MEMORANDUM

To: Paul Feiner, Supervisor; Members of the Town Board
CC: Garrett Duquesne, AICP
From: Stuart Mesinger, AICP
      Caren LoBrutto
Date: July 3, 2019
Re: Elmwood Preserve – Draft Response to Comments Received at June 26, 2019 Public Scoping Hearing

Chazen Job #: 81922.00

On June 26, 2019, a Public Scoping Hearing was held at the Town Hall on the Elmwood Preserve project that proposes to develop 175, 55+ age-restricted townhouse units at the former Elmwood County Club on Dobbs Ferry Road in the Town of Greenburgh. During the hearing, several comments were raised, and the meeting was adjourned to July 10, 2019. The Supervisor asked that the Chazen Companies provide a draft response to comments received on June 26 and a revised draft scope in advance of the July 10 meeting.

A summary of the comments stated before the Town Board during the Scoping Hearing is presented below. The comments have been categorized according to the relevant scope section and responded to using the following categories:

- Accepted – Draft scope has been revised to reflect this change (draft scope section identified for revision);
- Acknowledged – Draft scope already includes this information (draft scope section is identified);
- Not Accepted – Draft scope has not been revised (rationale is provided); and
- Under consideration.

Comments that expressed opinions about the project as opposed to offering suggestions for revisions to the draft scope are not included.
Proposed Project

1) Comment: Page 2, incorrect project description should indicate that part of the property will be rezoned to R-20 because part of the project is already zoned R-20. Should say “place” instead of “facilitate” PUD. Should indicate that two rezonings are occurring (to R-20 and for PUD).

Response: Accepted – Draft scope has been revised to reflect this change. The sentence in the first paragraph on page 2 reads, “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 sentence will be revised to read, “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.”

2) Comment: Table 1: Required Approvals and Permits includes the Tree Removal Permit in the wrong section, this permit should be included under the Planning Board not the Town Board.

Response: Accepted – Draft scope has been revised to reflect this change. The Tree Removal Permit has been moved to fall under the responsibility of the Planning Board.

Organization and Content of the DEIS

3) Comment: Page 3, Cover Sheet, the Applicant should be required to list the consultant team.

Response: Acknowledged – Draft scope already includes this information on Page 3, Cover Sheet, list item (3), which asks for the name, address, email and telephone number of the preparer and other organizations that contributed to the DEIS.

II. Description of the Proposed Project

4) Comment: Scope should require Applicant to provide floor plans for proposed age-restricted dwelling units.

Response: Accepted – Draft scope has been revised to reflect this change. See new Section II.B.c.(8), “Provide floor Plan diagrams of proposed dwelling units”.

5) Comment: Scope should require Applicant to indicate whether the clubhouse amenities will be private or public and whether they will be available for rental.

Response: Accepted – Draft scope has been revised to reflect this change. See revised Section II.B.d.(5), “Indicate whether these facilities will be open to the public or for private use only and whether these facilities are available for rental.”
6) Comment: Scope should require Applicant to describe the Con Edison easement on the property.

Response: Acknowledged - Draft scope already includes this information, see Sections II.A.4. (Description of Project Action) and III.A.1.a.(2) and III.A.1.c.(2) (Land Use, existing conditions and proposed impacts).

7) Comment: Scope should require Applicant to indicate whether subletting will be allowed as part of the proposed project.

Response: Accepted – Draft scope has been revised to reflect this change. See revised Section II.B.c.(7), “Indicate the subletting and vacation rental policy that will apply to the new dwelling units, if any.”

8) Comment: Scope should require Applicant to indicate how the project will be energized given the natural gas supply moratorium.

Response: Acknowledged - Draft scope already includes this information, see Section II.B.1.h., which reads, “discussion of energy supply in light of Con Edison’s natural gas connection moratorium.”

9) Comment: Scope should require Applicant to indicate a long-term plan (e.g. multi-family or rental use?) for the proposed project in the event the development does not sell. This should be discussed for all alternatives.

Response: Not Accepted – Draft scope has not been revised. Under SEQR, the Applicant is responsible for assessing impacts to the study area based on known data, but not on a scenario based on a speculative future condition. Notwithstanding this, the Alternatives section requires an assessment of Alternative D: Multifamily PUD Development under Existing Zoning with no age restriction and no public park and the revision to this section identified in Comment/Response 63 in the Alternatives section.

10) Comment: Scope should require Applicant to include the following information: 1) Description of wetland and watercourse features on-site (to be provided by a Wetlands Scientist (per Chapter 280); 2) Summary of tree cover on-site; and 3) Description of topography of site, and submission of a Slopes Analysis Plan.

Response: Accepted – Draft scope has been revised to reflect this change. See revised Section II.A.12, II.A.13, and II.A.14.

11) Comment: Scope Section II.B.1.f. should be revised as follows: 1) Replace Landscaping and Buffers header with, “Tree Removal, Tree Preservation, Landscaping and Buffers”; 2) Addition of requirement to include a “Landscaping Details Plan (Planting details, mulch, maintenance requirements)”; and 3) Addition of a requirement to include a “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.”
Response: Accepted – Draft scope has been revised to reflect this change. See Revised Section II.B.1.f.

12) Comment: Scope Section II.B.1.i should be revised as follows: Addition of requirement to include “Wetland/Watercourse Plan, including extent of 100-foot regulated buffer area. Show in relation to proposed disturbances.”

Response: Accepted – Draft scope has been revised to reflect this change. See Revised Section II.B.1.i.

III.A. Land Use, Zoning and Public Policy

13) Comment: Scope should require the Applicant to consider community character impacts from multi-family and townhouse condominiums to local neighborhood.

Response: Acknowledged – Draft scope already includes this information, see Section III.A.1.c.(1), “Describe the compatibility of the proposed Project with existing land uses in the study area.” See also Comment/Response 63 in the Alternatives section.

14) Comment: Scope should require the Applicant to include the potential sale of or conversion to storage of Carlsons Greenhouse in various analyses.

Response: Not Accepted – Draft scope has not been revised. Under SEQR, the Applicant is responsible for assessing impacts to the study area based on known data, but not on a scenario based on a speculative future condition. At this time, the greenhouse is not for sale and if it was for sale there are a myriad of potential development scenarios. In the absence of an actual development application to the Town, there is no basis for consideration of this scenario.

15) Comment: Scope should require the Applicant to consider if the project will result in impacts to the un-landscaped, unkempt triangle of land used for truck parking located between the southbound entry to the Sprain Brook Parkway and the southbound travel lane where they cross Dobbs Ferry Road.

Response: Not Accepted - Draft scope has not been revised. Per SEQR, the scope requires the Applicant to assess the proposed project’s compatibility with existing land uses within the study area, see Section III.A.1.c(1). The site is currently unimproved and utilized formally or informally for truck parking. The development of the site would have no impact on this land use. Furthermore, the triangle is owned by the New York State Department of Transportation (NYSDOT) and is therefore unlikely to be developed. If the site is being used for non NYSDOT use it may be considered an enforcement issue but is not directly or indirectly related to the proposed action.

16) Comment: Scope should require the Applicant to consider the project’s impact on the Hartsdale 4 Corners study.
Response: Not Accepted – The draft scope has not been revised to reflect this change because the scope requires the Applicant to discuss pending policy initiatives within ½ mile of the site and the study involves an area outside of the study area. See Section III.A.3, Public Policy.

17) Comment: Scope should require the Applicant to consider the project’s consistency with the Comprehensive Plan.

Response: Acknowledged – Draft scope already includes this information, see Section III.A.3.c (project’s consistency with public policy).

18) Comment: Scope should require the Applicant to consider land uses within 2-3 miles of the project site.

Response: Not Accepted – The draft scope has not been revised to reflect this change because the SEQR analysis is focused on direct impacts to local land uses. A 2-3 mile radius would include thousands of properties that would not plausibly be impacted by the project. A ½ mile radius provides for examination of land uses with the potential to be impacted by the project. Note that the ½ mile radius is calculated off the project site boundaries.

19) Comment: Scope should require the Applicant to consider pending zoning changes occurring with five miles of the project.

Response: Not Accepted – The draft scope has not been revised to reflect this change because the SEQR analysis is focused on direct impacts to local land uses. Zoning changes at great distance from the project do not have a plausible impact on nearby land uses. Note that the ½ mile radius is calculated off the project site boundaries.

20) Comment: The Scope includes, “discuss potential consolidation of Greenburgh Central School District facilities” within the land use section. This should be included in the traffic section.

Response: Accepted – Draft scope has been revised to reflect this change. See revised Section III.K.3.s.

21) Comment: Scope should require the Applicant to identify if the development will be gated and if not, how gating will be prevented in the future (e.g. restrictive covenant, etc.).

Response: Accepted – Draft scope has been revised to reflect this change. See new Section II.B.1.e.(8), “Identify any gates and/or fences that would be included as part of the project design” and see also Section II.B.1.l.(4).

22) Comment: Scope should require the Applicant to comply with the 10% affordable housing set aside. Greenburgh was the first locality -I think in the state- to require 10% affordable housing in
multifamily housing. This is a very big development and the developer should have to comply with the spirit of our law.

Response: Accepted – Draft scope has been revised to reflect this change. See revised Section III.A.2.c.(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).”

III.F. Stormwater Management

23) Comment: The Scope should require the Applicant to consider the unforeseen consequences from tree removal, e.g. erosion, hydrology.

Response: Acknowledged – Draft scope already includes this information, see Section III.F. Stormwater Management.

24) Comment: The Scope should require the Applicant to consider flooding on Dobbs Ferry Road.

Response: Acknowledged – Draft scope already includes this information, see Section III.F. Stormwater Management.

III.H. Sanitary Sewage

25) Comment: The proposed development will increase sewage flows from this site into the existing infrastructure and will add to the volume requiring treatment at the Yonkers Joint Water Resource Recovery Facility operated by Westchester County. We appreciate that the draft scoping document already contains language referencing the County Department of Environmental Facilities (WCDEF) policy requiring inflow and infiltration (I&I) mitigation. We recommend that the language in the scope be revised to be more specific regarding this policy. The scope should note that the 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. In addition, the EIS should also provide specific details on how implementation of these improvements is to be accomplished. For example, will the applicant be required to place funds into a dedicated account for I&I work based on a per gallon cost of removal of flow through I&I? How will I&I projects be identified? Who will conduct the work and in what timeframe?

Response: Accepted – Draft scope has been revised to reflect this change. See Section III.H.4.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 (I&I) 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.

III.J. Vegetation and Wildlife

26) Comment: The scope should require the Applicant to do an inventory of trees and consider the project’s impact on the rural suburban character of the area.

Response: Acknowledged – Draft scope already includes this information in Section III.J.1.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.” See also Section III.J.3.a., “Prepare a proposed conditions map relative to the number of trees over 6” diameter measured at a height of four feet from the ground to be removed.” and III.B.1 (Community Character/Visual Impacts, existing conditions) and III.B.3. (Community Character/Visual Impacts, proposed conditions).

27) Comment: On page 17, J.1. b. should that be 4.5 feet? What does the Town require?

Response: Not Accepted – Draft scope has not been revised because Chapter 260-2 of the Town Code states, “No person or firm shall purposely, carelessly or negligently cut down, kill or otherwise destroy or commit any act which will lead to the eventual destruction of any tree exceeding six inches in diameter measured at a height of four feet from the ground on any property, unless said person is in possession of a tree removal permit issued pursuant to this chapter.”

28) Comment: III.J.3.a. needs to be changed to match the correct high and diameter.

Response: Accepted – Draft scope has been revised to reflect this change. See revised Section III.J.3.a., “Prepare a proposed conditions map relative to the number of trees over 6” diameter measured at a height of four feet from the ground to be removed.”

III.K. Traffic, Transit and Pedestrians

29) Comment: Section K.1.b.(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” should be removed from Scope.

Response: Accepted – Draft scope has been revised to reflect this change. See revised Section III.K.1.b. (collection of current data for existing conditions) in updated Draft Scope.

30) Comment: Scope should require Applicant to identify where parking for public access walking paths/trails will occur and whether there is capacity on the public roadways adjoining these paths/trails?
Response: Accepted – Draft scope has been revised to reflect this change. See new Section III.K.3.t., “Discuss suitability of public parking on streets that provide access to the proposed walking paths/trails.” Note that Section III.K.3.k (Parking Facilities On-Site) requires the Applicant to “Describe method for providing sufficient parking for both the residential and recreational components of the Project.”

31) Comment: Scope should consider traffic impact to North and South Sprain Brook Parkway; Hartsdale Road; Hilltop Farms; Seacourt; and Poets Corner – where exactly are these?

Response: Under Consideration.

32) Comment: Scope should consider traffic impact to White Plains and Hartsdale Train Stations.

Response: Not Accepted – Draft scope has not been revised because a preliminary assessment was conducted by Chazen for the draft scope and an assignment of project-related trips within the local traffic network was used to determine appropriate study intersections, which are identified in Section III.K.1.b. The intersections chosen are generally included within a ½ mile study area, except Route 9A, which is a major thoroughfare. These locations are located in excess of a ½ mile and are unlikely to be significantly impacted by the project.

33) Comment: Scope should require the Applicant to assess impacts to the bus routes and stops.

Response: Accepted – Draft scope has been revised to reflect this change. See revised Section III.K.1.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” and revised Section III.K.3.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” in updated Draft Scope.

34) Comment: Scope should require the Applicant to consider alternate bus stops that would assist in improving existing traffic congestion issue.

Response: Not Accepted – Draft scope has not been revised because the Applicant is not accountable for or in control over the existing bus stop system. This is the responsibility of Westchester County.

35) Comment: Scope should require the Applicant to obtain traffic accident information for the last five years.

Response: Not Accepted – Draft scope has not been revised because the Applicant is required to obtain traffic accident information for the last three years, which is the standard practice in a traffic impact analysis under SEQR. See Section III.K.1.b.(3) in the revised scope.
36) Comment: Scope should require the Applicant to assess traffic impacts to the Elmwood Day School and the other commercial properties in the area.

Response: Acknowledged – Draft scope already includes this information. See Section III.K.1 (existing conditions) and Section III.K.3 (potential impacts).

37) Comment: Scope should require the Applicant to assess parking congestion impacts at the White Plains and Hartsdale train stations from the proposed project.

Response: Accepted – Draft scope has been revised to reflect this change. See revised Section III.K.3.e which states, “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.”

38) Comment: Scope should require Applicant to describe how many calls send emergency vehicles onto Dobbs Ferry Road in the last three years.

Response: Acknowledged – Draft scope already includes a version of this information. See Section III.K.3.r., “Discuss impacts to response times for the Fairview and Hartsdale Fire Districts. Provide evidence of discussion with these districts.”

39) Comment: Scope should require Applicant to describe impacts to Ardsley Union Free School District as it relates to bussing of BOCES students.

Response: Acknowledged – Draft scope already includes this information. See Section III.K.3.q., “discuss impacts to the school districts that use Dobbs Ferry Road for their transportation purposes. Provide evidence of discussion with all school districts.”

40) Comment: Scope should require Applicant to assess traffic impacts at the Metropolis Country Club, Maplewood, Our Lady of Shkodra and the four corners at Hartsdale.

Response: Not Accepted – Draft scope has not been revised because a preliminary assessment was conducted by Chazen for the draft scope and an assignment of project-related trips within the local traffic network was used to determine appropriate study intersections, which are identified in Section III.K.1.b. The intersections chosen are generally included within a ½ mile study area, except Route 9A, which is a major thoroughfare. These locations are located in excess of a ½ mile and are unlikely to be significantly impacted by the project.

41) Comment: Scope should require that the Applicant assess existing and proposed conditions at the project site that may be resulting in sight distance issues for drivers using Worthington Road.
Response: Accepted – Draft scope has been revised to reflect this change. See revised Section III.K.3.i., which will be revised to add this sentence, “Sight distance analysis for Worthington Road and the proposed driveways on NY 100B and Rumbrook Park Drive.”

42) Comment: the scoping document should be revised to include a more comprehensive discussion of how pedestrian access and circulation relates to bus transit around the site. The discussion should focus on how the site has proximity to bus routes along both Dobbs Ferry Road (Bee-Line Route 6) and Saw Mill River Road (Bee-Line Routes 1 C and 5) and how the development of the subject site can improve pedestrian access to all of these Bee-Line routes in the general area.

For example, we point out that Worthington Road is the only street in this area that provides any access between Dobbs Ferry Road and Saw Mill River Road. Since Worthington Road has no sidewalks, pedestrian access through the site to surrounding road network should be examined. We recommend this discussion be included under Section II.A Description of Project Location, Section II.B. Site Access, Roadways and Circulation and Section 111.K Traffic, Transportation, Pedestrians and Transit. For this last section, bullet point (h) should also be revised to include the evaluation of pedestrian and bicycle safety conditions along Worthington Road. We point out that, in addition to being the only through-street in the area to connect Dobbs Ferry Road to Saw Mill River Road, there is also an informal access point to the South County Trailway near Saw Mill River Road and White House Road, which would require pedestrians and cyclists coming from Dobbs Ferry Road to use Worthington Road.

Response: Accepted – Draft scope has been revised to reflect this change. See revised Section III.K.3.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.”

43) Comment: As mentioned in the Traffic Study for the Elmwood Preserve, dated April 5, 2018, the proposed age-restricted housing community is projected to generate 35 and 46 trips during the peak weekday AM and PM hours, respectively. When comparing the proposed age-restricted housing community to the reoccupancy of the country club, the community is projected to generate 12 and 13 additional trips during the peak weekday AM and PM hours, respectively. The addition of 7 additional intersections for a total of 15 intersections to be studied for this low projection of traffic volumes appears disproportionate and misplaced.

Response: Under consideration.

44) Comment: The analysis of the two private driveways for the existing golf driving range appears to be unnecessary. Typically, traffic studies analyze intersections with public streets and roads. Driving ranges don’t typically generate a substantial amount of traffic. The proposed driveway for the Elmwood Preserve does not align opposite the existing driving range’s driveways. For these reasons, we believe the analysis of the two driving range driveways is unnecessary.
Response: Under consideration.

45) Comment: The traffic counts for the Traffic Study for the Elmwood Preserve, dated April 5, 2018, were conducted in November 2017 while schools were in session and represent normal traffic operating conditions. We should be able to utilize this count data instead of recounting the intersections.

Response: Under consideration.

III.L. Community Demographics, Facilities and Services

46) Comment: Scope should require that the Applicant seek comments on the proposed project from the affected school districts.

Response: Acknowledged – Draft scope already includes this information. See Section III.L.3.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.”

47) Comment: Scope should require the Applicant to identify who will be responsible for maintenance and liability on the proposed walking paths/trails.

Response: Acknowledged – Draft scope already includes this information. See Section II.B.1.g.(5), “Discuss proposed access, ownership, liability, maintenance plans, financing, and enforcement of use for proposed trails.” Note, III.L.3.i also requests this information.

48) Comment: Scope should require the Applicant to describe the connection between the residential development and the proposed 14.2-acre addition to Rumbrook Park, including how access will occur across the Con Edison easement and whether there are any limitations to the crossing imposed by the Con Edison easement.

Response: Accepted – Draft scope has been revised to reflect this change. See revised Section II.B.1.g.(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” in updated Draft Scope.

49) Comment: Scope should require the Applicant to discuss the impact to schools.

Response: Acknowledged – Draft scope already includes this information. See Section III.L.1.c.(5) (school district existing conditions) and III.L.3.c (school district impacts). See also Section III.K (Traffic).
50) Comment: Scope should require Applicant to describe impacts to parochial and private schools.

Response: Not Accepted – Draft scope has not been revised to reflect this change. Affected public school districts utilizing taxpayer money are considered in the SEQR analysis. Because it is an age-restricted project, it is not anticipated to generate school children to private or parochial schools. The Alternatives section has been amended to include generation of both public and private school children, see page 28, first paragraph under the Alternatives section.

51) Comment: Will Rumbrook Park be absorbed into Elmwood Preserve?

Response: Not Accepted – Draft scope has not been revised to reflect this change. Rumbrook Park is a publicly owned facility. No part of the proposed project indicates a transfer in ownership for the public park.

III.F. Fiscal and Economic Conditions

52) Comment: Scope should require Applicant to compare tax assessments for different dwelling types, e.g. condominium versus single family home.

Response: Acknowledged – Draft scope already includes this information. See Section III.M.3.h, “Describe fiscal impacts resulting from the proposed ownership structure and compare to other potential structures (i.e. rental and condominium ownership)).”

53) Comment: On page 24, III.M.3.b., I had asked that to estimate school children that standard metrics not be used but rather a comparable metric using a neighborhood like Poet’s Corners or Hilltop Farms. Further I think for employment of over 55’s, Westchester educated affluent stats should be used not some national figure. If these units are to sell at $900k plus, I think the metric should reflect that population.

Response: Acknowledged – Draft scope already includes this information. As an age-restricted project, it is not anticipated to generate school children. The Alternatives section on page 28 states, “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 should be based on both local and regional metrics.” Section III.L.1.b. requests information on demographic factors such as income, employment, age, etc. for the current population of the Town.

III.N. Historic and Cultural Resources
54) Comment: Scope should require Applicant to provide copies of all documentation submitted to the New York State Historic Preservation Office (NYSOPRHP) to be submitted to the Town’s Historic and Landmarks Preservation Board.

Response: Accepted – Draft scope has been revised to reflect this change. See new Section III.N.1.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.

55) Comment: Scope should require Applicant to provide a history of the site.

Response: Acknowledged – Draft scope already includes this information. See Section II.A.10, “Discussion of Project background and Project Site history including prior use(s).”

III.O. Environmental Contamination

56) Comment: Scope should require that NYSDEC is involved.

Response: Acknowledged – Draft scope already includes this information. See Table 1 on Page 3. NYSDEC is an involved agency in the review of this project as they issue the State Pollutant Discharge Elimination System (SPDES) General Permit GP-0-15-002 For Stormwater Discharges From Construction Activities and would be the regulatory authority providing oversight should the site be found to exceed the soil cleanup objectives (SCOs) for residential development. SCOs are contaminant-specific remedial action objectives for soil based on a site’s current, intended, or reasonably anticipated future use.

57) Comment: Scope should require the Applicant to test the soil where the golf carts and gas tanks were stored.

Response: Acknowledged – Draft scope already includes this information. See Section III.O.1 (existing conditions). This section requires the Applicant to provide a Phase 1 Environmental Site Assessment that would discuss the locations of golf cart storage and gas tanks among other pertinent details (including historical sources of contamination) and establish whether the site exceeds the SCOs for contaminants.

58) Comment: Scope should be consistent in requirement to analyze fertilizers, herbicides, and pesticides.

Response: Acknowledged – Draft scope already includes a form of this information. The scope requires the Applicant to test soils using the Environmental Protection Administration methods that are relevant to lands used as golf courses. See Section III.O.1 (existing conditions).
59) Comment: Scope should require the Applicant to test where the parking lot is located currently, including all tests done at Frank’s nursery.

Response: Acknowledged – Draft scope already includes a form of this information. The scope requires the Applicant to test soils using the Environmental Protection Administration methods that are relevant to lands used as golf courses. See Section III.O.1 (existing conditions).

Effects of the Use and Conservation of Energy Resources

60) Comment: Scope should require Applicant to address any sustainability best practices employed in the design and construction of the proposed project, including sources of construction materials, such as wood, metal, and concrete.

Response: Accepted – Draft scope has been revised to reflect this change. See revised Effects of the Use and Conservation of Energy Resources on Page 28 of the updated Draft Scope. Note Section II.B.1.b. states, “Sustainability and Green Building Design: Description of sustainability measures and environmental building technologies that will be used” within the Description of the Proposed Project section.

Alternatives

61) Comment: Scope should require the Applicant to consider a more sustainable project, one that could meet objectives contained within the 2050 environmental plan and that is eligible for LEED certification.

Response: Accepted – Draft scope has been revised to reflect this change. See revised Alternatives on page 28 (Alternative E) of the updated Draft scope, which now includes a “Use of Sustainable Resources” alternative.

62) Comment: Scope should require the Applicant to provide the same level of information for each alternative.

Response: Not Accepted – Draft scope has not been revised to reflect this change. The Applicant is required to provide a schematic site plan and to assess the comparative impacts of each alternative versus the proposed action and other alternatives. The comparison will utilize the same methodologies required for the proposed action and will focus on the results of these analyses. Detailed engineering plans or analyses are not required for the Lead Agency to make a comparison of the impacts of each alternative to the proposed action.

63) Comment: Scope should require Applicant to indicate whether subletting will be allowed as part of any alternative.
Response: Accepted – Draft scope has been revised to reflect this change. See revised page 28, which includes the statement, “Qualitative impacts to land use character should also be described, including potential for subletting and/or vacation rentals”.

64) Comment: Scope should require the Applicant to consider impacts from blasting for all alternatives.

Response: Accepted – Draft scope has been revised to reflect this change. See revised page 28, which includes the statement, “Potential for blasting impacts should be discussed for each alternative.”