



MEMORANDUM

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

FROM: Valerie Monastra, AICP

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: August 9, 2023

We have reviewed the Supplemental Final EIS for River Knoll prepared by JMC Planning, Engineering, Landscape Architecture, and Land Surveying, PLLC, dated June 1, 2023.

We offer the following comments for the Board's consideration. We feel that the additional information provided by the Applicant, along with the revisions detailed below, completes the SFEIS. In addition, some comments require more information and can be finalized during the site plan approval process. The outstanding information is highlighted below and recommended to be incorporated into the Findings Statement.

RESPONSE TO COMMENTS

1. 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. While the Applicant did provide a more detailed response and a landscaping plan, **it is recommended that the Findings Statement notes that during site plan review the Applicant will provide an updated landscaping plan that incorporates the Town's recommended landscaping standards and further details on tree preservation during construction activities. In addition, further review of the plant species and location will be undertaken by the Planning Board.**
2. In response to comment 4-1, the Applicant was asked to provide a summary of the geotechnical work done to date and its results. The Applicant was also asked to provide estimates of where on-site blasting is most likely to occur. The Applicant provided a more detailed response but noted that more information will be submitted during site plan

approval. **It is recommended that the Findings Statement notes that during site plan review the Applicant will provide a geotechnical analysis and a draft blasting or rock removal plan that meets Chapter 89, Explosives, of the Town Code for review and approval.**

3. In comment 4-2 and 1B-17, 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 refers to Figure C-220 and this Figure is not located in the SFEIS but as a separate submission. **Please include the figure in the body of the document of the final SFEIS.**
4. Corresponding to comments 4-1 and 4-7, more information about potential blasting work (how much, period of time, potential mitigation practices) was requested. The Applicant provided a more detailed response but noted that more information will be submitted during site plan approval. **It is recommended that the Findings Statement notes that during site plan review the Applicant will provide a geotechnical analysis and a draft blasting or rock removal plan that meets Chapter 89, Explosives, of the Town Code for review and approval.**
5. 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. The Applicant provided more information. **It is recommended that the Findings Statement notes that during site plan review the Applicant will provide a more detailed stormwater infiltration management and maintenance plan and an updated SWPPP for review and approval.**
1. The Applicant was asked to provide more information on the anticipated phases, or “sequences,” of the disturbance and the acres associated with each phase, or “sequence” during the site plan approval process in comments 5-5, 6-10, 12-2, and 12-4. In addition, more information was requested on the truck trips for each phase of construction activity. The Applicant provided some addition information. **However, it is recommended that the Findings Statement notes that during site plan review the Applicant will provide a more detailed construction sequencing plan for review and approval. This will include estimated truck trips for each phase of construction activity. In addition, it is recommended that the Applicant complete the recommendation from the March 13, 2023, Kimley Horn memorandum that requests the Applicant to document current school bus stop activity on Croton Dam Road and outline a plan that will minimize the impact of construction activity on such activity.**
2. Comments 5-6 and 5-7 ask the Applicant to provide a swale maintenance plan. Detailed information was not provided. **It is recommended that the Findings Statement notes that during site plan review the Applicant will provide a more detailed swale management and maintenance plan and an updated SWPPP for review and approval.**

3. 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?

Detailed information was not provided. **It is recommended that the Findings Statement notes that during site plan review the Applicant will identify inflow/infiltration projects based on the input from the Town Engineer.**

4. 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. This information was not provided. **It is recommended that the Findings Statement notes that during site plan review the Applicant will provide a more detailed construction sequencing plan for review and approval. This will include estimated truck trips for each phase of construction activity as well as responses to the questions posed directly above.**
5. 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 provides some additional information, but **it is recommended that the Findings Statement notes that during site plan review the Applicant will provide more details on how the project will meet the Town’s Stretch Code and energy efficient design.**
6. 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. The Applicant’s response notes that design will be finalized later in the process. **It is recommended that the Findings Statement notes that during site plan and ARB review the Applicant will provide more details on the design including potential mechanisms to prevent bird strikes.**

7. In addition, while the Applicant provided responses to questions on wetlands, **it is recommended that during site plan review the Applicant reconfirm the wetland boundaries on the project site.**
8. There are still a few outstanding traffic comments that can be addressed during the site plan approval process. **It is recommended that the Applicant complete the following recommendation from the March 13, 2023, Kimley Horn memorandum: the Applicant should add to the site plan the extent of the proposed on-street parking as currently envisioned and a final review of the proposed parking be undertaken for any impacts on sightlines and vehicular circulation.**