Elmwood Preserve

Town of Greenburgh, New York
Draft Environmental Impact Statement (DEIS)
Draft Scoping Document

Name of Project: Elmwood Preserve
Applicant: Ridgewood/Elmwood Owner LLC
Project Location: 850 Dobbs Ferry Road
P.O. White Plains
Town of Greenburgh
Westchester County, NY
Tax ID: 7.530-320-1..SE
7.530-320-1..SG
SEQRA Classification: Type I
Lead Agency: Town of Greenburgh Town Board
177 Hillside Avenue
White Plains, NY
Lead Agency Contact: Garrett Duquesne, AICP
Commissioner, Department of Community Development and Conservation
Town of Greenburgh
(914) 989-1532
Date of Scoping Meetings: June 26, 2019
Date of Scope Adoption: July XX, 2019 (Proposed)
Elmwood Preserve
Town of Greenburgh, New York
Draft Environmental Impact Statement (DEIS)

DRAFT Scope

This document identifies the issues to be addressed in the Draft Environmental Impact Statement (DEIS) for the proposed Elmwood Preserve (the “Project”) in the Town of Greenburgh, New York (the “Town”), proposed by Ridgewood/Elmwood Owner LLC (the “Applicant”). This Scope document contains the items described in 6 NYCRR Part 617.8 (e) (1) through (7). For purposes of this Scope, the term “Project” means the Project and all related implementing actions, such as approvals and permits.

REQUIRED ELEMENTS OF THE DEIS

The DEIS shall conform to requirements for preparation and content of environmental impact statements as stipulated in 6 NYCRR 617.9, which include but are not limited to the following:

- A description of the proposed Project and its environmental setting;
- A statement of the environmental impacts of the proposed Project, including its short- and long-term effects, and typical associated environmental effects;
- An identification of any significant adverse environmental effects that cannot be avoided if the proposed Project is implemented;
- A discussion of alternatives to the proposed Project;
- An identification of any irreversible and irrevocable commitments of resources that would be involved if the proposed Project is implemented;
- A description of mitigation measures proposed to minimize or avoid any significant adverse environmental impacts of the proposed Project.

All discussions of mitigation will consider at least the mitigation measures identified in this Scope. Where reasonable and necessary, such mitigation measures will be incorporated into the proposed Project if they are not already so included. If any mitigation measures listed in this Scope are not incorporated into the proposed Project, the rationale for not incorporating them will be discussed in the DEIS. The Applicant may suggest additional mitigation measures where appropriate. When no mitigation is provided, the rationale will be discussed in the DEIS.

PROPOSED PROJECT

Ridgewood/Elmwood Owner LLC (the "Applicant" and owner) proposes re-development and repurposing of the 106.8-acre, former Elmwood Country Club located at 850 Dobbs Ferry Road, Greenburgh, NY 10523 (the "Property"). The Project Site, located on the north side of Dobbs Ferry Road, is identified as tax parcels 7.530-320-1..SE and 7.530-320-1..SG on the Town of Greenburgh Tax Map.
Currently, the property is split-zoned, with 20.4 acres of land in the R-20 district and 86.4 acres of land in the R-30 district. The Applicant proposes to rezone the R-30 zoned portion of the property to R-20 and then to rezone the entire property to a Planned Unit Development (PUD) to facilitate the proposed development. These actions require a Zoning Map Amendment. The Applicant proposes to rezone the entire property to the R-20 District to facilitate a Planned Unit Development (PUD), which requires a Zoning Map Amendment.

The Applicant proposes to develop a 92.6-acre portion of the 106.8-acre property with approximately 175 age restricted, multi-family townhomes in 45 buildings, for buyers aged 55 and older, and dedicate the remaining 14.2 acres (east of Con Edison power lines which bifurcate the property and occupy a 200-foot wide easement) to the Town of Greenburgh for community recreational use. The Project would also contain a clubhouse, pool, tennis courts and other amenities. Each townhome would have three bedrooms and a two-car garage with some units having basements.

As part of the proposed Project, a walking trail is proposed to connect with adjacent subdivisions located on Country Club Drive, Overhill Road and Valleyview Road. The 14.2-acre portion of the PUD proposed to be dedicated to the Town of Greenburgh as a recreational area would include a multi-purpose field and two baseball fields. The walking trail would be located within a proposed easement, while the remaining open space throughout the property would be controlled by a future homeowner's association.

Internal roadways will be constructed with sidewalks and a sidewalk is proposed for the north side of Dobbs Ferry Road. Two accesses are proposed off Dobbs Ferry Road, one across from Westchester View Lane and another located centrally across from the new Capitol Senior Housing Development.

As part of the Project, the entrance to Rumbrook Park is proposed to be moved west to improve the traffic congestion issues associated with the Sprain Brook Parkway ramps and Dobbs Ferry Road.

The proposed Project requires the approvals and permits identified in Table 1:
Table 1: Required Approvals and Permits

<table>
<thead>
<tr>
<th>Agency</th>
<th>Approval/Permit</th>
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<tbody>
<tr>
<td>1. Town of Greenburgh Town Board</td>
<td>• SEQRA Determination (§200-3)(^{1})</td>
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<td>• Rezoning &amp; PUD Overlay</td>
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<td></td>
<td>• Tree Permit</td>
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<td>2. Town of Greenburgh Planning Board</td>
<td>• Site Plan Approval (PUD) (§285-53.B)(^{1})</td>
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<td>• Subdivision Approval (§250-4)(^{1})</td>
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<td></td>
<td>• Wetland Permit (Adjacent Area) (§280-8.A)(^{1})</td>
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<td>• Steep Slopes Permit (§245-4)(^{1})</td>
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<td>• Tree Removal Permit (§260-4)(^{1})</td>
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<tr>
<td>3. Town of Greenburgh Engineering Department</td>
<td>• Stormwater Pollution Prevention Plan (SWPPP) Approval (§248-8.A)(^{1})</td>
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<td>• Stormwater Management Control Permit</td>
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<td>4. Town of Greenburgh Building Department</td>
<td>• Building Permit</td>
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<tr>
<td>5. Greenburgh Consolidated Water District No.1</td>
<td>• Backflow Prevention</td>
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<td>• New Water Service</td>
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<tr>
<td>6. Westchester County Health Department</td>
<td>• Backflow Prevention</td>
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<td></td>
<td>• New Sewer Service</td>
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<td>7. Westchester County Planning Board</td>
<td>• §239-m General Municipal Law Referral</td>
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<tr>
<td>8. New York State Department of Environmental Conservation (NYSDEC)</td>
<td>• SPDES General Permit GP-0-15-002 For Stormwater Discharges From Construction Activities</td>
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<tr>
<td>9. New York State Department of Transportation (NYSDOT)</td>
<td>• Highway Work Permit</td>
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Note: \(^{1}\) Town of Greenburgh Code Section

**ORGANIZATION AND CONTENT OF THE DEIS**

The DEIS will contain the following information and address the following issues as they relate to the proposed Project.

**COVER SHEET** identifying:

1. The proposed Project and its location;
2. The name, address, email and telephone number of the Lead Agency and contact person;
(3) The name, address, email and telephone number of the preparer and other organizations that contributed to the DEIS; the date of DEIS submission and acceptance;

(4) The name, address, email and telephone number of the Applicant/Owner;

(5) Public hearing date and DEIS comment period; and

(6) Website where the DEIS and Final Environmental Impact Statement (FEIS) will be posted.

Following the cover sheet, a list (name, address, email and telephone numbers) of all of the Applicant’s consultants, and a list of all interested and involved agencies will be provided, with names, address, email and phone numbers for each agency provided.

**TABLE OF CONTENTS**, indicating the chapters of the DEIS and page numbers as well as lists of exhibits, tables and appendices.

The text of the DEIS will include the following:

**I. EXECUTIVE SUMMARY**

A. Introduction;

B. Description of the proposed Project;

C. List of all involved and interested agencies and identification of local, county, State and other approvals required;

D. Statement of Project purpose and need;

E. Summary of significant adverse environmental impacts identified in each subject area;

F. Summary of mitigation measure proposed for significant adverse environmental impacts; and

G. Description of alternatives analyzed and a table comparing the impacts of the proposed Project with the impacts of the various alternatives.

**II. DESCRIPTION OF THE PROPOSED PROJECT**

A. Description of Project Location
   1. Identification of regional and area location (including mapping and other descriptive graphics).
   2. Narrative and mapping of tax parcel, and total parcel area.
   3. Description of present ownership and use.
4. Describe the nature and location of any known covenants and easements on the Project Site.

5. Narrative and mapping of existing and abutting streets, site frontage and access and surrounding road network clearly indicating the routes to and from the proposed Project both local and on the regional roadway network.

6. Describe the Project Site’s relationship to available transit options.

7. Description of on- and off-site utilities serving the Project Site.

8. Description of site conditions, surrounding land uses and existing zoning in narrative and graphic form.

9. Description of all existing uses and structures, currently on the Project Site, including buildings or other facilities to be removed or retained, and their current physical condition.

10. Discussion of Project background and Project Site history including prior use(s).

11. Summarize soil and groundwater testing results.

12. Description of wetland and watercourse features on-site (to be provided by a Wetlands Scientist (per Chapter 280).

13. Summary of tree cover on-site.

14. Description of topography of site, and submission of a Slopes Analysis Plan.

B. Description of the Proposed Project

1. Proposed Planned Unit Development (Proposed PUD)

   a. Mapping and narrative of layout and design concept for the proposed PUD including both a site plan and subdivision plan at a scale of 1” = 100’.

   b. Sustainability and Green Building Design: Description of sustainability measures and environmental building technologies that will be used.

   c. Residential Component

      (1) Number and types of dwelling units (including total number of bedrooms) and parking.

      (2) Proposed building styles and materials, including color palette and architectural concepts. Provide elevations illustrating design concepts.

      (3) Discuss compliance with the New York State Fire and Building Code including whether any variances will be requested.

      (3)(4) Discuss consistency with Comprehensive Plan.

      (4)(5) Identify affordable housing components.

      (5)(6) Discuss the age restriction proposal, including mechanism of enforcement.
(7) Discussion of planned ownership and management (rental, condominium, fee-simple, homeowner’s association, etc.). Indicate the subletting and vacation rental policy that will apply to the new dwelling units, if any.

(6) Provide floor Plan diagrams of proposed age-restricted dwelling units.

(7)(8)____

d. Residential Amenities Component

(1) Location, ownership, maintenance, type and use of proposed club facilities, including type and frequency of events, number of employees, and hours of operation for club use.

(2) Bulk and area requirements for club use (floor area, building height, setbacks, parking).

(3) Proposed parking and loading facilities, including location, layout and count. Describe provisions and location for overflow parking.

(4) Describe pool and tennis facilities.

(4)(5)____ Indicate whether these facilities will be open to the public or for private use only and whether these facilities are available for rental.

e. Site Access, Roadways and Circulation

(1) Internal Site Circulation: Proposed roadways and abandonment of roadways.

(2) Proposed sidewalks and bicycle paths, and other access routes (e.g. golf cart/adult tricycle).

(3) Connections to adjacent roadways, sidewalks, and pedestrian/bicycle paths.

(4) Connections to adjacent neighborhoods and developments.

(5) Relationship to public transit.

(6) On and off-street parking.

(7) Emergency, refuse service and maintenance access and circulation.

(7)(8)____ Identify any gates and/or fences that would be included as part of the project design.

f. Tree Removal, Tree Preservation, Landscaping and Buffers

(1) Conceptual landscaping plan, including plant lists and maintenance plan.
(2) Proposed treatment and maintenance of buffer areas between the Project and adjoining properties.

(3) Landscaping Details Plan (Planting details, mulch, maintenance requirements).

(2)(4) Description and submission of a conceptual tree removal plan and tree preservation plan, including species, size (dbh), canopy spread, tree condition/health. Written description to be provided by a Certified Arborist.

g. Recreation and Open Space

(1) Description and graphics illustrating public and private recreation spaces and amenities.

(2) Description of use, ownership and maintenance of proposed Rumbrook Park addition.

(3) Summarize evaluation of proposed dedicated parkland versus payment of recreation fees and loss of tax revenue. Identify any restrictions on use imposed on Greenburgh residents.

(4) Describe connections to adjacent public recreation areas including Rumbrook Park East, including location, materials, etc. and permissions (e.g. easement or similar) including liable parties and any limitations imposed by the Con Edison easement.

(5) Discuss proposed access, ownership, liability, maintenance plans, financing, and enforcement of use for proposed trails.

(6) Discuss the availability of the proposed trails to the public.

h. Utilities and Support Facilities

(1) Description and mapping of public and private (e.g. telecommunications, etc.) utilities, including on-site and off-site infrastructure improvements:

   (a) Discussion of energy supply in light of Con Edison’s natural gas connection moratorium.

   (b) Description of any proposed water lines, conceptual locations of any booster stations, pressure reducing stations, storage tanks, etc. Discuss compliance with relevant county and state design and construction standards.

   (c) Description of any proposed gravity sewer mains and/or sanitary force mains to include conceptual locations of any wastewater pump stations, etc. Discuss compliance with relevant county and state design and construction standards.
(d) Description of any necessary infrastructure upgrades for both water and/or sewer both on site and off site.

(e) Description of ownership and maintenance of utilities.

(f) Description of Inflow/Infiltration (I&I) reduction, including conceptual method, proposed ratio and implementation schedule.

(2) Map and describe site maintenance, storage and refuse sites and facilities.

(3) Describe security provisions and facilities.

i. Site Excavation, Grading and Fill Plan

(1) Grading plan.

(2) Cut and fill plan, showing amounts and areas to be cut and filled.

(3) Amount and source of any required fill.

(4) Methods to be used to ensure fill slope stability during flood events.

(5) Wetland/Watercourse Plan, including extent of 100-foot regulated buffer area. Show in relation to proposed disturbances.

j. Stormwater Management

(1) Proposed Stormwater Pollution and Prevention Plan (SWPPP) to manage stormwater quantity and quality.

k. Construction

(1) Description of Project phasing, including how market conditions may affect phasing.

(2) Description of construction process and phasing, to be shown graphically on a plan, including the anticipated number of construction workers, the routes these trucks would take to the Project Site and the duration and time periods over which they will take them.

(3) Discussion of emergency access and provisions for emergency service during construction, including demonstration that fire apparatus can safely access the site.

(4) Identify number of employees and deliveries anticipated, temporary parking for construction workers, and hours of construction activity.

(5) Identify mitigation measures as needed, including any controls (e.g. dust control and blasting plans) that are proposed.
I. Project Purpose and Need

(1) Discussion of Project purpose and need, including data and/or demographic market trends and identified housing demand for a project of this type and target audience. Document the need for the Project as opposed to that which would be allowed under as-of-right development.

(2) Discussion of objectives of the Applicant.

(3) Description of benefits of the proposed Project.

(4) Discuss future ownership and any proposed deed restrictions, covenants, or similar that are proposed to ensure a development of the type proposed.

m. Description of required permits and approvals, including a description of the approval process

III. EXISTING CONDITIONS, POTENTIAL IMPACTS AS A RESULT OF THE PROPOSED PROJECT AND PROPOSED MITIGATION

A. Land Use, Zoning and Public Policy

1. Land Use

   a. Existing Conditions

      (1) Description and mapping of current Project Site land use, including current building conditions.

      (2) Description of any relevant easements or covenants.

      (3) Description and mapping of land uses within a 1/2 mile radius of the Project Site including public and private open space areas.

   b. Future without the Proposed Project

      (1) Description of any known land use changes for the Project Site, which would occur in the future without the proposed Project.

      (2) Future known and planned projects in the Town of Greenburgh with the potential to affect the proposed Project.

   c. Potential Impacts as a result of the Proposed Project

      (1) Describe the compatibility of the proposed Project with existing land uses in the study area.

      (2) Describe any impacts associated with existing or proposed easements and/or covenants.

   d. Mitigation
(1) Discuss appropriate mitigation measures to reduce identified impacts.

2. Zoning, Site Plan and Subdivision Regulations
   a. Existing Conditions
      (1) Map and describe zoning districts within a 1/2 mile radius including the current R-20 and R-30 zoning requirements including: use, density, bulk and height, and lot and dimensional requirements per Chapter 285.
      (2) Description of PUD provisions and the review and approval process for a PUD.
      (3) Description of site plan review and approval process, and site plan design standards per Chapter 285; and subdivision review and approval process; and subdivision design standards per Chapter 250.
   b. Future without the Proposed Project
      (1) Discuss the use of the Project Site without the proposed Project, including potential development under current R-20 and R-30 zoning.
      (2) Describe any pending zoning changes within 1/2 mile of the Project Site.
   c. Potential Impacts as a result of the Proposed Project
      (1) Discuss compliance with the PUD requirements at Article III, §285-24 of the Zoning Ordinance, including but not limited to the ability of the Applicant to provide at least a 10% affordable housing set aside in support of the objective stated in §285-24.A(3).
      (2) Discuss compliance with the site plan standards at Article VIII of Chapter 285 of the Town of Greenburgh Code.
      (3) Discuss compliance with the subdivision standards at Chapter 250 of the Town of Greenburgh Code.
      (4) Discuss the potential precedent set by the Proposed rezoning action, especially with respect to the rezoning and subsequent development of other large tracts of open space in the Town.
   d. Proposed Mitigation
      (1) Discuss appropriate mitigation measures to reduce identified impacts.
3. Public Policy
   a. Existing Conditions:
      (1) Describe local, regional and other applicable public planning and policy documents including, but not limited to Town of Greenburgh 2016 Comprehensive Plan, including recommendations relevant to the Project Site including, but not limited to Section 11.6.1.
      (2) Westchester County, “Westchester 2025.”
      (3) Westchester County, “Patterns for Westchester.”
   b. Future without the Proposed Project
      (1) Describe any currently pending public policy initiatives that would affect the site or the 1/2 mile study area.
      (2) Discuss potential consolidation of Greenburgh Central School District facilities.
   c. Potential Impacts as a result of the Proposed Project
      (1) Discuss compatibility of the proposed Project with relevant planning and public policy documents listed above by outlining relevant policies, sections of chapters and specific code citations.
      (2) Discuss recommendation made relevant to the Project Site and the proposed Project as described in the 2016 Town of Greenburgh Comprehensive Plan.
      (3) Provide comparison of proposed project to build out analysis done for the site.
      (4) Discuss potential need for amendment to Comprehensive Plan if the Project density is in excess of the Plan’s policy.
      (4)(5) Discuss potential impacts to currently pending public policy initiatives that would affect the site or the 1/2 mile study area.
   d. Proposed Mitigation
      (1) Discuss appropriate mitigation measures to reduce identified impacts.

B. Community Character/Visual Impacts
   1. Existing Conditions
      a. Document, with photographs and narrative the visual character of the Project Site and the immediately surrounding area.
      b. Describe and provide photographs of the appearance of the Project Site from surrounding land uses to be specified by the Town.
c. Describe the surrounding community character including the surrounding residential areas and Elmwood Country Day School and Camp.

d. Perform a GIS based visibility analysis assuming the Project is built to identify areas within one, three, and five miles from which the Project Site is visible.

e. Perform a field visit to areas offsite to verify Project visibility while simulating Project visibility through a balloon test or similar means.

f. Take photographs of the Project Site in “leaf-on” and “leaf-off” conditions from areas as determined through consultation with Town planning staff and consultants after review of the analysis in B.1.d above and the balloon test in B.1.e above, and provide a narrative description of method and findings, including information regarding photo lens used.

2. Future without the Proposed Project

a. Provide narrative description of the Project Site in the future condition without the proposed Project.

3. Potential Impacts as a result of the Proposed Project

a. Provide photographic simulations of the Project during “leaf-on” and “leaf-off” conditions from areas determined through consultation with Town planning staff and consultants utilizing the same methodology utilized for assessment of existing conditions. The photosimulations will be prepared for full build-out.

b. Discuss the proposed exterior lighting program including typical light fixtures, maximum foot candles, and how this complies with the Town lighting standards.

c. Describe the architectural design, including materials, colors, characteristic details and dimensions of proposed structures (elevations and perspectives).

4. Proposed Mitigation

a. Discuss appropriate mitigation measures for identified impacts.

C. Geology – Soils, Topography and Steep Slopes

1. Existing Conditions

a. Identify existing on-site soils using Westchester County Soil Survey data.

b. Disclose soil map units or soil samples erodibility, depth to bedrock/groundwater, drainage class, hydrologic soil group and limitations for use related to the proposed Project (limitations for construction, dwellings with basements, site disturbance, etc.).
c. Describe subsurface conditions including soil stratigraphy based on published references and available geotechnical information.

d. Describe surface conditions including delineation or identifications of outcroppings, significant depressions, ridges or other landforms through Site cross-sections running east-west and north-south.

e. Describe topography and steep slopes, as defined in the Town of Greenburgh Code Chapter 245, using available mapping with graphic overlay and shown with the existing buildings and road network as a frame of reference.

2. Future without the Proposed Project
   a. Describe conditions on the Project Site without the proposed Project.

3. Potential Impacts as a result of the Proposed Project
   a. Provide a grading plan.
   b. Describe potential impacts from site grading with respect to bedrock depth, soil erosion, slope stabilization, rock removal, and tree removal.
   c. Provide an estimate of cut and fill, describe the impacts if cuts and fills are not balanced and discuss any applicable Town requirements. Discuss the source and quality of any required fill with respect to potential contaminants.
   d. Discuss rock removal and blasting, if any, and on-site rock crushing, if any. Describe plan/protocols, including compliance with relevant standards and laws.
   e. Discuss possible construction debris processing and reuse and any related impacts.
   f. Describe environmental and sedimentation control measures with a focus on areas of steep slopes, erodible soils, and any additional site-specific measures necessary to prevent erosion and water quality impacts on adjacent areas.

4. Proposed Mitigation
   a. Discuss appropriate mitigation measures to reduce identified impacts.

D. Groundwater Resources

1. Existing Conditions
   a. Describe subsurface conditions based on published resources.
   b. Provide depth to water table, yield and water quality date from any wells on the subject property. Water quality should be analyzed for the parameters identified in Section III.Q.1.b.(4) of this scope.

2. Future Without the Proposed Project
a. Describe conditions on the Project Site without the proposed Project.

3. Potential Impacts as a result of the Proposed Project
   a. Discuss potential for encountering or interacting with groundwater resources during construction. Describe plans for managing groundwater resources if encountered as a result of construction.
   b. Describe any potential use of on site wells for irrigation.

4. Proposed Mitigation
   a. Discuss appropriate mitigation measures to reduce identified impacts.

E. Surface Water Courses and Wetlands
   1. Existing Conditions
      a. Delineate and map existing streams, waterbodies, wetlands and aquatic resource buffers under Federal (United States Army Corps of Engineers), State, and Town jurisdictions. Describe such resources in close proximity to the Project Site.
      b. Provide functional analysis of site streams, waterbodies and wetlands including their ecological benefits, including wildlife habitat and their impact on water quality and biological diversity.
      c. Discuss relevant Town Freshwater Wetland Resource Protection regulations.
      d. Describe and map any floodplains on the Project Site.
   2. Future without the Proposed Project
      a. Describe conditions on the Project Site without the proposed Project.
   3. Potential Impacts as a result of the Proposed Project
      a. Describe potential impacts to Federal, State and Town regulated streams, wetlands and wetland buffers and measures to avoid and/or minimize potential impacts.
      b. Discuss compliance with Federal, State and Town permitting standards for any activities affecting regulated resources.
      c. Describe any impacts to floodplains.
   4. Proposed Mitigation
      a. Discuss appropriate mitigation measures to reduce identified impacts.
      b. Discuss the status of any permitting required from State or Federal agencies.

F. Stormwater Management
   1. Existing Conditions
a. Discuss existing drainage patterns (including regional watershed and on-site drainage) and their relationship to the Project Site. Compute pre-development stormwater volumes and peak rates for the 1, 10, 25, and 100-year storms to each design point/point of interest throughout the site based on proposed area of disturbance.

b. Discuss existing stormwater and drainage infrastructure on the site.

c. Discuss relevant Town, County and State Stormwater Management and Erosion and Sediment Control regulations.

2. Future without the Proposed Project

a. Describe the conditions on the Project Site without the proposed Project.

3. Potential Impacts as a result of the Proposed Project

a. Describe the components and function of the proposed drainage system. Describe potential impacts to the local drainage system and downstream discharge points from construction and operation of the proposed drainage system, including bioretention areas and water quality ponds. Discuss the need for improvements to any downstream components of the drainage system.

b. Describe pre and post development stormwater volumes and peak rates for the 1, 10, 25, and 100-year storms to each design point/point of interest throughout the site based on proposed area of disturbance.

c. Discuss impacts to the Saw Mill River, including the potential to exacerbate flooding.

d. Discuss the proposed erosion and sediment control plan and material components of the SWPPP.

e. Discuss the proposed stormwater management (quantity and quality) plan and SWPPP, including sizing of ponds and other practices necessary to address all relevant State and Town design criteria including “green infrastructure” practices.

f. Describe the potential for sedimentation and induced turbidity in on-site and downstream water courses and bodies.

g. Discuss ownership and maintenance of stormwater management facilities.

h. Discuss compliance with relevant Stormwater Management and Erosion and Sediment Control regulations.

4. Proposed Mitigation

a. Discuss appropriate mitigation measures to reduce identified impacts.

b. Consider use of porous pavement in parking lots and driveways, where appropriate.

G. Water Supply
1. Existing Conditions
   a. Discuss the existing Greenburgh Consolidated Water District water supply and capacity.
   b. Discuss existing on-site infrastructure and the extent to which it will be used or abandoned.

2. Future without the Proposed Project
   a. Describe the conditions on the Project Site without the proposed Project.

3. Potential Impacts as a result of the Proposed Project
   a. Describe Project-generated demand for potable water, irrigation water and water for fire suppression at full buildout. Assess the ability of the system to provide required flows and pressure when considering the Project as well as other approved or planned projects identified by Town planning staff.
   b. Describe ownership and maintenance of on-site water supply conveyance system.
   c. Describe preliminarily proposed water lines, locations of any booster stations, pressure reducing stations, etc.
   d. Describe capacity of Greenburgh Consolidated Water District to accommodate Project-generated demand.

4. Proposed Mitigation
   a. Discuss appropriate mitigation measures to reduce identified impacts.
   b. Discuss measures to reduce water consumption.

H. Sanitary Sewage
1. Existing Conditions
   a. Describe the existing Saw Mill Sewer District and Yonkers Joint Water Resources Recovery Facility facilities and treatment capacity.
   b. Describe ownership and maintenance of the existing on-site Project wastewater conveyance system including locations of significant infrastructure items such as sewer pump stations, sewers and force mains.
   c. Discuss existing off site (downstream) infrastructure and characterize in terms of age, condition, adequate capacity, slope, etc.

2. Future without the Proposed Project
   a. Describe the conditions on the Project Site without the proposed Project.

3. Potential Impacts as a result of the Proposed Project
   a. Discuss estimated Project-generated demand by use component at full buildout. Assess the ability of the system to convey and treat wastewater
from the Project as well as from other known or planned projects as identified by Town planning staff.

b. Discuss the capacity of the existing Yonkers Wastewater Treatment Plant and downstream collection system to accommodate Project generated demand.

4. Proposed Mitigation

a. Discuss measures to offset projected increases in sanitary wastewater flows to the Yonkers Joint Water Resources recovery facility, such as reduction in inflow and infiltration and maintenance of sewer laterals. **Reduction of I&I should be at ratio of three for one for market rate units and at a ratio of one for one for affordable AFFH units. Describe the implementation process for these proposed improvements, including whether funds will be placed into a dedicated account for I&I work based on a per gallon cost of removal of flow through I&I; the selection process for I&I projects; the responsible entity for completing the work; and the timeframe to complete the work.**

I. Solid Waste

1. Existing Conditions
   a. Discuss existing solid waste generation from the Project Site.
   b. Discuss current solid waste collection and disposal for the Project Site.

2. Future without the Proposed Project
   a. Describe the conditions on the Project Site without the proposed Project.

3. Potential Impacts as a result of the Proposed Project
   a. Discuss anticipated Project generated solid waste, by use component, at full build out.
   b. Discuss on-site storage, removal, etc. (including discussion of recycling).
   c. Describe whether solid waste removal will be handled by a private company or through the Town’s services.
   d. Discuss disposal location and ability of this off-site location to accommodate Project generated solid waste and related construction and demolition debris.

4. Proposed Mitigation
   a. Discuss appropriate mitigation measures to reduce identified impacts.

J. Vegetation and Wildlife

1. Existing Conditions
a. Obtain data from the New York Natural Heritage Program (NYNHP) and the USFWS regarding potential Rare, Threatened and Endangered species on and in the vicinity of the site and assess the potential for the site to support these species.

b. Complete an inventory of trees larger than six inches in diameter measured at a height of four feet from the ground, per Town Code Chapter 260.

c. Discuss the site’s habitat and wildlife values.

2. Future without the Proposed Project

a. Describe conditions on the Project Site without the proposed Project.

3. Potential Impacts as a result of the Proposed Project

a. Prepare a proposed conditions map relative to the number of trees over 86” diameter measured at a height of four feet from the ground to be removed three feet above the base of the trunk to be removed.

b. Discuss impacts to site habitat and wildlife values.

c. Discuss the impact of construction activities and ongoing use on vegetation on adjoining properties including trees and their root systems, shrubs, and plant materials, and on wildlife and terrestrial and aquatic ecosystems.

4. Proposed Mitigation

a. Describe proposed landscape plan, including use of native species. Identify any Town ordinance or requirements to be met.

b. Discuss the landscape maintenance plan, including responsibilities and proposed use of fertilizers, pesticides and herbicides.

K. Traffic, Transportation, Pedestrians and Transit

1. Existing Conditions

a. Describe the roadway network and local intersections serving the site. Descriptions are to include number of lanes and lane widths, pavement condition, speed limits, sidewalks and crosswalks, and traffic control.

b. Collect current traffic data for the intersections listed in Section K.1.b.(2). The data used for analysis shall reflect periods when schools are in session, outside of traditional vacation times, and during times of fair weather and normal driving conditions, when area roadways are operating normally and without closures, restrictions, accidents, construction or other factors impacting normal traffic operating conditions.

   (1) Automatic Traffic Recorder Counts

   24-hour Automatic Traffic Recorder counts will be performed on NY 100B (Dobbs Ferry Road) between Worthington Road and the Sprain Brook Parkway. These 24-hour counts will be supplemented by available count information from such sources as the New York State
Department of Transportation (DOT) and Westchester County Department of Public Works and Transportation.

(2) Manual Traffic Counts

Manual turning movement counts are to be collected at the following intersections on a weekday from 7:00-9:00 A.M. and from 3:30-6:00 P.M. to cover the critical peak hours.

(a) NY Route 100B & NY Route 9A
(b) NY Route 100B & the driveway for Elmwood Day School
(c) NY Route 100B & Worthington Road
(d) NY Route 100B & existing Site driveway
(e) NY Route 100B & Westchester View Lane
(f) NY Route 100B & the two driveways for the Game On Golf Center driving range
(g) NY Route 100B & the driveway for Carlson’s Greenhouse and Nursery
(h) NY Route 100B & Rumbrook Park Drive (Town Park Driveway)/Sprain Brook Parkway southbound on-ramp
(i) NY Route 100B & Sprain Brook Parkway southbound off-ramp
(j) NY Route 100B & Sprain Brook Parkway northbound on-ramp and off-ramp
(k) NY Route 100B & Spencer Court
(l) NY Route 100B & Verne Place
(m) NY Route 100B & Rogers Avenue
(n) NY Route 100B & Hartsdale Road
(o) NY Route 100B & West Hartsdale Avenue/Knollwood Road (NY Route 100A)

These manual counts will be supplemented by available count information from such sources as the New York State Department of Transportation (DOT) and Westchester County Department of Public Works and Transportation or data in the files of the Town of Greenburgh.

The manual counts for the intersection of NY Route 100B with the driveway for Elmwood Day School should be collected during a non-summer month on a typical school day when classes are in session to capture current vehicle activity at the school. Both cars and school buses should be counted. If possible, manual counts should also be
collected at this intersection during the summer to capture camp function and the associated bus traffic.

(3) Counts will not be undertaken until the intersections to be counted and the peak periods to be studied have been finalized with the Town of Greenburgh planning staff.

(4) Accident data.
(a) Collect accident data along NY Route 100B. Three (3) years of data are to be sought.

c. Existing Traffic Volumes. Reduce the traffic count data collected to determine the traffic volumes on the adjacent roadway network during the busiest AM and PM hour. Also, balance the peak AM and PM hour traffic flows as appropriate for use in analysis of existing traffic operating conditions.

d. Traffic Operating Conditions. Perform a capacity and Levels-of-Service (LOS) analysis using the latest Highway Capacity Manual (HCM) utilizing Synchro software. Determine “Existing” LOS and queuing for each of the above-noted intersections for the weekday AM and PM peak periods. Also, provide the electronic files of the computer-generated simulation of traffic flows in the studied network. Discuss existing traffic operating conditions during normal periods as well as during periods when traffic is heavy and alternative travel routes are utilized.

e. Research recent accident history at all study locations in d. above using traffic safety data from local, County or State police records for the most recent three-year period. Include pedestrian and bicycle accidents that have occurred during the study period. Summarize the data in tabular form.

f. Provide descriptions and discussions of public transportation (commuter rail, bus, other), bicycle, and pedestrian patterns based on available record data. For buses, identify existing stops and routes within half-mile area.

2. Future Without the Proposed Project

a. Identify the “No-Build” conditions, which include the existing traffic volumes projected with an annual growth rate and appropriate surcharges to account for other pending or proposed projects as identified by the Town of Greenburgh Community Development and Conservation Department to the Horizon Year. The future No-Build scenario shall include (but not be limited to) traffic from the redevelopment of the Frank’s Nursery property to an assisted living facility and from the re-occupancy of the Elmwood Country Club. The Horizon Year shall be the estimated time of completion (ETC) of the proposed Project plus five years.

b. Discuss planned, proposed or underway traffic improvements, including projects on the NYSDOT Transportation Improvement Plan.
c. Traffic Operating Conditions. Perform a capacity and Levels-of-Service (LOS) analysis using the same methodology as that described for existing conditions. Determine “No-Build” LOS and queuing for the intersections noted above for the weekday AM and PM peak periods. Also, provide the electronic files of the computer-generated simulation of traffic flows in the studied network. Qualitative discussion of traffic operating conditions during normal periods, as well as during periods when traffic is heavy, such as flooding, and alternative travel routes may be utilized.

3. Potential Impacts of the Proposed Project

a. Trip Generation. Using the Institute of Transportation Engineers (ITE) Trip Generation Manual, latest edition, provide estimates of traffic generated by the proposed Project for the Build Year. Projects involving NYSDOT roadways require the build year to be the estimated time of completion (ETC) plus five years. Trip generation estimates should be developed for both the residential and recreational components of the Project which are proposed on the Project Site.

b. Proposed Trip Distributions. Add both the residential and recreational components of the Site-generated traffic to the study streets and intersections and describe the methodology used to determine the patterns of both components of the new traffic. Discuss roadways anticipated to be utilized by both the residential and recreational components of the site-generated traffic destined to/from the Project Site.

c. Traffic Operating Conditions. Determine “Build” LOS and queuing for the intersections noted above, including all proposed new driveways, for the weekday AM and PM peak periods. Also, provide the electronic files of the computer-generated analyses of traffic flows in the studied network. Qualitatively discuss the impact of site-generated volumes on existing traffic operating conditions during normal periods as well as during periods when traffic is heavy, such as flooding, and alternative travel routes may be utilized.

d. Provide a plan for implementation of the recommended mitigation measures. The plan will include, but not be limited to, construction phasing and timing and a monitoring plan to ensure the appropriateness of each recommended improvement at the time of construction.

e. Generally discuss ridership on Metro North trains and project the number of additional riders. Contact and/or provide documentation from Metro North on impacts of Proposed Action on ridership and capacity of rail line(s) to service the Project. Discuss impacts to parking availability at the White Plains and Hartsdale Train Stations.

f. Describe available transit services for future residents of the Project including distances to transit stops and accommodations to access transit. Describe impacts to existing bus system within half-mile study area. Provide evidence of discussion with Westchester County transportation.
g. Provide an evaluation of potential traffic reduction measures that can be applied by the Applicant such as shuttle bus service to the train station, bike/pedestrian amenities, expanded car-pool programs, etc.

h. Evaluate pedestrian safety conditions along NY Route 100B (Dobbs Ferry Road) and crossings of NY 100B and provide assessment of bicycle and pedestrian facilities on surrounding roads and connections to nearby trails and parks.

i. Sight Distance Analysis for Proposed Driveways on NY 100B and Rumbrook Park Drive. Provide the two types of sight distance measurements – Stopping Sight Distance (SSD) and Intersection Sight Distance (ISD) using the standards and methodology published by the American Association of State Highway and Transportation Officials (AASHTO).

j. Internal Site Traffic Circulation. Discuss access to the Site and planned circulation within the Site.

k. Parking Facilities On-Site. Identify the residential and recreational parking requirements based on the Town Code and compare with estimated parking demand and the proposed to be included on the Site. Describe method for providing sufficient parking for both the residential and recreational components of the Project.

l. Loading, Trash & Delivery Areas On-Site. Discuss truck traffic impacts, including local truck deliveries and by-pass truck traffic on NY Route 100B.

m. Discuss the potential for impacts associated with construction truck traffic related to excavation and filling activities, as well as construction worker and delivery of materials traffic, including estimated volumes and routes used to access the site and the duration of such trips. Assess the impact to road pavement and sub-base conditions as a result of increased truck and operations traffic.

n. Discuss proposed ownership and maintenance of site roadways.

o. Discuss provisions for emergency access and evacuation.

p. Compare the trip generation for the proposed Project with the trip generation for both the re-occupancy of the former Elmwood Country Club and the as-of-right 119 single-family homes permitted on the property.

q. Discuss impacts to the school districts that use Dobbs Ferry Road for their transportation purposes. Provide evidence of discussion with all school districts.

r. Discuss impacts to response times for the Fairview and Hartsdale Fire Districts. Provide evidence of discussion with these districts.
s. Discuss potential consolidation of Greenburgh Central School District facilities.

r-t. Discuss suitability of public parking on streets that provide access to the proposed walking paths/trails.

4. Proposed Mitigation.

a. Based on the results of the Levels-of-Service analyses, identify and describe roadway and operational improvements at the study locations needed to mitigate Project impacts. Such improvements should be designed, to the extent needed, to at least maintain or, preferably, improve traffic flow and safety conditions at the impacted locations. Mitigation measures may include but are not limited to:

   (1) Traffic control implementation including signing, markings, signalization, etc.

   (2) Roadway or intersection modifications including new roadways, intersection relocations, easements, right-of-way donations, linkages to adjacent parcels, multi-modal improvements such as pedestrian, bicycle, and transit accommodations.

   (3) Traffic calming measures.

L. Community Demographics, Facilities and Services

1. Existing Conditions

   a. Describe current population of the Town from census and population change from 1990 to present.

   b. Describe other demographic factors such as income, employment, age, etc.

   c. Describe Town facilities and other relevant service providers including:

      (1) On-site and off-site recreational resources (active, passive and availability for public) such as open space, trails or commercial recreational venues and their current connectivity. Discuss any master plans for recreation facilities and use. Discuss existing use levels of recreation fields and facilities. Discuss the need for new field facilities based on discussions with Town recreation personnel and youth groups that use such facilities.

      (2) Describe Rumbrook Park, including facilities available and relevant master plan objectives. Describe admissions policy.

      (3) Police, including budget and capacity.

      (4) Fairview Fire District and Hartsdale Fire Districts, including budget and capacity.

      (5) Elmsford and Greenburgh Central School Districts, including budget, enrollment trends and physical capacity of each school.
(6) Other community services (such as libraries, day care centers, medical or intermodal transit facilities).

2. Future without the Proposed Project
   a. Describe conditions on the Project Site without the proposed Project.

3. Potential Impacts as a result of the Proposed Project
   a. Discuss anticipated Project population and resulting increase in Town population.
   b. Discuss potential impacts to community facilities and services based upon consultation with each service provider. Provide evidence of such consultation.
   c. Given that the Project is proposed to be age restricted, no direct generation of school children would occur. Provide evidence of discussion with the Elmsford and Greenburgh School Districts with respect to any impacts that may occur to the respective districts.
   d. Identify parks, playgrounds and other active and passive recreational space that would be available for use by new residents.
   e. Provide an assessment of potential impacts on parks, playgrounds and other active and passive recreational space in the Town generated by the Project, including impacts on youth group recreation. Provide an estimate of the impact on the operating budget of the recreation department from operation of the proposed new facilities. Provide evidence of discussion with recreation department personnel.
   f. Describe proposed new 14.2-acre dedicated parkland area that would be deeded over to the Town, including compliance with Subdivision Code §250-19.
   g. Discuss the availability of the newly dedicated parkland to the public.
   h. Discuss the mechanism (e.g., conservation easement) to preserve open space and lawn area or any land to be dedicated to the Town. Discuss maintenance plans, including who is responsible for financing future maintenance of the open space/lawn.
   i. Discuss proposed access, ownership, liability, maintenance plans, financing, and enforcement of use for proposed trails.
   j. Discuss the availability of the proposed trails to the public.
   k. In performing the analyses above, include other approved or proposed projects that may affect the analyses, as identified by Town planning staff.

4. Proposed Mitigation
   a. Discuss appropriate mitigation measures to reduce identified impacts.

M. Fiscal and Economic Conditions
1. Existing Conditions
   a. Identify current taxes provided to each taxing jurisdiction (town, county, each school district, fire district, Westchester Joint Water Works Water District, etc.).
   b. Summarize the current operating budgets for the school districts, fire districts, Westchester Joint Water Works Water District, Town Police, Town Department of Public Works and other service providers.
   c. Provide evidence of demand for the proposed Project that justifies the proposed increase in density contemplated by the rezoning.

2. Future without the Proposed Project
   a. Describe conditions on the Project Site without the proposed Project.

3. Potential Impacts as a result of the Proposed Project
   a. Estimate annual tax revenues to be generated to each taxing jurisdiction upon Project completion using current tax rates.
   b. Discuss potential impacts to community facilities and services, including the Town, school districts, fire districts and other taxing jurisdictions by estimating variable revenues and expenses associated with the Project. Each jurisdiction’s particular financial situation and sources of revenues and expenses will be assessed to gauge total changes in revenues and expenditures. Standard metrics (new residents, new school aged children, new roadway miles, etc. as appropriate and applicable) will be used to determine new costs using a “marginal costing” technique. An annual net fiscal impact (revenues less expenditures) will be generated for each jurisdiction.
   c. Estimate potential impacts to school district State aid formulas as a result of the Project.
   d. Discuss whether the proposed Project will result in the loss of recreation fund escrow funds and if so compute such loss.
   e. Calculate loss of tax revenue to taxing jurisdictions that would result from the dedication of land to the Town for recreation/open space.
   f. Calculate tax revenue to be generated if the proposed park were instead to be developed with single family homes.
   g. Describe employment generation resulting from construction, and operation of the Project.
   h. Describe fiscal impacts resulting from the proposed ownership structure and compare to other potential structures (i.e. rental and condominium ownership).
   i. Discuss construction and operational period direct and indirect economic impacts (using RIMS-II-modeling).
j. Identify any anticipated Payment in Lieu of Taxes (PILOT), tax certiorari, or other tax relief/abatement programs that may be applied for, before or after construction, and the impacts that those programs may have on the anticipated taxes paid to each taxing jurisdiction, including the Elmsford and Greenburgh Central District.

4. Proposed Mitigation
   a. Discuss appropriate mitigation measures to reduce identified impacts.

N. Historic and Cultural Resources
   1. Existing Conditions
      a. Prepare and submit Notice of Project to New York State Office of Parks, Recreation and Historic Preservation (NYOPRHP) Cultural Resources Information System (CRIS).
      b. Upon receipt of comment from NYOPRHP, if required, prepare and submit Phase IA cultural resources report for resources on and within ¼ mile of the site and for any areas proposed for off-site improvements such as utility improvements.
      c. If recommended by the 1A study, prepare a Phase 1B cultural resources report.
      d. Include the Commissioner, Department of Community Development and Conservation and the Chair of Town’s Historic and Landmarks Preservation Board as contacts for correspondence in NYSOPRHP’s Cultural Resource Information System (CRIS) upon initiation of the project file to allow receipt of all project-related correspondence.
   2. Future without the Proposed Project
      a. Describe conditions on the Project Site without the proposed Project.
   3. Potential Impacts of the Proposed Project
      a. Describe potential direct and indirect impacts to cultural resources.
   4. Proposed Mitigation
      a. Discuss appropriate mitigation measures to mitigate any identified impacts.

O. Environmental Contamination
   1. Existing Conditions
      a. Prepare Phase 1 Environmental Site Assessment (ESA).
      b. Prepare and conduct soil testing plan in area proposed for entire property, including land area to be dedicated to Town. The plan should consist of:
         (1) Discrete soil samples taken at a depth of 0-6 inches and 6-24 inches.
(2) A sampling frequency of 1 sample/five acres. Sample locations should include: 1) Representative distribution of tee boxes and greens. 2) Samples from sediment in on-site ponds. 3) Sample(s) from locations where chemical mixing would have occurred.

(3) Groundwater from on-site wells if proposed to be used for the Project, for example for irrigation purposes.

c. All samples shall be analyzed for arsenic and lead (EPA Method 6010), pesticides (EPA Method 8081) and herbicides (EPA method 8151).

d. Discuss test results in comparison to Soil Cleanup Objectives for the proposed use.

e. Discuss the fate of existing buildings with respect to the potential for lead and asbestos contamination if they are proposed to be demolished.

2. Future without the Proposed Project
   a. Describe conditions on the Project Site without the proposed Project.

3. Potential Impacts of the Proposed Project
   a. Discuss potential impacts based on soil testing and ESA.

4. Proposed Mitigation
   a. Discuss appropriate mitigation measures to reduce identified impacts, including construction soil management plan.

P. Noise

1. Existing Conditions
   a. Provide a list of sensitive noise receptors within 500 feet of the Project Site.
   b. Provide a qualitative description of the existing noise environment.

2. Future Without the Proposed Project

3. Potential Impacts of the Proposed Project
   a. Provide an estimate of construction noise impacts on surrounding land uses using published data regarding construction equipment.
   b. If blasting is required, evaluate the noise impacts.
   c. Provide qualitative discussion of the noise environment after the construction of the Project.

4. Proposed Mitigation
   a. Identify and describe measures to avoid or mitigate significant adverse noise impacts including during construction.

Q. Air Quality

1. Existing Conditions
a. Summarize existing ambient air quality conditions in the region based on published New York State Department of Environmental Conservation (NYSDEC) ambient air monitoring data and compare with the National Ambient Air Quality Standards (NAAQS).

2. Future without the Proposed Project
   a. Describe conditions on the Project Site without the proposed Project.

3. Potential Impacts of the Proposed Project
   a. Provide a qualitative evaluation of potential air impacts resulting from construction activities, site preparation, and construction traffic and comparison to established air quality parameters.
   b. Conduct an air quality screening process in accordance with the NYSDOT Environmental Procedures Manual to determine if Project specific (microscale) air quality analyses are warranted. If, based on the results of the screening further analysis is warranted, it shall be conducted as part of the DEIS.
   c. If blasting is proposed, the potential impacts on air quality from blasting will be qualitatively analyzed and discussed.

4. Proposed Mitigation
   a. Discuss appropriate mitigation measures to reduce identified impacts.

ALTERNATIVES

The analysis of reasonable alternatives to the proposed Project will be based on schematic concept plans, with impacts quantified in terms of areas of disturbance, cut and fill, traffic generation/circulation, water and sewer utilization, drainage and flood storage, including impacts to adjoining and downstream properties, population, school age children and tax generation. School children generation to public, private, and parochial schools should be based on both local and regional metrics. Alternatives will be compared to one another and to the Proposed Action in a summary table. Qualitative impacts to land use character should also be described, including potential for subletting and/or vacation rentals. Potential for blasting impacts should also be discussed for each alternative. The alternatives will include:

A. The “No Action” Alternative.

B. Zoning Compliant Single-Family Residential Subdivision Plan with no age restriction and no public park.

C. Zoning Compliant Single-Family Residential Subdivision in a cluster/conservation layout with and without age restrictions and no public park.

D. Multifamily PUD Development under Existing Zoning with no age restriction and no public park.
E. Use of Sustainable Resources.

SIGNIFICANT IMPACTS THAT CANNOT BE AVOIDED

Identification of significant long term and short-term construction impacts (including construction impacts: traffic, air quality, noise, etc.) that cannot be avoided.

GROWTH INDUCING ASPECTS

A description and analysis of potential growth-inducing aspects, including short and long term, and primary, secondary and indirect impacts, will be provided and mitigation measures discussed if necessary. This section would provide a qualitative discussion of the potential impact of the proposed Project on local business, population characteristics, community character, and community services.

EFFECTS ON THE USE AND CONSERVATION OF ENERGY RESOURCES

A description of the effect of the proposed Project on the short and long term use and conservation of energy resources will be provided including ways to reduce inefficient or unnecessary consumption during construction and long term operation. A description of sustainability best practices employed in the design and construction of the proposed project, including sources of construction materials, such as wood, metal, and concrete.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Identification of those natural and man-made resources consumed, converted or otherwise made unavailable for future use as a consequence of the proposed Project.

APPENDICES

A. SEQRA Notices and Filings
B. Scoping Document
C. Letters of Record
D. Traffic Impact Analysis
E. Stormwater Pollution Prevention Plan
F. Cultural Resources Report(s)
G. Phase I Environmental Site Assessment
H. Soils Testing Results
I. Construction Management Plan
J. Others as required