



MEMORANDUM

TO: Carolyn Stevens, Chair, and the Town of Ossining Planning Board

FROM: Valerie Monastra, AICP
Scott Newhart

CC: John Turnquist, Town of Ossining Building Inspector
Dan Ciarcia, PE, Town of Ossining Planning Board Engineer
Kathy Zalantis, Esq., Town of Ossining Planning Board Attorney

SUBJECT: River Knoll Supplemental Final Environmental Impact Statement (SFEIS) Review

DATE: March 10, 2023

We have reviewed the Supplemental Final EIS for River Knoll prepared by JMC Planning, Engineering, Landscape Architecture, and Land Surveying, PLLC, dated December 2022.

We offer the following comments for the Board's consideration. Based on the comments set forth in this memorandum, it is recommended that the Lead Agency request the Applicant to incorporate the additional information that is missing from the responses to the comments.

GENERAL DOCUMENT COMMENTS

1. The Town of Ossining received public comments from 12 different submissions, and only six (6) were listed in the FEIS. Please revise the FEIS to include all public comments and responses to all comments. The missing comments are appended to this memorandum.

[We will respond to the comments under separate cover.](#)

2. Project Description and Executive Summary: There is a discrepancy in the Project Description and Executive Summary regarding the number of units that will be built. Is it 95 or 96 units? Please provide an updated zoning table that corresponds to the number of units proposed.

[Unclear on which "zoning table" you are referring to.](#)

3. Please review Section 617.9(8) of the State Environmental Quality Review regulations and include all required items, specifically the reference or incorporation of the SDEIS into the SFEIS.

[Please clarify what you are requesting.](#)

RESPONSE TO COMMENTS

1. In comment 1A-1, the Applicant is asked for a better explanation of the price point of the units and anticipated residents. In Section I.E, as well as their comment response 1A-1, the Applicant notes that *“a greater range of price points for the proposed market rate units has been provided with the addition of 20 “stacker” units in addition to the 10 affordable stacker units provided in the SDEIS Plan.”* Is “stacker unit” referencing the buildings noted

as containing two dwelling units within one building in the Site Plan? If so, these units should be identified or labeled on the Site Plans as “stacker units.”

We can do this.

Furthermore, Section I.E notes that *“the ten affordable units provided have now been spread throughout the Project site in three locations and fully mixed within the market-rate units. Their sizing will be larger than HUD guidelines and be very roughly 1,400 square feet for a two-bedroom unit and 1,700 square feet for a three-bedroom unit.”* Will the only difference between the additional “20 ‘stacker’ units” and the “10 affordable stacker units” be the price point, or will the units have different sizes/amenities?

Comment Response: Neither the affordable nor market-rate stacker units have been fully designed and the differences between them have not been determined. They have only been conceptually designed with general sizing and layout for each type. The exteriors of either unit type will be, generally speaking, indistinguishable from the market-rate units with high-quality Hardie plank siding, metal-frame windows, and quality doors and garage doors. Internally, the market-rate units will have a higher level of finishes, higher quality kitchen appliance package, higher quality bathroom finishes, etc. However, the affordable unit interiors will have very good quality materials, appliances, construction, etc.

Please provide a unit mix table identifying all the proposed unit types, their planned square footage, and bedroom quantities.

Once again, these units have not been fully designed and we have ranges of sizes.

Comment Response: We will provide under separate cover.

2. In response comment 1A-3, the Applicant has indicated that a list of the involved and interested agencies as well as which agencies are either involved or interested, is provided in Table I-2 within Section I.F of the SFEIS. We note that this information is provided in Table I-1 within Section I.G of the SFEIS, not Table I-2 within Section I.F of the SFEIS. Will be corrected.

Additionally, comments 1A-4 and 1B-5 ask the Applicant to list the Zoning Board of Appeals (ZBA) as an involved agency in Table I-1 within Section I.G of the SFEIS, as the Proposed Project will require approval from the ZBA. The Applicant has responded that *“This information is provided in Section I.E of the SFEIS.”* We note that there is no mention of the ZBA within Section I.E of the SFEIS. The ZBA has been added as an involved agency in Table I-1 within Section I.G of the SFEIS. Please correct this.

Comment Response: This will be corrected.

3. Comments 1A-5, 1A-6, 1A-7, and 1A-8, all submitted in Appendix B-5, Letter – Town Environmental Advisory Committee, have to do with landscaping. Particularly, the Applicant has been asked to revise the proposed plantings along the proposed retaining walls and ensure the preservation of mature existing trees. The Applicant has given assurance that these requests will be met in a Landscaping Plan to be submitted in the future, stating both:

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- *“during the formal site plan level of design, a landscaping plan will be prepared, and the trees that will be preserved will be identified;” and*
 - *“...a comprehensive landscaping plan will be prepared which will specify the plant types that will be used in and around the retaining walls. Plant types that may have root systems that might pose any problem to retaining wall stability and structure will be avoided.”*

The response to IA-5 and IA-6 should include additional information on the number of trees that will be preserved and their locations on the site plan. Response to comment IA-7 should include some example plant species that are being considered. In addition, the Town of Ossining has landscaping standards that should be incorporated into this response.

Comment Response: The current concept site plan and concept landscaping plan show the intentions of providing substantial green buffering throughout the site to adjoining neighborhoods. A comprehensive, cohesive and unified formal landscaping plan will be provided at the formal site plan stage of this Project. The exact footprints of the units, exact design of roadways and their profiles, storm water control design, retaining walls and other aspects will be fully designed and engineered. It’s at that point that the number of trees to be removed will be fully known. Similarly, the number of non-diseased trees will also be better understood, and with the full formal landscaping plans, the type of trees and shrubs will have been selected. The plans will show all planting details, etc.

4. The response to comments IB-4 and 2-10 states, *“the Town Code states that properties that otherwise meet the requirements of the Multifamily (MF) district can apply to be rezoned, anywhere in the Town and not necessarily adjacent to the existing MF zones which are predominantly within the western side of Unincorporated Ossining, as noted above.”* Please provide the section of the Town Code that states this in your response.

Comment Response: Unclear as to what is being requested. Please expand.

5. The response to comment IB-5 states, *“this information is provided on Table I-2 within Section I.F of the SFEIS.”* The SFEIS does not include Table I-2. Please provide a list of variances that will be needed.

Comment Response: To be provided.

6. The response to comment IB-6 is not complete. At a minimum, the response should refer to mitigation measures, plans, maps, images, and detailed responses for each of the items raised.

Comment Response (a) and (b): The existing psychiatric hospital site was substantially altered by the nine existing hospital buildings, three parking lots, basketball court, playing fields, and its many retaining walls. Over the years, the site has been mowed throughout including the entire eastern side of the property adjacent to First, Second and Narragansett Avenues, and along the quarter mile-long meadow fronting Croton Dam Road, and the entire meadow adjacent to Narragansett Avenue. Four of the existing hospital buildings – the Recreation Building, the West Building, the Garage, and the Maintenance Building (***see Figure 2-2 of the June '22 SDEIS***) will all be razed (as will all the hospital buildings) and replaced with new healthy trees and greenery and storm water management control. The site currently also has many unstable existing retaining walls. There is no comprehensive storm water management system and, as such, the homes alongside Second Avenue and Pershing experience storm water runoff from the hospital property. These homes will all now benefit from a new comprehensive storm water management system that is designed to channel all stormwater to detention swales.

Regarding fauna and natural habitats, there is little wildlife on this site. The site has been altered by the hospital buildings and the operation of the hospital over many years, and the mowing of lawns. And as the site is surrounded by developed areas, there are no migration corridors that exist on this property or that connect to such corridors.

Comment Response (c): The existing storm water runoff condition will be greatly improved on the entire site including the south and easterly portion adjacent to Second Avenue and Pershing Avenue. The engineered storm water system will greatly improve storm water control not only for the Project site, but also from the rear-yard runoff of the homes on First and Second Avenues. The SDEIS Section III-D provides summary of the stormwater management plan and presents the percent reductions in peak rates of storm water runoff of the existing condition versus the proposed condition post construction (***see Table III.D-2 of the June '22 SDEIS***).

More importantly, the 644-page Storm Water Pollution Protection Plan (“SWPPP”) has been provided to you under Volume 2 of the SDEIS. That document provides enormous detail of the storm water management planning, methodology of evaluation and design, approach to soil erosion and sediment control, construction phasing, and post-construction maintenance. Analysis is given for the 1 year, 10 year and 100-year storm events. This document provides permanent control measures and facilities for long-term protection with discussion on infiltration basins, catch basins, rip-rap energy dissipators, and seeding protocols. Appendix E of that document provides the “Maintenance Inspection Checklists” for stormwater basins and management areas.

Comment Responses (d), (e) and (f): There are only ten units at this location and not 53 units. The comment’s length and height figures are not correct. The retaining wall in this area is approximately 320 feet long, and at its highest point, which is the southeasterly edge, it is approximately eight feet high, although it is tiered and steps back from the property line. From that point, the retaining wall tapers downward as it heads northward along the property line and is approximately three feet in height at the northernmost edge. It should also be noted that the adjacent homes on Second Avenue are non-conforming to setback requirements and are nearly on the property line. The two-tier structure of the retaining wall allows for the wall to be planted with grasses which will minimize the perception of height. Additionally, it should be pointed out that the abutting homes on First and Second Avenues have basements or garages below the living areas and, as such, the site lines of the living areas are, generally speaking above the retaining walls. Any views from these homes will be above the top level of the retaining wall and viewing the new homes.

7. The response to comment IB-7 is not complete. At a minimum, the response should refer to plans, maps, images, and provide detailed responses on how the proposed plan is addressing the issues of concern raised in the comment.

Comment Response (a): Yes, the revised site plan dramatically reduced the unit density on this portion of the Project site from thirty-two (32) units to ten units (10).

Comment Responses (b): The setbacks of the homes on Second Avenue are non-conforming and sit nearly on the property line. The existing hospital’s Maintenance Building sits closer to the Project’s property line than the proposed units in this location. Similarly, the West Building and the Garage building and adjacent parking areas are to be razed and turned into new green spaces with new trees and plantings and engineered storm water control.

Similarly, there are no units proposed on the meadow adjacent to Narragansett Avenue. This area is the location of the only wetland on the entire site (0.27 acres) and the concept site plan maintains the required wetland setbacks as per Town code.

Additionally, the Recreation Building which sits on the northern property line adjacent to the Grandview Avenue homes (see Figure 2-2 of the June ’22 SDEIS) will be razed and nearest edge of proposed units will be fifty (50) feet from the property line, with all other

units at further distances.

Comment Response (c and d): please see comment responses 6a, 6b, 6c, 6d, 6e, and 6f above.

Comment Response (E): please see comment response “7b” above.

8. In comment IB-9, the Applicant was asked, “if someone has to install an elevator because they cannot maneuver the stairs, what would the cost be, and who would bear that cost? Will the elevators be wheelchair accessible?” The Applicant has not addressed these questions.

Comment Response: All the units will allow for the installation of an elevator which will be an option and it will be wheelchair accessible. The installation cost will differ by unit type but will range from \$27,000 to \$35,000 very roughly.

9. In the response to comment IB-10, please provide a table of the proposed unit types, sizes, and bedrooms.

Comment Response: Please see Comment Response #1 above.

10. In the response to comment IB-11, please provide how the proposed project will include accessibility for various income levels.

Comment Response: The table shown in Response #1 above gives a range of price points based on the size of the unit, number of bedrooms, location on the site. The stacker units are smaller and, as such, are at a lower price point. The ten affordable units are, yet again, priced lower. As such, the Project will offer a spectrum of unit offerings and a spectrum of price points based on these factors. As such, the unit offerings will work within the budgets of empty nesters and retirees of differing financial means.

11. Response to comment IB-12 is not adequate. Please explain how the affordable units will comply with the Town Code.

Comment/Response: The Project is being designed in accordance with all codes. To do otherwise would put the Project at risk of code violations and the inability to obtain certificates of occupancy. Throughout the design development, construction documentation, and construction processes, we maintain third-party consultants who review all documents to ensure compliance with local code, fire codes, state code, federal codes (ADA compliance), OSHA guidelines (on-site construction practices), and HUD guidelines to make absolutely sure that the Project conforms to these. Similarly, during construction, these compliance consultants regularly inspect the Project and construction for compliance.

12. Response to comment IB-14 does not address the concerns that the proposed project will have greater impacts than the prior proposal. Please provide a detailed response to the concerns raised on retaining walls, impervious coverage, stormwater runoff, tree removal, and open space.

Comment/Response: The redesigned Project was done at the behest of the Town, which specifically requested this seniors-oriented home ownership product. The design of the new site plan specifically leaves the entire front of the site as green open space, and removes several hospital buildings and paved parking areas in the areas abutting First, Second and Pershing Avenues and replaces them with new green buffers. Similarly, the north side of the Project removes existing hospital buildings which sit on the property line adjacent to Grandview Avenue and also replaces this with new green buffers. Further, the entire Narragansett Avenue facing portion of the site remains green with an extensive green buffer. The only portion of the site that has near proximity *to any homes* is the easterly side of the site and only to three homes, and each of these existing homes is non-conforming with regard required Town zoning setbacks. Once again, at the request of the Town, we redesigned the Project and moved twenty-two (22) units to other parts of the site. The ten units that remain at this location were pulled back from the property line and lowered a full story. Additionally, the back facades of these units were given considerable attention to provide “architectural interest” with forward-facing gables, standing-seam metal roofs, and porches to ensure that they are attractive.

13. The response to IB-15 should include additional information on the number of trees that will be preserved and their locations on the site plan. The response should also include some example plant species that are being considered. In addition, the Town of Ossining has landscaping standards that should be incorporated into this response.

Comment/Response: There are very few good-quality, undamaged, non-diseased trees on the entire site. Both the north and south sides of the property will gain new healthy trees in place of existing buildings, parking lots and retaining walls. The views of the homes from Grandview, Pershing and Narragansett will greatly improve. The entire front of the Project alongside Croton Dam Road will continue to be green open space and will be sculpted and planted with attractive grasses and ornamental trees (e.g., river birches).

At the formal site plan submission stage of the Project a comprehensive landscape plan will be submitted which will include all details of plant types, planting details, decorative paving, irrigation details, and much more.

14. The response to comment IB-17 is not complete. At a minimum, the response should provide details on how the proposed plan addresses cut and fill volumes and import of fill.

Comment/Response: A detailed “Cut and Fill Analysis” is already provided and depicted on Figure 3.C-5 of the June '22 SDEIS, with narrative in section III.C of that document.

15. Comment 2-5 asks the Applicant about the level of affordability proposed for the ten affordable units, and what units are proposed to be affordable. It additionally asks to provide a description of how the proposed affordable units will comply with §200-35. The Applicant's response does not sufficiently address this request.

Comment Response: please see responses #1 and #10 above.

16. Response 2-6 still does not mention the type of trail that will be proposed. Will there be sidewalks along the emergency accessway? Will there be sidewalks along the internal roads within River Knoll?

Comment Response: The Project will have weight-bearing pervious services – one accessing Narragansett Avenue across from Veterans Memorial Park and one to the northwestern edge of the site accessing Croton Dam Road (*please see "Layout Plan", Figure I-2 of the June '22 SDEIS*). These accessways can also be viewed within "Context Model Visual Analysis" (*see Appendix C of the December '22 SFEIS*).

The Project will have some internal walkways and their location will be determined at the time of formal site and landscape plans are prepared. Our designers intend to strike a balance between providing safe sidewalk access for the older empty-nester resident profile with a Project design that does not have unnecessary paved surfaces.

17. Response 2-7 refers to Response 2-6, which does not answer the question, "*will there be sidewalks added for this interconnection?*"

Comment Response: Please see Response 2-6 above.

18. In response to comment 4-1, please provide a summary of the geotechnical work done to date and its results. Also, provide estimates of where on-site blasting is most likely to occur.

Comment Response: No determination of the extent of blasting will be known until engineered design documents are prepared that provide detail on all unit footprints, foundation and footing design, and retaining wall design. During this design phase when the *exact locations* of the buildings will be known and full Geotech analysis will be undertaken specific to the footprints of each.

19. In comment 4-2, the Applicant was asked to provide a side-by-side illustration of the existing topography and the proposed topography so that a visual comparison can be made of pre and post construction impacts. The Applicant has not addressed this.

Comment Response: Section III.C "Soils, Topography (Steep Slopes) and Geology chapter of the June '22 SDEIS provides a substantial amount of information regarding the geology of the site, thoughts on excavation, mitigation measure, comparisons of existing slopes (Figure 3.C-2), steep slope disturbances (Figure 3.C-3), preliminary site grading plan (Figure 3.C-4) and cut and fill analysis (Figure 3.C-5).

20. In comment 4-3, the Applicant was asked to provide a narrative that discusses the lengths and heights of the retaining walls proposed on site, which has not been included.

Comment Response: Please see Response 5d, 5e and 5f above.

21. In comment 4-5, the Applicant was asked to provide the anticipated amount of fill to be used for the retaining walls, and, again, provide their heights and lengths. This information has not been offered, aside from the heights of the retaining walls noted on the Site Plan.

Comment Response: Please see Response 5d, 5e and 5f above.

22. Corresponding to comments 4-1 and 4-7, significantly more information about potential blasting work (how much, period of time, potential mitigation practices) is warranted.

Comment Response: Please see Responses #18 and #19 above.

23. Comment 5-1 asks the Applicant to provide a description of how the stormwater infiltration basin will be planted and maintained. The comment asks if this feature will be a mowed lawn or a beneficial prairie area, if it will be mowed yearly, and if the plants will be native plants or lawn grasses. In their response, the Applicant indicates that the flat basin floor area must be comprised of grass turf, along with a grass channel provided at the inflow to the basin. However, no information was provided as to the proposed maintenance practices of the stormwater management areas. Routine upkeep is required in order to ensure these stormwater management features function properly. Similarly, to comment 5-1, comment 6-1 again asked the Applicant to identify the plantings/vegetation proposed for these areas, as well as the frequency with which the vegetation comprising the infiltration basins, noted as "grass turf," will be mowed. This request was not addressed. Will these stormwater management areas adhere to the planting specifications outlined in the "Specifications for Final Stabilization of Graded Areas" section on Page 31 of the SWPPP?

Comment Response: Please see Response #3 above. Once the formal landscaping plan is fully designed, the method of maintenance for plant types and care, and storm water management will be addressed. However, the Storm Water Pollution Protection Plan (*Volume 2 of the SDEIS*) provides detail on the storm water management planning, approach to erosion and sediment control, construction phasing, and post-construction maintenance.

24. Regarding comments 5-5 and 6-10, the Applicant has not provided more information on the anticipated phases, or “sequences,” of the disturbance and the acres associated with each phase, or “sequence.” Please provide this information.

Comment Response: Please see Appendix E of the June '22 SDEIS entitled “Construction Management Plan” depicting construction phasing, temporary construction measures, construction parking and staging.

25. Comments 5-6 and 5-7 ask the Applicant to provide a swale maintenance plan. This information was not provided.

Comment Response: Please see comment response #23 above.

26. Comments 6-3 and 2-11 ask the Applicant what will be done to prevent birds from unintentionally flying into the large windows. A response to that comment was not provided.

Comment Response: This is not a concern that should be addressed specific to this Project. This is an issue that can be factor with any building with windows. If the Town believes that this is a universal problem, then it should enact laws/codes to address this issue – if such codes could, in fact, be enforceable.

27. Landscaping Plan. The following comments were identified as “acknowledged” or “noted” by the Applicant and assured to be included in the final Landscaping Plan to be submitted as part of the Site Plan Review process. However, the accompanying changes were not undertaken for the submittal of the SFEIS.

- Comment 6-4: The landscaping plan should include a more diverse plant selection.
- Comment 6-5: Additional information is required regarding proposed plantings in the areas of the retaining walls and associated maintenance practices. The Site Plan does not indicate the presence of any plantings between the two, tiered retaining walls. However, the Applicant has responded that *“the retaining wall will be planted with appropriate species suitable for such a retaining wall. An access to the retaining wall will be provided for plant maintenance.”*

Comment Response: The plantings for the retaining walls will be specified within the landscape plan to be submitted with the formal site plan application. The landscape plan will address all plant types throughout the entire Project and suggested maintenance.

28. In comment 8-1, the Westchester County Planning Board outlines several requests for additional information regarding the identification of mitigation measures that will offset the projected increase in flow requiring treatment at the Ossining Water Resource Recovery Facility operated by Westchester County through reductions in inflow/infiltration (I&I). Some general questions listed in this comment are:

- 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?

Comment Response: In consultation with those involved with other projects within the County, and through our own experience with other projects within the County, all have had similar recommendations by the County Planning Board. The comment regarding inflow/infiltration is a typical comment. We recommend guidance be provided by the Town Engineer.

29. Comment 12-2 asks the Applicant to provide the construction sequence for the proposed project, as the construction sequence listed does not detail the proposed project but seems to outline work for a standalone building. The Applicant's response did not provide this information.

Comment Response: Please see Appendix E of the June '22 SDEIS entitled "Construction Management Plan" depicting construction phasing, temporary construction measures, construction parking and staging. Also the Storm Water Pollution Protection Plan provides construction phasing measures with regard to storm water control.

30. Comment 12-4 asks the Applicant to provide the average truck trips per day for each phase of construction, to which the Applicant has only provided anticipated truck trips for the excavation phase and the foundation and structural framework phases. The Applicant should provide an estimation of truck trips for the remaining construction phases.

Comment Response: During the initial excavation, foundation and structural framework stage of the Project's construction it is easier to estimate the potential trips needed for this work as it is the most requiring of trips and volumes of materials needed for delivery or removal can be better estimated. Once these stages are complete and the buildings are enclosed, the work internal to the structures is much less requiring of significant deliveries of materials. As an example, sheetrock or HVAC equipment delivery can be provided in one or two truck loads a week. After the initial construction phase material deliveries taper off, most remaining trips pertain to the few teams of carpenters, mechanical/electrical installers, sheetrock installers, and cabinet installers that will continue their work at the site. These trades are sequenced (e.g., sheet rock team cannot commence until all MEP contractors are complete with their work, by unit) so not all of trades are present at site at the same time. Typically, these workers arrive in a few truck/cars early in the morning and typically leave late afternoon.

31. Comment 12-5 asks the Applicant where the construction staging area will be located, and if the field along Croton Dam Road be used for the parking of construction vehicles, to which the Applicant states that *“the construction staging area will likely utilize the field along Croton Dam Road for the parking of construction vehicles.”* However, this area is planned to be regraded and redesigned for the proposed stormwater management areas. If the excavation and rough grading phase occurs early on in the construction process, how will construction vehicles be stored in these areas for later phases? Will the proposed stormwater management areas be developed later on in the construction process? Please confirm whether or not construction staging, and vehicles, will be stored in these areas, and if so, how this will occur as the areas are regraded.

Comment Response: Please see Appendix E of the June '22 SDEIS entitled “Construction Management Plan” depicting construction phasing, temporary construction measures, construction parking and staging.

32. In comment 17-8, the Applicant is asked to clarify how the design of the expanse of exterior glass panels shown in the 3D graphics is intended to reduce heat gain during warm weather, to which there is no sufficient response.

Comment Response: it is an interesting question that will be better addressed as the site plan and unit plans are further evolved. However, there are many factors that go into the minimization of solar heat gain such as the orientation of windows, window coatings, roof overhangs, vegetation, etc. Several townhouse clusters contain one or two units with larger glazing area and a variety of shade-providing products are available to mitigate heat-gain within units. Some measures include automated blinds or reflective curtains that respond to sunlight, as examples.

33. In comment 17-9, the Applicant is asked if the proposed project can incorporate heat pumps, permeable pavement, native plants, and a reduction of mowing, to which the Applicant responds with a reference to several energy-efficient technologies planned to be implemented in the project. However, none of the relevant items referenced in this comment are discussed or even listed in the referenced response by the Applicant.

Comment Response: Several of the mentioned technologies will be considered as the Project evolves in its design. Similarly, technologies for energy savings are evolving rapidly. Technologies that were available when we commenced this Project 8.5 years ago have often been superseded by newer-yet technologies. We will embrace any practicable technologies that provide cost efficiency and are those that the marketplace is receptive to.

34. In comment 17-10, the Applicant is asked to provide information on how this project is consistent with the goals of the Climate Leadership and Community Protection Act. The Applicant’s response does not sufficiently address this request.

Comment/Response: Please see comment response #33 above.

35. The Applicant has not addressed comment 17-11, which asks about several details regarding the Front Entry Building glass walls. Additionally, the Applicant's response did not address plans to mitigate negative impacts on wildlife stemming from nighttime illumination from interiorly lit glass walls.

Comment Response: We plan to orient the glass wall of the front entry building northward toward the entry road as we believe this will be a welcoming gesture to those arriving at the Project. This orientation will be toward the open meadow fronting Croton Dam Road and we do not expect significant wildlife to be present in this location.

If you have any questions or concerns regarding our review, please do not hesitate to contact us.

Supervisor Levenberg & Members of the Town of Ossining Board & Town of Ossining Planning Board
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RECEIVED

JUL 12 2022

Town of Ossining
Planning & Planning Department

Re: Concerns about Proposed River Knoll Project 40 Croton Dam Road, Ossining, NY

Dear Supervisor Levenberg and Members of the Town of Ossining Board & Town of Ossining Planning Board,

My name is James May and I am a Village of Ossining resident. I am writing to state my continued objection to the proposed development by Hudson Park Group, LLC, successor to Glenco LLC, of property located at 40 Croton Dam Road, Ossining, NY (known as River Knoll multifamily development).

Last year, the proposed development's potential to spread invasive species of plants to neighboring properties was brought to the Planning Board and Hudson Park Group, LLC's attention. However, the revised SDEIS includes no plan as to how the actual construction project-including the disruption of soil containing invasive species as well as invasive species seed and rhizomes-will mitigate the spread of invasive species to neighboring properties. Instead, the SDEIS only states the River Knoll HOA will "regularly remove any invasive species that impact the landscaping."

"As noted above, there were several invasive species noted on the Site, all of which are Tier 4 species. For Tier 4 species, the NYSDEC recommends focusing on localized management over time to contain, exclude, or suppress to protect highpriority [sic] resources like rare species or recreation assets, and be strategic when deciding if/where to control. As part of its maintenance of the landscaping, the Project 4 Town of Ossining Code, Chapter 183 "Tree Protection" River Knoll - SDEIS February 2022 Vegetation and Wildlife III.E-6 HOA will regularly remove any invasive species that impact the landscaping."¹

This revision is wholly inadequate. If rhizomes or seeds are spread due to disruption and carting of contaminated soil during construction, it puts nearby homes and properties along the carting route at risk. Japanese Knotweed-one of the property's invasive species noted on the SDEIS--can take years to eradicate. The board must ensure Hudson Park Group, LLC has a clear mitigation policy during construction as well as relying on the River Knoll HOA to continue to monitor and remove invasive species.

In addition to the above, I continue to have major concerns with this project in general. This development would harm one of Ossining's most unique ecosystems, be detrimental to our community and its infrastructure as well as permanently changing the character of the Village and surrounding neighborhood. Here are some of the concerns I have with Hudson Park Group, LLC's River Knoll Project at 40 Croton Dam Road, Ossining, NY:

- In 2019, citizens told the board they did not want a large development in an area zoned for single family homes. This type of spot zoning is undemocratic and will alter the character of the neighborhood, village, and town, changing zoning from Single Family R-15 to Multi Family.
- The development does not match objectives in the Town's Town of Ossining Comprehensive Plan Draft which aims to "Ensure the existing character and quality of the Town of Ossining's neighborhoods is maintained and that new development is not in conflict with the local identity."²

¹ Hudson Park Group LLC. "SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT VOLUME I." Planning Board projects -Town of Ossining, New York. Town of Ossining, March 9, 2022.
<https://www.townofossining.com/cms/planning-board/planning-board-archive/planning-board-projects, IIIE-5 - IIIE-6>

² Town of Ossining Comprehensive Plan Draft Objectives & Strategies WXY Studio, PACE Land Use Law Center August 2021; accessed January 2, 2022
https://static1.squarespace.com/static/5f9340852cc9b90e880d030a/t/6144c880ef02af6f6da204cc/1631897728626/2_10831_WXY_OssiningCompPlan_Objectives_Strategies_FINAL_DRAFT.pdf

- "" Despite being labeled as a 55 and older community, the developer cannot bar children from living there and add to our already overcrowded schools.³
- "" With 98 units, traffic will increase. This will negatively impact existing traffic patterns, put more cars in a residential neighborhood and stress roads that are already in need of repair and maintenance.
- "" The property includes sensitive wetlands and steep slopes, which will be negatively impacted by development. With climate change, development in such an ecosystem could bring flooding and landslides. Several years ago, a landslide below a development project occurred at Hunter Street and Sector. Not only dangerous, it became a blight viewable to all visitors, residents, and potential residents getting off the train. Why risk this again?
- "" In direct contrast with Ms. Levenberg's pledge to "continue [the town's] legacy of environmental stewardship..."⁴ this project would eliminate nearly 60% of the property's mature trees, acres of open meadow, and add impermeable surfaces that increase the risk of flooding and pollution within the local watershed.⁵
- The development proposal is for 8-21 months of heavy construction during the hours of 8AM-8PM Monday-Friday and 9AM-5PM on Saturday, Sunday, and holidays, which will include the use of explosives/ blasting as well as large construction vehicles and loud machinery-all of this will create an undue environmental and quality of life burden for nearby residents; this will inconvenience all residence who will face increased traffic due to construction.'

Best Regards,

James May
61 Narragansett Ave
Ossining, NY 10562

³ Questions and Answers Concerning the Final Rule Implementing the Housing for Older Persons Act of 1995 (HOPA)." US Department of Housing and Urban Development. Accessed April 3, 2021. https://www.hud.gov/sites/documents/DOC_7769.PDF.

⁴"Village & Town of Ossining Celebrate Being Named Tree Cities for 2020 by the Arbor Day Foundation." The Village of Ossining. Tree City USA, February 25, 2021.<https://myemail.constantcontact.com/VILLAGE---TOWN-OF-OSSINING-CELEBRATE-BEING-NAMED-TREE-CITIES-FOR-2020-BY-THE-ARBOR-DAY-FOUNDATIONS.html?soid=1J26605899251&aid=p7jVVcbpeU>.

⁵ Hudson Park Group LLC. "SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT VOLUME I." Planning Board projects-Town of Ossining, New York. Town of Ossining, March 9, 2022. <https://www.townofossining.com/cms/planning-board/planning-board-archive/planning-board-projects, 1-14, IV-I>

⁶ Hudson Park Group LLC. "SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT VOLUME I." Planning Board projects -Town of Ossining, New York. Town of Ossining, March 9, 2022. <https://www.townofossining.com/cms/planning-board/planning-board-archive/planning-board-projects, III.C-10>

Supervisor Levenberg & Members of the Town of Ossining Board & Town of Ossining Planning Board
 101 Route 9A
 PO Box 1166
 Ossining, New York 10562
 bldgdept@townofossining.com

RECEIVED

JUL 12 2022

Re: Concerns about Proposed River Knoll Project 40 Croton Dam Road, Ossining, NY

Dear Supervisor Levenberg and Members of the Town of Ossining Board & Town of Ossining Planning Board

My name is Ruth Delgado and I am an Ossining resident. I am writing to state my continued objection to the proposed development by Hudson Park Group, LLC, successor to Glenco LLC, of property located at 40 Croton Dam Road, Ossining, NY (known as River Knoll multifamily development).

Living in Ossining for about 16 years has been amazing, an experience that has changed my point of view in a positive way. My children grew up in the house where we currently reside, and I can't imagine things that would negatively impact our neighborhood and our long living memories this way.

This development would harm one of Ossining's most unique ecosystems, be detrimental to our community infrastructure as well as permanently changing the character of the Village and surrounding neighborhood. Here are some of the concerns I have with Hudson Park Group, LLC's River Knoll Project at 40 Croton Dam Road, Ossining, NY:

- In 2019, citizens told the board they did not want a large development in an area zoned for single family homes. This type of spot zoning is undemocratic and will alter the character of the neighborhood, village, and town, changing zoning from Single Family R-15 to Multi Family.
- The development does not match objectives in the Town's Town of Ossining Comprehensive Plan D1 which aims to "Ensure the existing character and quality of the Town of Ossining's neighborhoods is maintained and that new development is not in conflict with the local identity."¹
- Despite being labeled as a 55 and older community, the developer cannot bar children from living there and add to our already overcrowded schools.²
- With 98 units, traffic will increase. This will negatively impact existing traffic patterns, put more cars in a residential neighborhood and stress roads that are already in need of repair and maintenance.
- The property includes sensitive wetlands and steep slopes, which will be negatively impacted by development. With climate change, development in such an ecosystem could bring flooding and landslides. Several years ago, a landslide below a development project occurred at Hunter Street and Sector. Not only dangerous, it became a blight viewable to all visitors, residents, and potential residents getting off the train. Why risk this again?
- In direct contrast with Ms. Levenberg's pledge to "continue [the town's] legacy of environmental stewardship..."³ this project would eliminate nearly 60% of the property's mature trees, acres of open meadow, and add impervious surfaces that increase the risk of flooding and pollution within the local watershed.⁴

¹ Town of Ossining Comprehensive Plan Draft Objectives & Strategies \VXY Studio, PACE Land Use Law Center August 2021; accessed January 2, 2022 https://static1.squarespace.com/static/5f9340852cc9b90e880d030a/t/6144c880eID2af6f6da204cc/1631897728626/210831_VXY_OssiningCompPlan_Objectives_gies_FINAL_DRAFT.pdf

² Questions and Answers Concerning the Final Rule Implementing the Housing for Older Persons Act of 1995 (HOPA)." US Department of Housing and Urban Development. Accessed April 3, 2021. https://www.hud.gov/sites/documents/DOC_7769.PDF

³ "Village & Town of Ossining Celebrate Being Named Tree Cities for 2020 by the Arbor Day Foundation." nle Village of Ossining. Tree City USA, February 25, 2021. https://myemail.constantcontact.com/NILLAGE---TO\VN-OF-OSSINING-CELEBRATE-BEING-NAMED-TREE-CITIES-FOR-2020-BY-THE-ARBOR-FOUNDATION.html?oid=1126605899251&aid_p7jVVVcpeU.

⁴ Hudson Park Group LLC. "SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT VOLUME I." Planning Board, projects • Town of Ossining, New York. *Town of Ossining*, March 9, 2022.

<https://www.townofossining.com/cms/ulannin11-board/olannin11!-board-archive/nlannin11!-board-projects.1-14.IV-1>

- The development proposal is for 8-21 months of heavy construction during the hours of 8AM-8PM Monday-Friday and 9AM-5PM on Saturday, Sunday, and holidays, which will include the use of explosives/ blasting as well as large construction vehicles and loud machinery-all of this will create undue environmental and quality of life burden for nearby residents; this will inconvenience all residence who will face increased traffic due to construction.⁵
- The property site has numerous invasive plant species including Garlic Mustard, Oriental bittersweet and Japanese Knotweed. Construction will risk the spread of these species to neighboring properties along truck routes carrying soil and/or organic materials to/from the site.⁶ The revised SDEIS include no plan as to how the actual construction project including the disruption of soil containing invasive species as well as invasive species seed and rhizomes-will mitigate the spread of invasive species to neighboring properties. Instead, the SDEIS only states the River Knoll HOA will "regularly remove r invasive species that impact the landscaping.

Ruth Delgado

40 First Avenue

We are not interested in this development happening because it will affect not only traffic, population size, contamination, but the environment as well. We are not for this development since it will negatively impact (neighborhood! This is an easy decision when money is not a factor!

Best Regards,

Ruth Delgado

⁵ Hudson Park Group LLC. "SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT VOLUME I." Planning B projects• Town of Ossining, New York. Town of Ossining. March 9, 2022.

<https://www.townofossining.com/cms/planning-board/planning-board-archive/planning-board-projects>, III.C-10

⁶ "New York State Prohibited and Regulated Invasive Plants." New York State & Cornell University, September IO, 2014.

Supervisor Levenberg & Members of the Town of Ossining Board & Town of Ossining Planning Board
101 Route 9A
PO Box 1166

Ossining, New York 10562
bldgdept@townofossining.com

---"Jwj 12- 7iJ2S

Re: Concerns about Proposed River Knoll Project 40 Croton Dam Road, Ossining, NY

Dear Supervisor Levenberg and Members of the Town of Ossining Board & Town of Ossining Planning Board,

We are writing to state our continued objection to the proposed development by Hudson Park Group, LLC, successor to Glenco LLC, of the property located at 40 Croton Darn Road, Ossining, NY (known as River Knoll multifamily development).

We have been residents of the town of Ossining for over 20 years and moved to the area, as many have, to enjoy the benefits of a less crowded and less trafficked suburban community. Over this period, the population has grown, and traffic has increased, significantly. This is slowly changing the nature of the community. While a certain amount of growth over time is to be expected and perhaps is not completely avoidable, the type of large-scale residential development being proposed (yet again, after a similar proposal was already denied) on currently open and uninhabited space is completely unnecessary, avoidable and would serve to expedite this negative trend.

The development would harm one of Ossining's most unique ecosystems, be detrimental to our community and its infrastructure, and permanently change the character of the Village and surrounding neighborhood and Town.

The following are some of the concerns we have with the proposed Hudson Park Group, LLC's River Knoll Project at 40 Croton Dam Road, Ossining, NY:

- In 2019, citizens told the board they did not want a large development in an area zoned for single family homes. This type of spot zoning is undemocratic and will alter the character of the neighborhood, village, and town, changing zoning from Single Family R-15 to Multi Family.
- The development does not match objectives in the Town's Town of Ossining Comprehensive Plan Draft which aims to "Ensure the existing character and quality of the Town of Ossining's neighborhoods is maintained and that new development is not in conflict with the local identity."¹
- Despite being labeled as a 55 and older community, the developer cannot bar children from living there and add to our already overcrowded schools.²
- With close to 100 units, traffic will increase significantly. This will negatively impact existing traffic patterns, put more cars in a residential neighborhood and stress roads that are already heavily traveled and in need of repair and maintenance. Traffic issues need to be controlled rather than creating larger ones.
- The property includes sensitive wetlands and steep slopes, which will be negatively impacted by development. Development in such an ecosystem could bring flooding and landslides. Several years ago, a landslide below a development project occurred at Hunter Street and Sector. Not only dangerous, it became a blight viewable to all visitors, residents, and potential residents getting off the train. Why risk this again?

¹ Town of Ossining Comprehensive Plan Draft Objectives & Strategies WXYStudio, PACE Land Use Law Center August 2021; accessed January 2, 2022 https://static.lspacespace.com/static/5f9340852cc9b90e880d030a/t/6144c880ef02af6f6da204cc/I631897728626/210831_WXY_OssiningCompPlan_Objectives_Strategies_FINAL_DRAFT.pdf

² Questions and Answers Concerning the Final Rule Implementing the Housing for Older Persons Act of 1995 (HOPA)." US Department of Housing and Urban Development. Accessed April 3, 2021. https://www.hud.gov/sites/documents/DOC_7769.PDF.

- In direct contrast with Ms. Levenberg's pledge to "continue [the town's] legacy of environmental stewardship ..."³ this project would eliminate nearly 60% of the property's mature trees, acres of open meadow, and add impermeable surfaces that increase the risk of flooding and pollution within the local watershed.⁴
- The development proposal is for 8-21 months of heavy construction during the hours of 8AM-8PM Monday-Friday and 9AM-5PM on Saturday, Sunday, and holidays, which will include the use of explosives/ blasting as well as large construction vehicles and loud machinery-all of this will create an undue environmental and quality of life burden for nearby residents and will inconvenience all residents who will face increased traffic due to construction.⁵
- The property site has numerous invasive plant species including Garlic Mustard, Oriental bittersweet, and Japanese Knotweed. Construction will risk the spread of these species to neighboring properties along truck routes carrying soil and/or organic materials to/from the site.⁶ The revised SDEIS includes no plan as to how the actual construction project including the disruption of soil containing invasive species as well as invasive species seed and rhizomes-will mitigate the spread of invasive species to neighboring properties. Instead, the SDEIS only states the River Knoll HOA will "regularly remove any invasive species that impact the landscaping.

As noted, and as the Board is aware, the community loudly voiced its concerns regarding a similar proposal in 2019 and the proposal was ultimately denied. The same concerns are at issue in the current proposal. The proposed development simply is not appropriate for the Stony Lodge property.

It is our hope that the Board will again do the right thing and deny the proposal for this development. This is an extremely important issue, the ultimate determination of which will have a dramatic effect on the quality of life in the surrounding area. It also will have a large impact on our voting going forward.

Thank you for your consideration of our concerns.

Sincerely,

Larry Eckert and Elaine Costello
3 Bracken Road
Ossining, NY 10562

³ "Village & Town of Ossining Celebrate Being Named Tree Cities for 2020 by the Arbor Day Foundation." The Village of Ossining. Tree City USA, February 25, 2021. <https://myemail.constantcontact.com/VILLAGE---TOWN-OF-OSSINING-CELEBRATE-BEING-NAMED-TREE-CITIES-FOR-2020-BY-THE-ARBOR-DAY-FOUNDATION.html?soid=1126605899251&aid=-p7jVVCbpeU>.

⁴ Hudson Park Group LLC. "SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT VOLUME I." Planning Board projects -Town of Ossining, New York. Town of Ossining, March 9, 2022. <https://www.townofossining.com/cms/planning-board/planning-board-archive/planning-board-projects, I- I 4, IV-I>

⁵ Hudson Park Group LLC. "SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT VOLUME I." Planning Board projects -Town of Ossining, New York. Town of Ossining, March 9, 2022. <https://www.townofossining.com/cms/planning-board/planning-board-archive/planning-board-projects, II.C- I 0>

⁶ "New York State Prohibited and Regulated Invasive Plants." New York State & Cornell University, September 10, 2014.

Stony Lodge Property Development Application Review

Meredith Larson <meredithtoday@hotmail.com>

Wed 7/20/2022 4:20 PM

To: Ossining Building Department <bldgdept@townofossining.com>

Dear Members of the Ossining Planning Board,

I am reaching out to you to ask you to consider heavily the potential, and likely negative, effects this development will have on our community.

While I appreciate the potential revenue such a property could provide, I am wary of the impacts on the neighborhood's landscape, plumbing systems, loss of trees and associated erosion, increased flooding potential, loss of habitat for wildlife, increased traffic and associated dangers, and a significant increase in population within a relatively small area. It would seem the costs (hard and soft) could outstrip the potential revenue benefits. A single-family development makes sense, but such an ambitious project, as proposed by Hudson Park Group LLC (prior Glencove), more than likely benefits few and hurts many others.

There is no doubt you have already weighed these, and other, considerations. Appreciating your responsibilities, I humbly request that you not approve this project, in lieu of other potentially more complementary or appropriate developments.

Thank you for all of your efforts.

Kind regards,

Meredith Larson

I Support the River Knoll Proposal

Ossining 10562 9147727314 <ffanelli@oidny.com>

Thu 8/4/2022 12:38 PM

To: Sandra Anelli <Sanelli@townofossining.com>

First Name Helayne

Last Name Scheier

Email helayne411@gmail.com

Address 217 N Highland Ave

City Ossining

Zip Code 10562

Phone 9147727314

Agreement By filling out the form above & clicking submit, I hereby understand that the letter above will be sent to public officials in the Town of Ossining on my behalf.

I Support the River Knoll Proposal

Scarborough 10510 9146610316 <ffanelli@oidny.com>

Thu 8/4/2022 12:03 PM

To: Sandra Anelli <Sanelli@townofossining.com>

First Name Edward

Last Name Costa

Email edc1559@hotmail.com

Address P.O.B. 9212

City Scarborough

Zip Code 10510

Phone 9146610316

Agreement By filling out the form above & clicking submit, I hereby understand that the letter above will be sent to public officials in the Town of Ossining on my behalf.