in the quality to any reservoir, stream, wetlands or watercourses. Even though the post-development condition contains more impervious area than existing conditions, the proposed stormwater management facilities mitigate the stormwater quality impacts as per the NYSDEC Rules and Regulations. The stormwater systems for the project are proposed for the qualitative and quantitative management of stormwater runoff from the Project Site.	Amount and location of land disturbance and pervious surfaces would be the same as the DEIS Proposed Action, therefore, potential impacts to stormwater conditions, as well as mitigation measures, would be the same.
Utilities	Phase 1 water Usage = 59,757 gpd Master Development Plan water usage= 254,635 gpd Phase 1 sewer usage = 35,015 gpd Master Development Plan sewer usage = 106,180 gpd Con Ed has indicated there is ample power supply available to support the electric and natural demands of the DEIS Proposed Action. Con Ed has also indicated that they can provide interruptible natural gas service to the North 60.	Phase 1 Water Usage = 42,540 gpd Master Development Plan Water Usage= 260,691 gpd Phase 1 sewer usage = 42,540 gpd Master Development Plan sewer usage = 140,295 gpd
Traffic and Transportation	<u>Phase 1 Trip Generation</u> Weekday Peak AM Entry - 412 Exit - 217 Total – 629 Weekday Peak PM	<u>Phase 1 Trip Generation</u> Weekday Peak AM Entry – 399 Exit – 243 Total – 642 Weekday Peak PM

	DEIS Proposed Action	**Alternative G**
	Entry - 272 Exit - 461 Total – 733 <u>Master Plan Trip Generation</u> Weekday Peak AM Entry - 1328 Exit - 526 Total – 1854 Weekday Peak PM Entry - 574 Exit - 1530 Total – 2104 With planned mitigation measures, traffic to and from the Project Site can be accommodated in a safe and efficient manner.	Entry – 301 Exit – 450 Total – 751 <u>Master Plan Trip Generation</u> Weekday Peak AM Entry – 1078 Exit – 522 Total – 1600 Weekday Peak PM Entry – 606 Exit – 1328 Total - 1934 Alternative G would result in a higher overall trip generation than the DEIS Proposed Action in Phase 1, but a lower overall trip generation in the Master Development Plan. However, these estimates are conservative as the proposed residences would be located on Main Street, within walking and biking distance of other uses on the project site.
Community Facilities and Services	The DEIS Proposed Action is expected to introduce approximately 1,052 employees to the Project Site in Phase 1 and 6,343 employees at full development of the Master Development Plan. On-site population (comprised of workers, visitors, shoppers, hotel guests, etc.) could result in an increase in the demand for police, fire and emergency services. DEIS Proposed Action uses proposed for Phase 1 are expected to generate approximately 61.6 tons per month (tpm) of solid waste. Upon completion of the Master Development Plan, 261.1 tpm of solid waste would be generated.	<u>Phase I</u> 853 employees 143 on-site residents <u>Master Plan</u> 6,145 employees 143 on-site residents The introduction of a new biotechnology employment center with on-site housing at the project site is expected to result in increased demand for police protection services commensurate with an estimated 0.5% increase in the Town population at build-out of Phase 1. Alternative G would result in only approximately 3 school-age children residing on the project site and attending schools in the Mount Pleasant Central School District. Alternative G uses proposed for Phase 1 are expected to generate approximately 56.12 tons per month (tpm) of solid waste. Upon completion of the Master Development Plan, 228.22 tpm of solid waste would be generated.

	DEIS Proposed Action	Alternative G
Fiscal and Market Impacts	$9.3 million in estimated new real estate taxes annually to Westchester County, the Town of Mount Pleasant and the School Districts. Estimated $7 million annually in additional rent revenues to Westchester County. Approximately 1,000 new construction jobs. The DEIS Proposed Action would introduce approximately 1,052 employees to the Project Site in Phase 1 and 6,343 employees at full development of the Master Development Plan.	Property taxes to be generated would be the same or similar to the DEIS Proposed Action estimate of $9.3 million. Rent revenues to Westchester County would be the same as the DEIS Proposed Action. Fewer permanent jobs generated than under the DEIS Proposed Action. On-site housing for biotech employees and students is considered vital to the economic viability of the project based on Weitzman Study, therefore including limited low-impact residential uses, results in a more robust and viable program of uses on the site.
Historic, Archaeological and Cultural Resources	Two archeological sites (Saw Mill River Precontact Site and J. Van Tassel Historic Site) have been identified within the Project Site. Construction activities would occur at the Project Site impacting the above-mentioned archeological resources. With respect to cultural resources in the vicinity of the Project Site, the DEIS Proposed Action is not expected to have any significant adverse impacts.	Since the amount and location of land disturbance is the same as the DEIS Proposed Action, similar to the DEIS Proposed Action no significant adverse impacts are anticipated.
Hazardous Materials	Recognized environmental conditions on the Property include: Six underground fuel oil tanks associated with the onsite residences are in-use on the property. Although five of the tanks were tightness tested in 2010, the tanks current condition cannot be determined. A 275-gallon aboveground fuel oil tank is located adjacent to the garage at 48A Saw Mill River Road. The tank appeared in good condition with no observed leaks or spills but it had no secondary containment. Several 55-gallon drums of ethylene glycol were observed in two garages from the former Nilsson Nurseries. Once operational, the proposed bioscience and technology center will generate solid waste, some of which may be Regulated Medical Waste (RMW) and other specialty wastes. The exact nature of the waste production and the quantities will not be known until specific tenants are identified. All waste will be managed in accordance with applicable state and federal regulations. All future tenants of the Project Site will be required to comply with all applicable NYS regulations for the handling, storage, transport and disposal of RMW. RMW generated at these facilities will be stored on-site prior to transportation off-site by permitted vendors to regulated/permitted disposal facilities. Based on this information, no significant adverse impacts on human health are anticipated from the management of RMW.	Project Site access, building placement, and building footprints would be the same as the DEIS Proposed Action so impacts and remediation would be the same.

	DEIS Proposed Action	Alternative G
Noise	Mechanical equipment will be designed, constructed and located in a manner to comply with NYSDEC policy and the Town of Mount Pleasant Noise Ordinance, no significant adverse stationary source noise impacts are anticipated for both the Phase 1 and Master Plan Project. Trips generated by both the Phase 1 and Master Plan Project are expected to primarily travel on already heavily-trafficked roadways and receptor locations along Stephens Avenue would not see a substantial change in mobile source noise. Therefore, there would be no significant adverse noise impact due to mobile sources. Construction would be conducted in accordance with the Town of Mount Pleasant Noise Ordinance to minimize potential impact.	Since access, building placement, site plan and utilities would be the same as the DEIS Proposed Action and only programming within the buildings would change, noise impacts would be the same.
Air Quality	Construction activities associated with the Phase 1 and Master Plan Project could result in temporary increases of air quality pollutants. As the Phase 1 and Master Plan Project become operational, no adverse air quality impacts are expected.	Since access, building placement, site plan and utilities would be the same as the DEIS Proposed Action and only programming within the buildings would change, air quality impacts would be the same.
Greenhouse Gas Emissions, Energy Conservation, Green Building and Sustainability	The project will meet all applicable NYS building codes including the NYS Energy Conservation Construction Code, which regulates the design and construction of energy-efficient building envelopes and the installation of energy-efficient mechanical, lighting and power. Specific preliminary measures to decrease the GHG emissions of the Project include: A combination of LED and CFL lighting will be used to minimize electric usage. High efficiency tankless water heaters may be installed to provide on-demand hot water to save on energy consumption. Energy Star compliant appliances may be installed. Insulation to reduce heat loss in the winter and heat gain in the summer. The windows will be double glazed, insulating glass for winter heating and low emissivity for summer cooling. The specific design and emissions reduction measures through the implementation of the measures outlined above will be determined as Project design advances through the site plan approval process.	Since access, building placement, site plan and utilities would be the same as the DEIS Proposed Action and only programming within the buildings would change, impacts to greenhouse gas emissions, energy conservation, green building and sustainability would be the same.
Construction	Construction of the DEIS Proposed Action would likely result in several temporary environmental impacts. Impacts generally associated with construction consist of: noise from the operation of heavy equipment; fugitive dust and emissions from the operation of construction equipment; construction traffic relating to employee arrival/departure and material deliveries; and increased soil erosion from on-going earthwork operations. It is anticipated that construction of Phase 1 will take approximately 60 months to complete.	Since access, building placement, site plan and utilities would be the same as the DEIS Proposed Action and only programming within the buildings would change, construction phasing and construction related impacts would be the same.

1.5 Process for Site Plan Approval and SEQRA Compliance for Future Phases of Master Development Plan

As explained in the DEIS and this FEIS, the Proposed Action would be implemented in phases. The DEIS examined impacts from both Phase 1 development and full build-out of the Master Development Plan. The Proposed Action includes rezoning the project site to OB-5, the adoption of the new zoning text, review and approval of a Master Development Plan for the project site, and site plan approval for Phase 1 of the Master Development Plan, Steep Slope and Wetland Permits. As explained in Chapter 2 of the DEIS, once the Master Development Plan is approved by the Town Board, individual Site Plans for various phases of the Proposed Action would have to be consistent with the approved Master Development Plan and would be subject to approval by the Planning Board. All applications for development plans submitted subsequent to this EIS which are consistent with the approved Master Development Plan and would be carried out in conformance with the conditions and thresholds established for such actions in the SEQRA Environmental Findings Statement would not require further SEQRA review. Again, all subsequent site plans would also be referred to the DPWT Commissioner for review and approval in accordance with the Applicant's lease with the County.

Any future proposed actions that are not consistent with the approved Master Development Plan either by varying in use or exceeding the combined threshold of 3 million square feet of bio-tech/research and development related uses, medical offices, a children's science and education center, neighborhood retail, a hotel, residential uses and other bio-tech supportive uses as part of the comprehensive Master Development Plan, would need to comply with the requirements of SEQRA. In the event a specific threshold was exceeded and significant environmental impacts associated with the future action were not evaluated in the SEQRA process, the Applicant would have to undergo a proper review and analysis of the environmental impacts prior to approval of any subsequent action.

Additional Future Studies

Any site plan approvals remain subject to the Planning Board review and approval process and must be consistent with the Master Development Plan. As part of the site plan application process for any site plan approvals following completion and occupancy of Phase 1, the Applicant would be required to document the project's consistency with the Master Development Plan and update selected technical studies to assess actual versus projected project impacts including, but not limited to the following (all additional future studies would be identified in the Findings Statement):

<u>Traffic and Transportation</u>

A traffic improvement monitoring program is proposed to ensure that the required roadway improvements proposed by the Applicant are in place or under construction to support the proposed development. The proposed development would continue to be reviewed by the Town, County and New York State Department of Transportation (NYSDOT). Roadway work

permits would be required from NYSDOT or the County depending on the jurisdiction of the roadway/location of the improvements.

Key intersections, as identified in Response K.48 (see Chapter 3 of this FEIS), would be monitored after each phase of development to determine if signalization or adjustments to signal timing are needed.

The addition of bicycle storage areas or areas for supporting a bike sharing program would be evaluated as part of the long-term development programs once a critical mass (500,000 square feet) is built and occupied.

As new applications are made for subsequent site plans, the parking and traffic management plan will be updated. This would establish the actual parking demand required to support the existing development program, which would reflect and include any change in use. The information would be a basis for establishing the parking requirements for the subsequent project phases reflected in the "new" site plan which could be higher or lower when compared to the approved plan.

1.6 Project Approvals and Reviews

Under SEQRA, involved agencies are those which have approval authority over a proposed action. Interested agencies are those other agencies that have an interest in a proposed action, but not approval authority. Project reviews and approvals by involved agencies and reviews by interested agencies are listed in Table 1-9, below. The project approval and review requirements for Alternative G are the same as presented in the DEIS for the DEIS Proposed Action.

Table 1-9 Project Approvals

Involved Agency	Approval/Review
Town of Mount Pleasant Town Board	› Adoption of OB-5 Zoning District – Master Development Plan (MDP) (Zoning Law Text Amendment) › Rezoning the Site to OB-5 District (Zoning Map Amendment) › Approval of Master Development Plan for the site › Tree Removal/Planting/Maintenance/Replanting Permit
Town of Mount Pleasant Planning Board	› Site Plan Approval for Phase 1 and subsequent development phases › Subdivision Approval (if necessary)
Mount Pleasant Town Engineer	› Wetland Permit (unless approved by Planning Board as part of an application) › Steep Slopes Permit
NYS Department of Environmental Conservation	› State Pollution Discharge Elimination System (SPDES) for Stormwater › Protection of Waters Permit › Section 401 Water Quality Certification
United States Army Corps of Engineers	› Individual Permit
NYS Department of Transportation	› Highway Work Permit
NYS SHPO	› Cultural resources review
Westchester County Planning Department (Board)	› GML 239-m referral (General Municipal Law advisory review) › Tree Removal Permit
Westchester County Department of Environmental Facilities	› Confirm Capacity for projected sewage flows › Water supply approval
Westchester County Department of Public Works/Transportation	› Street opening permit; GML 239-f building approval (frontage on County Road) › Submission of certain applications to DPWT per Lease
Westchester County Department of Health	› Sanitary Sewer and water supply approval › Subdivision plat review and signature

Lead Agency:
Town of Mount Pleasant Planning Board
One Town Hall Plaza
Valhalla, NY 10595

Involved Agencies:

- Town of Mount Pleasant Town Board
- Town of Mount Pleasant Planning Board
- New York State Department of Environmental Conservation
- United States Army Corps of Engineers
- New York State Department of Transportation
- New York State SHPO
- Westchester County Planning Board
- Westchester County Department of Environmental Facilities
- Westchester County Department of Public Works / Transportation
- Westchester County Department of Health

Interested Agencies:

- Town of Greenburgh Town Board
- US Fish and Wildlife
- Hawthorne Fire Company
- Grasslands Fire Department
- Town of Mount Pleasant Police Department
- Town of Mount Pleasant Conservation Advisory Council
- Mount Pleasant Central School District
- Pocantico Hills School District

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Letter #10	Pg. 2	Mount Pleasant Conservation Advisory Council	Traffic and Transportation	K.34
Letter #10	Pg. 2	Mount Pleasant Conservation Advisory Council	Traffic and Transportation	K.35
Letter #10	Pg. 2	Mount Pleasant Conservation Advisory Council	Traffic and Transportation	K.36

Comment Source/Key		Commenter	FEIS Subsection	Comment/ Response Number
Letter #10	Pg. 2	Mount Pleasant Conservation Advisory Council	Greenhouse Gases, Energy Conservation, Green Building and Sustainability	R.23
Letter #10	Pg. 2	Mount Pleasant Conservation Advisory Council	Greenhouse Gases, Energy Conservation, Green Building and Sustainability	R.24
Letter #10	Pg. 2	Mount Pleasant Conservation Advisory Council	Greenhouse Gases, Energy Conservation, Green Building and Sustainability	R.25
Letter #10	Pg. 2	Mount Pleasant Conservation Advisory Council	Greenhouse Gases, Energy Conservation, Green Building and Sustainability	R.26
Letter #10	Pg. 2	Mount Pleasant Conservation Advisory Council	Stormwater Management	I.2
Letter #10	Pg. 2	Mount Pleasant Conservation Advisory Council	Vegetation and Wildlife	G.7
Letter #10	Pg. 2	Mount Pleasant Conservation Advisory Council	Vegetation and Wildlife	G.8
Letter #10	Pg. 2	Mount Pleasant Conservation Advisory Council	Community Services	L.4
Letter #10	Pg. 2	Mount Pleasant Conservation Advisory Council	Community Services	L.5
Letter #10	Pg. 3	Mount Pleasant Conservation Advisory Council	Project Description	A.24
Letter #11	Pg. 1-2	Business Council of Westchester	Project Description	A.25
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Letter #12	Pg. 2	Provident Design Engineering	Topography and Slopes	F.3
Letter #12	Pg. 2-3	Provident Design Engineering	Topography and Slopes	F.4
Letter #12	Pg. 3	Provident Design Engineering	Topography and Slopes	F.5
Letter #12	Pg. 3-4	Provident Design Engineering	Topography and Slopes	F.6
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Letter #12	Pg. 5	Provident Design Engineering	Stormwater Management	I.6
Letter #12	Pg. 5	Provident Design Engineering	Stormwater Management	I.7
Letter #12	Pg. 5-6	Provident Design Engineering	Stormwater Management	I.8
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Letter #12	Pg. 6	Provident Design Engineering	Stormwater Management	I.11
Letter #12	Pg. 6	Provident Design Engineering	Stormwater Management	I.12
Letter #12	Pg. 6	Provident Design Engineering	Stormwater Management	I.13
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Comment Source/Key		Commenter	FEIS Subsection	Comment/ Response Number
Letter #12	Pg. 7	Provident Design Engineering	Stormwater Management	I.15
Letter #12	Pg. 7	Provident Design Engineering	Stormwater Management	I.16
Letter #12	Pg. 7	Provident Design Engineering	Stormwater Management	I.17
Letter #12	Pg. 7	Provident Design Engineering	Stormwater Management	I.18
Letter #12	Pg. 7	Provident Design Engineering	Stormwater Management	I.19
Letter #12	Pg. 7	Provident Design Engineering	Stormwater Management	I.20
Letter #12	Pg. 7	Provident Design Engineering	Stormwater Management	I.21
Letter #12	Pg. 7-8	Provident Design Engineering	Stormwater Management	I.22
Letter #12	Pg. 8	Provident Design Engineering	Stormwater Management	I.23
Letter #12	Pg. 8	Provident Design Engineering	Stormwater Management	I.24
Letter #12	Pg. 8	Provident Design Engineering	Stormwater Management	I.25
Letter #12	Pg. 9	Provident Design Engineering	Stormwater Management	I.26
Letter #12	Pg. 9	Provident Design Engineering	Stormwater Management	I.27
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Letter #12	Pg. 10	Provident Design Engineering	Stormwater Management	I.29
Letter #12	Pg. 10-11	Provident Design Engineering	Stormwater Management	I.30
Letter #12	Pg. 11	Provident Design Engineering	Stormwater Management	I.31
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Letter #12	Pg. 12	Provident Design Engineering	Stormwater Management	I.33
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Letter #12	Pg. 15	Provident Design Engineering	Traffic and Transportation	K.37
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Letter #12	Pg. 16	Provident Design Engineering	Traffic and Transportation	K.39
Letter #12	Pg. 16	Provident Design Engineering	Traffic and Transportation	K.40
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Letter #12	Pg. 22	Provident Design Engineering	Traffic and Transportation	K.51
Letter #12	Pg. 22	Provident Design Engineering	Traffic and Transportation	K.52
Letter #12	Pg. 22	Provident Design Engineering	Traffic and Transportation	K.53

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Letter #12	Pg. 22	Provident Design Engineering	Traffic and Transportation	K.54
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Letter #12	Pg. 22	Provident Design Engineering	Traffic and Transportation	K.56
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Letter #13	Pg. 1	Cleary Consulting	Project Description	A.27
Letter #13	Pg. 1	Cleary Consulting	Project Description	A.28
Letter #13	Pg. 1	Cleary Consulting	Project Description	A.29
Letter #13	Pg. 1	Cleary Consulting	Project Description	A.30
Letter #13	Pg. 1	Cleary Consulting	Project Description	A.31
Letter #13	Pg. 2	Cleary Consulting	Project Description	A.32
Letter #13	Pg. 2	Cleary Consulting	Project Description	A.33
Letter #13	Pg. 2	Cleary Consulting	Project Description	A.34
Letter #13	Pg. 2	Cleary Consulting	Project Description	A.35
Letter #13	Pg. 2	Cleary Consulting	Project Description	A.36
Letter #13	Pg. 2	Cleary Consulting	Project Description	A.37
Letter #13	Pg. 2	Cleary Consulting	Project Description	A.38
Letter #13	Pg. 2	Cleary Consulting	Project Description	A.39
Letter #13	Pg. 2	Cleary Consulting	Project Description	A.40
Letter #13	Pg. 2-3	Cleary Consulting	Project Description	A.41
Letter #13	Pg. 3	Cleary Consulting	Project Description	A.42
Letter #13	Pg. 3	Cleary Consulting	Project Description	A.43
Letter #13	Pg. 3	Cleary Consulting	Project Description	A.44
Letter #13	Pg. 3	Cleary Consulting	Project Description	A.45
Letter #13	Pg. 3	Cleary Consulting	Project Description	A.46
Letter #13	Pg. 3	Cleary Consulting	Project Description	A.47
Letter #13	Pg. 3	Cleary Consulting	Project Description	A.48
Letter #13	Pg. 3-4	Cleary Consulting	Project Description	A.49
Letter #13	Pg. 4	Cleary Consulting	Project Description	A.50
Letter #13	Pg. 4	Cleary Consulting	Project Description	A.51
Letter #13	Pg. 4	Cleary Consulting	Project Description	A.52
Letter #13	Pg. 4	Cleary Consulting	Project Description	A.53
Letter #13	Pg. 4	Cleary Consulting	Project Description	A.54
Letter #13	Pg. 4	Cleary Consulting	Project Description	A.55
Letter #13	Pg. 4	Cleary Consulting	Land Use, Zoning & Public Policy	C.2
Letter #13	Pg. 4	Cleary Consulting	Land Use, Zoning & Public Policy	C.3

Comment Source/Key		Commenter	FEIS Subsection	Comment/ Response Number
Letter #13	Pg. 4-5	Cleary Consulting	Land Use, Zoning & Public Policy	C.4
Letter #13	Pg. 5	Cleary Consulting	Land Use, Zoning & Public Policy	C.5
Letter #13	Pg. 5	Cleary Consulting	Land Use, Zoning & Public Policy	C.6
Letter #13	Pg. 5	Cleary Consulting	Land Use, Zoning & Public Policy	C.7
Letter #13	Pg. 5	Cleary Consulting	Land Use, Zoning & Public Policy	C.8
Letter #13	Pg. 5	Cleary Consulting	Land Use, Zoning & Public Policy	C.9
Letter #13	Pg. 5	Cleary Consulting	Land Use, Zoning & Public Policy	C.10
Letter #13	Pg. 5	Cleary Consulting	Land Use, Zoning & Public Policy	C.11
Letter #13	Pg. 6	Cleary Consulting	Land Use, Zoning & Public Policy	C.12
Letter #13	Pg. 6	Cleary Consulting	Visual Resources and Community Character	D.7
Letter #13	Pg. 6	Cleary Consulting	Visual Resources and Community Character	D.8
Letter #13	Pg. 6	Cleary Consulting	Visual Resources and Community Character	D.9
Letter #13	Pg. 6	Cleary Consulting	Visual Resources and Community Character	D.10
Letter #13	Pg. 6	Cleary Consulting	Visual Resources and Community Character	D.11
Letter #13	Pg. 6	Cleary Consulting	Visual Resources and Community Character	D.12
Letter #13	Pg. 6	Cleary Consulting	Visual Resources and Community Character	D.13
Letter #13	Pg. 6	Cleary Consulting	Visual Resources and Community Character	D.14
Letter #13	Pg. 7	Cleary Consulting	Visual Resources and Community Character	D.15
Letter #13	Pg. 7	Cleary Consulting	Geology and Soils	E.1
Letter #13	Pg. 7	Cleary Consulting	Geology and Soils	E.2
Letter #13	Pg. 7	Cleary Consulting	Topography and Slopes	F.7
Letter #13	Pg. 7	Cleary Consulting	Topography and Slopes	F.8
Letter #13	Pg. 7	Cleary Consulting	Topography and Slopes	F.9
Letter #13	Pg. 7-8	Cleary Consulting	Vegetation and Wildlife	G.9
Letter #13	Pg. 8	Cleary Consulting	Vegetation and Wildlife	G.10
Letter #13	Pg. 8	Cleary Consulting	Vegetation and Wildlife	G.11

Comment Source/Key		Commenter	FEIS Subsection	Comment/ Response Number
Letter #13	Pg. 8	Cleary Consulting	Vegetation and Wildlife	G.12
Letter #13	Pg. 8	Cleary Consulting	Vegetation and Wildlife	G.13
Letter #13	Pg. 8	Cleary Consulting	Vegetation and Wildlife	G.14
Letter #13	Pg. 8	Cleary Consulting	Vegetation and Wildlife	G.15
Letter #13	Pg. 8	Cleary Consulting	Vegetation and Wildlife	G.16
Letter #13	Pg. 8	Cleary Consulting	Vegetation and Wildlife	G.17
Letter #13	Pg. 8-9	Cleary Consulting	Vegetation and Wildlife	G.18
Letter #13	Pg. 9	Cleary Consulting	Vegetation and Wildlife	G.19
Letter #13	Pg. 9	Cleary Consulting	Vegetation and Wildlife	G.20
Letter #13	Pg. 9	Cleary Consulting	Wetlands, Waterbodies and Watercourses	H.6
Letter #13	Pg. 9	Cleary Consulting	Wetlands, Waterbodies and Watercourses	H.7
Letter #13	Pg. 9	Cleary Consulting	Wetlands, Waterbodies and Watercourses	H.8
Letter #13	Pg. 9	Cleary Consulting	Wetlands, Waterbodies and Watercourses	H.9
Letter #13	Pg. 9	Cleary Consulting	Utilities	J.8
Letter #13	Pg. 9	Cleary Consulting	Utilities	J.9
Letter #13	Pg. 9	Cleary Consulting	Utilities	J.10
Letter #13	Pg. 9-10	Cleary Consulting	Utilities	J.11
Letter #13	Pg. 10	Cleary Consulting	Utilities	J.12
Letter #13	Pg. 10	Cleary Consulting	Traffic and Transportation	K.57
Letter #13	Pg. 10	Cleary Consulting	Traffic and Transportation	K.58
Letter #13	Pg. 10	Cleary Consulting	Traffic and Transportation	K.59
Letter #13	Pg. 10	Cleary Consulting	Traffic and Transportation	K.60
Letter #13	Pg. 10	Cleary Consulting	Traffic and Transportation	K.61
Letter #13	Pg. 10-11	Cleary Consulting	Traffic and Transportation	K.62
Letter #13	Pg. 11	Cleary Consulting	Traffic and Transportation	K.63
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Letter #13	Pg. 11	Cleary Consulting	Traffic and Transportation	K.65
Letter #13	Pg. 11	Cleary Consulting	Traffic and Transportation	K.66
Letter #13	Pg. 11	Cleary Consulting	Traffic and Transportation	K.67
Letter #13	Pg. 11	Cleary Consulting	Traffic and Transportation	K.68
Letter #13	Pg. 11	Cleary Consulting	Traffic and Transportation	K.69
Letter #13	Pg. 11	Cleary Consulting	Community Services	L.6
Letter #13	Pg. 12	Cleary Consulting	Community Services	L.7
Letter #13	Pg. 12	Cleary Consulting	Community Services	L.8
Letter #13	Pg. 12	Cleary Consulting	Community Services	L.9
Letter #13	Pg. 12	Cleary Consulting	Community Services	L.10
Letter #13	Pg. 12	Cleary Consulting	Community Services	L.11
Letter #13	Pg. 12	Cleary Consulting	Community Services	L.12
Letter #13	Pg. 12	Cleary Consulting	Community Services	L.13

Comment Source/Key		Commenter	FEIS Subsection	Comment/ Response Number
Letter #13	Pg. 13	Cleary Consulting	Community Services	L.14
Letter #13	Pg. 13	Cleary Consulting	Community Services	L.15
Letter #13	Pg. 13	Cleary Consulting	Community Services	L.16
Letter #13	Pg. 13	Cleary Consulting	Fiscal Impacts	M.6
Letter #13	Pg. 13	Cleary Consulting	Fiscal Impacts	M.7
Letter #13	Pg. 13	Cleary Consulting	Hazardous Materials	O.3
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Letter #13	Pg. 13	Cleary Consulting	Hazardous Materials	O.5
Letter #13	Pg. 13	Cleary Consulting	Hazardous Materials	O.6
Letter #13	Pg. 13	Cleary Consulting	Hazardous Materials	O.7
Letter #13	Pg. 14	Cleary Consulting	Noise	P.4
Letter #13	Pg. 14	Cleary Consulting	Noise	P.5
Letter #13	Pg. 14	Cleary Consulting	Noise	P.6
Letter #13	Pg. 14	Cleary Consulting	Noise	P.7
Letter #13	Pg. 14	Cleary Consulting	Noise	P.8
Letter #13	Pg. 14	Cleary Consulting	Noise	P.9
Letter #13	Pg. 14	Cleary Consulting	Noise	P.10
Letter #13	Pg. 14-15	Cleary Consulting	Air Quality	Q.3
Letter #13	Pg. 15	Cleary Consulting	Air Quality	Q.4
Letter #13	Pg. 15	Cleary Consulting	Air Quality	Q.5
Letter #13	Pg. 15	Cleary Consulting	Greenhouse Gases, Energy Conservation, Green Building and Sustainability	R.27
Letter #13	Pg. 15	Cleary Consulting	Greenhouse Gases, Energy Conservation, Green Building and Sustainability	R.28
Letter #13	Pg. 15	Cleary Consulting	Greenhouse Gases, Energy Conservation, Green Building and Sustainability	R.29
Letter #13	Pg. 15	Cleary Consulting	Construction	S.15
Letter #13	Pg. 15	Cleary Consulting	Construction	S.16
Letter #13	Pg. 15	Cleary Consulting	Construction	S.17
Letter #13	Pg. 15	Cleary Consulting	Construction	S.18
Letter #13	Pg. 15	Cleary Consulting	Construction	S.19
Letter #13	Pg. 16	Cleary Consulting	Construction	S.20
Letter #13	Pg. 16	Cleary Consulting	Alternatives	T.1
Letter #13	Pg. 16	Cleary Consulting	Alternatives	T.2
Letter #13	Pg. 16	Cleary Consulting	Alternatives	T.3
Letter #13	Pg. 16	Cleary Consulting	Alternatives	T.4
Letter #13	Pg. 16	Cleary Consulting	Alternatives	T.5
Letter #13	Pg. 16	Cleary Consulting	Alternatives	T.6
Letter #13	Pg. 16-17	Cleary Consulting	Alternatives	T.7
Letter #13	Pg. 17	Cleary Consulting	Alternatives	T.8

Comment Source/Key		Commenter	FEIS Subsection	Comment/ Response Number
Letter #13	Pg. 17	Cleary Consulting	Alternatives	T.9
Letter #13	Pg. 17	Cleary Consulting	Alternatives	T.10
Letter #13	Pg. 17	Cleary Consulting	Alternatives	T.11
Letter #13	Pg. 17	Cleary Consulting	Alternatives	T.12
Letter #13	Pg. 17	Cleary Consulting	Alternatives	T.13
Letter #13	Pg. 17	Cleary Consulting	Alternatives	T.14
Letter #13	Pg. 17	Cleary Consulting	Alternatives	T.15
Letter #13	Pg. 17-18	Cleary Consulting	Alternatives	T.16
Letter #13	Pg. 18	Cleary Consulting	Alternatives	T.17
Letter #13	Pg. 18	Cleary Consulting	Alternatives	T.18
Letter #13	Pg. 18	Cleary Consulting	Alternatives	T.19
Letter #13	Pg. 18	Cleary Consulting	Alternatives	T.20
Letter #13	Pg. 18	Cleary Consulting	Alternatives	T.21
Letter #13	Pg. 18	Cleary Consulting	Alternatives	T.22
Letter #13	Pg. 18	Cleary Consulting	Alternatives	T.23
Letter #13	Pg. 18	Cleary Consulting	Alternatives	T.24
Letter #13	Pg. 18	Cleary Consulting	Alternatives	T.25
Letter #13	Pg. 18	Cleary Consulting	Alternatives	T.26
Letter #13	Pg. 18	Cleary Consulting	Alternatives	T.27
Letter #13	Pg. 18	Cleary Consulting	Alternatives	T.28
Letter #14	Pg. 1	James Lima Planning + Development	Project Description	A.56
Letter #14	Pg. 1-2	James Lima Planning + Development	Project Description	A.57
Letter #14	Pg. 2	James Lima Planning + Development	Fiscal and Market Impacts	M.8
Letter #14	Pg. 3	James Lima Planning + Development	Fiscal and Market Impacts	M.9
Letter #14	Pg. 3	James Lima Planning + Development	Fiscal and Market Impacts	M.10
Letter #14	Pg. 4	James Lima Planning + Development	Fiscal and Market Impacts	M.11
Letter #14	Pg. 4	James Lima Planning + Development	Fiscal and Market Impacts	M.12
Letter #14	Pg. 4	James Lima Planning + Development	Fiscal and Market Impacts	M.13
Letter #14	Pg. 5	James Lima Planning + Development	Fiscal and Market Impacts	M.14
Letter #14	Pg. 6	James Lima Planning + Development	Fiscal and Market Impacts	M.15
Letter #14	Pg. 6	James Lima Planning + Development	Fiscal and Market Impacts	M.16

Comment Source/Key		Commenter	FEIS Subsection	Comment/ Response Number
Letter #14	Pg. 6	James Lima Planning + Development	Fiscal and Market Impacts	M.17
Letter #14	Pg. 7	James Lima Planning + Development	Fiscal and Market Impacts	M.18
Letter #14	Pg. 7	James Lima Planning + Development	Fiscal and Market Impacts	M.19
Letter #14	Pg. 7	James Lima Planning + Development	Fiscal and Market Impacts	M.20
Letter #14	Pg. 8-9	James Lima Planning + Development	Fiscal and Market Impacts	M.21
Letter #14	Pg. 9	James Lima Planning + Development	Fiscal and Market Impacts	M.22
Letter #14	Pg. 12	James Lima Planning + Development	Fiscal and Market Impacts	M.23
Letter #14	Pg. 13	James Lima Planning + Development	Fiscal and Market Impacts	M.24
Letter #14	Pg. 14	James Lima Planning + Development	Fiscal and Market Impacts	M.25
Letter #14	Pg. 15	James Lima Planning + Development	Fiscal and Market Impacts	M.26
Letter #14	Pg. 15	James Lima Planning + Development	Fiscal and Market Impacts	M.27
Letter #14	Pg. 16	James Lima Planning + Development	Fiscal and Market Impacts	M.28
Letter #14	Pg. 16-17	James Lima Planning + Development	Fiscal and Market Impacts	M.29
Letter #14	Pg. 17	James Lima Planning + Development	Fiscal and Market Impacts	M.30
Letter #14	Pg. 17	James Lima Planning + Development	Fiscal and Market Impacts	M.31
Letter #15	Pg. 1	Sarah Miles Smiley	Greenhouse Gases, Energy Conservation, Green Building and Sustainability	R.30
Letter #15	Pg. 1	Sarah Miles Smiley	Greenhouse Gases, Energy Conservation, Green Building and Sustainability	R.31
Letter #15	Pg. 1	Sarah Miles Smiley	Greenhouse Gases, Energy Conservation, Green Building and Sustainability	R.32
Letter #15	Pg. 1	Sarah Miles Smiley	Greenhouse Gases, Energy Conservation, Green Building and Sustainability	R.33

Comment Source/Key		Commenter	FEIS Subsection	Comment/ Response Number
Letter #15	Pg. 1-2	Sarah Miles Smiley	Greenhouse Gases, Energy Conservation, Green Building and Sustainability	R.34
Letter #15	Pg. 2	Sarah Miles Smiley	Greenhouse Gases, Energy Conservation, Green Building and Sustainability	R.35
Letter #16	Pg. 1	Katherine Meladossi	Greenhouse Gases, Energy Conservation, Green Building and Sustainability	R.36
Letter #17	Pg. 1	Peter & Rita Curtin	Traffic and Transportation	K.70
Letter #17	Pg. 1	Peter & Rita Curtin	Traffic and Transportation	K.71
Letter #17	Pg. 1	Peter & Rita Curtin	Traffic and Transportation	K.72
Letter #17	Pg. 1	Peter & Rita Curtin	Traffic and Transportation	K.73
Letter #17	Pg. 2	Peter & Rita Curtin	Visual Resources and Community Character	D.16
Letter #17	Pg. 2	Peter & Rita Curtin	Greenhouse Gases, Energy Conservation, Green Building and Sustainability	R.37
Letter #17	Pg. 2	Peter & Rita Curtin	Vegetation and Wildlife	G.21
Letter #18	Pg. 1	Tom Sialiano, Mount Pleasant Councilmember	Community Services	L.17
Letter #18	Pg. 1	Tom Sialiano, Mount Pleasant Councilmember	Alternatives	T.29
Letter #18	Pg. 1	Tom Sialiano, Mount Pleasant Councilmember	Alternatives	T.30
Letter #18	Pg. 1	Tom Sialiano, Mount Pleasant Councilmember	Alternatives	T.31
Letter #18	Pg. 1	Tom Sialiano, Mount Pleasant Councilmember	Alternatives	L.32
Letter #18	Pg. 1	Tom Sialiano, Mount Pleasant Councilmember	Alternatives	T.33

3

Comments and Responses

The following section includes all substantive and relevant comments on The North 60 DEIS including comments provided during the Public Hearings and written comments submitted during the written comment period. Comments are separated by topic area and similar comments are grouped together.

A. Project Description

Comment A.1

Regarding the lease on the land, is it over a certain period of time?

(Public Hearing #1, Ms. Joan Lederman, Planning Board Member, 9/3/20. pg. 30)

Response A.1

Please see Appendix L, page 10 Section 2.2 Term (99 year lease starting from endorsement) and page 62 endorsements (January 2019).

Comment A.2

I want to say that the project has a lot of positive attributes, not the least are the wetlands restoration, the commitment to using native plants, and the designated open space on the northern portion of the property.

(Public Hearing #1, Mr. Steven Kavee, Chair of the Town of Mount Pleasant Conservation Advisory Council, 9/3/20. pg. 32)

Response A.2

Comment noted.

Comment A.3

We would like to speak briefly about Alternative C, the housing, and suggest that the planning board might consider looking closely at Alternative C or some version of Alternative C . There's no affordable housing component mentioned in Alternative C. I think that there should be an enhanced look at Alternative C that would include some one and two-bedroom units, that would be affordable and market to be consistent with that the Town's Master Plan is moving toward, which is to create the idea of live-work communities. Alternative C really should consider not just residential use that's more consistent with general markets, but also an affordable housing component.

(Public Hearing #1, Mr. Steven Kavee, Chair of the Town of Mount Pleasant Conservation Advisory Council, 9/3/20. pg. 36-37)

Response A.3

As discussed in Chapter 1 of this FEIS, in response to comments received from the Lead Agency (Town of Mount Pleasant Planning Board), the Town Board, the Westchester County Planning Board, and the public, and in response to the findings and recommendations from the North 60 Market and Financial Feasibility Study ("Weitzman Study", see DEIS Appendix M), a new project alternative has been identified, Alternative G: Alternative Development Program with Fewer Low Impact Residential Units. Specifically, Alternative G includes low-impact residential uses, similar to DEIS Alternative C, but the number of residential units has been reduced.

Alternative G replaces approximately 100,000 SF of bio-tech uses in Phase 1 with approximately 100,000 SF of low-impact residential uses. Residential uses for Phase 1 would include 98 residential units including 29 studio units and 69 one-bedroom units.

It is anticipated that many of these units would be occupied by employees or students of uses on the project site or adjacent medical and school uses. The integration of campus housing is intended to create a live-work community. At this time, the corporate or educational tenants for the residential components of the development are not yet

known but the low-impact, campus housing would be affordable by design, offering studio and one-bedroom units available to corporate tenants, educational institutions and medical/bio-technology employees.

Comment A.4

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.

(Letter #1, Richard Wisniewski, 9/15/20, pg. 3 and Public Hearing #1, Mr. Wisniewski, 9/3/20. pg. 50)

Response A.4

The intent as represented in the plan is to make no vehicular connections to the north and to minimize visual impacts. However, the plan shows a pedestrian connection that would allow residents in the adjoining neighborhood to access walking trails, as well as permit access to other amenities, thereby promoting walking (healthy behaviors) versus driving (added vehicular traffic). While a trail connection would be beneficial to adjacent residents, the proposed trail connection will be removed as requested by residents.

Comment A.5

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."

(Letter #1, Richard Wisniewski, 9/15/20, pg. 3-4 and Public Hearing #1, Mr. Wisniewski, 9/3/20. pg. 50-51)

Response A.5

Please see Figure 3b-5 (page 140) the Visual Simulations Key Plan, note the '10' with directional arrows, this is the view where Visual Simulation 10 Dorothy Court Looking South (page 150) is taken from. There is no North 60 parking lot, the asphalt and vehicles that you are seeing in this simulation are the existing asphalt of the roadways and driveways and vehicles traveling on the same.

The intent as represented in the plan is to make no vehicular connections to the north and to minimize visual impacts. However, the plan shows a pedestrian connection that would allow residents in the adjoining neighborhood to access walking trails, as well as permit access to other amenities, thereby promoting walking (healthy behaviors) versus driving (added vehicular traffic). While a trail connection would be beneficial to adjacent residents, the trail connection will be removed as requested by residents.

Comment A.6

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.

(Letter #1, Richard Wisniewski, 9/15/20, pg. 4)

Response A.6

As the writer notes, the North County Trailway has no designated path between the two ends identified. It is defined in general with no specific route. In fact, the NYSDOT's rehabilitation of the Hospital Road bridge over the Sprain Brook Parkway is only for deck replacement and does not provide sidewalks or bike paths. Where possible, the Applicant will work with the County on the trails as much as possible on lands under its control. See also Response A.14.

Comment A.7

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 complement 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.

(Letter #2, Commissioner Norma Drummond, Westchester County Planning Board, 9/28/20, pg. 2)

Response A.7

Based on valuable input from Westchester County, and others, and in response to the findings and recommendations from the North 60 Market and Financial Feasibility Study ("Weitzman Study", see DEIS Appendix M), a new alternative (Alternative G) has been identified and evaluated in this FEIS. Alternative G includes low-impact residential uses, similar to DEIS Alternative C, but the number of residential units has been reduced.

Alternative G replaces approximately 100,000 SF of bio-tech uses in Phase 1 with approximately 100,000 SF of low-impact residential uses. Residential uses proposed for Phase 1 would include 98 residential units including 29 studio units and 69 one-bedroom units.

It is anticipated that many of these units would be occupied by employees or students of uses on the project site or adjacent medical and school uses. The integration of campus housing is intended to create a live-work community. At this time, the corporate or educational tenants for the residential components of the development are not yet known but the low-impact, campus housing would be affordable by design, offering studio and one-bedroom units available to corporate tenants, educational institutions and medical/bio-technology employees.

The intent of the housing is to be supportive of the biotech industry and would meet the intent of the County requirements. Details of the program may be modified to respond to market changes following Phase 1, to the extent that such program changes do not create any significant impacts.

Comment A.8

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.

(Letter #2, Commissioner Norma Drummond, Westchester County Planning Board, 9/28/20, pg. 2)

Response A.8

At this time, the retail tenants are not yet known, but the Applicant will remain flexible and open to responding to what the constantly evolving retail marketplace is trending towards.

Comment A.9

The Master Development Plan is proposed to be completed in not less than 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.

(Letter #2, Commissioner Norma Drummond, Westchester County Planning Board, 9/28/20, pg. 6)

Response A.9

Per DEIS Table 2-6, the Applicant is providing an additional 321 parking spaces (beyond the zoning requirement) in Phase 1. The rationale for the additional parking is to allow a surplus of parking spaces to support the phased construction of the project, the additional parking spaces that are provided are the anticipated total to support the construction of one additional building. The surface parking constructed in Phase 1 will only support the parking required for Phase 1 but will then be used for construction phasing and then incorporated into a built structure for additional phases. The additional parking spaces (beyond zoning requirement) are being provided on a temporary basis to

facilitate the construction of the project during Phase One of the project and to facilitate the future development. The surplus parking will be occupied by construction activities (removing a parking lot to build the next building) as well as for construction team parking as the buildings are developed so that the parking required per zoning is always available throughout the duration of the development of the site.

Comment A.10

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 areas 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 Planning Board for an expeditious process in approving this much needed project during these trying times.

(Letter #3, Bill Losapio, 9/29/20, pg. 1)

Response A.10

Comment noted.

Comment A.11

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.

(Letter #6, Ashley Pitrulle, 10/12/20, pg. 1)

Response A.11

Within the land controlled by the North 60, new pedestrian and cyclist circulation will be provided along with pedestrian and cyclist connections to the Grasslands Campus. The area mentioned in the comment above is not controlled by the Applicant, and is under the control of the County, State, and private landowners. In the future, the shuttle system will provide a safe and convenient means of access to the train station.

Comment A.12

I live in Valhalla, on Beech Place. I read the report very clear. It's a very positive project, I think. So I was just voicing my satisfaction with it and see that the benefit will be great for the community.

(Public Hearing #2, Mr. Delpozza, 10/1/20, pg. 105)

Response A.12

Comment noted.

Comment A.13

Can you please define what a "cycletrack" is?

(Letter #7, Mary Hegarty, 10/11/20, pg. 1)

Response A.13

A cycletrack is a two-way, on-street separated and dedicated bicycle lane with appropriate signage.

Comment A.14

How will the bike path shown on Figure 2-15 be connected to the North County Trail?

(Letter #7, Mary Hegarty, 10/11/20, pg. 1)

Diagram Note: Red denotes primary trail route; blue denotes existing trail pathway; orange denotes existing North County Bike Trail.

Source: https://planning.westchestergov.com/images/stories/reports/TarrytownKensicoTrail2016.pdf

Response A.14

The planned Tarrytown-Kensico Trailway/Bikeway Plan from the Old Croton Aqueduct to the Bronx River Pathway (2016) illustrates the Preferred Route of this trail. It runs along the southern edge of the site.

Cyclists would connect:

1. From the North County Trailway to Tarrytown Kensico Trailway heading east along Old Saw Mill River Road to a path west of the State Route 9A where it crosses 9A to Dana Road.
2. From Dana Road to north on Hammond House Road to east on Sunshine Cottage Road to Hospital Drive.
3. From Hospital Drive to the Site.
4. An off-street bike/pedestrian path that is a section of the Tarrytown-Kensico Trailway/Bikeway is proposed to be built by the owner along Hospital Road on the north side of the street along the property only.
5. From Hospital Road, bike lanes have now been added along Main Street which will allow convenient central access to the North 60 and the core of the amenities. This is done in place of the previously proposed bicycle path on West Street (that bicycle path has been removed). This change will provide a more legible, convenient, and integrated bike solution.

Comment A.15

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?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 1)

Response A.15

There is no predetermined outcome for what may happen at the end of the lease term, although it is highly unlikely that the site would be abandoned, which would leave extending the lease of the site or the sale of the site as two likely outcomes. Note that Westchester County has leased approximately 60 acres to the Applicant for 99 years.

Comment A.16

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?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 1)

Response A.16

As stated in the lease, the project is required to undergo environmental review in accordance with SEQR and must comply with the local (Town of Mount Pleasant) land use regulations. The lease requires the applicant to seek the necessary approvals from Mount Pleasant. In addition, there are notice provisions that include the County in the development and the review process.

Comment A.17

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.

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 1)

Response A.17

As stated in the lease, the Master Development Plan and all supporting documentation such as zoning amendments, site plans and other necessary documents for review and approval. In addition, the Town of Mount Pleasant Building Department will issue permits for all actions and will ensure that such actions are consistent with all approved plans and with any Findings Statement that is adopted by the Planning Board.

Comment A.18

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?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 1)

Response A.18

At this time, the effect of the COVID-19 pandemic in real estate is not fully known yet, it is too early to conclude what changes in behavior and consumer preferences will remain, but the Applicant will remain flexible and open to responding to and accommodating the lasting effects the pandemic may have in the Office use marketplace.

Comment A.19

Will there be fitness center on site and will there be an opportunity for town Residents to use the facility?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 1)

Response A.19

At this time, the retail tenants are not yet known, but it is envisioned that there would be a Health and Wellness Tenant as part of the Retail use.

Comment A.20

Can we define the protocols instituted for the safety of Children in the proposed children's center?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 2)

Response A.20

At this time, the operator of the Children's Science and Education Center has not been selected. The operator would establish the safety protocols consistent with good practice and applicable codes.

Comment A.21

Will there be a day care facility on site? If so what are the hours of operation?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 2)

Response A.21

At this time, the retail and corporate tenants are not yet known. Day care facilities would be a permitted use on the site so it is possible that a day care center could be established to meet the needs of the new employees on the site. The tenant would establish their operating hours.

Comment A.22

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?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 3)

Response A.22

The bridge (connecting Bradhurst Avenue [State Road] with Hospital Road [County Road]) is not controlled by the Applicant and is under the control of the State.

Comment A.23

"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 provide 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 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.

(Letter #10, Mount Pleasant Conservation Advisory Council, 10/30/20, pg. 1-2)

Response A.23

The term "Open Space" was used here to describe all types of Open Space including undisturbed areas, areas intended to be "natural" and serve as wildlife habitat, and non-natural open space. It is a correct statement that the areas in excess of the 36.5 acres are not intended to be natural habitat although landscape design should incorporate elements that are attractive to wildlife (ex. plants that attract butterflies and birds).

Comment A.24

The increased residential units in Alternative C 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.

(Letter #10, Mount Pleasant Conservation Advisory Council, 10/30/20, pg. 3)

Response A.24

Comment noted. As discussed in Chapter 1 of this FEIS, the FEIS includes a new alternative, Alternative G, which would provide 98 low-impact residential units in Phase 1. See Response A.3.

Comment A.25

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.

(Letter #11, Business Council of Westchester. 10/1/20, pg. 1-2)

Response A.25

Comment noted. The FEIS includes a new alternative, Alternative G, which would provide 98 low-impact residential units in phase 1. See Response A3.

Comment A.26

DEIS page 2-2. 1st partial ¶ **-** What process or procedure is proposed to empower the Town Board to grant approval of the Master Development Plan?

(Letter #13, Cleary Consulting, 10/31/20, pg. 1)

Response A.26

The proposed zoning amendment to Chapter 218-72.1 - the addition of the OB-5 Master Development Plan District to the "Special District Regulations" establishes that the Town Board, has jurisdiction to approve a proposed Master Development Plan. Subsequent to the Master Development Plan being approved, individual site plans remain within the jurisdiction of the Planning Board. The Town Board, as part of its review and adoption of the zoning text amendment in its legislative function, must consider the uses proposed to be part of the OB-5 Master Development Plan District. The DEIS should be amended to reflect that the Planning Board has the authority to approve individual site plans.

Comment A.27

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 1)

Response A.27

As stated in the lease, the lease provides for reasonable uses of the land that will be compatible with, and complement, activities and programs now located on the Valhalla Campus and that are permitted by the Town of Mount Pleasant. The spirit of the agreement is that any proposed uses need to be supportive of the Campus (in other words: Bio-Tech Use, Westchester County Health Care Corporation, and the New York Medical College, as well as new housing opportunities, retail and economic development and the preservation of open space). The County Commissioner of Public Works and Transportation (DPWT Commissioner) will review (and approve) the Master Development Plan and any zoning text amendments, site plans and other accompanying documentation.

Comment A.28

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 1)

Response A.28

Assisted Living was included as a potential use under Alternative C. The location of the use was envisioned in the northeastern corner of the site. An Assisted Living Use has a nexus with the Grasslands Campus, primarily the Medical and Medical Office Use present as well as the surrounding areas in the Town of Mount Pleasant. An Assisted Living use would have to comply with the Town's current definition of Assisted Living Residence and the associated regulations (Section 218-63.2).

Comment A.29

DEIS page 2-6. 3rd bullet– Clarify that the sublease taxes will apply to all taxing jurisdictions.

(Letter #13, Cleary Consulting, 10/31/20, pg. 1)

Response A.29

The Applicant will pay all real estate taxes applicable to the site.

Comment A.30

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 1)

Response A.30

Yes, also see Response A.27. Though in any event, the discretionary authority of the Town Board and Planning Board would not be usurped by a County level approval.

Comment A.31

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 1)

Response A.31

The project would fall under the jurisdiction of the Town of Mount Pleasant's property maintenance law.

Comment A.32

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 2)

Response A32

The 60-acre eastern and central most portion of the 80-acre project site is part of the Grasslands Campus ("Grasslands"). Westchester County purchased the approximately 512-acre Grasslands Reservation in 1915 to provide an isolated setting for a poor house, a penitentiary and a public hospital.

Prior to the site's acquisition by the County in 1915, there was little documented historic use or development of the site. Based on the Phase I Archeological Investigation (See DEIS Appendix I), historic maps indicate that there was a structure located within the southeastern portion of the project site between 1851 and 1892. There is also an extant historic structure of mid-19th century construction in the northwestern portion of the project site. The remainder of the project site appears to have seen little historic development prior to the late 20th century.

Comment A.33

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 2)

Response A.33

See FEIS Figure 3-1, which illustrates the current uses of adjoining properties as described in the narrative on DEIS page 2-8.

Comment A.34

DEIS page 2-9. Table 2-2 – Identify if the uses on the 20-acre parcel are presently occupied, or vacant.

(Letter #13, Cleary Consulting, 10/31/20, pg. 2)

Response A.34

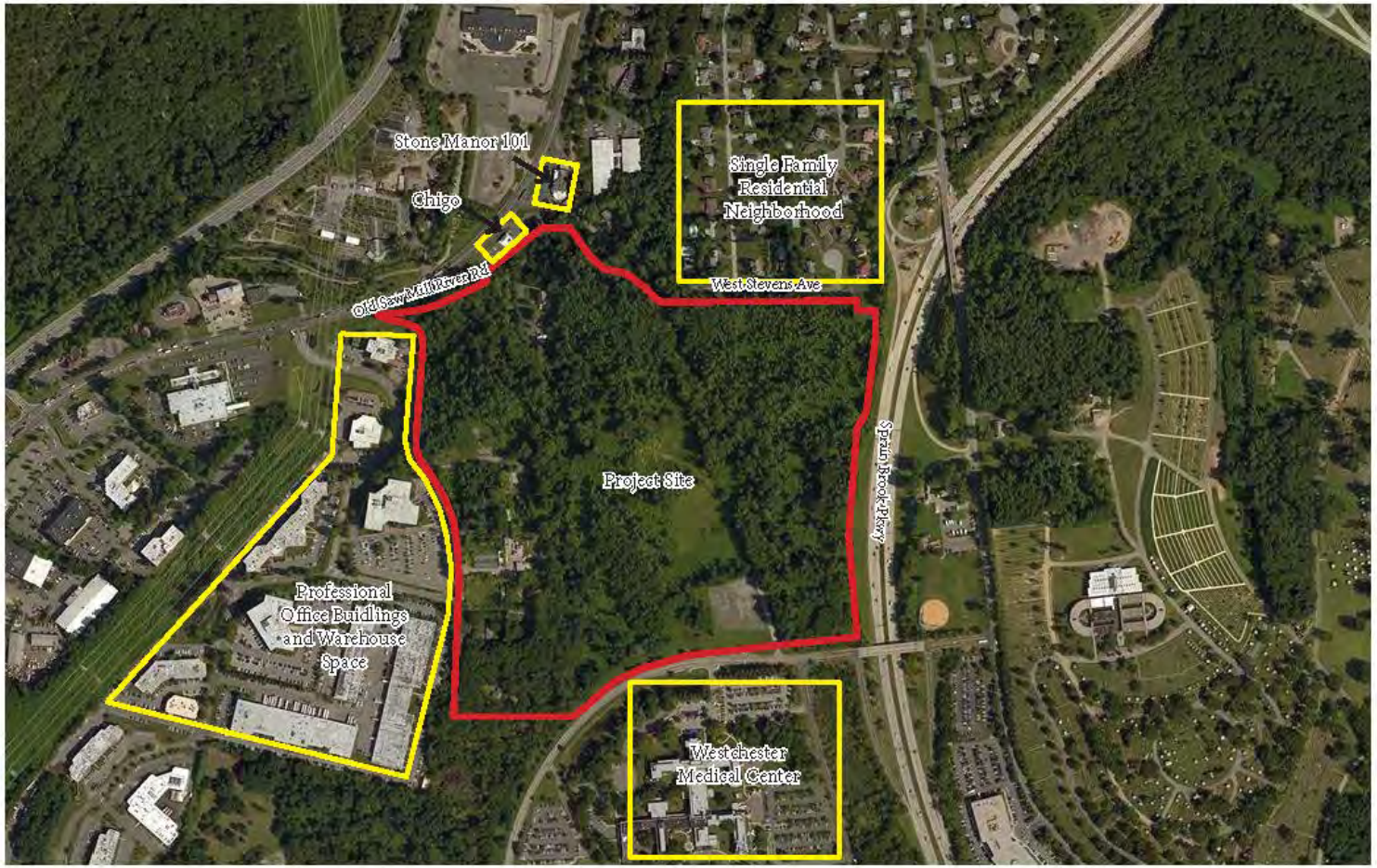
48 Saw Mill River Road (Single Family Dwelling)	Residential (Occupied)
48A Saw Mill River Road (Single Family Dwelling)	Residential (Occupied)
Saw Mill River Road (Nilsson Nursery)	Nursery/Landscape Yard (Vacant)
42 Saw Mill River Road (Single Family Dwelling)	Residential (Occupied)
44 Saw Mill River Road (Single Family Dwelling)	Residential (Occupied)
46 Saw Mill River Road (Single Family Dwelling)	Residential (Occupied)

Comment A.35

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 2)

vhb | Figure 3-1



North 60 | Mount Pleasant, NY

Current Uses of Adjoining Properties

Response A.35

The use is included the Applicant's zoning petition and proposes a definition of "Independent Senior Housing". In addition, the recently added use of Assisted Living Residence (ALR) to the Mount Pleasant Town Code by LL 3-2018 allows this type of use in the OB-5 zoning districts.

Comment A.36

DEIS page 2-16. Phase 1 – provide the square footages of each use in each proposed building.

(Letter #13, Cleary Consulting, 10/31/20, pg. 2)

Response A.36

The following areas are approximate:

Bldg. B1: Retail 6,000 S.F., Grocery 35,000 S.F., Health & Wellness 35,000 S.F.
Bldg. B2: Biotech 50,000 S.F.
Bldg. B4: Retail 14,000 S.F., Biotech/Research 170,000 S.F.
Bldg. B5: Retail 10,000 S.F., Medical Office 100,000 S.F.
Bldg. B14; Hotel 100,000 S.F.

Note that under Alternative G, a portion of the biotech in buildings G7 and B6 would be residential.

Comment A.37

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 2)

Response A.37

At this time, the effect of the COVID-19 pandemic in real estate is not fully known yet, it is too early to conclude what changes in behavior and consumer preferences will remain, but the Applicant will remain flexible and open to responding to the lasting effects the pandemic may have on real estate.

The Applicant would comply with the current Federal, State or Local Building Codes and the Site Plan Approvals at the time of submission for a building permit.

Comment A.38

DEIS page 2-26. Entry and Main Street, 1st ¶ - Provides examples of "ground floor uses to encourage activity and a pedestrian streetscape."

(Letter #13, Cleary Consulting, 10/31/20, pg. 2)

Response A.38

Final ground floor uses are to be determined with lease-up of the spaces. However, it is the intent that ground floor uses will include restaurants, general retail, a grocery entry, as well as having office and medical office entries. Ground floors will have transparent glass that provide views to activity within the buildings.

Comment A.39

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 2)

Response A.39

A narrative description of improvements has been provided and is found on pages 2-46 through 2-49 of the DEIS and includes descriptions of Neighborhood Square (lawn and plaza, water feature, seating, lighting, landscaping, and public art), Entry Plaza, and Overlook Plaza (plaza, seating, lighting, landscaping, public art). An additional description of the Entry Plaza is included here, as well as a general description of the streetscape:

Entry Plaza

An entry plaza at the intersection of Hospital Road and "main street" (and at the interface between the project site and the hospital site) will serve as a point of arrival feature and an outdoor space with seating that is accessible to the public.

Plaza

This space will be primarily paved with special decorative pavers.

Public Art

This prominent location will incorporate public art. This may be a freestanding sculpture, or may be integrated into the design elements of the plaza.

Seating

Seating will be incorporated into this space.

Landscaping

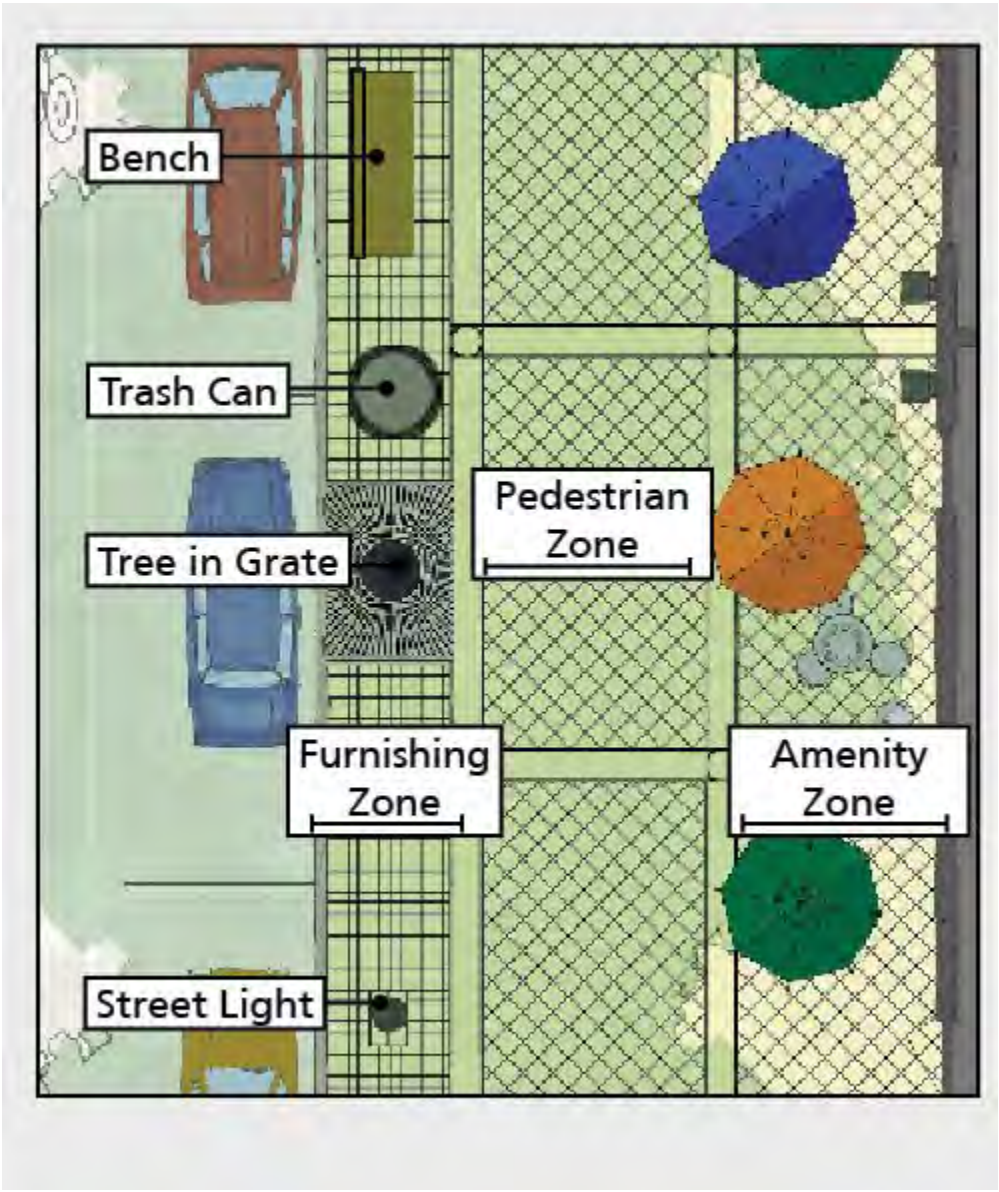
Street trees will define the edges of the space. Additional landscaping may include potted seasonal plants.

Lighting

Specialty lighting, such as uplighting of trees, will be incorporated in this location. Specific specialty lighting will be determined at the time of design of final construction documents.

Main Street Streetscape

The main street streetscape will have furnishings, such as benches, trash receptacles, street trees and lighting close to the curb. Sidewalks will provide ample space for pedestrian movement. Space will also be provided to allow for additional amenities, such as tables, chairs, benches, works of art, etc. Paving materials are envisioned to be concrete, at this time, but will be determined at the time of final design. See diagram below.



Comment A.40

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 2)

Response A.40

The use of the space will not be restricted.

Comment A.41

DEIS page 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 afterthought. Will separate bike lanes be provided?

Are traditional concrete sidewalks proposed, or more innovative pedestrian ways? Clarification is requested.

(Letter #13, Cleary Consulting, 10/31/20, pg. 2-3)

Response A.41

On site there will be sidewalks or paths provided for pedestrians. The type (concrete, etc.) will be determined during the final site plan approval process, which will integrate sidewalks into pedestrian plazas. Sharrows (painted symbols on roadways) will be provided for bicycle circulation, in addition to marked on-street bike lanes along Main Street. See Response K.1 for additional detail.

Comment A.42

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 3)

Response A.42

The Applicant will continue exploring opportunities to advance the Project's sustainability measures, including pursing and being guided by a design generally consistent with principles associated with LEED certification at Silver level or higher, as the project design progresses. In addition to sustainable building features, the project site aims to design and construct in ways that exceed minimum code requirements. For instance, the project will provide for the integration of green infrastructure measures, which will reduce impervious areas and improve stormwater management (e.g., creating new ponds and wetlands for greater biodiversity in surrounding areas; installation of bio-swales, etc.). Furthermore, the project area will be designed with consideration of the "healthy community" concepts, which encourage bicycle and pedestrian activities with dedicated bicycle facilities and on-site walking trails within a park like setting facilitating rest and relaxation.

Comment A.43

DEIS page 2-33. Architectural Site Design, 4th ¶**-** Explain how the project is "…economically and socially sustainable…" Provide examples.

(Letter #13, Cleary Consulting, 10/31/20, pg. 3)

Response A.43

Socially Sustainable Strategies:

1. The Children's Science and Education Center provides educational opportunities for the region.
2. Interpretive signage in the natural areas provides educational opportunities for the general public.
3. The Neighborhood Square provides gathering and activity opportunities for diverse populations in the community.
4. The residential alternative discussed in Chapter 1 of this FEIS (Alternative G) would provide low impact residential uses opportunities for underserved populations seeking career opportunities in the scientific community in Westchester County.

Economically Sustainable Strategies:

1. The majority of buildings are oriented with the short side of the building facing the sun at the hottest time of the day in the summer, thereby reducing cooling loads, energy consumption and operating expenses. Thereby making buildings more economical to operate.
2. North 60 is a mixed-use compact walkable place. Mixed-use compact walkable places with extensive amenities and landscape open space generate more tax revenue per acre, obtain higher rents, and are more economically resilient during economic downturns when compared to conventional suburban business parks.

Comment A.44

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 3)

Response A.44

The Applicant will focus on roof mounted solar on this site. The Applicant will incorporate energy efficiency and conservation measures for the Project as the design progresses.

Comment A.45

DEIS page 2-34. 8th ¶- Explain how the connection to the North County Trailway will be made.

(Letter #13, Cleary Consulting, 10/31/20, pg. 3)

Response A.45

The final route of the North County Trailway has not been established by the Town, County, or State. The Applicant will provide a connection through the site to provide continuity of the Trailway as it passes the site. The location of that connection will be based once the final route is chosen. See also Response A.14.

Comment A.46

DEIS 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 3)

Response A.46

The DEIS provided bike/pedestrian path illustrates how a cyclist/pedestrian could make a connection today on-roads and/or sidewalks. The Tarrytown-Kensico Trailway/Bikeway Plan from the Old Croton Aqueduct to the Bronx River Pathway (2016) illustrates the County planned bike/pedestrian route. See diagram below.

Diagram Note: Red denotes primary trail route; blue denotes existing trail pathway; orange denotes existing North County Bike Trail.
Source: https://planning.westchestergov.com/images/stories/reports/TarrytownKensicoTrail2016.pdf

The path along the southern edge of the property is to be built by the Applicant. The path beyond the property is a part of the Tarrytown-Kensico Trailway/Bikeway Plan and is to be built by the County in the future in phases.

Comment A.47

DEIS page 2-38. Sustainability, Green Technologies and Energy Efficiency – The DEIS indicates that the Master Development Plan will be *"capable of obtaining LEED Silver 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 3)

Response A.47

The Applicant intends to show that the biotechnology / medical space is capable of obtaining the LEED Silver certification utilizing the LEED Checklist; however, certification will not be sought.

Comment A.48

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 3)

Response A.48

The Applicant will continue exploring energy efficiency and conservation measures for the Project, as the design progresses. Specific measure include incorporating LEED Silver standards and, if possible in selected areas, to LEED Gold as the project design progresses. In addition to sustainable building features, the project site Applicant aims to design and construct in ways that excel beyond minimum code requirements. For instance, the project will enhance the area's resiliency through the integration of green infrastructure measures, which will help reduce impervious areas and improve stormwater management (e.g., creating new ponds and wetlands for greater biodiversity in surrounding areas; installation of bio-swales, etc.). Furthermore, the project area will be designed with consideration of the "healthy community" concepts, which encourage bicycle and pedestrian activities with bicycle facilities and on-site walking trails. The Applicant will focus on roof mounted solar on this site.

Comment A.49

DEIS page 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, and not exclusively for the tenants of the development? Perhaps Figure 2-17 can be used to illustrate this.

(Letter #13, Cleary Consulting, 10/31/20, pg. 3-4)

Response A.49

Areas A,B,C,D, E, the Neighborhood Square, and the Promenade and Stream Valley Pond illustrated in Figure 2-17 will be open to the general public. However, there will be times when the Neighborhood Square, and the Promenade and Stream Valley Pond will be closed to the general public during special planned activities.

The specific tenants for the buildings have not been determined at this time. The courtyards between buildings may be either private or publicly accessible and will be determined when the individual buildings are designed.

Comment A.50

DEIS page 2-41. Site Safety & Security – Describe the proposed "*Site Security*."

(Letter #13, Cleary Consulting, 10/31/20, pg. 4)

Response A.50

The overall site will be publicly accessible (streets and trails). Individual buildings will have controlled access through the use of key cards, or similar. There will also be an on-site security person to monitor security.

Comment A.51

DEIS pages 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 4)

Response A.51

The following map pinpoints the location of the various active and passive open space features discussed in the DEIS on pages 2-45 through 2-49:

Open Space Areas

Comment A.52

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 4)

Response A.52

Street sections are provided as an attachment illustrating a 'complete streets' approach. See FEIS Appendix K.

Comment A.53

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 4)

Response A.53

Comment noted. The final mix of uses is detailed in Chapter 1 of this FEIS. Based on valuable input from Westchester County, and others, revisions have been made to the Proposed Plan. The FEIS Proposed Action (detailed in Chapter 1) includes low-impact residential uses, similar to DEIS Alternative C, but the number of residential units has been reduced. FEIS Chapter 1 provides an analysis of impacts based on the revised plan and program.

Comment A.54

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 4)

Response A.54

The portion of the estimated $9.3 million in annual real estate taxes at full build-out that would be attributable to the Town of Mount Pleasant would be approximately $823,224.

Comment A.55

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 4)

Response A.55

A cycletrack refers to two-way, on-street separated and dedicated bike lanes. However, in response to comments, the two-way bike lanes (referred to as cycletrack in the DEIS) along West Street have been removed and replaced by bike lanes along Main Street that provide central and more convenient access to the North 60. See Response K.1 for additional detail.

Comment A.56

In 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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 1)

Response A.56

See Response A.37.

Comment A.57

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." If the applicant intends to include a residential component – senior, student, micro-unit, or otherwise – the submission should be updated to reflect that.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 1-2)

Response A.57

As noted in Chapter 1 of this FEIS, revisions have been made to the revised program. The plan and program will evolve with market trends in such a manner as not to exceed the environmental impacts studied in the SEQRA process and will be consistent with any Findings Statement.

B. SEQR Process, Policy and Procedures

Comment B.1

When is the written comment period going to end?

(Public Hearing #1, Ms. Mary Hagerty, 9/3/20, pg. 67)

Response B.1

November 1, 2020. The written comment period remained open for 30 days following the close of the public hearing.

Comment B.2

Is there a methodology that we could use where we hit thresholds for traffic, sewer, any of these type of things that this application would need to have some kind of additional environmental study, because ten years is an awfully long time to sit on one SEQRA process.

(Public Hearing #2, Mr. Collins, 10/1/20, pg. 112)

Response B.2

What is done in instances like this, when a project extends over a long period of time, is to build proportional impact thresholds in the Environmental Findings Statement, such that if any threshold exceeds a certain percentage, it requires the applicant to revisit the Findings or the Environmental Impact Statement. This allows the phased project to move ahead in a timely manner, provided it keeps within the thresholds. Such thresholds will be documented in the Environmental Findings Statement for this project.

Comment B.3

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?)

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 1)

Response B.3

See Response B.2.

C. Land Use, Zoning and Public Policy

Comment C.1

At a March town board work session meeting, Mr. Cleary was giving an overview, and he said something to the effect that the North 60 is having a great influence on the town's master plan. And to me, that sounded a little like the tail wagging the dog. I just wonder if he might be able to comment about that.

(Public Hearing #1, Mr. Kenny Noonan, 9/3/20. pg. 52-53)

Response C.1

As stated in *Envision Mount Pleasant*, the Town's Comprehensive Plan, The North 60 represents a regionally significant development that will transform the southern portion of the Town. Making sure the North 60 becomes part of, and not apart from – the Town and the Hamlets is vitally important. The developer is committed to ensuring the success of the existing communities.

Comment C.2

DEIS page 3A-2. Document the distances to the various land uses (specific buildings) identified to the North, East, South and West of the project site.

(Letter #13, Cleary Consulting, 10/31/20, pg. 4)

Response C.2

North: The closest single-family residences are approximately 190 feet away from the northern boundary of the project site. The northern portion of the project site will remain largely buffer area. The former Green Valley Nursery along Saw Mill River Road is approximately 1,200 feet away from the project site. Holy Rosary Church and parochial school, are approximately 1,800 feet from the project site. The Hawthorne Elementary School, is approximately 2,800 feet from the project site. The closest of the condominiums are approximately 1,960 feet from the project site. State Troop K Hawthorne Barracks is approximately 2,460 feet from the project site. The car dealership is approximately 780 feet from the project site.

East: Across the Sprain Brook Parkway, Bradhurst Park which fronts on the Sprain Brook Parkway is approximately 290 feet from the project site and Gates of Heaven cemetery is approximately 690 feet from the project site.

South: The buildings closest to the project site in the Westchester Medical Center are approximately 360 feet away. The residences closest to the project site, which are located along West Stevens Avenue and Dorothy Court, are approximately 1,000 feet away. The commercial uses, including Panera Bread and a Walgreens, are approximately 930 feet from the project site. Hawthorne Country Day School, a special needs school, is approximately 2,240 feet from the project site.

West: The closest buildings in the Mid Westchester Executive Office Park are approximately 140 feet from the project site. The Rockefeller Preserve Park is approximately 1,600 feet from the project site.

Comment C.3

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 4)

Response C.3

Comment noted.

Comment C.4

DEIS page 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 construction of a new 4th hamlet center within the Town.

(Letter #13, Cleary Consulting, 10/31/20, pg. 4-5)

Response C.4

The Project's new employees will increase demand and patronage for retail. The proposed retail space will enhance the offerings for existing residents and existing and new employees.

1. Commercial/retail is driven by potential users. The greater the number of potential users, the greater the demand for commercial and retail uses. The proposed development will bring significant additional employees to the area and thereby increase overall demand for commercial/retail activity, including in the Hawthorne and Valhalla hamlet centers. For example, tenants will seek a diverse selection of dining options. The Hawthorne and Valhalla hamlet centers will provide additional options for users and visitors.
2. The proposed retail uses on the North 60 site are generally different from the existing uses in the hamlet centers of Hawthorne and Valhalla. For example, it is currently envisioned in Phase 1 that a grocery will be a potential tenant (and major component of the retail program) - no grocery exists in the hamlet centers of Hawthorne or Valhalla. As another example, it is currently envisioned in Phase 1 that a health and wellness facility will be a major component of the retail program – no health and wellness facility exists in the hamlet centers of Hawthorne or Valhalla.
3. Alternative G introduced in Chapter 1 of this FEIS would bring new residents and an increase in population and thereby a demand for commercial/retail services, including in the hamlet centers of Hawthorne and Valhalla.

Comment C.5

DEIS page 3-15. 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 5)

Response C.5

The proposed development is proposed as an integrated part of the Town of Mount Pleasant and Westchester County, as a whole. This is accomplished by:

1. Biotech/healthcare/medtech is a major component of the local economy. The proposed project leverages these types of uses to be an integral part of the Mount Pleasant economy.
2. While the Westchester Medical Center and the Westchester Medical College are located on County owned land, they are major components of the Mount Pleasant community and economy. Rather than treat these as isolated components, the North 60 embraces these elements by designing a pedestrian interface with the hospital that includes buildings with fronts facing Hospital Drive and sidewalks and trails allowing pedestrian access.
3. A new street (West Street) creates a much needed link and connection between the North 60 and the Saw Mill River Road corridor which facilitates connectivity with the surrounding community.
4. A grid network of internal streets and trails provide links to the Grasslands property facilitating access for the community.
5. The site (walkable streets, open spaces (plazas, squares, overlooks, trails)) will be open to the surrounding community.
6. A shuttle will provide connectivity to the Metro-North commuter train line and the hamlet centers of Hawthorne and Valhalla. This shuttle system will allow for enhanced connectivity without the use of an individual car.
7. Retail stores will be open to all residents of Mount Pleasant.
8. Educational opportunities are provided for Mount Pleasant and Westchester County residents and school children through the Living Science Center, a key component of the development.
9. Connectivity with the existing adjacent office park to the west is technically feasible and a connection point has been provided.

Comment C.6

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 5)

Response C.6

There isn't a single targeted user or type of user for the bio-science and technology uses. It is desirable to have a diverse set of types of users involved in advanced science and technology – this focus will allow for the type of synergy that leads to innovation and discovery by bringing users of different backgrounds together.

Comment C.7

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 5)

Response C.7

1. Biotech/healthcare/medtech organizations are the major components of the proposed development program. These uses and their laboratories, employee density, parking and building scale are not associated with the hamlet centers of Valhalla and Hawthorne, as well as Thornwood. As a result, the proposed development's market focus minimizes any potential competition with existing uses.
2. The proposed development will bring significant additional employees to the area and thereby increase overall demand for commercial/retail, including in the Hawthorne and Valhalla hamlet centers. For example, tenants will seek a diverse selection of dining options. The Hawthorne and Valhalla hamlet centers will provide such additional options for users and this will provide added support for existing retail uses.
3. The proposed retail uses on the North 60 site are generally different from the existing uses in the hamlet centers of Hawthorne and Valhalla. For example, it is currently envisioned in Phase 1 that a full service grocery will be a potential tenant (and major component of the retail program) - no such grocery exists in the hamlet centers of Hawthorne or Valhalla. As another example, it is currently envisioned in Phase 1 that a comprehensive health and wellness facility will be a major component of the retail program – no such health and wellness facility exists in the hamlet centers of Hawthorne or Valhalla. As a result, the majority of uses planned for the retail component will not complete with existing land uses in the Hamlet.

4. The residential alternative discussed in Chapter 1 of this FEIS, Alternative G, would bring residents that would increase population and demand for commercial/retail services, including in the hamlet centers of Hawthorne and Valhalla, as well as Thornwood. This would provide additional support for existing retail uses.
5. Alternative G would bring residences targeted to young professionals in the Biotech/healthcare/medtech industries and seniors. There is a lack of this type of housing in Hawthorne, Valhalla, and Thornwood, so this land use would not compete with existing land uses and residents would provide additional support for existing retail uses. The project is designed to be fully complimentary to the existing uses and conditions.
6. While a grocery exists in Thornwood, it is projected that there is sufficient demand to support an additional grocery store.

Comment C.8

DEIS page 3A-16. b) Zoning, last ¶ - This citation of the proposed OB-5 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 5)

Response C.8

As mentioned in Response A. 26, the addition of the OB-5 Master Plan District to the "Special District Regulations" requires the Planning Board, not the Town Board, to approve a Master Development Plan.

Comment C.9

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 5)

Response C.9

The proposed uses within the OB-5 Master Development Plan District must complement the proposed principally permitted uses and those uses that are immediately adjacent to the site. The site specific impacts for a particular site plan will be reviewed by the Planning Board when a Site Development Plan is submitted. Self storage and vape shops are not contemplated by the current proposal. If there are specific uses that the Town Board wants to prohibit, then a process similar to that contemplated by Town Code § 218-75(A)(3) (list of conforming uses) or (4) (list of specifically excluded uses) where the Town Board may, from time to time, after public hearing, adopt a list of uses that are conforming (or nonconforming) with town policy. All uses will be disclosed and identified as a part of review and approval of the Site Plan for the Master Development Plan.

Comment C.10

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 5)

Response C.10

The permitted uses under the OB-5 MP zone are more expansive than the specifically identified uses in the Lease. Under Section 5.1 "Permitted Uses" of the Lease, the types of uses range from biotechnology to medical office and from hotel to assisted living facilities. In addition, the Lease Concept Plan (Ex. B to the Lease) has been approved by the County and incorporated into the Lease so the general uses identified in the Lease Concept Plan have already been "approved" by the County. The Lease requires a minimum of square footage used for specific uses. However, the Lease does not prohibit the Applicant from including more than the minimum square footage of a particular use nor does it prohibit any additional specific uses. Therefore, the Lease, as approved by the County, includes a wide range of permitted uses. As far as uses proposed for each of the Phases, each Site Development Plan shall be reviewed and approved by the County Commissioner of Public Works and Transportation. If a particular use is proposed as part of a future Site Development Plan that is not contemplated as a permitted use in the Lease, then the County has the ability to address the concern before any specific Site Development Plan is submitted to the Town.

Comment C.11

DEIS page 3A-19. Patterns for Westchester – Clarify how the project compiles with the density provisions established in Patterns.

(Letter #13, Cleary Consulting, 10/31/20, pg. 5)

Response C.11

Patterns for Westchester recognizes the project site as "Other Publicly Owned Lands," representing an area characterized by public institutions and public facilities As such, Patterns does not recommend specific density parameters for the project site. The Proposed Action would be a complementary use to the surrounding Grasslands Reservation uses. The Proposed Action is also compatible with the density recommendations for the area surrounding the project site. The recommended density range for the adjacent areas is Medium Density Suburban with a recommended floor Area Ratio (FAR) range of 0.1 to 0.4 and a Gross Residential Density (GRD) of 3 to 13.

Specifically, the Proposed Action would result in an FAR of approximately 0.15 at completion of Phase 1, and an FAR of approximately 0.87 at completion of the Master Development Plan. The Proposed Action would result in a GRD of approximately 3 at

completion of Phase 1, and a GRD of approximately 8 at completion of the Master Development Plan.

Comment C.12

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 6)

Response C.12

All activities involving the use and handling of hazardous materials, chemicals, bio-substances, or experimental drugs, will be required to provide and maintain adequate safety devices against the hazard of fire and explosion. Adequate fire safety devices will be installed in accordance with the appropriate codes and documentation of such provided to the Town prior to issuance of building permits for the individual buildings. This effort will be coordinated with the Hawthorne Fire Company and Grasslands Fire Brigade. In addition to fireproof buildings, on-site security will be at a level consistent with sensitive activities. Mock training drills will be coordinated with the Town and County, fire, police and Medical Center security.

All employees responsible for the handling, storage and management of hazardous materials, chemicals, bio-substances or experimental drugs would be thoroughly trained on proper handling methods and procedures in order to avoid gaps in protocol. All employees would receive training in the management of toxic and hazardous materials according to Occupational Safety and Health Act (OSHA) requirements and the respective manufacturer's recommendations.

The individual bio-science and biotechnology facilities on the site will be within enclosed buildings with on-site security and access limited to authorized personnel. Security cameras will be monitored through the building's command center.

Typically, one operational person is assigned to monitor safety and/or environmental issues for each facility, but the facility manager has the ultimate responsibility in these areas. Facility personnel will receive ongoing training consistent with Occupational Safety and Health Act (OSHA) safety regulations. Training with respect to specific environmental requirements will also be provided.

Facility personnel will be responsible for ensuring compliance with the NYS Hazard Mitigation Plan and any facility permit requirements. The required monitoring and testing reports will be filed with the appropriate agencies.

D. Visual Resources and Community Character

Comment D.1

I am concerned about light pollution. Make sure that the light is pointed down and not diffuse. Ensure minimal light pollution.

(Public Hearing #1, Ms. Mary Hagerty, 9/3/20. pg. 62-63)

Response D.1

The project will use dark sky compliant fixtures with lighting directed past horizontal. The photometric plan shows no light trespass at the neighboring properties.

Comment D.2

Does the plan include steps toward mitigation of light pollution?

(Letter #4, Domenick Vita, 9/28/20. pg. 2)

Response D.2

The project will use dark sky compliant fixtures with lighting directed past horizontal. The photometric plan shows no light trespass at the neighboring properties.

Comment D.3

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.

(Letter #7,Mary Hegarty, 10/11/20, pg. 2)

Response D.3

Comment noted. This is stated in the DEIS section that discusses the Town's Comprehensive Plan (see DEIS pages 3A-7 and 3A-8).

Comment D.4

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.

(Letter #7, Mary Hegarty, 10/11/20, pg. 2)

Response D.4

The proposed Lighting utilizes state of the art Solid State L.E.D. technology that reduces both energy and light trespass. The Lighting proposed are dark sky approved, scalable and designed to provide consistent distribution. The photometric plan provides calculations showing the light trespass to adjacent properties is negligible.

Comment D.5

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?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 3)

Response D.5

The areas where the trees are to be removed due to grading paralleling the Sprain Brook Parkway will be planted with a mix of trees (primarily evergreen trees and shrubs) to create a visual buffer. Street lights will have cutoffs to reduce spillover of lighting. Additional evergreen trees planting opportunities will be identified to reinforce the buffer.

Comment D.6

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?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 4)

Response D.6

The North 60 site is dimensionally constrained due to stream valleys, wetlands, and steep slopes. A 200' buffer would render the majority of the site undevelopable. The plan establishes a significant natural buffer to the north where single-family homes are located – buildings are located more than 200' from the property along the northern edge. The adjacent property to the west is an office park, so development is visually compatible with those uses. The property to the south is the hospital, so uses are visually compatible along that edge. The developable land to the east is narrow. An evergreen landscaped buffer will be planted along the property line. Additional evergreen trees planting opportunities will be identified to reinforce the buffer.

Comment D.7

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 6)

Response D.7

Comment noted. DEIS page 3B-1 states "The 60-acre portion of the Project Site, which is owned by Westchester County, is primarily vacant land, some of which has been used by Westchester Medical Center as a construction staging area." The asphalt parking lot adjacent to Hospital Road, which is described on DEIS page 3A-1, is part of the construction staging area.

Comment D.8

DEIS page 3B-1. Visual Character of Surrounding Properties – *Residential Properties* – describe the approximate lot sizes and square footages of the homes near the site.

(Letter #13, Cleary Consulting, 10/31/20, pg. 6)

Response D.8

Surrounding residential properties such as those on Philip Place, West Stevens Avenue, Dorothy Court, Joyce Place, Belmont Road and Rutledge Avenue typically have lot sizes over ½ acre (ranging from about 0.46 acres to 0.79 acres). Square footages of the homes in this area range from under 1,800 SF to 5,600 SF with most being between 2,000 and 3,000 SF.

Comment D.9

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 6)

Response D.9

The Grasslands campus includes almost 4.5 million square feet of floor area including the Westchester Medical Center, which encompasses six buildings and two million square feet of floor area. including the main hospital tower (400,000 SF), the Maria Fareri Children's Hospital (260,000 SF), and the Ambulatory Care Pavilion (280,000 SF). Other uses on the Grasslands Campus, in addition to the Medical Center, include the New York Medical College, the County's lab and research facilities, a fire and emergency training center, public works operation and a correctional facility.

The office park adjacent to the project site on the west, contains approximately 700,000 SF and the adjacent Touro office building contains 248,000 SF.

Comment D.10

DEIS page 3B-1. Visual Character of Surrounding Properties – *Campus* – Characterize the primary architectural styles of the various building on the campus.

(Letter #13, Cleary Consulting, 10/31/20, pg. 6)

Response D.10

The buildings in the Westchester Medical Center on the Grasslands Campus range in height from 3-stories to 7-stories. Most of the buildings have brick facades and were built between 1920 and the early 2000's. Styles of the buildings range from colonial revival to postmodern. The building housing the Maria Fareri Children's Hospital varies from the red brick facades and flat roofs featured on surrounding buildings, with a white façade and red and gray patterned sloped roof.

Comment D.11

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 6)

Response D.11

Office Park

In the Office Park adjacent to the project site on the west, buildings range in height from one-story to four-stories with flat roofs. Facades on buildings in the office park range from brick to concrete to vinyl siding.

A majority of the office park lots are covered in impervious asphalt parking areas, with manicured lawn medians along the perimeter of the office park and the buildings. Loading docks are on the interior sides of buildings with regular parking spaces throughout. Deciduous and evergreen trees are planted along portions of the medians.

The total square footage of buildings within the office park is approximately 700,000 square feet.

Businesses along Saw Mill River Road

Businesses and commercial uses along Saw Mill River Road generally range from one to three-stories. Due to the diverse nature of commercial uses along Saw Mill River Road, there are a variety of architectural styles and building designs along this commercial corridor. Façade materials include, but are not limited to brick, natural stone, vinyl siding, and paneling. Architectural styles are typical of speculative office buildings constructed in the 1960's and 1970's with other buildings and styles typically used in more recent commercial development.

Buildings are typically set back from the road with parking areas or landscaped lawns bordering the road. Established trees provide a buffer between the utility lines and the commercial corridor along Saw Mill River Road as well as along several property boundaries.

Businesses along Saw Mill River Road (on both sides of the road from Wendy's to the car dealership) add up to approximately 300,000 square feet of development.

Comment D.12

DEIS 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 6)

Response D.12

This is a master plan for a multi-year build-out. As a result, the specific tenants nor the specific architecture for specific buildings are not known at this time, However, we are including here precedent images of potential architectural character for this site.

Bio-science/Healthcare/Medtech:

Grocery and Health and Wellness Center:

Alternative 'C' Residential

Comment D.13

DEIS 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.?

(Letter #13, Cleary Consulting, 10/31/20, pg. 6)

Response D.13

Since this is a master plan for a multi-year build-out, specific tenants for each specific building are not known at this time. We have revised assumptions that estimate more impactful uses. This means that most of the proposed mechanical enclosures shown have been made larger (covering most of the roof). We have also made assumptions of additional equipment above the penthouses and distributed those as one might find in a fairly intensive situation. The attached revised views illustrate these changes (see FEIS Appendix I).

Comment D.14

DEIS 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 6)

Response D.14

Since this is a master plan for a multi-year build-out, specific tenants for each specific building are not known at this time. It is likely that some company name signage would be included, such as that seen in the image below. Lighting may be associated with this signage, but it is envisioned that lighting will be minimized.

Comment D.15

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 7)

Response D.15

As with all commercial/employment buildings, lights will be on in the evening hours. Windows will have a tint. Blinds or shades will be used. However, the land use to the east is predominantly a cemetery, to the south a hospital separated by a parking lot, and to the west an office park. Lights in the evening hours are compatible with these land uses.

The area to the north is a residential neighborhood. A significant setback is provided between the residential neighborhood and the proposed buildings with both preserved trees and a new landscaped buffer with evergreens to minimize visual impact.

Exterior building lighting and street lights will have cutoffs to direct and minimize light spillover.

Comment D.16

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 60?

(Letter #17, Peter & Rita Curtin, 10/31/20, pg. 2)

Response D.16

The project will use dark sky compliant fixtures with lighting directed past horizontal. The photometric plan shows no light trespass at the neighboring properties.

VHB has conducted a noise study to assess the potential for noise impacts due to the project. The results of the noise analysis can be found in the DEIS. Also see Response P.5.

E. Geology and Soils

Comment E.1

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 7)

Response E.1

The current overall plan as designed includes net export of soil. Based upon the site plans, there is a surplus of soil generated by the proposed development. It should be noted that the import and export of soil is costly and logistically challenging. Accordingly, it is intended through the development process to work toward reducing the surplus soil generated by site excavation of the entire development over time. The refinement of individual site plans at each phase will allow for adjustments in the grading of each phase with the intent to reduce surplus excavated soil. In early phases, the ability to stockpile excess material will allow for the continuous adjustment of grades on-site. Minor grading adjustments in parking lots, streets and landscape features represent opportunities for reducing the export of surplus soil. However, while every attempt will be made to reduce the surplus soil through the implementation of phase by phase designs and associated grading plans, the disposal of material to suitable off-site locations will be required.

Trucking routes for the delivery of equipment and materials throughout the construction of the project will avoid residential neighborhoods by utilizing the New West Road for connecting with the regional highway network.

As designed, the first phase generates an estimated surplus of 18,464 cubic yards of soil once that site grading and building construction is complete. All of this material will be trucked off-site by trailers to suitable locations. This volume translates to approximately 528 loads. For efficiency, it is likely that the trucking will be performed in a series of operations that will run an average of ten trucks each day with an anticipated 3 loads per day resulting in approximately 30 loads per day, two days per week. Accordingly, removal of 18,464 cubic yards will require approximately 9 weeks of anticipated trucking operations over the duration of the build out of Phase 1.

Under an analysis of the project as a whole (all phases), the following assumes that all of the currently calculated excess of 473,059 cy will need to be exported off the site over the course of a 10 to 15-year period after the completion of Phase One. Using the same

approach as above and understanding that the majority of excess material is driven by the subterranean parking structures, a total of 13,516 truckloads will be required to remove the excess soil generated over this over the duration of the project. Assuming that 30 loads per day will be the standard, this translates to 450 days of trucking over a 10 to 15-year period. The elimination of two full months per year (weather, holidays) over a 15-year period conservatively yields a total of 600 weeks. Accordingly, trucks will run on an average of less than one day per week to remove the surplus material from the site over an estimated full project build-out duration.

Comment E.2

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 7)

Response E.2

The North 60 property is currently not in any NYSDEC regulatory program and therefore is not regulated by the NYSDEC. The NYSDEC would oversee a remediation activity if a spill or release of petroleum was reported for the site. The Westchester County Department of Health is responsible for the registration and removal of petroleum storage tanks in Westchester County. When the existing residential underground storage tanks are removed from the site, the Town and Westchester County will be involved.

F. Topography and Slopes

Comment F.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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 1)

Response F.1

The Phase 1 Grading Plans have been revised to show steep slope and contour data at a scale equal to 1" = 50'.

The titles of the Steep Slope Plans have been updated as requested.

Comment F.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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 2)

Response F.2

The Phase 1 Site Plans have been revised to include estimated quantities of cut and fill required within the steep slope areas. The Phase 1 Site Plans have been revised to display the number and size of trees to be removed from the steep slopes. Cross Sections will be provided for the areas of steep slope disturbance and details of the proposed retaining wall systems will be provided.

Details of the proposed retaining wall systems have been added to the Phase 1 Site Plan set. Please see sheet 15 of 18 (Drawing D-1) in the revised plan set. Details for the proposed retaining walls have been prepared by the project Geotechnical Engineer based on their findings in the recently completed Geotechnical Report. Please see report

entitled, "Retaining Wall Foundation Recommendations" prepared by Mekael Engineering & Consulting, Inc., dated March 25, 2021.

Comment F.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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 2)

Response F.3

The locations of all stockpiles planned for future use onsite will be displayed on the revised Phase 1 Erosion Control Plan.

Comment F.4

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 2-3)

Response F.4

A geotechnical report for Phase 1 has been prepared (see Appendix S) and the Phase 1 construction plans and details will be revised based on the results of the report to ensure the graded slopes and retaining walls are properly designed.

The Geotechnical Report entitled, "Retaining Wall Foundation Recommendations" prepared by Mekael Engineering & Consulting, Inc., dated March 25, 2021 includes soil information and sections for the proposed retaining wall structures. Please see FEIS Appendix S.

Comment F.5

In addressing Standard B1, the DEIS states, "The only way to construct this roadway (i.e. West Street) 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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 3)

Response F.5

Due to the additional width required for the proposed West Street and the roadway restrictions found in the Town Code, the alternative alignment which more closely follows the existing paved driveway will result in sharper horizontal curves on the proposed roadway and potentially steeper roadway grades. West Street, as proposed on the current plans, has a maximum grade of 10% down the steep slope area towards Route 9A. The existing paved driveway referenced in the comment above has existing grades of approximately 15% through this same area. Due to safety concerns for the roadway users, it is preferable to leave West Street aligned as currently proposed. Please also note, West Street has been aligned based on a plan for a Fed-Ex distribution facility which was previously studied and reviewed by the Town contemplated for the 20-acre parcel.

A plan which shows an alternative alignment for the proposed West Street has been provided. The plan entitled; "West Street Alternative" dated May 12, 2021 (see FEIS Appendix T) shows that the alternative alignment of the roadway does not provide any substantial benefit over the currently proposed West Street Alignment as discussed previously in the written response. The alternate West Street required grading onto the neighboring Skyline Drive property to create the new intersection with Route 9A. If the intersection was angled such that it follows the Old Saw Mill River Road it would create a more dangerous intersection with less visibility for motorist than the currently proposed intersection. Additionally, the alternate roadway eliminates the proposed pocket wetland area which was proposed to treat runoff from a portion of West Street prior to Route 9A. The alternate alignment would require a new area for stormwater treatment and the surrounding hillside consists of very steep slopes with no areas suitable for stormwater practices. The alternate roadway also requires a longer horizontal curve radius to create the "switchback" as the roadway changes direction from east to west more drastically than the than the currently proposed West Street. The longer curve and relatively steep grades (approximately 10% at the horizontal curve) will create a more hazardous roadway.

Comment F.6

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 3-4)

Response F.6

The list of Erosion Control Notes have been revised as requested to conform with the requirements of the NYSDEC SPDES General Permit GP-0-20-001.

Comment F.7

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 7)

Response F.7

It is our understanding that the abandoned construction staging area in the northwestern corner of the Project Site was utilized over the course of many years and there is evidence of more recent dumping of landscaping debris such as soil bags, leaves, and planting pots in this area. The abandoned construction staging area in the center of the Project Site was used recently as a staging area for construction of additions to the existing hospital on the south side of Hospital Road. Construction debris that was dumped in this area appears to be from previous construction projects over the course of many years.

Comment F.8

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 7)

Response F.8

The proposed buildings have been located in the more gently sloped areas of the site. The building elevations have been selected to match existing grades or limit the amount of additional grading required. In many cases the buildings that are situated along the steeply sloped areas which run parallel to the onsite watercourses will be designed such that the rear of the buildings are at a significantly lower elevation than the first floor elevations to limit the grading of platforms around the buildings. A large portion of the proposed onsite parking will also be provided under the proposed buildings or in multilevel parking structures which further limits the amount steep slope disturbance that would be required to create large surface parking lots. West Street has been designed to limit the amount of proposed grading within to the steep slope area by utilizing tiered retaining walls and increasing the roadway length (with a "switchback") in order to more closely meet the existing grades of the steep hillside. The connection from Hospital Road to Route 9A is an extremely integral component of the site development from a public access and traffic circulation standpoint. Removing the roadway is the only way to significantly reduce the amount of steep slope disturbance and without the new roadway connection the project becomes unviable.

Comment F.9

DEIS page 3D-6. Retaining Walls – Identify the proposed heights of the retaining walls. Will all walls comply with the applicable height requirements?

(Letter #13, Cleary Consulting, 10/31/20, pg. 7)

Response F.9

The revised Site Plan grading plans provide proposed heights for all retaining wall structures and all applicable height restrictions will be adhered to. The top and bottom wall elevations have been reviewed and corrected where necessary. Top and bottom wall elevations have been added to the wall adjacent to the proposed Wet Pond (SWP-4) and the wall at the perimeter of East Parking Lot. Additionally, top and bottom wall labels have been provided on the Steep Slopes Plans (SS-1, SS-2, SS-3).

G. Vegetation and Wildlife

Comment G.1

With regard to landscaping, the DEIS speaks about the minimal use of pesticides and fertilizers. The CAC would recommend that the applicant look closely at the possibility of eliminating the use of pesticides, again, consistent with what the applicant is suggesting in terms of their creating a sustainable smart growth development.

(Public Hearing #1, Mr. Steven Kavee, Chair of the Town of Mount Pleasant Conservation Advisory Council, 9/3/20. pg. 35-36)

Response G.1

Pesticide usage will be limited and when utilized will be organic in composition.

Comment G.2

How do we preserve the northern portion of the project as a natural buffer?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 2)

Response G.2

The northern portion of the site will be left undisturbed beyond the contract limit line. The use of sediment and erosion controls will limit impacts beyond the limits of disturbance and the integration of native plantings and seed mixes withing the limits of disturbance will reestablish vegetation.

Comment G.3

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?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 2)

Response G.3

The majority of the proposed plantings are New York Native species. In both phases of the construction the level of required density factors of plantings has been exceeded with a variety of new plantings. Additional species can and will be provided as the plans are finalized and specific plantings designed and sourced thus increasing the biodiversity.

Comment G.4

How do we incorporate pollinator plants into the site and the greater Grasslands Reservation?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 2)

Response G.4

The proposed seed mix along with the native plantings will introduce pollinator plants on the site. The seed mix can be supplemented with additional seed mixes to provide additional pollinator plans such as New England Aster, Rudbeckia, Coneflower, Milkweed, Goldenrod, Coreopsis and Sunflower .

Comment G.5

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.

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 2)

Response G.5

The design of both phases of the project scrutinized the grading and limits of disturbance in order to save many significant trees. The majority of the specimen trees to be removed are located within the western portion of the property where the existing nursery and residential properties are located. These trees will be impacted with the development of the new road connecting Saw Mill River Road and the Hospital Peripheral Road. A map identifying the specimen trees locations is provided in FEIS Appendix Q.

Comment G.6

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.)

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 2)

Response G.6

The proposed nature path construction will include a plan to remove encountered invasive plantings. Education Signage will also be explored and posted.

Comment G.7

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.

(Letter #10, Mount Pleasant Conservation Advisory Council, 10/30/20, pg. 2)

Response G.7

The use of best management practices along with native plantings will minimize the need for pesticides and fertilizers. As an added benefit, native plantings have natural advantages requiring less water, help prevent erosion and provide food and shelter for wildlife. Pesticides used will principally be organic except for pervasive invaders. Fertilizer use will be managed to be only that required for plant health and include organic

products.

Comment G.8

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.

(Letter #10, Mount Pleasant Conservation Advisory Council, 10/30/20, pg. 2)

Response G.8

The majority (more than 80%) of proposed plantings are native species and will provide ecological benefits to the site.

Comment G.9

DEIS page 3E-10. Potential Impacts, Vegetative Cover, 2nd ¶- Explain the use of the term "*renaturalized.*" Renaturalized, in comparison to *revegetated* or *replanted*, implies that 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 7-8)

Response G.9

The intent is to revegetated and replant with native plants to carry out the functions of stabilization, encourage pollinators, consistent with a natural aesthetic.

Comment G.10

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 8)

Response G.10

Disturbance activity related to the proposed pond development includes vegetation removal and reshaping the landscape within the existing stream and wetland followed by revegetation activity. Disturbance activity related to proposed stream crossing includes vegetation removal. The revised project plans include box culverts to minimize disturbance to the stream channels. Disturbance activity related to the proposed building construction includes vegetation removal and the construction of the proposed structure. Construction activities will not occur during regulated breeding periods. Each activity will not occur during multiple breeding seasons. Activity related to stream and wetland disturbances with be completed within several months to less than one year. This will be

done in accordance with each permitting agency's regulatory guidelines for protected species.

Comment G.11

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 8)

Response G.11

The drainage and grading plans have been revised to show box culverts with open bottoms which will help maintain the integrity of the natural stream bed.

Comment G.12

DEIS page 3E-20. Vegetation to Remain – Within the areas of the site that will remain undisturbed, will any effort be made to remove invasive species?

(Letter #13, Cleary Consulting, 10/31/20, pg. 8)

Response G.12

The Applicant proposes long-term invasive species cutting along the forest edge that borders the developed portions of the property to control woody vines and minimize tree mortality in high-use areas.

Comment G.13

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 8)

Response G.13

The reference relates to species better adapted to live in these environments. Some of which may be nuisance species, but not all.

Comment G.14

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 8)

Response G.14

As building plans are developed, the Applicant will review the selection of exterior façade construction materials to address avian impact.

Comment G.15

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 8)

Response G.15

The project will not result in significant habitat fragmentation. Regionally, the site is already fragmented and is essentially an ecological island with very restricted movement for most wildlife (excluding birds and flying insects) to and from the site due to significant roads and large residential, commercial and institutional developments that surround the property. Onsite, there is no significant habitat. Wildlife utilizing the onsite habitat is accustomed to living within developed landscapes and, although the available habitat will be reduced in quantity, it will not be reduced in diversity.

Comment G.16

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 8)

Response G.16

The northern portion of the site is proposed to remain a natural forest, providing mammalian habitat. The submitted design plans have been updated and the final design plans will replace piped stream crossings with open-bottomed box culverts that will maintain the existing stream bed and allow wildlife passage along the edge of the streams. This will allow mammals to access the remaining open stream and wetland areas in the central and southern portions of the site, in addition to providing increased habitat value for all vegetation and wildlife.

Comment G.17

DEIS 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 8)

Response G.17

This comment is noted. The reduction in the abundance (but not diversity) of flora and fauna on the property is an unavoidable adverse impact.

Comment G.18

DEIS page 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 required as part of the Site Plan approval process, and for Phase 1, must be submitted at this time.

(Letter #13, Cleary Consulting, 10/31/20, pg. 8-9)

Response G.18

Comment noted. Final Landscaping Plans have been developed and are being submitted at this time. See FEIS Appendix M.

Comment G.19

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 9)

Response G.19

Proposed project plans have been developed to avoid and minimize adverse impacts to the greatest extent practicable while achieving the development goals of the County and Applicant. Wetland function has been continued and habitat has been improved. Debris has been removed and stormwater management function has been improved.

Comment G.20

DEIS page 3E-25. Fertilizer, Herbicide, Fungicide and Pesticide Application – Would the developer agree to a condition requiring the use of low nitrogen fertilizers.

(Letter #13, Cleary Consulting, 10/31/20, pg. 9)

Response G.20

The Applicant would agree to using low nitrogen or slow-release nitrogen fertilizer.

Comment G.21

What plans are there for forestry? Tall tree plantings? Etc., to beautify our neighborhood.

(Letter #17, Peter & Rita Curtin, 10/31/20, pg. 2)

Response G.21

Specimen shade trees are proposed in the visual buffer between the neighborhood and the project to provide natural beauty and screening. Plantings include oaks, maples, linden, and Hackberry to name a few.

H. Wetlands, Waterbodies and Watercourses

Comment H.1

What watershed are we in?

(Public Hearing #1, Ms. Mary Hagerty, 9/3/20. pg. 62)

Response H.1

The project site lies within the watershed of the Saw Mill River.

Comment H.2

I would just encourage the planning board to work with the county and the watershed planning that they're already doing.

(Public Hearing #1, Ms. Mary Hagerty, 9/3/20. pg. 64)

Response H.2

Comment noted.

Comment H.3

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.

(Letter #7,Mary Hegarty, 10/11/20, pg. 2)

Response H.3

The Applicant is welcome to working with the County Planning Department to protect the health of the Saw Mill River and its watershed area and better understand and coordinate our efforts with the County's work to achieve that end. It should be noted that the DEIS describes a Stormwater Pollution Protection Plan (SWPPP) which has been developed for the site in accordance with all applicable State and Municipal regulations and accordingly, the SWPPP will provide a very high level of stormwater treatment and attenuation during and post development. In addition, the Applicant's consultants have studied the two on-site tributaries to the Saw Mill River in great detail and have noted that there are some significant areas where the quality of the streams have been compromised due to dumping and embankment erosion. The Applicant has proposed methods of repair and restoration work in those areas as a commitment to improving the riparian corridors on-site which connect to the Saw Mill River. The County is reviewing the project Storm Water Management Plan.

Comment H.4

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.

(Letter #7,Mary Hegarty, 10/11/20, pg. 2)

Response H.4

The Applicant is pleased to include educational signage specific to the history and ecology of the Saw Mill River to the open space system as envisioned for the project. The proposed development plan calls for pedestrian friendly streets to be interconnected with interpretive off-street paths which follow the open space corridors. The corridors are largely comprised of buffers surrounding the two on-site streams and associated wetlands which are tributaries to the Saw Mill River. These trails interconnect the developed walkable streets, Neighborhood Square, Promenade & Valley Stream Pond as well other proposed site features with a series of wood chip pathways that meander alongside of and occasionally cross the streams with small pedestrian bridges. The proposed pedestrian bridge over Valley Stream Pond also provides for an educational experience. Signage specific to the history and ecology of the Saw Mill River, strategically positioned along these pathways and developed site features is consistent with the goals of the interactive development as envisioned and a fitting connection and program element of the proposed Children's Science and Education Center.

Comment H.5

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

(Letter #9, Barbara Benson, 10/28/20, pg. 1)

Response H.5

Comment noted. The Stormwater Pollution Prevention Plan (SWPPP) located in the DEIS appendices states that the Westchester County Department of Health Pesticide Reduction Law prohibits the use of pesticides on County owned property. It further states that "…it is not anticipated that any herbicides, pesticides of fungicides will be used on the project site and any potential application plans shall be reviewed and approved by the Westchester County Department of Health."

Comment H.6

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 9)

Response H.6

The Applicant's wetland biologist, together with the USACE, conducted a field investigation of the wetland boundaries as flagged in September 2019. That boundary line has been the basis for planning and the development of wetland mitigation plans. Once final limitations resulting from COVID are lifted, USACE is expected to issue final written findings which will be made available to the Town prior to the issuance of wetland permits. The Applicant received correspondence regarding jurisdictional determination dated July 1, 2020.

Comment H.7

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 9)

Response H.7

The developable portion of the project site is limited by topography including rock outcroppings and the steep banks associated with the two watercourses flowing through the length of the site. Included in the proposal is an Alternative to reduce the environmental impact by eliminating wetland crossings. In doing so, the development becomes disconnected. As such, this Alternative is not considered a viable alternative development scenario because it is inconsistent with the requirements of the Lease Agreement and would not meet the goals or development objectives of the County or the Applicant. Please refer to DEIS 4-25 for additional information. The proposed project plans minimize wetland impacts to the greatest extent practicable, while achieving project goals, through the incorporation of control measures and BMPs during and following construction.

Comment H.8

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 9)

Response H.8

An alternative to the use of culverts to traverse a stream and associated wetland areas is a bridge structure. Bridges are an extremely expensive and require extensive embankment disturbance for foundation installation. Properly sized culverts that allow for passage of water flow and wildlife are efficient in design to allow for such considerations, require a limited amount of excavation (generally fill only) and provide a relatively short period of site and habitat disturbance.

Comment H.9

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 9)

Response H.9

The proposed 1:1 is the minimum proposed ratio for this project. The USACE is involved with the mitigation plans and the Applicant will continue to follow the agency's guidance and explore the opportunity for additional compensation.

I. Stormwater Management

Comment I.1

How do we incorporate Rain Gardens into the streetscape to act as a natural water filter?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 3 and 4)

Response I.1

Comment noted. As the site plans for Phase 1 are further advanced, the use of rain gardens and bioswales will be considered for appropriate locations into the streetscape. The use of bioswales and rain gardens as part of the streetscape has been analyzed to identify if their inclusion into the stormwater design would prove beneficial. Since a vast majority of the proposed roadways and sidewalks are to be treated by infiltration systems and infiltration basins, the inclusion of bioswales and raingardens will not provide any substantial benefit over the stormwater management design as currently proposed. Based on our initial onsite soil testing results, the project site has very well drained soil in many areas of the site and the infiltration systems designed for the site already provide 100% runoff reduction for the areas tributary to the infiltration practices. Vegetated swales only receive 10% runoff reduction credit for soils in hydrologic group "C" and "D" as per the NYSDEC Stormwater Design Manual. These swales and rain gardens also have restrictions for maximum ponding depths and maximum flow rates which would not be feasible for this type of project. Bioswales and rain gardens are more commonly used in residential land use settings.

Comment I.2

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.

(Letter #10, Mount Pleasant Conservation Advisory Council, 10/30/20, pg. 2)

Response I.2

Comment noted. The Applicant is committed to a project that is underpinned by the protection of groundwater and surface water quality, sustainability, and green technologies. Runoff from the proposed paved parking areas is treated by proposed infiltration systems in the current version of the SWPPP. The infiltration systems are designed to capture and infiltrate the entire water quality volume and therefore the use of pervious pavement for the parking areas does not provide a tangible benefit over the current design. Please also note, including pervious pavement would eliminate the pretreatment hydrodynamic separator chamber as the stormwater enters the soil directly at the parking surface. This allows the opportunity for pollutants from motor vehicles (such as oil, gas, and anti-freeze) to potentially enter the soil and negatively impact groundwater quality.

Comment I.3

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 4)

Response I.3

The SWPPP and Site Plan for Phase 1 have been updated based on the specific comments provided by the Town's engineering consultant, Provident Design Engineering. See FEIS Appendix N. Stormwater Pollution Prevention Plan.

Comment I.4

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 4)

Response I.4

The SWPPP has been revised to reference the potential historic impacts identified in Appendix I of the DEIS. A Phase II Archeological Study has been prepared for the areas of concern. Section 1.1 of the SWPPP has been revised to further discuss the J Van Tassel historic site. The Applicant has determined that avoidance of this historic site is not feasible and has decided to move forward with the plan as currently proposed. Prior to the start of construction, a Phase III Cultural Resources investigation will be undertaken to mitigate the impact of the project on archaeological resources. The J. Van Tassel historic site has been identified on the site plans.

Comment I.5

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 4-5)

Response I.5

The SWPPP has been revised to reference the required permits from the New York State Department of Environmental and the US Army Corps of Engineers. The revised SWPPP will be submitted to the NYSDEC Region 3 Office for review.

Comment I.6

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 5)

Response I.6

The Erosion Control Plan has been revised to include additional runoff control measures during construction. It is anticipated that sediment basins and smaller sediment traps will be provided downhill of disturbed areas to collect sediment laden runoff during construction. The SWPPP has been revised to include all appropriate sizing calculations for the additional erosion and sedimentation control measures in accordance with the Blue Book.

The previously proposed "water breaks" have now been identified as "water bars" to remain consistent with NYSDEC language. The "water breaks" have been relocated to the proposed Main Street and the proposed East Parking Lot. These water breaks will help

disperse runoff from these areas and direct the runoff to the downstream erosion control practices (sediment traps). Temporary construction ditches have been shown where the "water breaks" were previously proposed on the revised Erosion Control Plan to provide more substantial runoff control measures which fit the scale of construction. Associated details have been provided on the Erosion Control Details sheet and the construction sequence has been revised to discuss the timing of installation for the temporary runoff control measures.

A temporary sump pit detail has been provided for dewatering excavated areas during construction and information about the dewatering measure has been discussed Section 3.1 of the revised SWPPP.

Comment I.7

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 5)

Response I.7

The revised Phase 1 SWPPP has been revised to include design details and calculations for the proposed sediment basins. The temporary sediment basins will be relocated away from the infiltration basins and onsite wetlands. The Erosion Control Plan has been revised to clearly note that the proposed stormwater basins SW-1, SW-3, and SW-4 shall not be used as temporary sediment basins.

Comment I.8

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 5-6)

Response I.8

As stated in the previous responses, the sediment control basins and sediment traps will be relocated outside of the infiltration basin areas and temporary diversion measures such as temporary water bars and swales will be added to the plan to demonstrate how runoff will be directed to the sediment control devices during construction.

Additional silt fencing has been shown uphill of the proposed infiltration basins which will help prevent sediment laden runoff from entering the treatment area. To ensure that the infiltration rate for the proposed basin is not inhibited by construction, the proposed infiltration basins shall not be excavated to their respective full depths until the overland areas tributary to the basins have been stabilized.

Comment I.9

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 6)

Response I.9

Any design calculations related to erosion and sedimentation control measures have been included in a separate Appendix section of revised SWPPP.

Comment I.10

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 6)

Response I.10

The Phase 1 Erosion Control Plan has been revised to specifically identify the locations of topsoil stockpiles and earth/excavated material stockpiles.

Comment I.11

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 6)

Response I.11

The Phase 1 Erosion Control Plan has been revised to show the correct size of the temporary soil stockpile to be located in the limits of Phase 1A. Temporary grading has been provided for the stockpile to demonstrate the proposed height of the stockpile.

Comment I.12

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 6)

Response I.12

The statement which references stockpiling material in Phase 1F in the construction sequence for Phase 1I is incorrect. The construction sequence has been revised to state all excess material from Phase 1I shall be stockpiled within the limits of Phase 1G and 1H.

Comment I.13

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 6)

Response I.13

The construction sequence has been revised to reference the use of erosion control blankets where appropriate to stabilize created slopes. The Phase 1 Erosion Control Plan has been revised to show the areas of the project site which will require the use of erosion control blankets during construction. The construction sequence has been revised to note the installation of the erosion control blankets for the relevant subphases on Phase 1.

Comment I.14

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 6-7)

Response I.14

The Rock Outlet Protection Detail has been revised to show the specific design specifications for each particular stormwater outfall based on the pipe size and 10-year storm event peak flow rate as per the NYSDEC Blue Book. The revised Phase 1 SWPPP will provide rock outlet protection sizing calculations in the appendix section of the report.

Comment I.15

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 7)

Response I.15

The silt fencing which is proposed downstream of pipe outlets is only a temporary measure to control sedimentation during construction. Properly sized permanent outlet protection will be provided for each proposed stormwater outfall in accordance with the NYSDEC Blue Book.

The silt fencing shown downhill of proposed pipe outfalls has been removed from the plan. Since catch basin grates will be set at finished grade, prior to final paving, the catch basin rim will be slightly higher than the surrounding binder course elevation. Therefore, it is anticipated that minimal amount of runoff is expected to enter the drainage conveyance system during construction. Each catch basin will be provided drop inlet protection which will prevent sediment laden runoff from discharging to the stormwater outfalls and the properly sized rock outlet protection pads, installed during construction, will effectively dissipate the pipe flows without the need for additional check dams.

Comment I.16

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 7)

Response I.16

The limit of disturbance line has been revised such that all temporary silt fencing is contained within the limits of disturbance. The references to the area of disturbance have been updated accordingly.

Comment I.17

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 7)

Response I.17

Prior to the start of Phase 1, the limits of disturbance shall be located and staked in the field by the project surveyor. The limits will be delineated during construction with temporary orange construction fencing. A note regarding the stakeout of the limit of disturbance has been added to the Phase 1 Erosion Control Plan. A note which provides the procedure to delineate the limit of disturbance line in the field has been included on the Phase 1 Erosion Control Plan and the Phase 1 Phasing Plan as requested.

Comment I.18

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 DEIS 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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 7)

Response I.18

The temporary mitigation measures which are required for the wetland and watercourse disturbance have been provided on the Phase 1 Erosion Control Plan. The construction sequence has been revised accordingly to detail the specific steps that must be taken during construction to divert and protect the impacted onsite surface waters.

Note #4 in the construction sequence for subphase 1D on the Phase 1 Phasing Plan provides information on the temporary measures required to construction the proposed wet pond within the existing wetland area. The existing watercourse which outfalls from the catch basins at the intersection of Hospital Road and Woods Road will be temporary diverted around the area of the proposed wet pond SWP-4. The Phase 1 Erosion Control Plan shows the temporary piping and structures required. Note #11 in the construction

sequence for subphase 1D discusses the timing to remove the temporary diversion piping.

Comment I.19

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 7)

Response I.19

The temporary drop inlet protection detail has been revised to meet the requirements of the NYSDEC Blue Book. A separate drop inlet protection detail will be provided for the protection of inlets located in paved areas. It is anticipated that the concrete blocks and crushed stone will be utilized to protection drop inlets on paved surfaces.

Comment I.20

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 7)

Response I.20

Details for the concrete washout areas, temporary water bars, and erosion control blankets have been added to the Phase 1 Erosion Control Details.

Comment I.21

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 7)

Response I.21

The "Soil Restoration Notes" found on Drawing D-4 have been revised to specifically reference Section 5.1.6 of the NYSDEC Stormwater Management Design Manual. Additionally, a table has been provided on the plan which includes all available soil

restoration methods. If it is determined that full soil restoration is required for a particular area of the project site, the additional measures specified in the Blue Book will be incorporated into the revised "Soil Restoration Notes".

Comment I.22

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 7-8)

Response I.22

The Erosion Control Program and Erosion Control Notes have been condensed into a single set of notes and any discrepancies found in the "Critical Area Seeding Specification" have been resolved.

Comment I.23

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 8)

Response I.23

Section 4.0 of the SWPPP and the "Erosion Control Program" found on Drawing D-4 has been revised to state 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 minimum of two (2) full calendar days. Additionally, the Qualified Inspector shall prepare an inspection report subsequent to every inspection in accordance with the requirements of the NYSDEC General Permit GP-0-20-001.

The "Erosion Control Program" has been retitled to, "Erosion Control Notes". Please note, since additional erosion control details were added to the plans, the "Erosion Control Notes" have been relocated to the Phase 1 Erosion Control Plan (EC-1).

Comment I.24

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 subcatchment area(s). Revise the calculations and the summary table in the SWPPP accordingly.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 8)

Response I.24

The WQv and RRv calculations found in Appendix B of the SWPPP has been revised so the sum of the runoff volumes from each tributary subcatchment will be used as the target WQv for each of the design points. The SWPPP table entitled, "Summary of Water Quality Volume" was created with the sole purpose of displaying that each stormwater practice implemented in the SWPPP has been properly sized to treat their respective water quality volumes. The "WQv Provided" column represents the actual volumes of the infiltration chambers and ponding areas created for the project. This column should not be interpreted as a list of "RRv Credit Taken". In order to clarify the intention of the table, it has been re-titled as, "Summary of Stormwater Practice Sizing".

In order to better summarize the RRv achievements of the design, we have removed the SWPPP table entitled "Summary of Runoff Reduction Volume" which provided a global analysis of runoff reduction per design point. Tables entitled, "Runoff Reduction Analysis" has been added to Appendix B of the SWPPP, preceding the RRV worksheets. The two tables (one for each design point) provide breakdowns of RRv credits for each subcatchment area containing new impervious surfaces. The tables show that green practices and techniques are being deployed throughout the project site to the greatest extent feasible. The tables also show that infiltration practices are used to treat a large majority of the new impervious surfaces in order to provide the maximum possible runoff reduction.

Comment I.25

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 RRvmin to be captured.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 8)

Response I.25

The RRv_{min} calculations have been revised to use a weighted average for the Specific Reduction Factor (S) based on the hydrologic soil group ratings of the contributing

drainage areas. The tables found in Appendix B of the SWPPP entitled, "Runoff Reduction Analysis" provide minimum RRv values for each subcatchment. The RRv-minimum value has been computed using a weighted average of hydrologic soil groups contained within the specific subcatchment area.

Comment I.26

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 9)

Response I.26

The SWPPP has been revised to include water quality treatment for the proposed impervious surfaces found in Post-development subcatchment "A8". The WQv and RRv calculations found in the SWPPP have been updated accordingly.

The stormwater design was previously revised to route stormwater runoff from the loading area of Building B1 to the proposed infiltration basin #1 (SWP-2). The infiltration basin will provide runoff reduction for the new impervious surfaces created by the loading area. Subcatchment A1 at the lower end of West Street will receive runoff reduction credit for the extensive tree planting to be performed along the proposed roadway. Please note, it is not feasible to provide additional treatment for the remaining WQv on the project site since this portion of the site contains very steep existing slopes and is immediately adjacent to the existing watercourse. Any additional stormwater treatment for subcatchment "A1" will need to be located within the NYSDOT right-of-way between NYS Route 9A and Old Saw Mill River Road. The final design of stormwater treatment within the right-of-way will need to be reviewed with the NYSDOT directly and coordinated with all other improvements planned for the new intersection. This level of fine tuning and coordination should occur prior to full Site Plan Approval when NYSDOT Highway Work Permits are being filed. The project as currently designed provides onsite runoff reduction and stormwater treatment to the greatest extent possible.

Comment I.27

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".

(Letter #12, Provident Design Engineering, 10/30/20, pg. 9)

Response I.27

The proposed SMP is designed as a wet pond and it is anticipated that wetland plantings will be provided at the perimeter of the pond to create a wetland ecosystem in the shallower zones surrounding the pond. Please note, the existing watercourse and associated wetlands which are planned to be converted into a pond, originate from existing manmade drainage basin along Hospital Road and the area has been previously impacted by construction debris and erosive flows. In the Applicant's opinion, it is anticipated that the NYSDEC will permit the creation of the proposed pond within this particular wetland due to the existing wetland quality and benefits that the pond will provide. The proposed pond will create a new habitat for wildlife and plants, it will improve water quality to the design point, and reduce flow velocities to prevent future erosion of the downstream watercourse. Additionally, the public will benefit from the pond as it creates a focal point for walkways and creates a "living science exhibit" for the adjacent education center to teach children about wetland ecosystems and stormwater management.

Comment I.28

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 9)

Response I.28

As stated in the above response, the proposed pond SWP-4 will provide substantial benefits for the existing wetland and an enhanced evaluation of the of the design has been provided in the revised SWPPP in accordance with the requirements of the NYSDEC General Permit GP-0-20-001.

Comment I.29

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 10)

Response I.29

The final design of the proposed infiltration systems have been revised to meet all requirements set forth in the NYSSMDM.

Comment I.30

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 postdevelopment 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."

(Letter #12, Provident Design Engineering, 10/30/20, pg. 10-11)

Response I.30

Final infiltration testing will be completed in accordance with procedures defined in the NYSSMDM and the onsite infiltration practices shall be revised based on the results of the testing.

Comment I.31

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 11)

Response I.31

The infiltration systems have been designed with diversion structures preceding the infiltration practices. The diversion structures have been designed with a primary pipe which directly flows to the infiltration practice and a concrete weir which routes runoff to a secondary overflow pipe. Please note, the proposed elevation of the concrete weirs have been selected to allow the infiltration practices to store the entire WQv below the weir elevation.

Comment I.32

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 11-12)

Response I.32

Appendix C of the SWPPP has been revised to include sizing information for all of the proposed Hydro-International First Defense High Capacity pretreatment devices.

Comment I.33

<u>Pre- and Post—Development HydroCAD Computations</u>

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 12)

Response I.33

The HydroCAD stormwater model for the site has been revised as requested. Reaches have been added to the Pre-development analysis for the channel flow between the offsite basins and the design points. The proposed stormwater basins and pond have been revised to provide a minimum of 1 foot of freeboard above the 100-year high water elevation in the practice. The Phase 1 Site Plan has been revised to include elevation views for each of the stormwater outlet control structures which correspond to the design parameters of the HydroCAD stormwater model.

Comment I.34

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 12)

Response I.34

The information provided in the narrative in Section 4.2 of the SWPPP has been merged into an Operation and Maintenance Plan in Appendix G of the revised SWPPP. The Operation and Maintenance Plan will also include the relevant Maintenance and Inspection Checklists from NYSSMDM and required inspection items and maintenance intervals for the stormwater management practices as defined in the NYSDEC document, "Maintenance Guidance, Stormwater Management Practices", dated March 31, 2017.

J. Utilities

Comment J.1

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.

(Letter #2, Commissioner Norma Drummond, Westchester County Planning Board, 9/28/20, pg. 6)

Response J.1

Comment noted. The County has specified correctable actions in the Town of Mt. Pleasant that would reduce the infiltration and inflow of water into the system. Developers are required to either pay for or complete these repairs to off-set project generated effluent. The Town of Mt. Pleasant has actively pursued correctable actions since the County-wide program was adopted.

Comment J.2

DEIS 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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 13)

Response J.2

Comment noted. The updated DEIS is incorporated by reference to reflect all language/responses to substantive review comments.

Comment J.3

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 13)

Response J.3

Please see the table below, which includes the requested information.

Proposed Use	Population	Usage Phase 1 (gpd)	Water Saving Usage Master Development Plan (gpd)	Average Daily Flow Phase 1 (gpm)[2]	Average Daily Flow Master Development Plan (gpm)[2]	Peak Factor	Peak Flow Phase 1 (gpm)	Peak Flow Master Development (gpm)
Medical Office	444	6,660	21,336	11	36	4.00	44.40	142.25
Bio-Tech/Research & Development	477	7,155	55,740	12	93	3.98	47.52	370.17
Neighborhood Shopping	145	8,000	17,120	13	29	4.20	55.94	119.72
Hotel	120	13,200	10,560	22	18	4.22	92.86	74.29
Children's Science & Education Center	356	N/A	1,424	N/A	2	N/A / 4.04[1]	N/A	9.59
TOTAL	***1,186/1,551[1]***	***35,015***	***106,180***	***58***	***177***	***3.75 / 3.67[1]***	***218.90***	***649.29***

Note: [1]Phase 1 / Master Development Plan
[2]Average Daily Flow applied over a 10-hour day.

Comment J.4

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 13)

Response J.4

Proper NYSDOT Permits will be acquired. Final connection details for sewer tie-in to the County trunk line will be coordinated with WCDEF and provided on the revised Phase 1 Site Plan. All applicable permits will be obtained prior to construction.

Comment J.5

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 13)

Response J.5

Upon consultation and review of the project, the Westchester County Department of Environmental Facilities has provided a written statement confirming that Westchester County's Joint Water Resource Recovery Facility (WRRF) and Saw Mill Trunk Sewer System will serve and have sufficient capacity to accommodate the project. See FEIS Appendix R.

Comment J.6

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 13)

Response J.6

Phase 1 profiles have been further developed to conform to the Ten States Standards requirements. Notes will be provided to maintain minimum crossing clearances as required. In the event a crossing cannot achieve the minimum separation distance, k-crete encasement will be proposed and the location of such will be indicated on the plan and profile where applicable.

Comment J.7

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).

(Letter #12, Provident Design Engineering, 10/30/20, pg. 13)

Response J.7

References have been revised to refer to the Town of Mount Pleasant Standards and Specifications. Pipe dimensions and material type have been provided on the revised plans. The proposed pipe sizes for the sanitary sewer mains have been listed as "to be determined" (TBD) at this time. The sewer main pipe sizes will be provided prior to Site Plan approval and shall be review and approved by the Westchester County Health Department and the Town of Mount Pleasant Department of Public Works. Based on preliminary sizing, it is expected that sewer mains will between 8" and 12" in diameter.

Comment J.8

DEIS page 3H-1. Water Supply – Who utilizes the water from Westchester County Water District #3? Is this water provided to County uses only?

(Letter #13, Cleary Consulting, 10/31/20, pg. 9)

Response J.8

Water from Westchester County District # 3 is utilized by County, State and Private facilities some of which include The Westchester Medical Center, Westchester County Department of Public Works buildings, Westchester Correctional Facility, New York Medical College, Westchester County Fire Training Center, New York State Department of Transportation.

Comment J.9

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 9)

Response J.9

Please see above response J.5. The Applicant has provided verification from WCDEF regarding the additional capacity available at the Westchester County Yonkers Joint Wastewater Treatment Plant.

Comment J.10

DEIS page 3H-8. Other Utilities – Clarify if solar energy is anticipated as a component of the development.

(Letter #13, Cleary Consulting, 10/31/20, pg. 9)

Response J.10

The Applicant will focus on roof mounted solar on this site. The Applicant will incorporate energy efficiency and conservation measures for the Project as the design progresses.

Comment J.11

DEIS page 3H-9. Mitigation Measures – Water Supply – The DEIS notes that the Kensico Water District cannot provide adequate fire flows for the project. Mitigation measures include Water District upgrades, expansion of Westchester County Water District #3 and an onsite storage tank. The applicant should document their commitment to assisting in the provision of these necessary mitigation measures.

(Letter #13, Cleary Consulting, 10/31/20, pg. 9-10)

Response J.11

It is anticipated that the project will be supplied with public water via an expansion of Westchester County Water District #3 located to the south of the Project Site. Final configuration of water storage tanks and system improvements will be coordinated with the Westchester County Department of Public Works.

Comment J.12

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 10)

Response J.12

The Applicant will include the Town Engineer on correspondence with Westchester County DEF regarding I&I mitigation.

K. Traffic and Transportation

Comment K.1

There are a few issues that I would like to suggest review further review and further comment what was described as share roads method for the bike path, which is a painted line in an existing roadway, where pedestrians and bike riders would share the road with motorized vehicles. This is not the optimal way for bike paths to be set up. A designated curb area, for safety reasons, really should be incorporated into this project for safety reasons, and really to generate the interest and use of the roadways for bikes and pedestrians.

(Public Hearing #1, Mr. Steven Kavee, Chair of the Town of Mount Pleasant Conservation Advisory Council, 9/3/20. pg. 32-33)

Response K.1

The proposed bike network is a combination of:

1. Off-Street Bike Path (asphalt trail off of roadway). This occurs along the existing Hospital Road. This street has more, and faster, vehicular traffic, so separated bike lanes are warranted.
2. On-street Bike Lanes. On-street bike lanes are provided on Main Street.
3. Sharrows (painted symbols on roadways to alert drivers that cyclists are present and roadway is shared with cyclists). This occurs on internal streets where there is less traffic, speed is slower, and significantly more pedestrians are present. This allows for more narrow pavement reducing cross times for pedestrians, a natural slowing of traffic due to reduced overall pavement width, and a reduction in the amount of impervious surface resulting in reduced carbon use and concentrated runoff.

   This combined approach to bike facilities balances the needs of cyclists with the needs of pedestrians and environmental sustainability.

Within the site the Applicant will incorporate design elements for bikes and pedestrians. Within the public right-of-way the Applicant will work with the County and State to incorporate bike lanes and sidewalks as appropriate.

Comment K.2

I do have a concern about Phase 1 and Phase 2 parking. I think that this really is a considerably large impact of impervious surface. Maybe some other type of parking arrangement should be considered. Multi-story, below grade, I realize, is quite expensive, but I think the impact of surface parking is a real concern.

(Public Hearing #1, Mr. Steven Kavee, Chair of the Town of Mount Pleasant Conservation Advisory Council, 9/3/20. pg. 37-38)

Response K.2

See Response A.9.

Comment K.3

At the end of Section 3I, which is related to traffic and transportation, page 33, the DEIS says there are no major improvements proposed by the New York State Department of Transportation surrounding the project site. I really don't think that's a wise way of approaching this project. This entire project is premised on the surrounding infrastructure being adequate to handle all of this additional volume and activity, and I really don't think that's the prudent way to approach this. When I listened to a board meeting in July, what I heard is that New York State suggested that both the North 60 and the Green Valley development be looked at together from the standpoint of traffic and transportation. I think that's a wise thing for the board to consider.

(Public Hearing #1, Mr. Wisniewski, 9/3/20. pg. 45-46)

Response K.3

The DEIS Traffic Impact Study and DEIS Traffic and Transportation Section I (pages 31-33) indicated the NYSDOT is currently rehabilitating the NYS Route 100C Bridge over NYS Route 9A as well as constructing a roundabout at NYS Route 100C and Old Saw Mill River Road.

The DEIS Traffic Impact Study provided a detailed evaluation of the potential impacts of the proposed North 60 site, including traffic signal timing improvements, monitoring for future signalization, turning lanes, and roundabout. In addition, a traffic monitoring program is proposed to ensure that the required roadway improvements proposed by the Applicant are "in place" or under construction to support the proposed development. See also Responses K4, K5 and K6.

Comment K.4

The biggest concern that I have about intersections is the one that includes Old Saw Mill River Road, 9A, and this new West Road or hospital connector. In the report it's not even mentioned that this is a three-way intersection. You're going to have people coming from the north, trying to make a left-hand turn without any improvements, no traffic light, no turn lane, nothing from 9A into this three-way intersection and then up this West Road. I think the State needs to look at that intersection and the board should involve the State in the traffic impacts, specifically the three-way intersection at Old Saw Mill River Road and the Hospital Road and also Bradhurst.

(Public Hearing #1, Mr. Wisniewski, 9/3/20. pg. 47-49)

Response K.4

The Traffic Impact Study indicates that the proposed Route 9A connector will intersect NYS Route 9A opposite Rosedale Nurseries at a "signalized" intersection. As shown on the Level of Service Summary Tables (FEIS Appendix F - Attachment 13), the Route 9A southbound shared left/through lane is projected to operate at a LOS "B" or better under both the Phase 1 and Phase 2 Condition.

Notwithstanding the above, an analysis has been provided with a "potential" separate southbound left turn lane (and northbound left turn lane into Rosedale Nurseries) if

required by the NYSDOT. Approval, including a Highway Work Permit, from NYSDOT will be required for this "new" connector road as well as the "potential" left turn lanes. In addition, the intersection of Old Saw Mill River Road will be part of that design.

The "potential" left turn lanes have also been shown on the Conceptual Improvement Plans (Exhibits 1 and 2) and analyses are contained in FEIS Appendix F (Attachment 12). The results of the analyses are shown on the updated LOS Table contained in FEIS Appendix F (Attachment 13). See also Response K.5.

Comment K.5

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

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.

(Letter #1, Richard Wisniewski, 9/15/20, pg. 1-2)

Response K.5

See Responses K.3 and K.4 above.

<u>NYS Route 9A and Proposed Route 9A Connector</u>

The Traffic Impact Study indicates that the proposed Route 9A connector will intersect NYS Route 9A opposite Rosedale Nurseries at a "signalized" intersection. As shown on the Level of Service Summary Tables (FEIS Appendix F - Attachment 13), the Route 9A southbound shared left/through lane is projected to operate at a LOS "B" or better under both the Phase 1 and Phase 2 Condition.

Notwithstanding the above, an analysis has been provided with a "potential" separate southbound left turn lane (and northbound left turn lane into Rosedale Nurseries) if required by the NYSDOT. Approval, including a Highway Work Permit, from NYSDOT will be required for this "new" connector road as well as the "potential" left turn lanes. In addition, the intersection of Old Saw Mill River Road will be part of that design.

The "potential" left turn lanes have also been shown on the Conceptual Improvement Plans (Exhibits 1 and 2) and analyses are contained in FEIS Appendix F (Attachment 12). The results of the analyses are shown on the updated LOS Table contained in FEIS Appendix F (Attachment 13). See also Response K.4.

It should be noted that vehicles exiting the connector during the PM peak hour are probably heading north to avoid the backup on the NB Sprain Brook Parkway. They would access the Taconic Parkway and/or the Saw Mill River Parkway in the vicinity of Route 117.

The traffic volumes developed in the Traffic Impact Study were based on existing traffic volumes along the area roadways including NYS Route 9A, NYS Route 100 (Bradhurst Avenue), Hospital Road and the surround roadways to/from the Westchester Medical Center (WMC) Campus, other development traffic, diversions from the area roadways to the proposed new Route 9A connector road and anticipated site generated traffic for the proposed North 60 development. See also Responses K.6 and K.42 and K.44.

Bradhurst Avenue (NYS Route 100) at Hospital Road

- Under Phase 1, traffic signal timing improvements are proposed.
- Under Phase 2, a roundabout is proposed and would replace the existing signalized intersection.

Comment K.6

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 whatever 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.

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.

(Letter #1, Richard Wisniewski, 9/15/20, pg. 2-3, 4)

Response K.6

See Responses K.3, K.4, and K.5 above.

The construction of the connector road will direct traffic to/from the north away from Bradhurst Avenue by providing an alternate which does not exist today except for diverting through the neighborhood. As a result of the new connector road, existing traffic from the area roadways (Sprain Brook Parkways, Taconic Parkway, NYS Route 100 and Hospital Road) were redistributed to the proposed Route 9A connector road. For example, it was anticipated that some of the existing traffic to/from the Taconic State Parkway currently using NYS Route 100 and Hospital Road to/from the WMC Campus would now use the new connector road and NYS Route 9A Corridor. Similarly, some of the existing traffic from the Sprain Brook Parkway northbound and Sprain Brook Parkway southbound would now use the NYS Route 9A and Saw Mill River Parkway and the new connector road to/from the WMC Campus. The proposed Route 9A Connector redistributions are shown on Figures No. 10-A, B, C. D and 11-A, B, C, D of the Traffic Impact Study.

The Traffic Impact Study discussed the existing queuing on the area roadways. As outlined in Responses K.3, K.4, and K.5 above, the Traffic Impact Study provided a detailed evaluation of the potential impacts of the proposed North 60 site, including recommended improvements including a monitoring program to ensure that the required improvements are “in place” or under construction to support the proposed development.

The Traffic Impact Study also recommends connectivity between North 60 and Westchester Medical Center (WMC) including shuttle service (Phase 1) as well as shuttle service to the Hawthorne Train Station (Phase 2).

The roundabout will improve traffic flow along Bradhurst Avenue by eliminating conflicting movements at both the NYS Route 100/Hospital Road and Hospital Road/Sprain Brook Parkway NB Off-Ramp.

Comment K.7

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.

(Letter #2, Commissioner Norma Drummond, Westchester County Planning Board, 9/28/20, pg. 2)

Response K.7

The proposed development has been/will continue to be reviewed by the Town, County and New York State Department of Transportation (NYSDOT). Roadway work permits will be required from NYSDOT or the County depending on the jurisdiction of the roadway/location of the improvements.

Comment K.8

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.

(Letter #2, Commissioner Norma Drummond, Westchester County Planning Board, 9/28/20, pg. 3)

Response K.8

The roundabout as shown on the Concept Plan is proposed for Phase 2 and may or may not be needed depending on the success of the use of mass transit, etc. The final design and detailed design plans will be coordinated with the NYSDOT and County and will incorporate all the elements listed, i.e., transit vehicles, trucks (and bicycle/pedestrian facilities, if required).

Preliminary turning templates have been prepared for a SU-30 truck, School Bus, Transit Bus (40-foot), Articulated Bus (60-foot), and Fire Truck and are contained in FEIS Appendix F (Attachment 17).

Comment K.9

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.

(Letter #2, Commissioner Norma Drummond, Westchester County Planning Board, 9/28/20, pg. 3)

Response K.9

As detailed in the Traffic Impact Study for the Acqeust Development (June 8, 2020), "the proposed Delivery Station's trip generation is estimated to peak during the late morning (10am-12pm), late afternoon (4pm-5pm), evening (8pm-9pm), and in the middle of the night (12am-1am). The late afternoon peak coincides with the typical PM peak hour. The late morning and evening peak hours occur outside typical weekday peak hours."

Based on the trip generation estimates contained in that Study, we have provided an analysis of the North 60 - Weekday Peak AM Highway Hour (8am-9am) and Weekday Peak PM Highway Hour (5pm-6pm) which are the "peak" traffic hours along NYS Route 9A (Saw Mill Rover Road) at the proposed new signalized Route 9A Connector Road to include the additional traffic from the Acquest development (+27 trips during the Peak AM Highway Hours and +215 trips during the Peak PM highway Hour). A copy of this analysis is contained in FEIS Appendix F (Attachment 1), Build Analysis with Acquest Development. As shown in Appendix F (Attachment 1`), similar Levels of Service and

delays will be experienced under future Build Conditions will the additional Acquest development traffic.

Comment K.10

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.

(Letter #2, Commissioner Norma Drummond, Westchester County Planning Board, 9/28/20, pg. 4)

Response K.10

If agreed to by the Mid Westchester Executive Park, this connector, when open, would be available to all traffic using Skyline Drive or West Street.

Comment K.11

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.

(Letter #2, Commissioner Norma Drummond, Westchester County Planning Board, 9/28/20, pg. 4)

Response K.11

It is very difficult to develop a VMT model without extensive data collection. As an alternate, the Applicant proposed a monitoring program to survey traffic volumes, parking utilization, and after 500,000 square feet of development, an employee survey to establish location of residency, mode of travel, etc. This information can then be used to project alternate modes of travel.

Comment K.12

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.

(Letter #2, Commissioner Norma Drummond, Westchester County Planning Board, 9/28/20, pg. 4)

Response K.12

The Applicant plans to work closely with the Grasslands Campus with respect to the implementation of new (revised) shuttle and bus routes, location of bus stops, etc. As the project develops, a TDM will be developed and coordinated with the "Greater TDM." The Applicant has made no decision regarding paid parking since there are no current tenants but is open to the idea of "paid parking." Bicycle facilities will be provided; see Response K.1 for additional details.

Comment K.13

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.

(Letter #2, Commissioner Norma Drummond, Westchester County Planning Board, 9/28/20, pg. 4)

Response K.13

See Response K.12.

Comment K.14

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:

4. 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.
5. 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.
6. 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.

(Letter #2, Commissioner Norma Drummond, Westchester County Planning Board, 9/28/20, pg. 5)

Response K.14

- The Applicant will work with the Grasslands Campus with respect to the implementation of new (revised) shuttle and bus routes in Phase One (as needed). See Response K.12 above.
- As summarized in DEIS Traffic and Transportation Section 3.I (Table 3), a 25% "mass transit" credit was utilized for the Medical Office, Bio-Tech, and Museum/Children's Science Center under the Phase 2 Master Plan. The 25% credit was based on the U.S. Census latest 5-year Journey-to-Work estimates for the Town of Mt. Pleasant, Westchester County, New York. A copy of the data is contained in FEIS Appendix F (Attachment 2). As shown in Appendix F Attachment 2), public transportation and carpool accounts for 23.8% of the Journey-to-Work trips. It is expected that due to the type of uses proposed and the availability of shuttle service, at least a 25% mass transit credit is expected. Furthermore, taking into account working at home, the U.S. Census data show a potential further reduction of 6.2%.

- The parking index(es) were based on a review of the latest parking rates contained in the Institute of Transportation Engineers (ITE) "Parking Generation Manual", 5th Edition, January 2019 and typical parking rates our office has used for similar types of uses. A copy of the ITE Parking Rates are contained in FEIS Appendix F (Attachment 2). As shown in Appendix F (Attachment 2), the parking rates shown in DEIS Section 2.3 (Tables 2-5, 2-6) were typically "higher" than the ITE average rates to provide a conservative estimate of the needed parking. As outlined in DEIS Section 2.3 (Table 2-5, 2-6) no "credit/"reduction" in parking was taken for "shared parking" between uses.
- The Applicant will work with Westchester County to relocate the bus stop to a mutually agreeable location.

Comment K.15

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.

(Letter #2, Commissioner Norma Drummond, Westchester County Planning Board, 9/28/20, pg. 5)

Response K.15

As part of the offsite improvements, crosswalks will be provided at selected locations to provide safe pedestrian connection from the Grassland Campus to the North 60.

Comment K.16

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.

(Letter #2, Commissioner Norma Drummond, Westchester County Planning Board, 9/28/20, pg. 5)

Response K.16

On-street bicycle lanes will be provided on Main Street and off-street bicycle paths will be provided along Hospital Road. Sharrows (painted symbols on roadways) will be provided on internal streets where there is less traffic, slower speed, and significantly more

pedestrians. Sharrows allow for more narrow pavement, reducing cross times for pedestrians, a natural slowing of traffic due to reduced overall pavement width, and a reduction in the amount of impervious surface resulting in reduced carbon use and concentrated runoff.

Since the use of bicycles reduces the demand for onsite parking and reduces traffic within the community, the Applicant is not opposed to consider bicycle storage areas or areas for supporting a bike sharing program. Each of these will be evaluated as part of the long-term development programs once a critical mass (500,000 square feet) is built and occupied. See Response K.1.

Comment K.17

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.

(Letter #2, Commissioner Norma Drummond, Westchester County Planning Board, 9/28/20, pg. 6)

Response K.17

The Applicant is aware of the benefits associated with the trailway and will work with the Town, County, and State in its implementation. There is a significant cost associated with the implementation of the trailway, especially the crossing of the Sprain Brook Parkway, which will require public funding. Note the current NYSDOT bridge rehabilitation project does not include such funding. The design of the roundabout and other roadway features can be designed to accommodate trailway features. See also Responses A.14 and A.46.

Comment K.18

I'm more concerned about widening of Bradhurst. Are you adding turning lanes onto that road? Any chance of opening the Sprain up for commercial traffic from, say, north of 287 to the development?

(Public Hearing #2, Mr. Accocella, 10/1/20, pg. 101)

Response K.18

There are no plans for widening Bradhurst Avenue due to limited Right-of-Way. As discussed in Response K-6, under Phase 2 a roundabout is proposed and would replace

the existing signalized intersection at NYS Route 100 (Bradhurst Avenue)/Hospital Road. The Spain Brook Parkway is under the jurisdiction of the New York State Department of Transportation (NYSDOT) and there are no plans to allow commercial traffic.

Comment K.19

For traffic and transport, I'm not familiar with the process related and how the county, the town, and the state interact, because we have a combination of roads here in play. You have 9A and Route 100, which is a state road. Then you have this west road, which would be above the development, which is, I assume, a town road. So I was just curious, how does that interaction work.

(Public Hearing #2, Mr. Wisniewski, 10/1/20, pg. 108-109)

Response K.19

As discussed in Response K.7, the proposed development has been/will continue to be reviewed by the Town, County and New York State Department of Transportation (NYSDOT). Roadway work permits will be required from NYSDOT or the County depending on the jurisdiction of the roadway/location of the improvements.

Comment K.20

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.

(Letter #7, Mary Hegarty, 10/11/20, pg. 1)

Response K.20

See Response K.1.

Comment K.21

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").

(Letter #7, Mary Hegarty, 10/11/20, pg. 1-2)

Response K.21

See Response K.1.

Comment K.22

In Figures 2-15 and 2-16, the location of the connection to the North County Trail is in different locations. In Figure 2-15, the connection to the North County Trail appears on the Northwest corner of the property. In Figure 2-16 the connection to the North County

Trail appears on the Southwest corner of the property. Please clarify this possible error/explain why the connections to the North County Trail are in two different locations.

(Letter #7, Mary Hegarty, 10/11/20, pg. 2)

Response K.22

The exact connection to the trailway has not yet been determined. The locations shown are potential but subject to Town and County approval. It should be noted that the Applicant does not control access to the trailway "off site". See also Response A.14.

Comment K.23

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?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 2)

Response K.23

As part of the site plan approval process, the location of school bus drop off/pickup locations will be identified to insure the safety of children.

Comment K.24

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?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 3)

Response K.24

The final design for paid parking onsite has not been determined. However, any decision regarding parking will include a variation of electronic parking for both visitors and employees. If paid parking is implemented, the design will insure that hospital workers will be charged for parking on the North 60 site.

Comment K.25

Is there an opportunity for hospital overflow parking for the hospital on the site?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 3)

Response K.25

There is the potential for overflow (special event) parking onsite for use by the hospital. The use of overflow parking by the hospital for normal conditions would be discouraged since it would impact the normal parking supply and layout of the North 60 site.

Comment K.26

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?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 3)

Response K.26

As indicated previously, the design for paid parking has not yet been determined. If paid parking is implemented, it will take the form of some type of electronic payments, which would permit modification of payment including free parking for short durations.

Comment K.27

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?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 3)

Response K.27

Please see FEIS Appendix J for the Conceptual Site Plans at a larger scale and zoomed-out to include more of the area surrounding the site.

Comment K.28

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?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 3)

Response K.28

The North County Trailway is located on the west side of Route 9A at varying distances from the North 60 depending on route selected. There is no current design for a connection to the North 60 site. While the site will require improvements to accommodate the trailway, i.e., storage, charging stations, bicycle accommodations, etc., there are other needed improvements to connect the Trailway to the site, which will

require design and funding by the County and other municipalities. See also Response A.14.

Comment K.29

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?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 3)

Response K.29

The location and required improvements will require discussion during the critical build out of the North 60 site. Stakeholders in that discussion will be Metro North, the County, Town and the Applicant. These discussions will include location, shelters, frequency of service, etc.

Comment K.30

Are any other train stations in Mt Pleasant in scope for drop off (Valhalla, Pleasantville?)

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 3)

Response K.30

As outlined in the DEIS/TIS, new shuttle service is proposed be between North 60 (and WMC) to the Metro North Hawthorne Station (initial location). Other locations can be added based on ridership demands.

Depending on ridership, other locations within Mount Pleasant could be involved. Based on location, Valhalla seems the most logical.

Comment K.31

Are we considering a commuter drop off on the Hudson Line as well to the Harlem Line?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 3)

Response K.31

New shuttle service is proposed to the Hawthorne Station (initial location). Other locations can be added based on ridership demands. See Response K.30 above.

Based on demand, this can be explored, however, the travel times involved would not result in the same frequency of service when compared to the Harlem Line.

Comment K.32

How do we mitigate traffic for this site impacting residential areas such as Pythian Avenue or Phillip Place?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 3)

Response K.32

The DEIS/TIS evaluated existing and future neighborhood "cut through" traffic conditions including Pythian Avenue, Philips Place. The opening of the NYS Route 9A connection (Hospital Road to NYS Route 9A) will provide traffic currently cutting through the neighborhood a preferred alternate to complete their desired route. The above connection will result in substantially less traffic through the neighborhood. The NYS Route 9A connection will also provide a direct access between Hospital Road and NYS Route 9A for the proposed Project. Signage directing traffic to the new Route 9A connector road will be developed as part of the detailed roadways design and permitting process.

Comment K.33

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.

(Letter #10, Mount Pleasant Conservation Advisory Council, 10/30/20, pg. 2)

Response K.33

See Response K.1 and K.16.

Comment K.34

Electric charging stations for bikes should be included.

(Letter #10, Mount Pleasant Conservation Advisory Council, 10/30/20, pg. 2)

Response K.34

Because the use of bicycles reduces the demand for onsite parking and reduces traffic within the community, the Applicant is not opposed to consider bicycle storage areas, bicycle charging stations, or other bicycle amenities. Each of these will be evaluated as part of the long-term development programs once a critical mass (500,000 square feet) is built and occupied.

Comment K.35

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.

(Letter #10, Mount Pleasant Conservation Advisory Council, 10/30/20, pg. 2)

Response K.35

Shuttle service will start with the emphasis on peak hour. The service can be expanded to off peaks based on demand. It is anticipated that there will be multiple stops, however the total travel time will need to be included in the selection of "stops." Current design requires the installation of a charging stations within the garage structure.

Comment K.36

The massive parking proposed would seem to encourage the use of individual cars rather than public transportation.

(Letter #10, Mount Pleasant Conservation Advisory Council, 10/30/20, pg. 2)

Response K.36

The parking is based on current zoning requirements to show compliance. It is anticipated that the actual number of spaces will be significantly lower and based on actual demand.

Comment K.37

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 15)

Response K.37

As shown on the ATR Location Figure, the ATR machine counts for Route 9A north of Old Saw Mill consists of ATR location 5 for SB traffic and ATR Location 6 for NB traffic.

As requested, a comparison of the turning movement counts, and ATR machine counts are provided in FEIS Appendix F (Attachment 3).

Locations 16, 17, and 28 are included in Traffic Appendix P of DEIS Appendix H. It should be noted Location 18-Broadway and Sprain Brook Parkway SB On Ramp is balanced between Locations 17 and 19.

Comment K.38

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 16)

Response K.38

The latest 2019 NYSDOT Historical Data has been provided for NYS Route 9A, NYS Route 100, and NYS Route 100C as well as the Sprain Brook Parkway and Saw Mill River Parkway. Based on this information, the 1.0% annually compound growth rate is appropriate. See FEIS Appendix F (Attachment 4).

Comment K.39

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 16)

Response K.39

Additional other development information has been provided to supplement the information contained in DEIS Traffic Appendices D and G. FEIS Appendix F (Attachment 5).

Comment K.40

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 16)

Response K.40

The ITE Trip Generation Rates were based on the ITE Trip Generation Manual, 10th Edition, 2017.

Comment K.41

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 16)

Response K.41

The trip generation rates for the proposed North 60 Medical Office were based on the existing trip generation rates counted at the existing medical office building (225,000 s.f.) located at 19 Bradhurst Avenue (similar type of use). A copy of the 19 Bradhurst Avenue traffic counts are contained in FEIS Appendix F (Attachment 6).

Comment K.42

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 17)

Response K.42

The Westchester Medical Center (WMC), New York Medical College (NYMC) and Westchester County Department of Correction (WCDOC) – "Valhalla Campus" are served by Hospital Road, Woods Road, and Dana Road/Walker Road. A map of the "Valhalla Campus" and area roadways are contained in FEIS Appendix F (Attachment 18).

The WMC Campus includes the Westchester Medical Center, Maria Fareri Children's Hospital, Behavioral Health Center, outpatient Ambulatory Care Pavilion and The Ronald McDonald House of the Greater Hudson Valley. A copy of the WMC Campus Parking and Site Map and overview of the Campus are contained in contained in FEIS Appendix F (Attachment 18).

The New York Medical College (NYMC) has 5 schools on the NYMC Campus, 45 academic programs, some 2000 students, 504 student housing beds, 2,500+ staff, some 1,500 employees and approximately 129,00 s.f. of total square footage dedicated to research. See FEIS Appendix F (Attachment 18).

The Westchester County of Correction (WCDOC) is one of the largest county jail complexes in New York State. See FEIS Appendix F (Attachment 18).

Based on the projected No-Build traffic volumes, there are currently some 1970 vehicles and 1841 vehicles entering/exiting the Valhalla Campus during the Weekday Peak AM and PM Peak Hours. A copy of the projected No-Build Traffic Volumes entering/exiting the Valhalla Campus (WMC, NYMC, WCDOC) are also contained in FEIS Appendix F (Attachment 18).

In order to account for "interplay" between WMC, NYMC and WCDOC and the North 60 Campus and their complementary uses, 30% of the hotel traffic, 30% of the office/bio-tech traffic and 20% of the retail, grocery, pharmacy, fitness traffic is anticipated to be destined to/from WMC, NYMC and WCDOC.

For Phase 1, this would equate to 17 (AM)/22 (PM) trips for the hotel, 84 (AM)/81 (PM) trips for the office/bio-tech and 59 (AM)/78((PM) trips for the retail, grocery, pharmacy, and fitness uses. This would equate to an "interplay" of approximately 8% during the Weekday Peak AM Hour and 10% during the Weekday Peak PM Hour between the WMC, NYMC, WCDOC Campus and North 60 and fall below the 20%-30% arrival/departure distributions used for "interplay".

For Phase 2, this would equate to 17 (AM)/22 (PM) trips for the hotel, 385 (AM)/398 (PM) trips for the office/bio-tech and 102 (AM)/141((PM) trips for the retail, grocery, pharmacy, and fitness uses. This would equate to an "interplay" of approximately 26% during the Weekday Peak AM Hour and 30% during the Weekday Peak PM Hour between the WMC, NYMC, WCDOC Campus and North 60 and fall within the 20%-30% arrival/departure distributions used for "interplay".

A copy of the "Internal Trip Analysis" is also contained in FEIS Appendix F (Attachment 18).

As discussed in the DEIS, a Monitoring Program "Trip Bank" will be implemented to determine any changes to the traffic patterns due to the development of the site. See also Response K.44

Comment K.43

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 17)

Response K.43

Fifteen percent of the retail/grocery/pharmacy/fitness traffic was shown using NYS Route 9A (Saw Mill River Road) to provide a conservative evaluation along the NYS Route 9A (Saw Mill River Road) Corridor. It is noted that a portion of this traffic could arrive via the Saw Mill River Parkway Exit 25 Northbound Off Ramp. A Sensitivity Analysis has been conducted with all of the 15% arriving from the Saw Mill River Parkway Northbound Off Ramp. As shown in FEIS Appendix F (Attachment 7), similar Levels of Service and delays would be expected.

Comment K.44

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 17)

Response K.44

See Response K.42.

Comment K.45

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 17)

Response K.45

The arrival/departure distributions used were based on a regional distribution and distributed on the area roadways/study area intersections based on the proposed site layout/driveways, area population, existing traffic volumes, and expected travel patterns.

Depending on the use, traffic to the North 60 Campus was distributed from population areas along the NYS Route 9A and Saw Mill River Parkway Corridors. As discussed in Response K-43, a Sensitivity Analysis was conducted with 15% of the retail/grocery/pharmacy/fitness traffic using the Saw Mill River Parkway Northbound Off Ramp (Exit 25).

Comment K.46

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 18-19)

Response K.46

1. The lane width adjustments were determined through use of Google Earth.

2. The approach grades were also determined through the use of Google Earth.

3. The intersection of Bradhurst Avenue and Broadway/Memorial Drive has been updated to reflect where there are the Right-Turn-On-Red (RTOR) restrictions. FEIS Appendix F (Attachment 8). The results of the analysis have been updated in the LOS Tables contained in FEIS Appendix F (Attachment 13).
4. The pedestrian counts are shown on the traffic count sheets contained in DEIS TIS Appendix "P" and were accounted for in the analysis. Pedestrian Figures have also been provided and are contained in FEIS Appendix F (Attachment 9).
5. The calculated Peak Hour factors utilized in the analysis are shown on the traffic count sheets contained in the DEIS TIS Appendix "P".
6. The traffic signal phasing/timings are contained in FEIS Appendix F (Attachment 10).
7. The vehicle detection parameters were based on the available information from the NYSDOT timing plans. Where vehicle detection information was not available, the Synchro Analysis parameters were utilized. It should be noted that any slight variation in the vehicle detection parameters will not significantly change the results of the analysis.
8. While the existing EB left turn storage lane pavement striping is 105', the analysis used a 130' storage lane to account for the additional storage length for 1 car (+25 feet) as shown on the Figure contained in FEIS Appendix F (Attachment 11).

Comment K.47

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 19)

Response K.47

1. The analyses have been updated to reflect the geometry shown on the Conceptual Improvement Plans (Exhibits 1 and 2). The updated analyses are contained in FEIS Appendix F (Attachment 12) and the results are shown on the updated LOS Table in FEIS Appendix F (Attachment 13).

2. The analyses have been updated to reflect the geometry shown on the Conceptual Improvement Plans (Exhibits 1 and 2). The updated analyses are contained in FEIS Appendix F (Attachment 12) and the results are shown on the updated LOS Table in FEIS Appendix F (Attachment 13).

3. The Conceptual Improvement Plans have been updated to reflect the analysis. The updated Conceptual Improvement Plans (Exhibits 1 and 2) are contained in FEIS Appendix F (Attachment 12).

Comment K.48

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:
    1. 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.
    2. 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.
    3. 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.
    4. 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.

5. 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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 19-20)

Response K.48

1. The Level of Service Summary Tables have been updated to resolve any inconsistencies. FEIS Appendix F (Attachment 13).

2. <u>Phase 1 Levels of Service/Average Vehicular Delays</u>

   › NYS Route 100 (Bradhurst Avenue) and 19 Bradhurst Avenue (Intersection 4)

   It should be noted that it is not uncommon for the side road or driveway approach to operate with delays while the major road operates at better Levels of Service. Based on the results of the analysis, this intersection should be monitored in the future for signalization under Future No-Build and Build Conditions.

   › Hospital Road and Sprain Brook Parkway NB Off Ramp (Intersection 5)

   The Sprain Brook Parkway NB Off Ramp is currently operating at a LOS "F" during the Weekday Peak AM Hour and is projected to continue to operate at a LOS "F" under future No-Build conditions. Under Phase 1, the Sprain Brook Parkway NB Off Ramp will continue to operate at a LOS "F" with a slight increase in delay. It should be noted that the proposed Route 9A Connector will divert existing Hospital Road and project traffic away from Bradhurst Avenue including the Sprain Brook Parkway Ramps. In addition, under the Phase 2 analysis, the NB Off Ramp will be modified for right turns only with left turns using the proposed roundabout at NYS Route 100 (Bradhurst Avenue) and Hospital Road improving the operation of the northbound off ramp.

   › NYS Route 9A and Proposed Route 9A Connector (Intersection 12)

   This intersection is proposed to be signalized under the Phase I Condition. As shown on the LOS Table, this intersection is projected to operate at an overall LOS "B". It should be noted that as traffic volumes develop along the Route 9A Connector Road, traffic timings can be adjusted to give additional green time to the side road approaches as needed. This intersection can be monitored for traffic signal timing adjustments after completion of Phase 1.

   › NYS Route 9A and Parkview Boulevard/Belmont Road (Intersection 20)

It should be noted that a traffic signal at this intersection is being installed as part of the recently approved Acquest Development.

› NYS Route 9A and Skyline Drive North Leg (Intersection 21)

As shown on the LOS Summary Table, this intersection is projected to operate at an overall LOS "C" during the Weekday PM Hour. While it is noted that the NB approach will continue to operate at a LOS "F", there will be a slight increase in delay as a result of the Project.

› NYS Route 9A and Skyline Drive South Leg (Intersection 23)

It should be noted that for unsignalized intersections it is not uncommon for the side road approach to operate with delays while the main road operates at better LOS. As shown on the LOS Summary Table, the unsignalized Skyline Drive South Leg is currently operating at a LOS "F" during the Weekday Peak PM Hour. Based on the results of the analysis, this intersection should be monitored for signalization under Existing and Future Conditions.

› NYS Route 9A and Dana Road/Home Depot Driveway (Intersection 24)

As shown on the LOS Summary Table, similar LOS will be experienced under the No-Build and Build condition with Route 9A operating at a LOS "C". As traffic volumes develop, traffic timings can be adjusted to give additional green time to the Dana Road/Home Depot driveway approaches.

› NYS Route 100/NYS Route 100A/NYS Route 100C (Intersection 29)

As shown on the LOS Summary Table, similar LOS will be experienced under the No-Build and Build condition. As a result, no improvements are proposed at this location.

› NYS Route 100C/Wacker Road/Clearbrook Road (Intersection 33)

As shown on the LOS Summary Table, similar LOS will be experienced with the No-Build and Build condition. As a result, no improvements are proposed at this location.

<u>Phase 2 Levels of Service/Average Vehicular Delays</u>

› NYS Route 100 (Bradhurst Avenue) and 19 Bradhurst Avenue (Intersection 4)

It should be noted that it is not uncommon for the side road or driveway approach to operate with delays while the major road operates at better Levels of Service. Based on the results of the analysis, this intersection should be monitored in the future for signalization under Future No-Build and Build Conditions.

› Proposed Route 9A Connector and Proposed Driveway # 3 (Intersection 10)

It should be noted that it is not uncommon for the side road or driveway approach to operate with delays while the major road operates at better Levels of Service. Based on the results of the analysis, this intersection should be monitored in the future for signalization under Future No-Build and Build Conditions.

› NYS Route 9A and Proposed Route 9A Connector (Intersection 12)

As shown on the LOS Table, the intersection is projected to operate at an overall LOS "D" during the Weekday Peak AM and overall LOS "C" during the Weekday

Peak PM Hour. It should be noted that as traffic volumes develop along the Route 9A Connector Road, traffic timings can be adjusted to give additional green time to the side road approaches as needed.

- NYS Route 100 (Bradhurst Avenue) and Chelea Street (Intersection 15)

  It should be noted that it is not uncommon for the side road or driveway approach to operate with delays while the major road operates at better Levels of Service. Based on the results of the analysis, this intersection should be monitored in the future for signalization under Future No-Build and Build Conditions.

- NYS Route 9A and Parkview Boulevard/Belmont Road (Intersection 20)

  It should be noted that a traffic signal at this intersection is being installed as part of the recently approved Acquest Development.

- NYS Route 9A and Skyline Drive North Leg (Intersection 21)

  As shown on the LOS Summary Table, this intersection is projected to operate at an overall LOS "C" during the Weekday PM Hour. While it is noted that the NB approach will continue to operate at a LOS "F", there will be a slight increase in delay as a result of the Project.

- NYS Route 9A/Saw Mill River Parkway NB ON/Off Ramps (Intersection 22)

  As shown on the LOS Table, this intersection is projected to operate at an overall LOS "D" during the Weekday Peak PM Hour. It should be noted that as traffic volumes develop on the Saw Mill River Parkway NB Off Ramp, traffic timings can be adjusted to give additional green time to the northbound off ramp. This intersection can be monitored for future traffic signal timing adjustments as North 60 develops.

- NYS Route 9A and Skyline Drive South Leg (Intersection 23)

  Based on the results of the analysis, this intersection should be monitored for future signalization.

- NYS Route 9A and Dana Road/Home Depot Driveway (Intersection 24)

  As shown on the LOS Summary Table, similar LOS will be experienced under No-Build and Build Conditions with Route 9A operating a LOS "C". As traffic volumes develop, traffic signal timings can be adjusted to give additional green time to the Dana Road/Home Depot Driveway approaches.

- NYS Route 100/NYS Route 100A/NYS Route 100C (Intersection 29)

  As shown on the LOS Summary Table, similar LOS will be experienced under the No-Build and Build condition. As a result, no improvements are proposed at this location.

- NYS Route 100C/Wacker Road/Clearbrook Road (Intersection 33)

  As shown on the LOS Summary Table, similar LOS will be experienced with the No-Build and Build condition. As a result, no improvements are proposed at this location.

3. While it is noted that the North 60 development may increase queuing, the noted queuing currently occurs under existing conditions. See Response K-50.

Comment K.49

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 21)

Response K.49

The Synchro Analysis files and resulting SIMTraffic simulation models will be provided to the Town's Traffic Consultant (PDE).

Comment K.50

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

- 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.
- 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.
- 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.
- 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.
- 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.
- 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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 21)

Response K.50

- The Sprain Brook Parkway NB Off Ramp currently experiences queuing during the typical Weekday Peak AM Hour. The proposed Route 9A Connector will divert existing Hospital Road and Project traffic away from Bradhurst Avenue including the Sprain

Brook Parkway Ramps. In addition, under the Phase 2 analysis, the NB Off Ramp will be modified for right turns only with left turns using the proposed roundabout at NYS Route 100 (Bradhurst Avenue) and Hospital Road improving the operation of the northbound off ramp.

- Comment noted. If agreed to by the Mid Westchester Executive Park, the emergency access would be available to all traffic using Skyline Drive or West Street. See Response K-10.
- Vehicle Turning Tracks have been conducted. FEIS Appendix F (Attachment 15). See Responses K-54 and K-55.
- The Conceptual Improvement Plans have been updated to show the proposed traffic signal. FEIS Appendix F (Attachment 12).
- The Conceptual Improvement Plan for Phase 2 has been updated accordingly. FEIS Appendix F (Attachment 12).
- Comment noted. Shuttle service will initially be to the Hawthorne Station. The shuttle bus service will be coordinated with the northbound and southbound train during Weekday Peak AM and Peak PM Hours. Future service (based on demand) may also include the Valhalla Station.

Comment K.51

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

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

(Letter #12, Provident Design Engineering, 10/30/20, pg. 22)

Response K.51

- The accident summaries have been provided for the Study Area Locations along Hospital Road on Table No. 5 of the DEIS TIS Appendix Q. This data summarized by location, date, time, traffic control, accident class, weather, manner of collision, and apparent contributing factors. As summarized on Table No. 5, there were 8 reportable accidents in 2015, 7 reportable accidents in 2016, 14 reportable accidents in 2017, and 19 reportable accidents in 2018 along Hospital Road in the vicinity of the site. A review

of the accident data indicates typical type accidents which includes rear-end accidents with apparent contributing factors such as failure to yield right of way, following too closely, and driver inattention. FEIS Appendix F (Attachment 14).

- There are no High Accident Locations along NYS Route 100 (Bradhurst Avenue) including the Bradhurst Avenue/Hospital Road intersection and the Sprain Brook Parkway Ramps. Based on the anticipated Site Generation, it is expected that the proposed development will not have a significant impact on the accident rates along Hospital Road in the vicinity of the site.
- Accident summaries have been provided for the NYS Route 9A Corridor (Table No. 6) and NYS Route 100C Corridor (Table No. 7). FEIS Appendix F (Attachment 14). Based on the anticipated Site Generation, it is expected that the proposed development will not have a significant impact on the accident rates along these Corridors.
- Typo noted.

Comment K.52

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 22)

Response K.52

Please see FEIS Appendix E Traffic Plan, which displays the requested information.

Comment K.53

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 22)

Response K.53

The parking index(es) were based on a review of the latest parking rates contained in the Institute of Transportation Engineers (ITE) "Parking Generation Manual", 5th Edition, January 2019 and typical parking rates our office has used for similar types of uses. A copy of the ITE Parking Rates are contained in FEIS Appendix F (Attachment 2). As shown in Appendix F (Attachment 2), the parking rates shown in DEIS Section 2.3 (Tables 2-5, 2-6) were typically "higher" than the ITE average rates to provide a conservative estimate of the needed parking. As outlined in DEIS Section 2.3 (Table 2-5, 2-6) no "credit/reduction" in parking was taken for "shared parking" between uses. In addition, no "credit/reduction" was taken for public transportation.It is anticipated that the actual number of spaces will be significantly lower and based on actual demand. The actual number of parking spaces will be determined as part of the Parking Management Program.

Comment K.54

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 22)

Response K.54

The area roadways surrounding the site including NYS Route 100 (Bradhurst Avenue), Hospital Road, etc., are designed for trucks. Turning tracks for trucks (SU-30) have been completed for passenger cars and trucks at the proposed site driveways. The final design of the driveway and internal roadways will be designed to accommodate trucks. FEIS Appendix F (Attachment 15).

Comment K.55

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

(Letter #12, Provident Design Engineering, 10/30/20, pg. 22)

Response K.55

Fire truck turning templates have been conducted at the site driveways and service access drives. FEIS Appendix F (Attachment 15).

Comment K.56

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

(Letter #12, Provident Design Engineering, 10/30/20, pg. 22)

Response K.56

Sight distances have been provided for the site driveway and are contained in FEIS Appendix F (Attachment 16).

Comment K.57

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 10)

Response K.57

Due to congestion on the Sprain Brook Parkway Northbound, there is existing traffic from the Medical Center using neighborhood streets to reach NYS Route 9A northbound. This traffic would have to use Hospital Road and Bradhurst Avenue to gain access to the neighborhood via Joyce Place and exit onto NYS Route 9A at Belmont Road. With the

proposed Route 9A connector there would be a direct connection from Hospital Road to NYS Route 9A, which would discourage the use of neighborhood streets.

Comment K.58

DEIS page 3I-13. 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 10)

Response K.58

There is no connection from the site to the neighborhood. The connector is directed away from the neighborhood; thus it would not create another diversion route.

Comment K.59

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 10)

Response K.59

Shuttle service will initially be to the Hawthorne Station. Future service (based on demand) may also include the Valhalla Station.

Comment K.60

DEIS page 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 construction?

(Letter #13, Cleary Consulting, 10/31/20, pg. 10)

Response K.60

The Applicant will construct the required roadway improvements.

Comment K.61

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 10)

Response K.61

Within the site the Applicant will incorporate design elements for bikes and pedestrians. Within the public right-of-way the Applicant will work with the County and State to incorporate bike lanes and sidewalks as appropriate. Off-street bicycle paths are proposed for Hospital Road, on-street bicycle lanes are proposed for Main Street, and Sharrows (painted symbols on roadways) will be provided on internal streets to allow for narrower streets. See Response K.1.

Because the use of bicycles reduces the demand for onsite parking and reduces traffic within the community, the Applicant is not opposed to consider bicycle storage areas or areas for supporting a bike sharing program. Each of these will be evaluated as part of the long-term development programs once a critical mass (500,000 square feet) is built and occupied.

Comment K.62

DEIS page 3I-21. Pedestrian/Bicycle/Ridesharing Accommodations – Is a bike share system proposed? If so, would it be a docked, or dockless system? Such a system would need to build into the site plan for the development.

(Letter #13, Cleary Consulting, 10/31/20, pg. 10-11)

Response K.62

There is no bicycle ride share program proposed as part of Phase 1. The potential exists for such a program in the future depending on demand. The Phase 1 site plan will provide location for a docked system. However, the use of a docked or dockless system will be decided at a future date.

Comment K.63

DEIS page 3I-21. Pedestrian/Bicycle/Ridesharing Accommodations – Are ridesharing improvements proposed (such as designated pick-up and drop off areas outside of traffic lanes)?

(Letter #13, Cleary Consulting, 10/31/20, pg. 11)

Response K.63

See Response K.62.

Comment K.64

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 11)

Response K.64

Parking for Phase 1 was based on conservatively on current industry standards with no credit taken for shared parking between uses or public transportation. As new applications are made for subsequent site plans, the parking and traffic management plan will be updated. This will establish the then existing parking demand taking into account existing development, which would include any change in use. That information will be used to establish the parking requirements for the "new" site plan which could be higher/lower when compared to initial estimates. The Applicant will be responsible for developing and administering the parking management plan as the tenant spaces are occupied.

Comment K.65

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 11)

Response K.65

The Route 9A Connector will require a permit from NYSDOT. During the design process, the Applicant will contact the Mount Pleasant Police Department for their input.

Comment K.66

DEIS page 3I-29. Monitoring Program – Explain why the "Trip Banks" are set below the combined trip totals.

(Letter #13, Cleary Consulting, 10/31/20, pg. 11)

Response K.66

The trips indicated for the AM and PM Peak Hours are total trips based on the assumed uses for Phase 1 and Phase 2. Since the proposed improvements can accommodate a higher traffic volume, the "Trip Bank" was set at higher totals, i.e., 1,000 total peak hour trips for Phase 1 and 2,500 total peak hour trips for Phase 2.

Comment K.67

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 11)

Response K.67

Changes in tenants is typical in a mixed-use development. If the tenant type does not change, there would be no need for a new trigger. In addition, if the square footage is small (less than 50,000 s.f.) there would be no need for a new trigger. The Board should establish general parameters for this new trigger.

Comment K.68

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 11)

Response K.68

Additional right-of-way in the order of 15 feet would be required to provide a bike lane along Bradhurst Avenue between the cemetery to the east and park land to the west. This 15 feet would require takings by the NYSDOT and/or Westchester County.

Comment K.69

DEIS page 3I-33. Vehicle Connection to Mid Westchester Executive Park – It is unclear what is meant by "*the previous landscape property.*"

(Letter #13, Cleary Consulting, 10/31/20, pg. 11)

Response K.69

The existing driveway to NYS Route 9A was used to serve a landscape company, which no longer is in business. This driveway is currently used as the emergency connection to NYS Route 9A for the Mid Westchester Executive Park.

Comment K.70

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 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.

(Letter #17, Peter & Rita Curtin, 10/31/20, pg. 1)

Response K.70

The Applicant does not propose a traffic light at Belmont Road. The provision of additional signage will require approval by the Town Board. The Applicant will support the Town based on its decision.

Comment K.71

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 Restaurant on Elmwood Ave and Commerce Street, a pedestrian was struck a few years ago. We do not want that to happen again here.

(Letter #17, Peter & Rita Curtin, 10/31/20, pg. 1)

Response K.71

The project is designed to minimize "cut thru" traffic. Changes in existing traffic control devices is subject to Town Board approval and not part of this application except as noted. Signing directing traffic to the new Route 9A connector road will be developed as part of the detailed roadways design and permitting process. See also Response K.32.

Comment K.72

We are also requesting a one way sign out on Joyce Place and Bradhurst Avenue so no thru traffic comes into this residential neighborhood.

In following this request, you would be directing traffic on Bradhurst Avenue and on Saw Mill River Road to go around the neighborhood in its entirety to Broadway and Brighton Avenue. 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 Avenue and Belmont Avenue 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?

(Letter #17, Peter & Rita Curtin, 10/31/20, pg. 1)

Response K.72

See Response K.71

Comment K.73

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?

(Letter #17, Peter & Rita Curtin, 10/31/20, pg. 1)

Response K.73

The proposed Route 9A Connector will divert existing Hospital Road and project traffic away from Bradhurst Avenue. Thus, providing the ability to assign some project traffic to Bradhurst Avenue without the associated traffic impact. Signage directing traffic to the

new Route 9A connector road will be developed as part of the detailed roadways design and permitting process. See also Response K.32.

L. Community Services

Comment L.1

The two school districts that the property's going to sit in, can we just state that for the public?

(Public Hearing #1, Mr. James Collins, Planning Board Member, 9/3/20. pg. 28-29)

Response L.1

The project site is located in two different school districts: the 60-acre County Parcel is located in the Mount Pleasant Central School District (CSD), and the 20-acre Applicant Parcel is located in the Pocantico Hills CSD.

Comment L.2

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.

(Letter #2, Commissioner Norma Drummond, Westchester County Planning Board, 9/28/20, pg. 7)

Response L.2

As stated in the DEIS, the collection of solid waste will be through a licensed hauler and materials will be collected, transported and disposed of in accordance with all applicable local and State regulations. The advancement of the detailed site plans and associated building designs which will be developed on a phase by phase basis will include provisions for storage to accommodate recycling requirements in accordance with the County's recycling program. The final site plan for each phase will include a nonresidential waste generator plan as is appropriate.

With respect to food waste, there may be some opportunities for composting onsite but not at a significant volume.

Comment L.3

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?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 1)

Response L.3

The need for additional recreation and open space has been evaluated in the DEIS (see DEIS Section 3J Recreation and Open Space). The Master Development Plan includes the preservation of approximately 36 acres (46.3%) of existing open space on the project site. As shown in DEIS Figure 2-17, Open Space Diagram, several areas would be preserved as natural open space while other areas would be designed and landscaped active or passive open space. Soccer and/or baseball fields are not proposed.

Onsite active and passive recreation amenities will be available not just to employees of the project site but to all area residents. It is anticipated that the increase in tax revenue, as well as the mitigation measures identified in DEIS Chapter 3J, Community Services, would offset any potential impacts to recreation and open space. The active and passive onsite recreation and open space amenities would add to the open space and recreation amenities currently available to the Mount Pleasant community.

In Alternative G, identified in Chapter 1 of this FEIS, the introduction of a residential population of approximately 143 to the project site in Phase 1 would likely result in more use of Town facilities than would occur under the Proposed Action. Alternative G would increase the current population by in the Town of Mount Pleasant by approximately 0.5% percent, which would potentially increase demand on Town facilities by up to 0.5% percent. Onsite active and passive recreation amenities would be available onsite for residents, workers, and all area residents, as with the Proposed Action. Taxes would be approximately the same as the Proposed Action and are expected to offset any potential impacts to recreation and open space.

Comment L.4

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.

(Letter #10, Mount Pleasant Conservation Advisory Council, 10/30/20, pg. 2)

Response L.4

With respect to food waste, there may be some opportunities for composting onsite but not at a significant volume.

Comment L.5

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.

(Letter #10, Mount Pleasant Conservation Advisory Council, 10/30/20, pg. 2)

Response L.5

Comment noted. See DEIS section 3J for a discussion on regulated medical waste. The NYSDOH is responsible for onsite waste management procedures for hospitals, freestanding diagnostic and treatment centers, residential health care facilities and clinical laboratories. The NYSDEC is responsible for overseeing storage, treatment and destruction processes for facilities not covered under NYSDOH jurisdiction, as well as offsite transport of RMW for all generators, tracking, responding to illegal disposal incidents, and for all off-site storage, transfer, treatment and disposal facilities. All future tenants of the project site would be required to comply with all applicable NYS regulations for the handling, storage, transport and disposal of RMW. RMW generated at these facilities would be stored onsite prior to transportation offsite by permitted vendors to regulated/permitted disposal facilities.

Comment L.6

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 11)

Response L.6

As stated in the DEIS, the Hawthorne Fire Company provides both the fire and EMS services to the project site and surrounding areas; Hawthorne Volunteer Ambulance Corps is not a separate entity. The Valhalla Volunteer Ambulance Corps does not have jurisdiction or service responsibility at the project site.

Comment L.7

DEIS Table 3J-1. Add a column that defines the jurisdiction that owns the park.

(Letter #13, Cleary Consulting, 10/31/20, pg. 12)

Response L.7

DEIS Table 3J-1 has been updated with a column defining the ownership of each park. See table below.

Table 3J-1 Parks and Recreation Resources in the Town of Mount Pleasant

Parks and Facilities	Community	Acres	Activities	Park Ownership
Hardscrabble Wilderness Area	Briarcliff	235	Camping, hiking, nature	Town
Mountain Trail Park	Pleasantville	5	Hiking	Town
Bear Ridge Lake	Pleasantville	2	Fishing, ice skating, picnicking	Town
Old Farm Hill Park	Pleasantville	22	Undeveloped	Town
Water District Field	Thornwood	6	Soccer, baseball, softball	Town
Opperman's Pond	Pleasantville	6	Fishing, ice skating, picnicking	Town
Mt. Pleasant Town Pool & Community Center	Valhalla	12	Bocce, basketball, volleyball, swimming, picnicking, playground, community center	Town
Broadway Field	Hawthorne	6	Basketball, baseball, softball, volleyball, picnicking, playground, shelter	Town
Pheasant Run Park	Pleasantville	16	Undeveloped	Town
Carroll Park	Thornwood	12	Baseball, softball, fishing, ice skating, picnicking, playground	Town
Westlake High School	Thornwood	20	Tennis, soccer, basketball, baseball, softball	Mt. Pleasant Central School District. Portions maintained by the Town.
Stonegate Park	Valhalla	12	Basketball, baseball, softball, picnicking, hiking, nature, shelter	Town

Parks and Facilities	Community	Acres	Activities	Park Ownership
Valhalla High School	Valhalla	n/a	Tennis, soccer, baseball, softball	Valhalla Union Free School District. Portions maintained by the Town.
Bradhurst Park & Community Center	Hawthorne	7	Baseball, softball, picnicking, playground, community center	Town
Lakeside Park	Valhalla	6	Soccer	Town
Pat Henry Field	Valhalla	2	Baseball, softball	Town
Hawthorne Elementary School	Hawthorne	17	Baseball, softball, playground	Mt. Pleasant Central School District. Portions maintained by the Town.
Columbus Avenue School	Thornwood	16	Baseball, softball, playground	Mt. Pleasant Central School District. Portions maintained by the Town.
Bronx River Reservation Field	Valhalla	2	Baseball, softball	Town
Graham Hills	Mount Pleasant	431	Hiking, walking, mountain biking, nature	County
Pocantico Lakes	Briarcliff	n/a	Fishing, hiking, walking, horse trails, nature	County
Kensico Dam Plaza	Valhalla	n/a	Bicycling, hiking, walking, in-link skating, nature, picnicking, playground	County

Parks and Facilities	Community	Acres	Activities	Park Ownership
North County Trailway		22 miles	Walking, bicycling, nature	NY State (leased to Westchester County)
Rockefeller State Park Preserve	Pleasantville	1,771	Horse trails, nature, picnicking, hiking, walking, fishing	NY State
Old Croton Aqueduct State Historic Park		26 miles	Walking, biking, nature, horse trails	NY State

Source: https://www.mtpleasantny.com/sites/mountpleasantny/files/uploads/town_parks_and_facilities.pdf, https://parks.westchestergov.com/images/stories/pdfs/2018YourMpGuideWEB.pdf, https://parks.ny.gov/

Comment L.8

DEIS page 3J-8. Police Services – Input from the Mount Pleasant Police Department is necessary before any determination of police service impacts can be determined.

(Letter #13, Cleary Consulting, 10/31/20, pg. 12)

Response L.8

The Applicant attended a meeting at Town Hall in Supervisor Fulgenzi's Office on November 20, 2019 at 9:00am with Police Chief Paul Oliva of the Town of Mount Pleasant Police Department (as well as Mr. Fulgenzi, Mr. Kim, Mr. Penelle, Mr. Cottle, Mr. DeLuca and Mr. Molnar). The project as proposed and with likely alternates was presented to the attendees during the meeting. Additional meetings have been held with emergency services providers throughout the development of the site plan with the most recent meeting being on January 28, 2021. See FEIS Appendix L for written correspondence from the Mount Pleasant Police Department and other emergency service providers.

The Applicant will continue their outreach the Police Department and other emergency service providers.

Comment L.9

DEIS page 3J-8. Police Services – the "*site safety*" measures should be more fully described. "*Private security*" and "*outdoor lighting*" inadequately describes the measures proposed.

(Letter #13, Cleary Consulting, 10/31/20, pg. 12)

Response L.9

To expand onsite security, the development's management company will contract with a private security company to provide unarmed communications officers and unarmed public safety officers to provide security coverage on a seven-day per week, 24-hours basis of the site. Additionally, an unarmed contract security contingent will staff fixed posts on the campus at a location deemed appropriate by the management company. To compliment the security staff there will be video surveillance provided as well.

Outdoor lighting will be provided in all public areas and switched on before sunset and kept on whenever people will be onsite. Lighting will be provided at a level compliant with the NYS Building Code and meet the dark sky standards.

Lastly, individual tenants will provide their own in-building security as well as when Biotech / Research use intelligence and research security is necessary for their business.

Comment L.10

DEIS page 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 will the Westchester County Department of Public Safety have at the site?

(Letter #13, Cleary Consulting, 10/31/20, pg. 12)

Response L.10

Westchester County Department of Public Safety will not be responsible for the site. There will be a communication role between WCDPS and the security vendor on site.

Comment L.11

DEIS page 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, biosubstances, 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 12)

Response L.11

See Response C.12.

Comment L.12

DEIS page 3J-9. Fire and Emergency Services – Input from the Hawthorne Fire Department is necessary before any determination of fire service impacts can be

determined.

(Letter #13, Cleary Consulting, 10/31/20, pg. 12)

Response L.12

The Applicant attended a meeting at Hawthorne Fire District Fire Station on February 18th, 2018 at 7:00pm with Carol Penelle in his capacity at the Hawthorne Fire Company (as well as several other Volunteer Fire Fighters).

The Applicant also attended a meeting at Town Hall in Supervisor Fulgenzi's Office on November 20th, 2019 at 9:00am attended by Carol Penelle in his capacity at the Hawthorne Fire Company (as well as Mr. Fulgenzi, Mr. Oliva, Mr. Kim, Mr. Cottle, Mr. DeLuca and Mr. Molnar). The project as proposed and with likely alternatives was presented to the attendees during the meeting. Additional meetings have been held with emergency services providers throughout the development of the site plan with the most recent meeting being on January 28,2021. See FEIS Appendix L for written correspondence from the Mount Pleasant Police Department and other emergency service providers.

The Applicant will continue their outreach the Police Department and other emergency service providers.

Comment L.13

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 12)

Response L.13

See Response J.11.

Comment L.14

DEIS Table J-9. This table is incorrectly titled. Additionally, solid waste and recycling attributable to the publicly accessible open spaces should be accounted for.

(Letter #13, Cleary Consulting, 10/31/20, pg. 13)

Response L.14

Comment noted, the title of DEIS Table J-9 is Solid Waste Generation. Solid waste and recycling attributable to the publicly accessible open spaces is anticipated to be negligible. Open space on the project site would be maintained by the Applicant,

therefore, solid waste and recycling collected at the open spaces would be disposed of through a private hauler. Solid waste collection would meet the Town of Mount Pleasant's sanitation requirements as well as Westchester County Source Separation Law. Appropriate solid waste and recycling bins would be placed throughout the open spaces where needed.

Comment L.15

DEIS page 3J-14. Police Services – As noted in comment #L.8, input from the Mount Pleasant Police Department is necessary before any determination of police service impacts can be determined.

(Letter #13, Cleary Consulting, 10/31/20, pg. 13)

Response L.15

See Response L.8.

Comment L.16

DEIS page 3J-14. Fire and Emergency Services – As noted in comment #L.12 input from the Hawthorne Fire Department is necessary before any determination of fire service impacts can be determined.

(Letter #13, Cleary Consulting, 10/31/20, pg. 13)

Response L.16

See Response L.12.

Comment L.17

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.

(Letter #18, Tom Sialiano, Mount Pleasant Councilmember, 01/13/21, pg. 1)

Response L.17

A satellite firehouse and police station is not proposed for this site. The project has been reviewed by and coordinated with input from Police Department, Fire Department and Emergency Services. Also see Response L.12

M. Fiscal and Market Impacts

Comment M.1

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 North 60 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 North 60 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 North 60 site that are being made in connection with and as a result of the North 60 project.

(Letter #4, Domenick Vita, 9/28/20, pg. 1)

Response M.1

There will be no tax impact to the Town of Mount Pleasant taxpayer, any road work required by the North 60, any water service work required by the North 60, any sewer work required by the North 60, and/or any land improvements required by the North 60 will be funded by the Applicant. In addition, this project will generate additional tax revenue to the applicable tax districts, as detailed in Section M. Fiscal and Market Impacts. See DEIS pages 309 – 312.

Comment M.2

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 North 60 developers instead of incurring it by the town, if indeed the town is incurring these costs?

(Letter #4, Domenick Vita, 9/28/20, pg. 2)

Response M.2

The Town of Mount Pleasant will not incur costs for offsite improvements required by the North 60.

Comment M.3

One of the concerns is the taxes being increased, and that would be for both things that are connected to this project, including off-site costs. And I noted that the DEIS mentioned some off-site improvements that would be needed. For instance, a road roundabout, widening of roads, sewage that's being handled differently, the water treatment plants that are being expanded or handled differently. So those kinds of things that are ancillary to this project and outside of the project site, I'm wondering how that affects our tax bill at the end of the day and who bears that cost, ultimately.

(Public Hearing #1, Mr. Domenick Vita, 9/3/20. pg. 39-40)

Response M.3

See Response M.1.

Comment M.4

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.

(Letter #2, Commissioner Norma Drummond, Westchester County Planning Board, 9/28/20, pg. 7)

Response M.4

Infrastructure improvements necessary for the development are funded by the Applicant and would not impact taxes currently levied by the Town. The County portion of the site is currently on the exempt roll. The estimated future taxes to be paid include $1.659 million annually for Phase 1 and approximately $9.3 million annual for the Master Development Plan. In addition, the Lease terms call for the Applicant to pay initial rent to the County of $125,000 per year, commencing upon the execution of the lease and thereafter, the Applicant will pay the County six percent **(6 percent)** of the gross rental income from the permitted uses and three percent **(3 percent)** of gross rental income from a hotel.

Comment M.5

How have the forecasts for rental opportunities been impacted by the Corona Virus pandemic?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 3)

Response M.5

At this time, the effect of COVID-19 on rental income for Retail and Hotel use(s) has seen a drop in the short term, but the long term is anticipated to return to normal. Note the principal use of this project is Biotech/Research which has seen a boost during this period.

Comment M.6

DEIS page 3K-3. Potential Impacts – The impact of the proposed development on the existing hamlets and business in the Town of Mount Pleasant should be documented.

(Letter #13, Cleary Consulting, 10/31/20, pg. 13)

Response M.6

See responses C.4, C.5, and C.7.

Comment M.7

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 13)

Response M.7

At this time, the effect of the COVID-19 pandemic on the marketing of real estate is not fully known yet, it is too early to conclude what changes in behavior and consumer preferences will remain, but the Applicant will remain flexible and open to responding to the lasting effects the pandemic may have on the marketing of Real Estate.

The Applicant has entered into contract with a marketing consultant, but the developing marketing campaign has been placed on pause awaiting on the project approval, which will ultimately decide what type and size of mixed-use campus this will be, which is a key factor for the marketing campaign.

Comment M.8

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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 2)

Response M.8

The Applicant has short-listed one national and one international construction manager(s) for preconstruction services to support the internal project justification for the preparation of a construction estimate for Phase 1, but the signing of this contract has been placed on pause awaiting on the project approval, which will ultimately decide what type and size of mixed-use campus this will be, which is a key factor for the preparation of the estimate.

Comment M.9

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.

i. 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.
ii. 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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 3)

Response M.9

See Response M.8 (regarding Phase 1 construction estimate) and DEIS 3Q-8 'Construction Schedule' 3rd paragraph, where flexibility is sought and the commitment to return to the Planning Board is made. That flexibility is critical, especially considering the post-COVID market that this portion of the project will be developed in.

Comment M.10

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.

5. 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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 3)

Response M.10

The multipliers used to estimate jobs in the DEIS are standard multipliers for the type of analysis required to satisfy the terms of the DEIS Scoping Outline and the obligations under SEQRA; additionally, it provides a high level estimate for the Town to consider when making its determination on the project. The employee estimates presented in this FEIS have been recalculated to allow for vacancy.

Comment M.11

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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 4)

Response M.11

The multiplier used to estimate bio-tech jobs was sourced from the Weitzman Study, instead of the U.S. Green Building Council, because it is assumed to be more accurate to reflect current trends in the region. The Weitzman Study multiplier was also selected because it is more conservative. Using the Weitzman Study multiplier, there would be an estimated 4,645 direct bio-tech jobs with development of the Master Development Plan, however, using the multipliers from the U.S. Green Building Council, there would be an estimated 5,360 direct bio-tech jobs (not including vacancy).

Comment M.12

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.

1. Observers have noted that many industries have seen declining square footage per employee since 2010.
2. However, COVID-19 has prompted many industries to increase the amount of square footage per employee, potentially offsetting previous trends toward smaller per-person workspaces.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 4)

Response M.12

At this time, the effect of the COVID-19 pandemic in real estate is not fully known yet and it is too early to conclude what changes in workplace trends will remain. The interior space of the offices would be outfitted by the tenants to meet their individual needs, however, tenants have not yet been selected for the development. The multipliers used to estimate the number of employees per square foot typically meet planning standards and are accepted as an appropriate level of analysis to determine potential impacts for purposes of SEQRA analysis.

Comment M.13

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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 4)

Response M.13

As stated in the DEIS, economic outputs are presented in annual numbers. Annual numbers are used because presenting the number in aggregate would inflate the total number of jobs expected. Not all jobs are new from year to year and calculating outputs in the aggregate for operational impacts would require determining the full life of the expected operations on the site, which is not reasonable or required for this type of analysis.

In recognition that the IMPLAN tax analysis is derived from national averages, a local property tax estimation is provided in the DEIS, starting on page 3K-6.

Comment M.14

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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 5)

Response M.14

Comment noted.

Based on valuable input from Westchester County, and others, and in response to the findings and recommendations from the North 60 Market and Financial Feasibility Study ("Weitzman Study", see DEIS Appendix M), a new residential alternative, Alternative G: Alternative Development Program with Fewer Low Impact Residential Units. Alternative G includes low-impact residential uses, similar to DEIS Alternative C, but the number of residential units has been reduced to 98 units.

Alternative G would replace approximately 100,000 SF of bio-tech uses in Phase 1 with approximately 100,000 SF of low-impact residential uses. Residential uses proposed for Phase 1 include 98 residential units including 29 studio unit and 69 one-bedroom units.

It is anticipated that many of these units would be occupied by employees or students of uses on the project site or adjacent medical and school uses. The integration of campus housing is intended to create a live-work community. At this time, the corporate or educational tenants for the residential components of the development are not yet known but the low-impact, campus housing would be affordable by design, offering studio and one-bedroom units available to corporate tenants, educational institutions and medical/bio-technology employees.

The intent of the housing is to be supportive of the biotech industry and would meet the intent of the County requirements. Details of the program may be modified to respond to market changes following Phase 1, to the extent that such program changes do not create any significant impacts.

Updated school student generation estimates are included in Chapter 1 of this FEIS based on the housing types and generation rates contained in the School Student Generation Study (see DEIS Appendix S).

Comment M.15

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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 6)

Response M.15

All SEQRA documentation has been provided as per the DEIS Scoping Outline as adopted by the Lead Agency on August 1, 2019. The request for financial feasibility is not necessary, or typically pursued, to satisfy the requirements of SEQRA. It is noted that the Applicant is well known and has a proven track record of highly successful projects in the County, the Town, and the region. Further, the Applicant went through a thorough vetting process, including vetting of financial soundness, when responding to the Request for Qualifications and Request for Proposals (RFP) issued by Westchester County to select a developer for the County-owned portion of the project site, leading to a 99-year lease of the property. As is typical for a project of this scope and scale, the Applicant will be required to put up construction bonds to ensure stability and success in development of the project.

Comment M.16

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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 6)

Response M.16

Sales tax is determined by the specific retail and service establishments onsite and can vary significantly by type. Specific businesses have not yet been determined or signed leases on the site, therefore, any estimation on sales tax would not be able to provide a reasonable basis for determining impacts. Likewise, hotel tax revenue varies depending upon the class of hotel and expected occupancy rate. A hotel operator has not yet been selected, nor has the type of hotel been determined, therefore, any estimation of hotel tax revenue would not be appropriate at this time.

Comment M.17

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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 6)

Response M.17

Consistent with other new infrastructure required by the Project, the Town of Mount Pleasant will not incur costs for water infrastructure required by the North 60. See Response M.1.

Comment M.18

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:

b. 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).

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 7)

Response M.18

See Response M.15.

Comment M.19

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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 7)

Response M.19

See Response M. 15.

Comment M.20

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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 7)

Response M.20

Comment noted.

A new project alternative, Alternative G, has been identified and analyzed in this FEIS to include low-impact residential uses as part of the bio-technology campus, in part, because through this process it has been shown that including residential development is the most economically viable plan for the project site and the Town.

Alternative G would replace approximately 100,000 SF of bio-tech uses in Phase 1 with approximately 100,000 SF of low-impact residential uses. Residential uses proposed for Phase 1 would include 98 residential units including 29 studio units and 69 one-bedroom units.

Comment M.21

Some of the assumptions and conclusions in the Weitzman report do not appear to be clearly supported:

a. 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.
b. 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.
c. 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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 8-9)

Response M.21

See Response M.15.

Comment M.22

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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 9)

Response M.22

See Response M.15. Note that the proposed mix of uses on the site is determined by the 99-year lease signed by the Applicant and the County.

Comment M.23

The applicant should provide evidence for the healthcare space demand that they see in the area to justify rent and absorption rate assumptions.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 12)

Response M.23

See Response M.15.

Comment M.24

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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 3)

Response M.24

At this time, the effect of the COVID-19 pandemic in real estate is not fully known yet and it is too early to conclude what changes in behavior and consumer preferences will remain, but the Applicant will continue to monitor changes in the market, and remain flexible and open to responding to the lasting effects the pandemic may have on the retail market. See also Response M.15.

Comment M.25

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,"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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 14)

Response M.25

This type of analysis was not required in the DEIS Scoping Outline and is beyond the purpose and intent of the SEQRA process. At this time, the effect of the COVID-19 pandemic in real estate is not fully known yet and it is too early to conclude what changes in behavior and consumer preferences will remain, but the Applicant will continue to monitor changes in the market, and remain flexible and open to responding to the lasting effects the pandemic may have on the hotel market. See also Response M.15 and Response M.16.

Comment M.26

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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 15)

Response M.26

The Applicant has a proven track record with establishing a variety of uses, ranging from residential, hotel, commercial, and other uses, including the Maria Fareri Children's Hospital at Westchester Medical Center, which shares the Grasslands Reservation with the project site. The Applicant has vast experience with procuring funding and entering essential partnerships to ensure the health and success of public development projects and public-private partnerships. At this time, the operator of the Children's Science and Education Center has not yet been selected. However, the Applicant has notified both local school districts about the project and is willing to partner with these and other appropriate local entities on the project. The Applicant has also committed to donating to the Children's Science and Education Center.

Comment M.27

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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 15)

Response M.27

Comment noted.

Comment M.28

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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 16)

Response M.28

This level of analysis is not required in the DEIS Scoping Outline and is beyond the purpose and intent of the SEQRA process. Analysis of impacts due to residential use on the site is provided in DEIS Section 4.3 Alternative C: Alternative Development Program and in FEIS Section 1 related to Alternative G: Alternative Development Program with Fewer Low Impact Residential Units.

Comment M.29

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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 16-17)

Response M.29

See Response M.14.

Comment M.30

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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 17)

Response M.30

Co-living is discussed in the DEIS as part of the Alternative C development scenario. No co-living units are proposed as part of the Alternative G development scenario.

Comment M.31

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.

(Letter #14, James Lima Planning + Development, 10/31/20, pg. 17)

Response M.31

Comment noted.

N. Historic, Archaeological and Cultural Resources

Comment N.1

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?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 2)

Response N.1

The significance of the two archeological sites is in the process of being investigated through a Phase II archeological site evaluation. The team's consulting archeologist, Hartgen Archeological Associates, Inc., has recommended that the Saw Mill River Precontact Site will not meet the criteria for inclusion on the National Register of Historic Places (NRHP), but that the J. Van Tassel Historic Site will meet the criteria. If the New York State Historic Preservation Office (NYSHPO) determines that either or both of the sites are eligible for the NRHP, then avoidance of the site(s) will be considered. If avoidance is not feasible, then the implementation of a Phase III archeological data retrieval plan is expected to mitigate the project's adverse impacts upon archeological resources.

Comment N.2

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

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 2)

Response N.2

If either the Saw Mill River Precontact Site or the J. Van Tassel Historic Site are determined to be eligible for the NRHP and cannot be preserved in place through avoidance, then a Phase III archaeological data retrieval study will be conducted. The Phase III study would result in documentation of the sites history and would include public outreach measures determined through consultation with involved agencies.

Comment N.3

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?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 2)

Response N.3

As this comment pertains to historic resources on the Grasslands Reservation but outside of the project site's boundary, the Applicant has no comment.

O. Hazardous Materials

Comment O.1

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)?

(Letter #4, Mr. Domenick Vita, 9/28/20. pg. 2)

Response O.1

A Phase 1 / II Environmental Site Assessment was completed for the North 60 property and was provided in the DEIS (see DEIS Appendix J). The Phase 1 / II investigation included extensive soil testing completed in 2019 on previously disturbed areas and from fill piles.

The lead agency's consultant requested additional soil and groundwater sampling in the area of the former Nilsson Nursery property at the western side of the site. Soil samples were recently collected in and around the garage that contained 55-gallon drums of ethylene glycol. The results of the testing are included in a report "*Sampling Investigation at the Former Nilsson Nursery Property*" (see FEIS Appendix G). Impacts from former pesticide use at the property appears to be limited to shallow (upper 2 feet) soil in former greenhouses and the unpaved portions of the garage. With limited exceptions the pesticide levels are below the NYSDEC clean-up in the former greenhouses and garage areas with pavement or 2-feet of clean soil to restrict direct contact with existing soils. A soil management plan will require Town and Westchester County Department of Health (WCDOH) review and approval. Prior to construction, the partially filled drums of ethylene glycol will be removed from the site and properly disposed of at a licensed disposal facility.

Comment O.2

The DEIS mentioned ethylene glycol being used from Nilsson Nurseries, which used to use the project. I'm just wondering if this soil is going to be tested before it's disturbed. I don't know if that is a carcinogen or toxic or whatever, but if that's something that needs to be taken care of, if it can be.

(Public Hearing #1, Mr. Domenick Vita, 9/3/20. pg. 42)

Response O.2

See Response O.1.

Comment O.3

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 13)

Response O.3

The reference to a two-family residence is in error. A vacant single-family residence with two-stories is located approximately 250 feet south of Old Saw Mill River Road at the north side of the County property. The residence is shown on the Existing Conditions drawing in the Site Plan set (Drawing No. EX-1). It is shown on Westchester County aerial photos since at least the mid-1970's.

Comment O.4

DEIS page 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 O.3), but also notes that its condition could not be determined. How will the condition of this large UST be determined?

(Letter #13, Cleary Consulting, 10/31/20, pg. 13)

Response O.4

As indicated in the DEIS, the 1000-gallon tank at the residence near Old Saw Mill River Road will be tightness tested by a qualified tank test contractor as part of the construction process for phase 1 and prior to the issuance of a certificate of occupancy for the phase 1 buildings.

Comment O.5

DEIS page 3M-2. Existing Conditions, 10) – Over what course of time were the 37 leaking tank incidents and 17 DEC spill incidents reported?

(Letter #13, Cleary Consulting, 10/31/20, pg. 13)

Response O.5

According to the EDR database, the reported DEC spill and leaking tank incidents occurred over a 29-year period from 1989 through 2018.

Comment O.6

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 13)

Response O.6

The underground fuel oil tanks on the Applicant Parcel were tightness tested or determined to be not leaking in 2010 and are currently servicing the existing residences

in that portion of the site. As indicated in the DEIS, the tanks will be tightness tested by a qualified tank test contractor as part of the construction process for phase 1 and prior to the issuance of a certificate of occupancy for the phase 1 buildings. The UST's are in areas of the property that will not be affected by phase 1 construction and the tanks may continue to service existing residences until phase 2 construction.

Comment O.7

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 13)

Response O.7

See Response to O.6

P. Noise

Comment P.1

Are there any changes to the town noise ordinance that are being considered as part of this in order to manage the construction noises?

(Public Hearing #1, Mr. Domenick Vita, 9/3/20. pg. 40)

Response P.1

The project is required to comply with the Town of Mount Pleasant Noise Ordinance (Chapter 139). There are no changes to the town noise ordinance that are being considered as part of this project.

Comment P.2

Does the plan include steps toward mitigation of noise pollution?

(Letter #4, Domenick Vita, 9/28/20. pg. 2)

Response P.2

Steps toward mitigation of noise pollution are detailed in the DEIS. See DEIS page 3N-11 for operational noise mitigation measures and see DEIS page 3N-12 for construction noise mitigation measures.

Comment P.3

Please include a noise study of the traffic and other potential noise issues related to the development.

(Letter #7, Mary Hegarty, 10/11/20, pg. 2)

Response P.3

DEIS section 3N contains an assessment of potential impacts from both stationary sources (such as HVAC and other on-site mechanical equipment) as well as mobile noise sources (traffic).

Comment P.4

DEIS page 3N-7. Westchester Medical Center – Indicate the distance to this sensitive receptor, as was done for all the other identified sensitive receptors.

(Letter #13, Cleary Consulting, 10/31/20, pg. 14)

Response P.4

As noted in Section 3N-1d of the DEIS, the Westchester Medical Center is approximately 350 feet south of the project site, across Peripheral Road.

Comment P.5

DEIS 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 14)

Response P.5

Noise measurements were conducted during the daytime period (1:00 PM to 3:00 PM) on June 28, 2019 at four measurement locations. The results of the noise measurements are presented in DEIS Table 3N-3. The measurements were used to characterize existing daytime **ambient** conditions at the four locations, following the guidelines outlined in the DEIS Scoping Document. These noise measurements are used to determine construction noise limits in accordance with NYSDEC guidelines to implement best management practices to reduce construction noise if levels exceed ambient levels by 10 dBA or more and exceed 65 dBA. These measurements were conducted during off-peak traffic periods, when daytime noise levels would generally be lower, to provide a conservative assessment of potential construction noise impacts.

A qualitative noise assessment was conducted for stationary and mobile sources. For stationary sources such as rooftop mechanical equipment, the Town of Mount Pleasant Noise Ordinance limits sound from the mechanical equipment irrespective of existing ambient conditions. According to NYSDEC noise policy, the potential for noise impact from stationary equipment is evaluated based on a comparison to existing noise levels. For the NYSDEC policy, there is a greater potential for impact when existing levels are quieter. The qualitative mobile source noise assessment indicated that as the project advances, the mechanical equipment will be designed and constructed to comply with NYSDEC noise policy and the Town noise ordinance.

The mobile source noise assessment qualitatively evaluated the potential for the project to change traffic noise conditions. Traffic noise impact is regulated by the FHWA and the NYSDOT. If a project involves adding a new highway or substantial altering existing highways, then noise abatement may be needed in accordance with NYSDOT noise policy. As described in the DEIS, this project would not introduce new travel lanes or make substantial improvements to existing highways and therefore the NYSDOT noise policy does apply.

Comment P.6

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 14)

Response P.6

The Noise section of the DEIS considered two potential HVAC equipment pathways. The first pathway ("Option A") would utilize a central chiller and boiler plant that would service all or most of the proposed buildings. The alternative HVAC scenario ("Option B") under consideration is to provide packaged rooftop units to each of the proposed buildings without a central plant. If the central plant option is utilized, the location will be reflected on the site plans.

Comment P.7

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 14)

Response P.7

The need for an emergency electrical generator would be Tenant driven, at this time we do not have a Tenant need. The Applicant understands that if a tenant requires an emergency generator that pursuant to the TMP Zoning Code Section 218-20.2 Emergency electrical generators: commercial; that an application for site plan approval from the Planning Board for the emergency generator is required.

Comment P.8

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 14)

Response P.8

Section 3N-2b of the DEIS presents a qualitative mobile source noise impact assessment for the Proposed Action, following the guidelines outlined in the DEIS Scoping Document. As part of the Phase 1 development, a Connector Road between Hospital Road and NYS Route 9A is proposed. This Connector Road would generally travel along the western property limit of the site.

The proposed Connector Road is approximately 650 feet from the nearest residence on Stevens Avenue. For comparison, this same residence is only approximately 400 feet from Route 9A. The Little Years Day Care is approximately 200 feet from the Connector Road, but only approximately 125 feet from Route 9A.

Both of the nearest sensitive receptors to the Connector Road are closer in distance to Route 9A. According to the traffic analysis performed in the DEIS, Route 9A is expected to carry at least 2.5 times more traffic than the Connector Road in the 2039 Phase 2 Build

condition. Since Route 9A is closer to the sensitive receptors and carries more vehicles, it is expected to be the dominant roadway noise source. As such, the proposed Connector Road is not expected to substantially affect noise levels at these receptors relative to traffic travelling on Route 9A.

Comment P.9

DEIS page 3N-11. Operational Mitigation – This section should address emergency generator noise mitigation as well.

(Letter #13, Cleary Consulting, 10/31/20, pg. 14)

Response P.9

As described in Section 3N-2a of the DEIS, any emergency generator used for the proposed development would be designed, constructed and located to comply with NYSDEC policy and the Town of Mount Pleasant Noise Ordinance. Such generators would be appropriately specified to include the necessary enclosure and exhaust silencer to meet the attenuation requirements. Generators would only operate during periodic testing and emergencies.

Comment P.10

DEIS page 3N-12. Construction Noise Mitigation/BMPs – How would certain construction BMPs such as "*Locating especially noisy equipment as far from sensitive receptors a possible*" or "*Using quieter construction equipment…"* be implemented, enforced and monitored?

(Letter #13, Cleary Consulting, 10/31/20, pg. 14)

Response P.10

The Applicant understands that noise related to construction activities will have to be compliant to the TMP Zoning Code Section 139-17 Commercial districts. (which reads) Noise levels within any commercial/retail-zoned districts shall not exceed 65 db(A)'s or an L10 of 60db(A)'s.

Q. Air Quality

Comment Q.1

I know that they were going to do things to mitigate air quality pollutants, but it wasn't very clear how they would mitigate to make sure there are not an extreme amount of air quality pollutants released from removing soil, blasting rock, et cetera.

(Public Hearing #1, Mr. Domenick Vita, 9/3/20. pg. 43)

Response Q.1

Soil sediment and erosion control plans to be implemented as part of the required storm water pollution prevention plan (SWPPP) must include provisions for the reduction of potential wind driven soils and sediments. These provisions typically include: 1) wetting exposed soil under dry conditions with a water truck, 2) placement of temporary ground cover such as mulch or chopped straw in inactive areas and 3) the early establishment of permanent ground cover such as grass and landscaping immediately upon completion of grading activities. These practices will all reduce the potential for dust generated during earthwork and blasting operations. A community air monitoring program can also be implemented during construction activities that provide indicators of high dust particle levels at the perimeter of the work areas so that specific action can be taken, such as wetting down road ways and soil stockpiles when dust particle levels become elevated.

Comment Q.2

Does the plan include steps toward mitigation of air pollution in general - from construction dust and debris?

(Letter #4, Domenick Vita, 9/28/20. pg. 2)

Response Q.2

See Response to Q.1. The project storm water pollution prevention plan must include provisions for mitigating wind driven erosion of soils and dust particles.

Comment Q.3

DEIS page 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 substances. This is a somewhat sensitive issue in the Town which hosted the corporate headquarters of Union Carbide during the Bhopal disaster.

(Letter #13, Cleary Consulting, 10/31/20, pg. 14-15)

Response Q.3

At this time, the bio-tech tenants are not yet known, however the bio-tech tenants would have to comply with all regulatory agency requirements specific to their operations on site, including any atmospheric discharge.

Comment Q.4

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 15)

Response Q.4

As described in Section 3O-2a, the screening assessment for the microscale analysis is a multi-step process. The first step is the *Level of Service Screening.* All 33 intersections were evaluated in the *Level of Service Screening* and only nine intersections were projected to operate at LOS D or worse under future conditions. These nine intersections were carried forward to the *Capture Criteria Screening.* Of the nine intersections considered for the *Capture Criteria Screening*, five intersections demonstrated volume increases greater than 10 percent. These five intersections were further considered in the *Volume Threshold Screening*. None of these five intersections had approach volumes that are projected to exceed the thresholds for quantitative analysis under future conditions.

Comment Q.5

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 15)

Response Q.5

As described in Section 3O-2a, all approach volumes for intersections considered in the *Volume Threshold Screening* were less than 4,000 vehicles per hour meaning a quantitative microscale analysis is not required. The maximum approach volume for each of the five intersections considered in the *Volume Threshold Screening* is presented in the Table below. These approach volumes represent the worst time period and Estimated Time to Completion plus 20 years (ETC+20) conditions for each intersection. The largest approach volume was 1,597 vehicles per hour, far less that the 4,000 vehicles per hour threshold for quantitative analysis.

Intersection	Maximum Approach Volume, ETC+20
Route 100/Hospital Road	1,028 vehicles per hour
Hospital Rd/Woods Road/Driveway 1	1,260 vehicles per hour
Route 9A/Rosedale Nurseries	1,597 vehicles per hour
Route 9A/Saw Mill River Parkway Ramps	1,337 vehicles per hour
Route 9A/ Dana Road	1,253 vehicles per hour

R. Greenhouse Gas Emissions, Energy Conservation, Green Building and Sustainability

Comment R.1

The DEIS speaks to specifically envisioning the use of green roofs and investigating solar panels, solar energy generation. I think that they should be clearly outlined as either/or. Either the applicant is going to use green roofs -- and by the way, there is one parking structure that is ideal for that, as well as the large buildings. There's a variety of opportunity for the use of green roofs there. It's consistent with the smart growth and sustainable growth that the applicant is envisioning in this development. In any case, these are mitigation measures that should be confirmed and clarified so that the planning board can accurately assess and review the impact and mitigation of this entire very large development.

(Public Hearing #1, Mr. Steven Kavee, Chair of the Town of Mount Pleasant Conservation Advisory Council, 9/3/20. pg. 33-34)

Response R.1

As noted in the DEIS, installation of green roofs will be considered for some of the proposed buildings as a potential mitigation measure to reduce stormwater runoffs. The Applicant will focus on roof mounted solar on this site. The Applicant will incorporate energy efficiency and conservation measures for the Project as the design progresses. The Applicant will continue exploring the opportunity to incorporate this mitigation measures as the project design progresses. Refer to Table 1-1, Summary of Impacts and Mitigation, in the DEIS for more details.

Comment R.2

LEED Silver is what the applicant is saying that the different leaseholders of the property would be held to. LEED Silver is a pretty low bar for buildings and smart growth. It doesn't really require that much. In fact, good windows and good lighting and just bike parking alone could possibly qualify as LEED Silver. The kind of really future-looking sustainable measures that we'd like to see exceed LEED Silver. That's all they're required to do, of course. But this kind of massive development with this kind of capital investment, I think, really could afford to demonstrate true sustainable and true smart growth building measures. And just meeting the applicable building codes is, again, a fairly low bar, and we'd like to see the applicant look at exceeding applicable building codes.

(Public Hearing #1, Mr. Steven Kavee, Chair of the Town of Mount Pleasant Conservation Advisory Council, 9/3/20. pg. 34-35)

Response R.2

The Applicant will continue exploring opportunities to advance the Project's sustainability measures, including incorporating LEED Silver standards and if possible in selected areas to as high as LEED Gold as the project design progresses. In addition to sustainable building features, the project site aims to design and construct in ways that excel beyond minimum code requirements. For instance, the project will enhances the area's resiliency

through the integration of green infrastructure measures, which will help reduce impervious areas and improve stormwater management (e.g., creating new ponds and wetlands for greater biodiversity in surrounding area; installation of bio-swales, etc.). Furthermore, the project area will be designed with consideration of the "healthy community" concepts, which encourage bicycle and pedestrian activities with bicycle facilities and onsite walking trails. The Applicant will focus on roof mounted solar on this site.

Comment R.3

Use Geothermal instead of gas.

(Public Hearing #1, Ms. Amy Hill, 9/3/20. pg. 56)

Response R.3

The Applicant will continue exploring energy efficiency and conservation measures for the Project, to the extent practical and financially feasible, as the design progresses.

Comment R.4

My question relates to how they calculated the significance of the carbon impact. It seems they are referring to New York State policies - - emission policies that are out of date. They refer to one from 2009, and they also are comparing gas to oil and coal based on carbon dioxide emissions. That ignores the fact that methane from gas is more potent as a greenhouse gas than carbon dioxide when calculated using a 20-year time frame, which is a calculation now mandated by New York State. I want them to answer how they came to the conclusion that the greenhouse gas emissions from this project would not significantly impact regional greenhouse gas emission. They don't show any back-up for that statement And we're talking about a potential of 3 million square feet of developed space using gas, so it's hard for me to believe that it wouldn't create a significant impact. And so I would like to know how they calculated that and if they're using the proper calculation for methane.

(Public Hearing #1, Ms. Sarah Smiley, 9/3/20. pg. 57-58)

Response R.4

The qualitative analysis of greenhouse gas emissions provided in the DEIS is consistent with the requirements and guidelines outlined in the DEIS Scoping Document, as adopted August 1, 2019 and the *NYS Department of Environmental Conservation's Guides for Assessing Energy Use and Greenhouse Gas Emissions In Environmental Impacts Statements*, which was in effect at the time of the adoption of the scope and throughout the writing and submission of the DEIS. Natural gas used onsite will be combusted and not directly released into the atmosphere as methane. The combustion of natural gas converts the methane into carbon dioxide, meaning GHG emissions of combusted natural gas are less than coal and oil as documented by the EPA.

(https://www.epa.gov/sites/production/files/2018-03/documents/emission-factors_mar_2018_0.pdf).

Comment R.5

They say while there may be additional greenhouse gas 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, end of quote. But it also states that the development will generate 1,854 new trips in the a.m., 2,104 new trips in the p.m. commute, and 8,500 parking places. Can details be provided to demonstrate that the proposed action will actually have lower greenhouse gas emissions than a traditional single-family residential development?

How are you calculating your comparison to greenhouse gas emissions, given the trip generation and given the size of the application?

Calculate that it's less than a traditional residential development.

(Public Hearing #1, Ms. Arline Segal, 9/3/20. pg. 60-61 and Letter #5, Arline Segal, 10/4/20, pg. 1)

Response R.5

Refer to Response R.4 for details on the methodology used for assessing air quality and greenhouse gas emissions for the project.

Comment R.6

I would just like to ask the developers to please consider using renewable heat technology and solar powered electricity.

(Public Hearing #1, Ms. Maddie Franklin, 9/3/20. pg. 65)

Response R.6

The Applicant will focus on roof mounted solar on this site. The Applicant will incorporate energy efficiency and conservation measures for the Project as the design progresses.

Comment R.7

Why not use renewable energy, all or as much as possible?

(Public Hearing #1, Ms. Sasha Skon, 9/3/20. pg. 71)

Response R.7

The Applicant will continue exploring energy efficiency and conservation measures for the Project, to the extent practical and financially feasible, as the design progresses.

Comment R.8

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.

(Letter #2, Commissioner Drummond, Westchester Planning Board, 9/28/20, pg. 7)

Response R.8

Comment noted.

Comment R.9

I strongly urge the Town Planning Board to require the developer to DO MORE than just installing Energy Star appliances and Water Sense fixtures! 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.

(Letter #7, Mary Hegarty, 10/11/20, pg. 2)

Response R.9

The Applicant will focus on roof mounted solar on this site. The Applicant will incorporate energy efficiency and conservation measures for the Project as the design progresses.

Refer to Response R.2 for more details of various mitigation measures the Project is considering to advance sustainability, including the integration of green infrastructure and healthy community concepts into the project design.

Comment R.10

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.

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 4)

Response R.10

The Applicant will focus on roof mounted solar on this site. The Applicant will incorporate energy efficiency and conservation measures for the Project as the design progresses.

Comment R.11

How do we strive for a higher level of LEEDS certification? What will it take to get to Gold LEEDS certification or higher?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 4)

Response R.11

Refer to Response R.2 for more details.

Comment R.12

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.

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 4)

Response R.12

Refer to Response R.2 for more details of various mitigation measures the Project is considering to advance sustainability, including the integration of green infrastructure and healthy community concepts into the project design.

Comment R.13

Do we have a measurement of how much energy will be produced on site?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 4)

Response R.13

At this time, energy production has not been determined. The Applicant will continue exploring energy efficiency and conservation measures for the Project, to the extent practical and financially feasible, as the design progresses.

Comment R.14

Will the site accommodate cars that need to be charged (e.g. charging stations?) If so how many charging stations will be installed?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 4)

Response R.14

Current design includes the installation of EV charging stations within the garage structure. Typical design will include a 2% dedication of EV charging stations.

Comment R.15

Have we considered geothermal for this site?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 4)

Response R.15

The Applicant will continue exploring energy efficiency and conservation measures for the Project, to the extent practical and financially feasible, as the design progresses.

Comment R.16

Is there an effort to build a healthy office environment by making efforts such thermal comfort, daylight and access to views?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 4)

Response R.16

As noted in DEIS Section 3P, *Greenhouse Gas Emissions, Energy Conservation, Green Building and Sustainability,* building orientation and site configuration has been crafted to create a series of outdoor courtyards that maximize views for tenants. Thermal comfort and daylighting are also LEED features which the application will continue to explore and integrate, to the extent practical, as the design progresses.

Comment R.17

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?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 4)

Response R.17

See Response B.2.

Comment R.18

In the Is there a plan in place to use sophisticated building technologies to ensure systems are only on when needed.

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 4)

Response R.18

As noted in Section 3H, *Utilities*, of the DEIS, project buildings would be designed with features to promote energy efficiency and other sustainability metrics. This would include installation of technologies as necessary to ensure energy efficiency and conservation practices.

Comment R.19

Is there any plan in place to treat water on-site for reuse?

(Letter #8, Jim Collins, Mount Pleasant Planning Board Member, 10/19/20, pg. 4)

Response R.19

The project will incorporate highly efficient appliances and water fixture (such as ENERGY STAR and WaterSense) to reduce water waste as much as possible. These water conserving fixtures proposed are anticipated to save approximately 20% gpd of the total average daily domestic water flow. Furthermore, current proposed site layout has been planned to minimize the demand for the irrigation water service by limiting the lawn areas as much as the design allows and by providing meadow growth for the areas such as stormwater detention basins. As such, there is currently no plan in place for onsite water treatment as impact analysis in the DEIS indicates that there will be adequate capacity at nearby water districts. Refer to Section 3H, *Utilities*, of the DEIS for more details.

Comment R.20

For the North 60 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.

(Letter #9, Barbara Benson, 10/28/20, pg. 1)

Response R.20

The Applicant will focus on roof mounted solar on this site. The Applicant will incorporate energy efficiency and conservation measures for the Project as the design progresses.

Comment R.21

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.

(Letter #9, Barbara Benson, 10/28/20, pg. 1)

Response R.21

See Response A.9.

Comment R.22

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

(Letter #9, Barbara Benson, 10/28/20, pg. 1)

Response R.22

Refer to Response R.2 for more details.

Comment R.23

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.

(Letter #10, Mount Pleasant Conservation Advisory Council, 10/30/20, pg. 2)

Response R.23

Refer to Response R.2 for more details.

Comment R.24

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.

(Letter #10, Mount Pleasant Conservation Advisory Council, 10/30/20, pg. 2)

Response R.24

Refer to Response R.2 for more details.

Comment R.25

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.

(Letter #10, Mount Pleasant Conservation Advisory Council, 10/30/20, pg. 2)

Response R.25

Refer to Response R.2 for more details.

Comment R.26

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.

(Letter #10, Mount Pleasant Conservation Advisory Council, 10/30/20, pg. 2)

Response R.26

The Applicant will focus on roof mounted solar on this site. The Applicant will incorporate energy efficiency and conservation measures for the Project as the design progresses.

Comment R.27

DEIS page 3P-2. Potential Impacts – Clarify what is meant by "*capable of obtaining LEED Silver Certification.*"

(Letter #13, Cleary Consulting, 10/31/20, pg. 15)

Response R.27

Project buildings will be designed with considerations and integration of sustainability features that meet LEED standard. Particularly, as required by the Lease, the design and construction of the biotechnology/medical technology space will incorporate green building components and techniques that would make it consistent with LEED Silver criteria. However, the building is not required to go through the formal LEED certification process.

Comment R.28

DEIS page 3P-2. Potential Impacts – Clarify the commitment to "*implement the following energy savings measures*." How will the Town ensure that items listed are implemented?

(Letter #13, Cleary Consulting, 10/31/20, pg. 15)

Response R.28

Since this is a voluntary requirement in excess of building code requirements, there is no enforcement requirement at the Town level. However, this is part and parcel with the requirement of the BioTechnology/Medical Buildings being constructed to the standard of being capable of obtaining the LEED Silver certification which is enforced by The County Commissioner of Public Works and Transportation (DPWT Commissioner) who will review (and approve) all construction.

Comment R.29

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 15)

Response R.29

This statement should be removed from DEIS section 3P. The comparison to residential uses is an error except in the DEIS Alternatives chapter.

Comment R.30

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?

(Letter #15, Sarah Miles Smiley, 11/1/20, pg. 1)

Response R.30

The Applicant will continue exploring energy efficiency and conservation measures for the Project, to the extent practical and financially feasible, as the design progresses.

Comment R.31

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.

(Letter #15, Sarah Miles Smiley, 11/1/20, pg. 1)

Response R.31

The analysis of greenhouse gas emissions provided in the DEIS is consistent with the requirements and guidelines outlined in the DEIS Scoping Document, as adopted August 1, 2019. Natural gas used onsite will be combusted and not directly released into the atmosphere as methane. The combustion of natural gas converts the methane into carbon dioxide, meaning GHG emissions of combusted natural gas are less than coal and oil as documented by the EPA (https://www.epa.gov/sites/production/files/2018-03/documents/emission-factors_mar_2018_0.pdf). The Applicant will continue exploring energy efficiency and conservation measures for the Project, including electrification strategies (such as heat pumps) to reduce natural gas consumption, as the design progresses. The Applicant recognizes the Project will be a source of mobile and stationary source greenhouse gas emissions and as such will incorporate numerous mitigation measures as outlined in Sections 3P-2 and 3P-3 of the DEIS.

Comment R.32

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.

(Letter #15, Sarah Miles Smiley, 11/1/20, pg. 1)

Response R.32

Natural gas used onsite will be combusted and not directly released into the atmosphere as methane. The combustion of natural gas converts the methane into carbon dioxide, meaning GHG emissions of combusted natural gas are less than coal and oil as documented by the EPA (https://www.epa.gov/sites/production/files/2018-03/documents/emission-factors_mar_2018_0.pdf). The Applicant will continue exploring

energy efficiency and conservation measures for the Project, including electrification strategies to reduce natural gas consumption, as the design progresses.

Comment R.33

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.

(Letter #15, Sarah Miles Smiley, 11/1/20, pg. 1)

Response R.33

Comment noted. The Applicant will focus on roof mounted solar on this site. The Applicant will incorporate energy efficiency and conservation measures for the Project as the design progresses.

Comment R.34

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?

(Letter #15, Sarah Miles Smiley, 11/1/20, pg. 1-2)

Response R.34

The Applicant will continue exploring energy efficiency and conservation measures for the Project as the design progresses.

Comment R.35

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 thisdevelopment.

(Letter #15, Sarah Miles Smiley, 11/1/20, pg. 2)

Response R.35

The Applicant will continue exploring energy efficiency and conservation measures for the Project, to the extent practical and financially feasible, as the design progresses. Refer to Response R.2 also for more details about other environmental and sustainability features to be incorporated into the Project that will protect natural resources and improve public health.

Comment R.36

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.

(Letter #16, Katherine Meladossi, 11/1/20, pg. 1)

Response R.36

The Applicant will continue exploring energy efficiency and conservation measures for the Project, to the extent practical and financially feasible, as the design progresses.

Comment R.37

How are you planning on dealing with the increased amounts of carbon dioxide and methane on our air and water?

(Letter #17, Peter & Rita Curtin, 10/31/20, pg. 2)

Response R.37

As noted in Section 3P of the DEIS, the GHG emission due to the implementation of the Proposed Action is not expected to significantly impact regional GHG. Furthermore, the Applicant will continue exploring energy efficiency and conservation measures for the Project, to the extent practical and financially feasible, as the design progresses.

S. Construction Impacts

Comment S.1

Where are you going to export all that soil to?

(Public Hearing #1, Ms. Joan Lederman, Planning Board Member, 9/3/20. pg. 30)

Response S.1

See Response E.1.

Comment S.2

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?

(Letter #4, Domenick Vita, 9/28/20. pg. 2)

Response S.2

The initial phase of the Project will be to provide a Route 9A connector. It is anticipated that construction traffic will use the connector in lieu of using neighborhood roads. The Applicant will work with the Town to direct construction vehicles away from the neighborhoods.

Comment S.3

Construction traffic is also a huge concern for people in this neighborhood. How are you going to manage traffic at Belmont on 9A. How are you going to manage traffic so that it does not necessarily have to come through this neighborhood, the neighborhood that borders the North 60 project?

(Public Hearing #1, Mr. Domenick Vita, 9/3/20. pg. 40-41)

Response S.3

See Response S.2.

Comment S.4

It there is any blasting, will we know about that ahead of time to prepare ourselves, our houses, our dogs, if we have them. How is that going to be monitored. For instance, who's going to be policing the quality of life issues that arise from this?

(Public Hearing #1, Mr. Domenick Vita, 9/3/20. pg. 43)

Response S.4

As detailed in DEIS Chapter 3C, Geology and Soils, based upon soil testing performed, it is not anticipated that rock blasting will be required for the Proposed Action. If rock is encountered in deeper excavations it is likely to be weathered and accordingly the goal of the construction is to use labor and machinery to remove rock from the project site.

Comment S.5

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?

(Letter #4, Domenick Vita, 9/28/20. pg. 2)

Response S.5

See Response S.4.

Comment S.6

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?

(Letter #4, Domenick Vita, 9/28/20. pg. 2)

Response S.6

In a separate article on construction activities, the Town Noise Ordinance allows commercial construction activities to occur only between the hours of 8:00 am and 6:00 pm on weekdays and 8:00 am to 5:00 pm on Saturdays. Construction is prohibited on Sundays and Holidays.

Comment S.7

Will someone be monitoring the noise levels in the neighborhood bordering the North 60 site to ensure that the levels do not surpass those in the town ordinances for allowable noise levels, or otherwise create an unlivable nuisance?

(Letter #4, Domenick Vita, 9/28/20. pg. 3)

Response S.7

The project site is subject to inspection by the Town of Mount Pleasant Code Enforcement Official and the Town Engineers to ensure compliance with all proposed mitigation measures.

Comment S.8

Will someone be monitoring the air quality in and around the North 60 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?

(Letter #4, Domenick Vita, 9/28/20. pg. 3)

Response S.8

As detailed in the DEIS (section 3.O pages 3O-7 through 3O-9), overall, air quality in the project site would not be expected to be substantially affected by the construction because of emission control procedures and the temporary nature of construction activities. Emissions from the operation of construction machinery are short term and not generally considered substantial. With the implementation of the various mitigation measures to minimize construction-related air quality impacts, no significant adverse impacts would be expected.

Comment S.9

Will there be a person or committee who interact directly with the neighbors and North 60 developers in order to raise and resolve any concerns as they arise?

(Letter #4, Domenick Vita, 9/28/20. pg. 3)

Response S.9

An employee of Fareri Associates will interact with the adjacent community throughout the life of the project.

Comment S.10

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

(Letter #12, Provident Design Engineering, 10/30/20, pg. 23)

Response S.10

Comment noted. The DEIS was revised accordingly prior to final acceptance of the DEIS as complete by the Lead Agency.

Comment S.11

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

(Letter #12, Provident Design Engineering, 10/30/20, pg. 23)

Response S.11

The SWPPP and Construction Phasing Plans have been revised and will be part of the Site

Plan submission. The Construction Phasing and Sequencing have been revised pursuant to the comments listed in Stormwater Comments I.13, I.17, and I.18. Additionally the revised construction sequence has been included in Appendix "N" of the revised SWPPP.

Comment S.12

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).

(Letter #12, Provident Design Engineering, 10/30/20, pg. 23)

Response S.12

As outlined in the DEIS, the construction sequencing for Phase I is anticipated to occur in Phases over 60 months. Consistent with Town Code Section 139-23, construction activities will typically be performed between 8:00 am and 6:00 pm on weekdays and 8:00 am to 5:00 pm on Saturdays. Based on the Phase and duration, it is anticipated that the number of workers on site would range between 30-100 during the initial phases for the site access for construction, construction staging areas, and installation of erosion and sediment control measures. The next phases which would generally include rough grading, utility and drainage structure installation, building/construction with site improvements and the number of workers would range between 250-550. As completion of Phase I nears, the number of workers would be between 100-200. It should be noted that not all workers are anticipated to arrive during the peak am hour and leave during peak pm hour (arrivals and departure would be slightly staggered). In addition there would be some ridesharing between workers (10%-20%). If there is no suitable way to balance the cut/fill on site, for efficiency, it is anticipated that 10 trucks will be utilized, 3 rounds per day, 2 days a week for approximately 9 weeks. The construction activity will be part of the Monitoring Program outlined for the Phase I development. A Construction Management Plan will also be developed. Based on the above, the construction traffic impacts would be less than the Phase I traffic impacts analyzed in the DEIS.

The Master Development Plan is anticipated to be constructed in phases with most of the infrastructure already in place from Phase I. While the Mater Development Plan development schedule and phasing is not known, the construction impacts are anticipated to be less than the Phase I impacts outlined above. The Master Development Plan construction activity will also be part of the Monitoring Program outlined for the Master Development Plan. A Construction Monitoring Plan will also be developed. Based on the above, these impacts would be less than the Master Development Plan traffic impacts analyzed in the DEIS.

Comment S.13

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

(Letter #12, Provident Design Engineering, 10/30/20, pg. 23)

Response S.13

It is anticipated that trucks will access the project site during construction from both NYS Route 9A and NYS Route 100. Hospital Road and Woods Road will be used to access the two state highways. The Applicant will mitigate any construction-related pavement damage as deemed necessary by the NYSDOT and Town of Mount Pleasant Highway Department. Please note, the project site is situated between two NYS parkways which prohibit commercial truck use, so the number of potential truck routes is limited.

The first two sentences of the above response have been converted to notes and are included on the Phase 1 Erosion Control Plan and Phasing Plan.

Comment S.14

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.

(Letter #12, Provident Design Engineering, 10/30/20, pg. 23)

Response S.14

It is anticipated that there will be some oversized vehicles required for the delivery of large equipment and materials. It is anticipated that the oversized trucks will utilize the same trucking routes described in Response S.13. Please note, the project site is located in an area that has experienced many large-scale construction projects over recent years and the existing network of roadways have adequately supported construction traffic in the past.

Comment S.15

DEIS page 3Q-11. Cut/Fill – Identify the total number of truck trips required to remove the 18,464 cubic yards of excess material.

(Letter #13, Cleary Consulting, 10/31/20, pg. 15)

Response S.15

As designed, the first phase generates an estimated surplus of 18,464 cubic yards of soil once that site grading and building construction is complete. All of this material will be trucked off-site by trailers to suitable locations. This volume translates to approximately 528 loads. For efficiency, it is likely that the trucking will be performed in a series of operations that will run an average of ten trucks each day with an anticipated 3 loads per day resulting in approximately 30 loads per day, two days per week. Accordingly, removal of 18,464 cubic yards will require approximately 9 weeks of anticipated trucking operations over the duration of the build out of Phase 1.

Comment S.16

DEIS page 3Q-11. Paving Operations – Identify the amount of paving required, and the

total number of truck trips required to import asphalt material.

(Letter #13, Cleary Consulting, 10/31/20, pg. 15)

Response S.16

It is estimated that 17,270 tons of asphalt is required for the paving operations contained in Phase 1. It will take approximately 865 deliveries of the required asphalt to the project site.

Comment S.17

DEIS page 3Q-11. Superstructure Concrete - Identify the amount of concrete required, and the total number of truck trips required for that material.

(Letter #13, Cleary Consulting, 10/31/20, pg. 15)

Response S.17

The following is an estimate of total concrete required for Phase 1 of the project.

Phase One:

Building	Cubic Yards of Concrete
B1	8,762.88
B2	3,467.1
B4	9,452.52
B5	6,852.72
B14	3,637.2
	32,172.42

With a typical concrete mixer truck capacity of 8 to 10 cubic yards, there will be approximately 3,600 truck trips for concrete deliveries, spread out over the course of Phase 1.

Comment S.18

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 15)

Response S.18

The Route 9A Connector will be constructed during Phase 1 and will be used for construction traffic. This will reduce the volume of trucks during construction using Bradhurst Avenue and the bridge over the Sprain Brook Parkway.

Comment S.19

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 15)

Response S.19

As detailed in Chapter 3C, Geology and Soils, based on soil test pit results, it is anticipated that rock blasting is not anticipated onsite as part of the earthwork operations required for the Proposed Action. However, if rock blasting is required is would be in the areas of the project site which will contain multiple levels of subsurface parking underneath the proposed buildings. Rock blasting may also be required to remove ledge rock from the hillside cut necessary to create the proposed West Street. Rock crushing is not currently proposed for the Project.

Any onsite rock blasting shall be in accordance with Chapter 104 of the Town Code of Mount Pleasant. Blasting shall only be performed by a licensed blaster once a permit is obtained from the Building Inspector. Any person conducting rock blasting operations will comply with all applicable State and Federal laws governing the use of explosives. All explosives used for the onsite rock blasting operations shall be properly stored in an approved storage magazine. Rock blasting will only be performed between the hours of 8:00 am and 7:00 pm, and no blasting operations will be conducted on Sundays or holidays. Rock blasting shall not be performed in adverse weather conditions, specifically high winds. The amount of explosive charges used shall be no greater than the amount required to start the ledge rock removal and additional machinery shall be used to remove the debris from the area once it has been blasted. The blasting charges shall be designed to minimize ground vibrations and air blast to the greatest extent practicable. Before firing the blasts, the material to be blasted shall be properly covered on the top and sides in accordance with the requirements of the Town Code. Stockpiles of excavated rock and soil can be used to help block noise created by the rock blasting operations from the areas surrounding the project site. A water truck shall be maintained onsite to control dust during the rock blasting operations. With implementation of these measures, impacts to adjacent properties are not anticipated.

Comment S.20

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 16)

Response S.20

There are no mitigation measures imposed in the lease with Westchester County. (See DEIS Appendix L for the North 60 Lease Agreement).

T. Alternatives

Comment T.1

DEIS page 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 condition.

(Letter #13, Cleary Consulting, 10/31/20, pg. 16)

Response T.1

Comment noted. Alternative B would generate substantially greater taxes and jobs than what currently exists on the site. The office buildings in Alternative B could include bio-tech uses, bringing new benefits to the Town over existing conditions, but these uses would not benefit from the complimentary uses, amenities, and integrated master planned approach undertaken with the Proposed Action.

Comment T.2

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 16)

Response T.2

The definition of the term low impact housing for the intent of this project would be housing designed and built to attract first act renters and second act renters. A first act renter could be defined as someone in the age group of 24 – 39 years of age, a single person starting out leaving their parent(s) home (their first act). A second act renter could be defined as a newly single person or couple with adult children in the age group of 55(+), the empty nester who no longer needs their single-family dwelling (their second act). Renters of this type will have minimal or no-impact to the community in which they live when compared to housing designed and built to attract families. A proposed definition of Low Impact Housing has been included in the draft Local Law (see FEIS Appendix O). Note that Alternative G which was identified in Section 1 of this FEIS, also includes low impact housing.

Comment T.3

DEIS page 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."

(Letter #13, Cleary Consulting, 10/31/20, pg. 16)

Response T.3

See Response T.4.

Comment T.4

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 16)

Response T.4

Low impact housing identified in Alternatives C and G would be purpose designed and built housing to support the Biotechnology/Medical workforce being attracted to the Town by the project. A Housing Marketing Plan to attract that target audience, (that meets Federal, State and Local guidelines) would be developed, which the Applicant's onsite marketing team would employ.

Access to student housing and employer sponsored housing would be restricted to the specific educational institution and/or Biotechnology employer that has directly contracted for such units. The type of student housing discussed in DEIS Alternative C is not included in Alternative G.

Comment T.5

DEIS 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 16)

Response T.5

The table has been amended below to show total numbers.

DEIS Table 4-1 Alternative C Trip Generation Volumes Compared to DEIS Proposed Action

Use	Entry Volume Alt. C	Entry Volume Proposed Action	Exit Volume Alt. C	Exit Volume Proposed Action	Total Volume Alt. C	Total Volume Proposed Action
Net New Multi-Family Residential – Phase 1						
Weekday Peak AM Hour	342	412	267	217	609	629
Weekday Peak PM Hour	330	272	400	461	730	733
Net New Multi-Family Residential – Master Development Plan						
Weekday Peak AM Hour	1,193	1,328	688	526	1,881	1,854
Weekday Peak PM Hour	759	574	1,392	1,530	2,151	2,104

Source: Hourly Trip Generation Rates based on ITE Land Use 220-Multi-Family

Comment T.6

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 16)

Response T.6

According to the standard planning multipliers published in the Urban Land Institute's Development Assessment Handbook[5] and not accounting for any existing surplus or deficiencies in current staffing, space or vehicles, the increase in population of 385 residents in Phase 1, and 1,209 with the Master Development Plan, could result in the need for an increase of 0.8 in police personnel, 77 square feet in police facility space, and 0.2 police vehicles in Phase 1, and 2.4 police personnel, 242 square feet of police facility space, and 0.7 police vehicles with the full build out of Master Development Plan.

For fire services, the increase in population could result in an increased demand for 0.6 fire personnel, 96 square feet of facility space, and 0.1 additional fire vehicles in Phase 1 and 2.0 fire personnel, 302 square feet of facility space, and 0.2 additional fire vehicles with the full build out of the Master Development Plan. For EMS services, this increase in population could also result in an increased demand for 14 EMS calls, 0 EMS vehicles, and 0.1 EMS full-time personnel in Phase 1 and 44 EMS calls, 0 EMS vehicles, and 0.2 EMS full-time personnel with the full build out of the Master Development Plan.[6]

For Alternative G, which also includes low impact residential uses, the increase in population of 143 residents in Phase 1 could result in the need for an increase of 0.3 in

[5] Model Factors for Social Impact Analysis (Police Services), Development Impact Assessment Handbook. Urban Land Institute, 1994.

[6] Model Factors for Social Impact Analysis (Fire and Emergency Medical Services), Development Impact Assessment Handbook. Urban Land Institute, 1994.

police personnel, 29 square feet of police facility space, and 0.1 police vehicles. For fire services, the increase in population could result in an increased demand for 0.2 fire personnel, 36 square feet of facility space, and 0 additional fire vehicles. For EMS services, this increase in population could also result in an increased demand for 5 EMS calls, 0 EMS vehicles, and 0 EMS full-time personnel.

Comment T.7

DEIS page 4-16. Recreation and Open Space – The impact on the Town's recreational resources resulting from an increased population of 1,209 residents, must be quantified, utilizing standard projection formulas.

(Letter #13, Cleary Consulting, 10/31/20, pg. 16-17)

Response T.7

According to the National Recreation and Park Association Park Metrics, the typical park and recreation agency maintains 9.9 acres of parkland per 1,000 residents. The Town of Mount Pleasant currently maintains approximately 14.8 acres per 1,000 residents, not including the substantial County and State resources that exist in and near the Town. The addition of 1,209 residents expected with the Alternative C Master Development Plan would reduce that ratio to 14.2 acres per 1,000 residents. The Proposed Action includes 6.2 acres of newly created parks, plazas, and courtyards on the project site, which would increase the open space ratio to 14.4 acres per 1,000 residents. The open space on the project site would be maintained by the Applicant but would remain a recreational amenity open to the public.

With Alternative G, the addition of 143 residents would reduce the current parkland ratio of 14.8 acres per 1,000 residents to ---- acres per 1,000 residents, which would increase to --- acres per 1,000 residents due to the 6.2 acres of newly created parks, plazas and courtyards on the project site.

Comment T.8

DEIS page 4-14. Utilities – The specific water consumption and sewage generation rates must be identified.

(Letter #13, Cleary Consulting, 10/31/20, pg. 17)

Response T.8

Water and Sewage rates are based on the most current New York State Department of Environmental Conservation Design Standards for Intermediate Sized Wastewater Treatment Systems, March 5, 2014 Edition and Stantec Consulting Services Inc. Water Demand Calculations (for cooling towers).

The specific usage rates that were used to produce the water demand estimates for the project and alternatives are as follows:

Phase I

Proposed Use	Usage Rate
Medical office	15 gpd per employee
Bio-Tech/R&D	15 gpd per employee
Neighborhood Shopping	0.11 gpd/sf
Hotel	110 gpd per room
Residential	110 gpd per bedroom

Master Plan

Proposed Use	Usage Rate
Medical office	15 gpd per employee
Bio-Tech/R&D	15 gpd per employee
Neighborhood Shopping	0.11 gpd/sf
Hotel	110 gpd per room
Liv Sci Center	5 gpd per patron
Residential	110 gpd per bedroom

Comment T.9

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 17)

Response T.9

At this time, as illustrated in DEIS Alternative C and FEIS Alternative G, the residential use is envisioned along Main Street. The Applicant understands that if approval for residential use is sought on lands that are in the Pocantico Hills School District, the potential impacts would have to be evaluated.

Comment T.10

DEIS page 4-17. Schools – Identify the multipliers utilized to calculate the number of school children generated. Were any other assumptions incorporated into the generation projections?

(Letter #13, Cleary Consulting, 10/31/20, pg. 17)

Response T.10

The methodology used to calculate the number of school children for Alternatives C and

G is explained in detail in Appendix S of the DEIS. The table below shows the multipliers and sources used as presented in Appendix S.

School-Age Children Generated on the Project Site in Alternatives C and G

Unit Type	No. of Units – Alt. C	No. of Units – Alt. G	Multiplier	School-Age Children – Alt. C	School-Age Children – Alt. G	Multiplier Source
Micro-Unit	132	0	0.008 (elementary); 0.005 (middle school)	1	0	Jack Schreder & Associates 2017
SRO (co-living apartment) unit	264	0	0.00	0	0	Portland Public Schools 2013
Studio/efficiency unit	132	29	0.00–0.03	4	1	Mix and Jiang 2009; RPM Consulting 2003; Lapkoff & Goblett 2018
One Bedroom Unit	132	69	0.02	3	2	Listokin 2006; Portland Public Schools 2013
TOTAL	660	98		8	3	

Comment T.11

DEIS page 4-17. Schools – Identify any school children generation rates or statistics relating to low impact housing, micro-units or co-living units.

(Letter #13, Cleary Consulting, 10/31/20, pg. 17)

Response T.11

Appendix S of the DEIS provides definitions of low impact housing types, as well as student generation rates for non-traditional housing types. See Response T.10 for multipliers and sources used, and see DEIS Appendix S for additional detail.

Comment T.12

DEIS page 4-19. Demand & Absorption – The DEIS states that "There is little or 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.)?

(Letter #13, Cleary Consulting, 10/31/20, pg. 17)

Response T.12

See Response M.30.

In addition, the Applicant understands that if there is a substantial change needed in the use that the impacts would have to evaluated.

Comment T.13

DEIS page 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 17)

Response T.13

On page 4-19 1st partial paragraph it states that not all of the housing units need to be built directly on the campus, but that 30% of the total should be. Furthermore, the Weitzman study suggests that the balance of that housing could be satisfied in the Primary Market Area of the following municipalities: Ardsley, Briarcliff Manor, Chappaqua, Dobbs Ferry, Elmsford, Hartsdale, Hastings on Hudson, Hawthorn, Irvington, Millwood, Mount Pleasant, Ossining, Pleasantville, Scarsdale, Tarrytown, Thornwood and White Plains. With a Secondary Market Area comprising all of Westchester County.

Comment T.14

DEIS page 4-19. Demand & Absorption, 1st partial ¶ – Where does the 30% figure for on-site housing come from?

(Letter #13, Cleary Consulting, 10/31/20, pg. 17)

Response T.14

The Weitzman Study independently concluded that approximately 30% of the estimated housing needed to accommodate employees working on the site should be provided on the site. This conclusion was drawn directly from the Weitzman Study, which is included in the DEIS. See the full Weitzman Study in Appendix M for additional detail.

Comment T.15

DEIS page 4-19. Demand & Absorption, 1st partial ¶ – Explain why it is assumed that the North 60 will support a "*millennial workforce*."

(Letter #13, Cleary Consulting, 10/31/20, pg. 17)

Response T.15

The statement is meant to convey that the housing in DEIS Alternative C, and FEIS Alternative G, would likely be rented by a first act renter, someone between the ages of 24 and 39 years old. In other words, a biotech/medical employee born between 1981 and 1996, this group is commonly referred to as the Millennial generation. This generation (nearly 73 million individuals) are the ones who are currently filling the entry level positions at many companies, at a starting salary and are therefore looking for economical housing options. The absorption will remain strong though as the Millennial generation ages out of the low impact housing Generation Z (nearly 68 million individuals) will take their place in the workforce and housing market. Generation Z is anyone born between 1997 and 2012.

Comment T.16

DEIS page 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 buildings vary significantly. Explain how the tax generation would not change.

(Letter #13, Cleary Consulting, 10/31/20, pg. 17-18)

Response T.16

The tax estimates provided in the DEIS are based on the Applicant's best estimates for purposes of SEQRA analysis only. The estimates provided are not based on actual assessments which would be set by the Town's Assessor after the site has been developed. Although residential uses could result in higher tax benefits (it is noted in the Weitzman Study that residential uses would require less subsidy and yield higher net present values than bio-tech uses), an assumption that taxes generated would be approximately the same was seen as a conservative approach.

Comment T.17

DEIS page 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?

(Letter #13, Cleary Consulting, 10/31/20, pg. 18)

Response T.17

Skyline Drive is privately owned by Robert Martin with deeded easements. The legal feasibility of access to the Applicant Parcel is yet to be determined.

Comment T.18

DEIS 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.

(Letter #13, Cleary Consulting, 10/31/20, pg. 18)

Response T.18

Whether the impact would be less than, equal to, or more than the Proposed Action has been added to each cell in DEIS Table 4-4, see table at the end of this chapter.

Comment T.19

DEIS Table 4-4. Geology & Soils, Alternative D – Generally quantify the "*substantially greater disturbance.*"

(Letter #13, Cleary Consulting, 10/31/20, pg. 18)

Response T.19

It is estimated that the Alternative D plan will require an additional 50,000 square feet of additional soil disturbance.

Comment T.20

DEIS Table 4-4. Topography & Steep Slopes, Alternative B – the disturbance area on the County parcel was omitted.

(Letter #13, Cleary Consulting, 10/31/20, pg. 18)

Response T.20

The Alternative B disturbance area noted in Table 4-4 has been revised to include disturbance on the county parcel. It is estimated that the Alternative B plan will require 3.28 acres of soil disturbance within steep slopes on the County parcel. (2.61 acres of steep slopes, 0.33 acres of very steep slopes, and 0.34 acres on excessively steep slopes.)

Comment T.21

DEIS Table 4-4. Topography & Steep Slopes, Alternative D – Generally estimate the "*substantially greater disturbance.*"

(Letter #13, Cleary Consulting, 10/31/20, pg. 18)

Response T.21

It is estimated that the Alternative D plan will require an additional 18,500 square feet of additional soil disturbance on steep slope areas.

Comment T.22

DEIS Table 4-4. Vegetation & Wildlife, Alternative B – Generally estimate the amount of tree removal.

(Letter #13, Cleary Consulting, 10/31/20, pg. 18)

Response T.22

It is estimated that the Alternative B plan will require the removal of 923 trees from the project site.

Comment T.23

DES Table 4-4. Vegetation & Wildlife, Alternative D – Generally estimate the amount of tree removal.

(Letter #13, Cleary Consulting, 10/31/20, pg. 18)

Response T.23

It is estimated that the Alternative D plan will require the removal of 1,467 trees from the Project Site.

Comment T.24

Table 4-4. Wetlands & Waterbodies, Alternative D – Generally estimate the amount of wetland disturbance.

(Letter #13, Cleary Consulting, 10/31/20, pg. 18)

Response T.24

It is estimated that the Alternative D plan will create a total of 65,050 square feet of soil disturbance within the onsite wetlands. (21,084 square feet on the 20-acre parcel and 43,966 square feet on the County parcel.)

Comment T.25

DEIS Table 4-4. Traffic & Transportation, Alternative A – Provide trip generation numbers for the existing residences.

(Letter #13, Cleary Consulting, 10/31/20, pg. 18)

Response T.25

The 5 single family homes would generate a total of 4 trips during the Weekday Peak AM hour and a total of 5 trips during the Weekday Peak PM hour. Table 4-4 has been updated accordingly.

Comment T.26

DEIS Table 4-4. Traffic & Transportation, Alternative B – Quantify the "*lower*" trip generation numbers.

(Letter #13, Cleary Consulting, 10/31/20, pg. 18)

Response T.26

The Alternative B scenario under existing zoning (52 five-bedroom single family homes and 292,000 s.f. of office) would generate a total of 378 AM trips/388 PM trips (as general office) and a total of 588 AM trips/525 PM trips (as medical office). Table 4-4 has been updated accordingly.

Comment T.27

DEIS Table 4-4. Fiscal & Market Impacts, Alternatives A, B and C – Identify estimated tax numbers.

(Letter #13, Cleary Consulting, 10/31/20, pg. 18)

Response T.27

Alternative A assumes no action would occur on the site, therefore, taxes would remain at approximately their current rates of $109,363 in annual property tax from the Applicant Parcel and no property taxes from the County-owned portion of the project site. Taxes were not calculated for Alternative B, though it is assumed in DEIS Table 4-4 that taxes generated from this alternative would be greater than the taxes currently generated on the site. As stated in DEIS Table 4-4, it is assumed that property taxes would be the same or similar to the Proposed Action estimate of $9.3 million. Taxes for DEIS Alternative C and FEIS Alternative G were generated based on the Applicant's experience and in-house estimations because similar examples and assessments do not exist in the Town. See also Response T.16.

Comment T.28

DEIS Table 4-4. Traffic & Transportation, Proposed Action and Alternative C – Rectify discrepancy between $9.2 and 9.3 million in taxes.

(Letter #13, Cleary Consulting, 10/31/20, pg. 18)

Response T.28

DEIS Table 4-4 has been corrected to state that the DEIS Proposed Action and DEIS Alternative C would generate $9.3 million in property taxes. See table 4-4 at the end of this chapter.

Comment T.29

A new methodology and independent professional must be hired to redetermine 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.

(Letter #18, Tom Sialiano, Mount Pleasant Councilmember, 01/13/21, pg. 1)

Response T.29

A complete School Student Generation Study is included in the DEIS (see DEIS Appendix S). This Study (and all materials submitted by the Applicant) has been reviewed by the Town's professional consultants. The School Study uses multipliers appropriate to the types of residential units to be built and concludes that due to the low impact nature of the proposed housing, and the number of students and young professionals likely to occupy the Project Site, under DEIS Alternative C, only approximately 8 school-age children would reside on the Project Site and attend schools in the Mount Pleasant Central School District.

As described in Chapter 1 of this FEIS, Alternative G includes 98 studio and 1-bedroom units, which would generate only 3 school age children. All housing on the site is purpose-build campus housing and not designed or constructed for family-housing.

After construction of Phase 1, the Applicant would determine the actual number of project generated children enrolled in the Mount Pleasant Central School District, assess fiscal impacts to the School District, and recalculate the anticipated number of public school children based on actual residents of Phase 1. If it is then anticipated that future phases would adversely impact the School District, the Applicant would reevaluate the types of residential units to build in future phases of the Master Development Plan.

Comment T.30

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

(Letter #18, Tom Sialiano, Mount Pleasant Councilmember, 01/13/21, pg. 1)

Response T.30

Alternative B: Alternative Plan Under the Existing Zoning, presented in DEIS Chapter 4, describes and analyzes an alternative where the project site would be redeveloped as permitted under the requirements of the existing zoning districts. In this alternative, the County parcel, which is currently located in the R-2- One-Family Residential District, would be developed with 52 single-family homes. The parcel owned by the Applicant, which is currently located in the OB-6 Office Building, Distribution, Limited Fabrication District, would be developed with 292,000 square feet of office space. See Chapter 4.2 in the DEIS for additional detail.

Comment T.31

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.

(Letter #18, Tom Sialiano, Mount Pleasant Councilmember, 01/13/21, pg. 1)

Response T.31

DEIS Alternative C includes micro and SRO type units, however, Alternative G does not. At this time, the effect of the COVID-19 pandemic in real estate is not fully known yet, it is too early to conclude what changes in behavior and consumer preferences will remain, but the Applicant will remain flexible and open to responding to and accommodating the lasting effects the pandemic may have in the residential marketplace.

Comment T.32

Research from a third party must be conducted 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.

(Letter #18, Tom Sialiano, Mount Pleasant Councilmember, 01/13/21, pg. 1)

Response T.32

Comment noted. All data and information submitted by the Applicant has been reviewed by the Town's professional consultants as part of the SEQRA process. The project has been reviewed by and coordinated with input from Police Department, Fire Department and Emergency Services. Also see Response L.12. Solid waste will be handled by a private hauler. Other incremental increases in demands for services will be offset by the new taxes to be generated by the project.

There will be no tax impact to the Town of Mount Pleasant taxpayer, any road work required by the North 60, any water service work required by the North 60, any sewer work required by the North 60, and/or any land improvements required by the North 60 will be funded by the Applicant. In addition, this project will generate additional tax revenue to the applicable tax districts. The County portion of the site is currently not taxable. Estimated future taxes to be paid include $1.659 million annually for Phase 1 and approximately $9.3 million annual for the full build out of the Master Development Plan. See DEIS Section M. Fiscal and Market Impacts for details.

See Response M.30.

Comment T.33

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

(Letter #18, Tom Sialiano, Mount Pleasant Councilmember, 01/13/21, pg. 1)

Response T.33

The Proposed Action as described in the DEIS does not include housing in the proposed development of the North 60. See DEIS Chapters 1 through 3 and 5 through 8 for detailed analyses of potential impacts of developing the site without residential uses.

DEIS Table 4-4 Impacts from the Proposed Action and Project Alternatives (Revised)

	DEIS Proposed Action	A-No Action	B-Alternative Plan Under Existing Zoning	C-Alternative Development Program	D-Alternative Access	E-Alternative Phasing Program	F-Reduced Environmental Impact Alternative	G-Alternative Development Program with Fewer Residential Units
Land Use, Zoning and Public Policy	The land use pattern on the Project Site would transform from mostly vacant land on the 60 acre parcel and five single-family homes on the 20 acre developer parcel to a master planned mixed-use bio-technology campus with complementary uses. The Project Site has not been designed to function as an isolated campus but rather to be open and integrated with the surrounding community and to complement the existing surrounding suburban community character. The Town does not currently have a single zoning district with use, area and bulk controls designed to regulate this type of development. The Proposed Action includes rezoning the entire project site to the OB-5 Office Business District and a text amendment to provide the required mechanisms to appropriately regulate the development. The OB-5 Master Plan District has limited applicability and is consistent with the purpose and intent of the OB districts. The Proposed Action is also consistent with the various local, regional, and state land use studies, plans and policies.	No changes to existing land uses on either the County Parcel or the Developer Parcel. No Project related impacts to surrounding land uses. No rezoning required under the No Action Alternative. The No Action Alternative would not meet the County's economic development objectives for County Parcel. Impacts to land use and zoning would be less than DEIS Proposed Action. Impacts to public policy would be greater than DEIS Proposed Action.	The land use pattern on the Project Site would transform from mostly vacant land on the 60 acre parcel and five single-family homes on the 20 acre Developer Parcel to a development consistent with existing zoning (R-20 zoning for the County Parcel and OB-6 zoning for the Developer Parcel). This Alternative Plan Under Existing Zoning is examined in this DEIS for compliance with the adopted SEQRA Scope for this project. In the Applicant's opinion, this Alternative is not considered a viable alternative development scenario because it is inconsistent with the requirements of the Lease Agreement and would not meet the goals or development objectives of the County or the Applicant. Impacts to land use would be equal to the DEIS Proposed Action. Impacts to zoning would be less than DEIS Proposed Action, and impacts to public policy would be greater than DEIS Proposed Action.	The land use pattern would be the same at the Proposed Action except this alternative includes up to 660 low-impact residential units in place of a portion of bio-tech or other uses. The proposed housing in Alternative C could provide additional opportunities for nearby college students, existing employees on the Grasslands Reservation, and the new employees of the bio-tech development. The low-impact housing would complement existing surrounding uses. The proposed OB-5 MP zoning district would permit this type of housing on the Project Site. This Alternative provides for residential uses which are essential for serving and attracting the proposed bio-tech uses. Impacts to land use, zoning and public policy would be equal to the DEIS Proposed Action.	Alternative D would create adverse impacts to existing land uses in the residential community to the north from additional access point. Impacts to land use would be greater than DEIS Proposed Action. Impacts to zoning and public policy would be equal to the DEIS Proposed Action.	Impacts to land use, zoning and public policy would be the same as those identified for the Proposed Action. Only the order in which individual sub-phases are constructed would change. Impacts to land use, zoning and public policy would be equal to the DEIS Proposed Action.	To strictly avoid sensitive environmental features, the eastern and western portions of the Project Site would not have direct access to the central portion of the site. The Developer Parcel and County Parcel would not be developable as one interconnected campus. Development of the County Parcel would require rezoning of the site from R-20 to a zone that would allow a mix of residential and office uses. Inconsistent with the Lease Agreement. Impacts to land use and zoning would be equal to the Proposed Action and impacts to public policy would be greater than the DEIS Proposed Action.	The land use pattern would be the same at the Proposed Action except this alternative includes 98 low-impact residential units in place of a portion of bio-tech or other uses in Phase 1. The proposed housing in Alternative G could provide additional opportunities for nearby college students, existing employees on the Grasslands Reservation, and the new employees of the bio-tech development. The low-impact housing would complement existing surrounding uses. The proposed OB-5 MP zoning district would permit this type of housing on the Project Site. This Alternative provides for residential uses which are essential for serving and attracting the proposed bio-tech uses. Impacts to land use, zoning and public policy would be equal to the DEIS Proposed Action.
Visual Resources and Community Character	The visual character of the Proposed Action would be different from the existing conditions. The Proposed Action would replace a mostly vacant property. The architectural design of the Proposed Action would capture the intrinsic natural character of the region and also embody the visionary and technological focus of the development. Building heights will vary across the Project Site to create an interesting blend of heights and engaging environment as if built over many years. Lighting will comply with Dark Sky standards. Views to and from the Project Site would not be adversely impacted.	Existing visual resources and community character would remain unchanged. The property would remain mostly vacant with no new development. Impacts would be less than DEIS Proposed Action.	The visual character of the site would transform from mostly vacant with 5 single family homes to a single-family subdivision and office park. Active and passive new public open spaces including wooded trails and public plazas would not be developed. Impacts would be equal to the DEIS Proposed Action.	Building height, bulk and placement would be the same as the Proposed Action. Architectural features and building amenities would vary slightly to accommodate residential uses but would not vary to a degree that would create additional impacts beyond those identified for the Proposed Action. Lighting on the Project Site would also be the same, or similar, to that proposed in the Proposed Action and would also comply with Dark Sky standards. Impacts would be equal to the DEIS Proposed Action.	Potential adverse impacts to community character would affect the residential community to the north. Impacts would be greater than the DEIS Proposed Action.	Impacts to visual resources and community character would be the same as those identified for the Proposed Action. Only the order in which individual sub-phases are constructed would change. Impacts would be equal to the DEIS Proposed Action.	Only the central Portion of the Project Site would be developed. Active and passive new public open spaces including wooded trails and public plazas would not be developed. More surface parking areas and fewer open landscaped plazas would be visible from Hospital Road. Impacts would be equal to the DEIS Proposed Action.	Building height, bulk and placement would be the same as the Proposed Action. Architectural features and building amenities would vary slightly to accommodate residential uses but would not vary to a degree that would create additional impacts beyond those identified for the Proposed Action. Lighting on the Project Site would also be the same, or similar, to that proposed in the Proposed Action and would also comply with Dark Sky standards. Impacts would be equal to the DEIS Proposed Action.

	DEIS Proposed Action	A-No Action	B-Alternative Plan Under Existing Zoning	C-Alternative Development Program	D-Alternative Access	E-Alternative Phasing Program	F-Reduced Environmental Impact Alternative	G-Alternative Development Program with Fewer Residential Units
Geology and Soils	Phase 1 38.2 acres of disturbance 18,464 cu. yds cut exported from site Master Plan ▪ 57.47 acres of disturbance ▪ 473,059 cu. yds cut exported from site	The existing geology and soils would remain intact without any land disturbance. Impacts would be less than DEIS Proposed Action.	County Parcel – disturbance to 34.3 acres. Developer Parcel – disturbance to 12.5 acres. Impacts would be less than DEIS Proposed Action.	Phase 1 38.2 acres of disturbance 18,464 cu. yds cut exported from site Master Plan ▪ 57.47 acres of disturbance 473,059 cu. yds cut exported from site Impacts would be equal to the DEIS Proposed Action.	An additional approximately 50,000 sf of disturbance would be required to add the additional site driveway in the northeast portion of the Project Site in Alternative D. Impacts would greater than DEIS Proposed Action.	Phase 1 38.2 acres of disturbance 18,464 cu. yds cut exported from site Master Plan ▪ 57.47 acres of disturbance 473,059 cu. yds cut exported from site Impacts would be equal to the DEIS Proposed Action.	Disturbance to approximately 16 acres of land. Impacts would be less than DEIS Proposed Action.	Phase 1 38.2 acres of disturbance 18,464 cu. yds cut exported from site Master Plan ▪ 57.47 acres of disturbance 473,059 cu. yds cut exported from site Impacts would be equal to the DEIS Proposed Action.
Topography and Slopes	Phase 1 5.7 acres of steep slopes would be impacted (3.6 acres of steep slopes, 1.2 acres of very steep slopes, and 0.9 acres of excessively steep slopes). Master Plan 8.6 acres of steep slopes would be impacted (5.2 acres of steep slopes, 2.0 acres of very steep slopes, and 1.4 acres of excessively steep slopes).	The existing topography and slopes would remain intact without any land disturbance. Impacts would be less than DEIS Proposed Action.	County Parcel – 3.28 acres of soil disturbance within steep slopes (2.61 acres of steep slopes, 0.33 acres of very steep slopes, and 0.34 acres on excessively steep slopes.) Developer Parcel – no impact to steep slopes. Impacts would be less than DEIS Proposed Action.	Phase 1 5.7 acres of steep slopes would be impacted (3.6 acres of steep slopes, 1.2 acres of very steep slopes, and 0.9 acres of excessively steep slopes). Master Plan 8.6 acres of steep slopes would be impacted (5.2 acres of steep slopes, 2.0 acres of very steep slopes, and 1.4 acres of excessively steep slopes). Impacts would be equal to the DEIS Proposed Action.	For Alternative D, approximately 18,500 sf of additional impacts to steep slopes would be required to add the additional site driveway in the northeast portion of the Project Site. Impacts would be greater than the DEIS Proposed Action.	Phase 1 5.7 acres of steep slopes impacted (3.6 acres of steep slopes, 1.2 acres of very steep slopes, and 0.9 acres of excessively steep slopes). Master Plan 8.6 acres of steep slopes impacted (5.2 acres of steep slopes, 2.0 acres of very steep slopes, and 1.4 acres of excessively steep slopes). Impacts would be equal to the DEIS Proposed Action.	Phase 1 - Avoids disturbance to 0.9 acres of excessively steep slopes. Master Plan - Not applicable - The Developer Parcel and County Parcel would not be developed as one interconnected campus. Impacts would be less than DEIS Proposed Action.	Phase 1 5.7 acres of steep slopes would be impacted (3.6 acres of steep slopes, 1.2 acres of very steep slopes, and 0.9 acres of excessively steep slopes). Master Plan 8.6 acres of steep slopes would be impacted (5.2 acres of steep slopes, 2.0 acres of very steep slopes, and 1.4 acres of excessively steep slopes). Impacts would be equal to the DEIS Proposed Action.
Vegetation and Wildlife	1,374 trees (measuring 10" DBH) will be removed from the Project Site: 993 during Phase I and 381 during the Master Development Plan. There are 94 specimen trees onsite: 20 in good condition and 74 in fair condition. Specimen trees account for 4% of the total inventoried tree population onsite. In Phase I, 44 specimen trees will be removed and following the Master Development Plan an additional 23 will be removed, totaling 67 specimen trees to be removed. Of the 1,374 trees to be removed to complete all phases of the project, 1,307 (or 95 percent) are non-specimen trees. Long-term impacts from habitat fragmentation are not expected to be significant.	No impacts to vegetation and wildlife. No trees removed. Impacts would be less than DEIS Proposed Action.	County Parcel – tree removal through much of site for development of single-family homes. Developer Parcel –Limited tree removal. Total removal of 923 from the Project Site. Impacts would be less than DEIS Proposed Action.	1,374 trees (measuring 10" DBH) will be removed from the project site: 993 during Phase I and 381 during the Master Development Plan. Alternative C would have the same impact as the Proposed Action. Impacts would be equal to the DEIS Proposed Action.	1,467 trees would be removed from the project site resulting in a greater number of trees removed to add the additional site driveway in the northeast portion of the Project Site. Impacts would be greater than the DEIS Proposed Action.	1,374 trees (measuring 10" DBH) will be removed from the project site: 993 during Phase I and 381 during the Master Development Plan. Impacts would be equal to the DEIS Proposed Action.	Phase 1 - Disturbance to approximately 16 acres of land and removal of an estimated 493 trees for Phase 1 development. Master Plan - Not applicable - The Developer Parcel and County Parcel would not be developable as one interconnected campus. Impacts would be less than DEIS Proposed Action.	1,374 trees (measuring 10" DBH) will be removed from the project site: 993 during Phase I and 381 during the Master Development Plan. Alternative C would have the same impact as the Proposed Action. Impacts would be equal to the DEIS Proposed Action.
Wetlands, Waterbodies and Watercourses	The Proposed Action will cause direct impacts to the two onsite streams and associated wetlands. Mitigation will restore	No disturbance to wetlands. No wetland restoration or wetland mitigation.	County Parcel – wetland area impacted: 12,255 SF. Mitigation area provided: 24,500 SF.	Amount and location of disturbance to wetlands would be the same as the Proposed Action, therefore, potential impacts to wetland, as well as	An estimated 65,050 SF of soil disturbance within the onsite wetlands (21,084 SF on	Amount and location of disturbance to wetlands would be the same as the Proposed Action,	No disturbance to wetlands or wetland buffers. No wetland restoration or wetland mitigation.	Amount and location of disturbance to wetlands would be the same as the Proposed Action, therefore, potential impacts to wetland, as well as

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	wetland and watercourse character and function.	Impacts would be less than DEIS Proposed Action.	Developer Parcel – wetland area impacted: 14,800 SF. Mitigation area provided: 29,600 SF. Impacts would be less than DEIS Proposed Action.	mitigation measures, would be the same. Impacts would be equal to the DEIS Proposed Action.	the 20-acre parcel and 43,966 SF on the County parcel). Impacts would be greater than DEIS Proposed Action.	therefore, potential impacts to wetland, as well as mitigation measures, would be the same. Impacts would be equal to the DEIS Proposed Action.	Impacts would be less than DEIS Proposed Action.	mitigation measures, would be the same. Impacts would be equal to the DEIS Proposed Action.
Stormwater Management	Stormwater peak runoff rates following development will not exceed those in the existing condition. As proposed, stormwater runoff rates following development would have no adverse impacts on downstream properties or stormwater conveying systems. Similarly, considering the nature of the existing site conditions and the level of stormwater treatment proposed in the post-development condition, it is predicted that this development will not represent a negative impact to stormwater quantity or degradation in the quality to any reservoir, stream, wetlands or watercourses. Even though the post-development condition contains more impervious area than existing conditions, the proposed stormwater management facilities mitigate the stormwater quality impacts as per the NYSDEC Rules and Regulations. The stormwater systems for the project are proposed for the qualitative and quantitative management of stormwater runoff from the Project Site.	Without any land disturbance and any increase in pervious surfaces, there would be no change to existing stormwater conditions on the Project Site. Impacts would be less than DEIS Proposed Action.	A complete Stormwater Management Plan would be required as part of any site development approval. County Parcel – area of stormwater management ponds: 75,700 SF. Developer Parcel – area of stormwater management ponds: 23,240 SF. Impacts would be equal to the DEIS Proposed Action.	Amount and location of land disturbance and pervious surfaces would be the same as the Proposed Action, therefore, potential impacts to stormwater conditions, as well as mitigation measures, would be the same. Impacts would be equal to the DEIS Proposed Action.	A complete Stormwater Management Plan would be required as part of any site development approval. Impacts would be equal to the DEIS Proposed Action.	Amount and location of land disturbance and pervious surfaces would be the same as the Proposed Action, therefore, potential impacts to stormwater conditions, as well as mitigation measures, would be the same. Impacts would be equal to the DEIS Proposed Action.	A complete Stormwater Management Plan would be required as part of any site development approval. Impacts would be equal to the DEIS Proposed Action.	Amount and location of land disturbance and pervious surfaces would be the same as the Proposed Action, therefore, potential impacts to stormwater conditions, as well as mitigation measures, would be the same. Impacts would be equal to the DEIS Proposed Action.
Utilities	Master Development Plan Water Supply Average daily domestic demand is 254,635 gallons per day (gpd; using the 20% reduction based on the use of water conservation fixtures). Peak hour domestic demand is 385 gpm (using a peak hour factor of 3.3 based on the PCI report). Irrigation demand is assumed to be applied in 3 zones yielding 480 gpm. Total Average Daily Demand is 865 gpm, rounded up to 900 gpm. The Proposed Action will generate an estimated 106,180 gpd sanitary sewage. Con Ed has indicated there is ample power supply available to support the electric and natural demands of the Proposed Action. Con Ed has also indicated that they can provide interruptible natural gas service to the North 60.	No increase in average daily domestic water/sewer demand beyond the existing pre-development levels. No increase in energy usage beyond the existing pre-development levels. Impacts would be less than DEIS Proposed Action.	Average daily domestic demand is 124,591 gallons per day (gpd; using the 20% reduction based on the use of water conservation fixtures). Peak hour domestic demand is 105 gpm (using a peak hour factor of 3.3 based on the PCI report). Irrigation demand is assumed to be applied in 3 zones yielding 460 gpm. Total Average Daily Demand is 565 gpm, rounded up to 570 gpm.	Average daily domestic demand is 260,934 gallons per day (gpd; using the 20% reduction based on the use of water conservation fixtures). Peak hour domestic demand is 400 gpm (using a peak hour factor of 3.3 based on the PCI report). Irrigation demand is assumed to be applied in 3 zones yielding 480 gpm. Total Average Daily Demand is 880 gpm, rounded up to 900 gpm. This alternative will generate an estimated 38,456 gpd sanitary sewage. Impacts would be greater than DEIS Proposed Action.	The overall development program for Phase 1 and the Master Development Plan would be the same as for the Proposed Action and, as such, demand to utilities systems would be the same. Impacts would be equal to the DEIS Proposed Action.	The overall development program for Phase 1 and the Master Development Plan would be the same as for the Proposed Action and, as such, demand to utilities systems would be the same. Impacts would be equal to the DEIS Proposed Action.	Average daily domestic demand is 105,906 gallons per day (gpd; using the 20% reduction based on the use of water conservation fixtures). Peak hour domestic demand is 190 gpm (using a peak hour factor of 3.3 based on the PCI report). Irrigation demand is assumed to be applied in 3 zones yielding 130 gpm Total Average Daily Demand is 320 gpm.	Average daily domestic demand is 260,691 gallons per day (gpd; using the 20% reduction based on the use of water conservation fixtures). Peak hour domestic demand is 400 gpm (using a peak hour factor of 3.3 based on the PCI report). Irrigation demand is assumed to be applied in 3 zones yielding 480 gpm. Total Average Daily Demand is 234 gpm, rounded up to 300 gpm. This alternative will generate an estimated 42,540 gpd sanitary sewage. Impacts would be greater than DEIS Proposed Action.

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			This alternative will generate an estimated 38,456 gpd sanitary sewage. Impacts would be less than DEIS Proposed Action.				This alternative will generate an estimated 62,000 gpd sanitary sewage. Impacts would be less than DEIS Proposed Action.	
Traffic and Transportation	<u>Phase 1 Trip Generation</u> Weekday Peak AM Entry - 412 Exit - 217 Total – 629 Weekday Peak PM Entry - 272 Exit - 461 Total – 733 <u>Master Plan Trip Generation</u> Weekday Peak AM Entry - 1328 Exit - 526 Total – 1854 Weekday Peak PM Entry - 574 Exit - 1530 Total – 2104 With planned mitigation measures, traffic to and from the Project Site can be accommodated in a safe and efficient manner.	No site generated traffic from the County Parcel. Existing traffic volumes from the 5 single family homes on the Developer Parcel would remain unchanged. The 5 homes generate a total of 4 trips during the Weekday Peak AM and a total of 5 trips during the Weekday Peak PM. Impacts would be less than DEIS Proposed Action.	Lower trip generation than the Proposed Action. A total of 378 trips during the Weekday Peak AM and a total of 388 trips during the Weekday Peak PM, assuming the office space is used for general office use. Or a total of 588 trips during the Weekday Peak AM and a total of 524 trips during the Weekday PM, assuming the office space is occupied by medical offices. Impacts would be less than DEIS Proposed Action.	Slightly lower trip generation than the Proposed Action in Phase 1 (-20 trips in the Weekday Peak AM and -3 trips in the Weekday Peak PM) but a higher overall trip generation in the Master Development Plan (+27 trips in the Weekday Peak AM and +47 trips in the Weekday Peak PM). Impacts would be similar to the DEIS Proposed Action.	The West Stevens Avenue additional site access would result is a significant redistribution of traffic along Hospital Road, Sprain Brook Parkway Ramps and Bradhurst Avenue in the order of 5% to 10% to the residential neighborhood. Impacts would be greater than DEIS Proposed Action.	The overall development program for Phase 1 and the Master Development Plan would be the same as for the DEIS Proposed Action and, as such, trip generation and distribution would be the same. Impacts would be equal to the DEIS Proposed Action.	All traffic would access the site from Hospital Road. Existing traffic volumes from the 5 single family homes on the Developer Parcel would remain unchanged. The need for off-site mitigation measures would be reevaluated based on the final site plan. Impacts would be less than DEIS Proposed Action.	Slightly higher trip generation than the Proposed Action in Phase 1 (+13 trips in the Weekday Peak AM and +18 trips in the Weekday Peak PM) but a lower overall trip generation in the Master Development Plan (-254 trips in the Weekday Peak AM and -170 trips in the Weekday Peak PM). Impacts would be less than DEIS Proposed Action.
Community Facilities and Services	The Proposed Action is expected to introduce approximately 1,052 employees to the Project Site in Phase 1 and 6,343 employees at full development of the Master Development Plan. On-site population (comprised of workers, visitors, shoppers, hotel guests, etc.) could result in an increase in the demand for police, fire and emergency services. DEIS Proposed Action uses proposed for Phase 1 are expected to generate approximately 61.6 tons per month (tpm) of solid waste. Upon completion of the Master Development Plan, 261.1 tpm of solid waste would be generated.	No additional site generated resident or employee population and no additional demand for community facilities and services beyond current levels from 5 existing single family homes. Impacts would be less than DEIS Proposed Action.	Substantially greater impact to community facilities and resources, particularly public schools: Total on-site residents: 220 School-age children: 76 On-site employees: 899 Impacts would be greater than DEIS Proposed Action.	<u>Phase I</u> 636 employees 385 on-site residents <u>Master Plan</u> 5,035 employees 1,209 on-site residents 4.4% increase in Town population. Alternative C could result in some impacts to police, fire, and emergency services, however, it is expected that tax revenue would offset these impacts. Impacts would be greater than DEIS Proposed Action.	Impacts to community facilities and services would be the same as those identified for the DEIS Proposed Action. Impacts would be equal to the DEIS Proposed Action.	Impacts to community facilities and services would be the same as those identified for the Proposed Action. Only the order in which individual sub-phases are constructed would change. Impacts would be equal to the DEIS Proposed Action.	The reduced impact alternative would introduce new on-site residential population and employees to the County Parcel. Impacts would be greater than DEIS Proposed Action.	<u>Phase I</u> 853 employees 143 on-site residents <u>Master Plan</u> 6,145 employees 143 on-site residents 0.5% increase in Town population. Alternative G could result in some impacts to police, fire, and emergency services, however, it is expected that tax revenue would offset these impacts. Impacts would be greater than DEIS Proposed Action.

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Fiscal and Market Impacts	$9.3 million in estimated new real estate taxes annually to Westchester County, the Town of Mount Pleasant and the School Districts. Estimated $7 million annually in additional rent revenues to Westchester County. Approximately 1,000 new construction jobs. The Proposed Action would introduce approximately 1,052 employees to the Project Site in Phase 1 and 6,343 employees at full development of the Master Development Plan.	The County Parcel would remain tax exempt and the Developer Parcel would continue to pay property taxes based on the current improvements to those properties. No new construction jobs or permanent jobs would be created. Impacts would be greater than DEIS Proposed Action.	The County Parcel would generate property taxes for 52 single-family homes. This would be an increase over current property tax generation for the County Parcel but residential development would not generate new jobs, annual rent, or retail and hotel taxes. The Developer Parcel would generate property taxes, rents and new on-site employment commensurate with typical office park development. Impacts would be greater than DEIS Proposed Action.	Property taxes to be generated would be the same or similar to the Proposed Action estimate of $9.3 million. Fewer permanent jobs generated than under the Proposed Action. On-site housing for biotech employees and students is considered vital to the economic viability of the project based on Weitzman Study. Impacts would be equal to the DEIS Proposed Action.	Overall development program would be the same as the Proposed Action and fiscal/market impacts would be the same. Impacts would be equal to the DEIS Proposed Action.	Overall development would be the same as the Proposed Action and fiscal/market impacts would be the same. Impacts would be equal to the DEIS Proposed Action.	County Parcel - would generate property taxes for 810,500 SF of development including 173,100 SF of retail, 228,100 SF of biotech, 25,000 SF of office, and 384,300 SF of residential use. Master Plan - Not applicable - The Developer Parcel and County Parcel would not be developable as one interconnected campus. Impacts would be less than DEIS Proposed Action.	Property taxes to be generated would be the same or similar to the Proposed Action estimate of $9.3 million. Fewer permanent jobs generated than under the Proposed Action. On-site housing for biotech employees and students is considered vital to the economic viability of the project based on Weitzman Study. Impacts would be equal to the DEIS Proposed Action.
Historic, Archaeological and Cultural Resources	Two archeological sites (Saw Mill River Precontact Site and J. Van Tassel Historic Site) have been identified within the Project Site. Construction activities would occur at the Project Site impacting the above-mentioned archeological resources. With respect to cultural resources in the vicinity of the Project Site, the Proposed Action is not expected to have any significant adverse impacts.	No land disturbance would result in no impacts to historic, archaeological and cultural resources. Impacts would be less than DEIS Proposed Action.	Similar to the Proposed Action, construction activities would impact the two archeological resources. Impacts would be equal to the DEIS Proposed Action.	Amount and location of land disturbance is the same as the Proposed Action. Impacts would be equal to the DEIS Proposed Action.	Similar to the Proposed Action, construction activities would impact the two archeological resources. Impacts would be equal to the DEIS Proposed Action.	Similar to the Proposed Action, construction activities would impact the two archeological resources. Impacts would be equal to the DEIS Proposed Action.	The two archeological sites are located outside the limits of disturbance. Impacts would be less than DEIS Proposed Action.	Amount and location of land disturbance is the same as the Proposed Action. Impacts would be equal to the DEIS Proposed Action.
Hazardous Materials	Recognized environmental conditions on the Property include: Six underground fuel oil tanks associated with the onsite residences are in-use on the property. Although five of the tanks were tightness tested in 2010, the tanks current condition cannot be determined. A 275-gallon aboveground fuel oil tank is located adjacent to the garage at 48A Saw Mill River Road. The tank appeared in good condition with no observed leaks or spills but it had no secondary containment. Several 55-gallon drums of ethylene glycol were observed in two garages from the former Nilsson Nurseries. Once operational, the proposed bioscience and technology center will generate solid waste, some of which may be Regulated Medical Waste (RMW) and other specialty wastes. The exact nature of the waste production and the quantities will not be known until specific tenants are identified.	Recognized environmental conditions would remain on-site Underground fuel storage tanks and existing drums of ethylene glycol would not be removed from the site, and a fill soil management plan would not be implemented for three locations with elevated concentrations of semi-volatile compounds. Impacts would be greater than DEIS Proposed Action.	Recognized environmental conditions on the Property would be remediated prior to redevelopment. A fill soil management plan would be implemented for three locations with elevated concentrations of semi-volatile compounds on the County Parcel. Underground fuel storage tanks and existing drums of ethylene glycol would be removed from the Developer Parcel. Impacts would be equal to the DEIS Proposed Action.	Project Site access, building placement, and building footprints would be the same as the Proposed Action so impacts and remediation would be the same. Impacts would be equal to the DEIS Proposed Action.	Project Site access, building placement, and building footprints would be the same as the Proposed Action so impacts and remediation would be the same. Impacts would be equal to the DEIS Proposed Action.	Project Site access, building placement, and building footprints would be the same as the Proposed Action so impacts and remediation would be the same. Impacts would be equal to the DEIS Proposed Action.	Recognized environmental conditions associated with the Developer Parcel would remain on-site. Underground fuel storage tanks and existing drums of ethylene glycol would not be removed from the site. Development of the County Parcel would likely necessitate development of a fill soil management plan for three locations with elevated concentrations of semi-volatile compounds. Impacts would be greater than DEIS Proposed Action.	Project Site access, building placement, and building footprints would be the same as the Proposed Action so impacts and remediation would be the same. Impacts would be equal to the DEIS Proposed Action.

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	All waste will be managed in accordance with applicable state and federal regulations. All future tenants of the Project Site will be required to comply with all applicable NYS regulations for the handling, storage, transport and disposal of RMW. RMW generated at these facilities will be stored on-site prior to transportation off-site by permitted vendors to regulated/permitted disposal facilities. Based on this information, no significant adverse impacts on human health are anticipated from the management of RMW.							
Noise	Mechanical equipment will be designed, constructed and located in a manner to comply with NYSDEC policy and the Town of Mount Pleasant Noise Ordinance, no significant adverse stationary source noise impacts are anticipated for both the Phase 1 and Master Plan Project. Trips generated by both the Phase 1 and Master Plan Project are expected to primarily travel on already heavily-trafficked roadways and receptor locations along Stephens Avenue would not see a substantial change in mobile source noise. Therefore, there would be no significant adverse noise impact due to mobile sources. Construction of the Proposed Action would be conducted in accordance with the Town of Mount Pleasant Noise Ordinance to minimize potential impact.	No noise impacts due to the Proposed Action's mechanical equipment, traffic generation, and construction activities would occur. Impacts would be less than DEIS Proposed Action.	Construction of Alternative B would result in limited short term noise impacts during construction. Impacts would be less than DEIS Proposed Action.	Since access, building placement, site plan and utilities would be the same as the Proposed Action and only programming within the buildings would change, noise impacts would be the same. Impacts would be equal to the DEIS Proposed Action.	Additional construction noise and traffic noise affecting the northeast portion of the Project Site and adjacent areas would occur with Alternative D. Impacts would be greater than the DEIS Proposed Action.	Noise impacts would be the same as the Proposed Action. Impacts would be equal to the Proposed Action.	Construction of Alternative F would result in limited short term noise impacts during construction. Impacts would be less than Proposed Action.	Since access, building placement, site plan and utilities would be the same as the Proposed Action and only programming within the buildings would change, noise impacts would be the same. Impacts would be equal to the DEIS Proposed Action.
Air Quality	Construction activities associated with the Phase 1 and Master Plan Project could result in temporary increases of air quality pollutants. As the Phase 1 and Master Plan Project become operational, no adverse air quality impacts are expected.	There would be no short term impacts to air quality associated with construction of Proposed Action. Impacts would be less than DEIS Proposed Action.	Construction activities would result in limited short term impacts to air quality including temporary increases of air quality pollutants. Impacts would be less than DEIS Proposed Action.	Since access, building placement, site plan and utilities would be the same as the Proposed Action and only programming within the buildings would change, air quality impacts would be the same. Impacts would be equal to the DEIS Proposed Action.	Construction activities would be expanded to the northeast portion of the Project Site and associated air quality impacts would affect the vicinity of the construction activities. Impacts would be equal to the DEIS Proposed Action.	Impacts to air quality would be the same as the Proposed Action. Impacts would be equal to the DEIS Proposed Action.	Construction activities would result in limited short term impacts to air quality including temporary increases of air quality pollutants. Impacts would be less than DEIS Proposed Action.	Since access, building placement, site plan and utilities would be the same as the Proposed Action and only programming within the buildings would change, air quality impacts would be the same. Impacts would be equal to the DEIS Proposed Action.
Greenhouse Gas Emissions, Energy Conservation, Green Building and Sustainability	The project will meet all applicable NYS building codes including the NYS Energy Conservation Construction Code, which regulates the design and construction of energy-efficient building envelopes and the installation of energy-efficient mechanical, lighting and power.	No changes to existing site generated greenhouse gas emissions or energy use (primarily from the Developer Parcel) would occur.	The project would be required to meet all applicable NYS building codes. Impacts would be less than DEIS Proposed Action.	Since access, building placement, site plan and utilities would be the same as the Proposed Action and only programming within the buildings would change, impacts to greenhouse gas emissions, energy conservation, green building and sustainability would be the same.	The project would be required to meet all applicable NYS building codes.	Since access, building placement, site plan and utilities would be the same as the Proposed Action and only programming within the buildings would change, impacts to greenhouse	Greenhouse gas emissions and energy use associated with the development of the County Parcel would be proportionately less commensurate with the reduction in Phase 1 development.	Since access, building placement, site plan and utilities would be the same as the Proposed Action and only programming within the buildings would change, impacts to greenhouse gas emissions, energy conservation, green building and sustainability would be the same.

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	Specific preliminary measures to decrease the GHG emissions of the Project include: A combination of LED and CFL lighting will be used to minimize electric usage. High efficiency tankless water heaters may be installed to provide on-demand hot water to save on energy consumption. Energy Star compliant appliances may be installed. Insulation to reduce heat loss in the winter and heat gain in the summer. The windows will be double glazed, insulating glass for winter heating and low emissivity for summer cooling. The specific design and emissions reduction measures through the implementation of the measures outlined above will be determined as Project design advances through the site plan approval process.	Impacts would be less than DEIS Proposed Action.		Impacts would be equal to the DEIS Proposed Action.	Impacts would be equal to the DEIS Proposed Action.	gas emissions, energy conservation, green building and sustainability would be the same. Impacts would be equal to the DEIS Proposed Action.	No changes to existing site generated greenhouse gas emissions or energy use from the Developer Parcel. Impacts would be less than DEIS Proposed Action.	Impacts would be equal to the DEIS Proposed Action.
Construction	Construction of the Proposed Action would likely result in several temporary environmental impacts. Impacts generally associated with construction consist of: noise from the operation of heavy equipment; fugitive dust and emissions from the operation of construction equipment; construction traffic relating to employee arrival/departure and material deliveries; and increased soil erosion from on-going earthwork operations. It is anticipated that construction of Phase 1 will take approximately 60 months to complete.	No construction and no construction related impacts would occur. Impacts would be less than DEIS Proposed Action.	Construction of the Proposed Action would likely result in several temporary environmental impacts. Impacts generally associated with construction consist of: noise from the operation of heavy equipment; fugitive dust and emissions from the operation of construction equipment; construction traffic relating to employee arrival/departure and material deliveries; and increased soil erosion from on-going earthwork operations. Impacts would be less than DEIS Proposed Action.	Since access, building placement, site plan and utilities would be the same as the Proposed Action and only programming within the buildings would change, construction phasing and construction related impacts would be the same. Impacts would be equal to the DEIS Proposed Action.	Additional construction related impacts resulting from additional site access and driveway in the northeastern portion of the Project Site would occur. Impacts would be greater than the DEIS Proposed Action.	Construction related impacts would be the same as those identified for the Proposed Action. Only the order in which individual sub-phases are constructed would change. Impacts would be equal to the DEIS Proposed Action.	Construction would likely result in several temporary environmental impacts such as noise from the operation of heavy equipment; fugitive dust and emissions from the operation of construction equipment; construction traffic relating to employee arrival/departure and material deliveries; and increased soil erosion from on-going earthwork operations. The Alternative, with less overall development, would have a shorter Phase 1 construction schedule. Impacts would be less than DEIS Proposed Action.	Since access, building placement, site plan and utilities would be the same as the Proposed Action and only programming within the buildings would change, construction phasing and construction related impacts would be the same. Impacts would be equal to the DEIS Proposed Action.