



FREDERICK P. CLARK ASSOCIATES, INC.

PLANNING, TRANSPORTATION, ENVIRONMENT AND DEVELOPMENT
RYE, NEW YORK FAIRFIELD, CONNECTICUT

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MEMORANDUM

To: Ching Wah Chin, Chairman,
and the Town of Ossining Planning Board

Date: April 4, 2017

Subject: **River Knoll – Completeness Review of the Proposed Draft
Environmental Impact Statement (DEIS) dated February 8, 2017**

As requested, we have completed a review of the proposed Draft Environmental Impact Statement dated February 8, 2017 in connection with a proposed zoning amendment to create a Multi-Family Residence 2 (MF2) district and apply the new district to the former Stony Lodge Hospital site as petitioned by Glenco Residential LLC and Hudson Valley Holdings LLC, in order to redevelop the 17.89-acre site located on Croton Dam Road as 188 units of multi-family housing (the “Proposed Action”).

The subject proposed DEIS was reviewed against the Final Scope (the “Scope”) for the Draft Environmental Impact Statement dated July 20, 2016 adopted by the Town of Ossining Planning Board as Lead Agency. We performed the review for the purpose of determining whether the document is complete with respect to scope and content.

SUMMARY

Based upon our review, we find that the proposed DEIS requires revisions and supplementation before it can be determined to be “adequate with respect to its scope and content for the purpose of commencing public review.” In our judgment, the current version of the DEIS does not fully and/or adequately address several of the topics identified in the Scope for the DEIS. Therefore, we recommend that the Applicant be requested to revise the DEIS to address the comments in this memorandum and any other comments that the Planning Board, Town staff or other advisors may have.

GENERAL COMMENTS

We organized our review comments according to the pertinent DEIS page number and subsection reviewed, and note the specific subsection of the adopted Scope on which the comment is based at the end of each comment. These comments address the

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completeness of the information provided, the clarity of the document, and the ability of the public to easily access the information and topics in the DEIS.

This memorandum does not provide substantive comments regarding the Proposed Action. A more detailed substantive review of the DEIS will be performed after it is revised and accepted as complete for the purpose of public review.

1. We will continue reviewing all the components of the DEIS for completeness when all missing, incomplete, or inadequate narrative sections are provided in a revised version of the DEIS.
2. In order to aid in the review of the next draft of the DEIS, all revisions made by the Applicant should be tracked with underline and ~~strikeout~~.
3. Throughout the document the Applicant's opinions and conclusions are presented as if they are fact. All conclusions and opinions of the Applicant should be eliminated from the document, or they should be identified as the "Applicant's" or the "Developer's." (*Scope General Guidelines*)

TITLE PAGES

4. The name and telephone number of a contact person at the Lead Agency was not provided as required, which should be added. (*Scope Section B.4.a*)

EXECUTIVE SUMMARY [DEIS Chapter 1]

5. Revisions made to other sections of the DEIS narrative, and to reports and study results in the Appendices in response to comments in this memorandum should be accounted for by revisions to the Executive Summary.
6. The Executive Summary should not include new or revised information that is not included in the other chapters of the DEIS.
7. Page 1-3, Table 1-1, Required Approvals and Referrals. Table 1-1 does not include all of the approvals listed in Table 1 of the Scope. Table 1-1 should be revised. (*Scope Section A., Table 1, Required Approvals*)
8. Page 1-6, first paragraph: The narrative states that the Phase 1A Archeological Documentary Study will be submitted to NYS OPRHP. This submission, if not already accomplished should be done immediately. The DEIS will not be complete until the results of all archeological and historic resources investigations and determinations are finalized and documented in the

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narrative and the reports, and determinations from agencies included in the Appendices. If a Phase 1B investigation or other work is required, a summary of the report of these investigations should be discussed in this section and the report(s) included in the Appendices as well. The results of any further investigations will require revision of the Executive Summary. (*Scope Chapter III.E.1*)

9. Pages 1-7 thru 1-8: The discussion on these pages regarding land use, zoning and public policy does not provide a summary that includes most of the issues required to be discussed by the Scope. The Executive Summary should provide enough discussion and details to summarize the required analyses included in DEIS Chapter 3G, and the Applicant's conclusions and opinions should be eliminated or identified as such. (*Scope Chapter III.G.1,2 and 3*)
10. Page 1-10, fourth paragraph: The summary included in the section regarding adverse environmental impacts that cannot be avoided is currently irrelevant to the topic as required by the Scope, which should be corrected. (*Scope Chapter IV*)

DESCRIPTION OF PROPOSED ACTION [DEIS Chapter 2]

11. Page 2-3, Table 2-1, Required Approvals and Referrals: Table 2-1 does not include all the required approvals listed in Table 1 of the Scope. Table 2-1 should be revised (*Scope Section A., Table 1, Required Approvals*)
12. Page 2-3, Section B., Overview and Description of Site and Environs: The title of the section should be "Overview and Description of Site and Environs." A general description of surrounding properties should be included, as required by the Scope. (*Scope Chapter II.B.1*)
13. Page 2-5, Section B., Brief History of the Site and Area: A history of the area in which the site is located, as required by the Scope, is missing. A general discussion of the area history should be added. (*Scope Chapter II.B.2*)
14. Page 2-6, Section C.1, Steep Slopes and Elevations: A description and a discussion regarding the elevations on the property are missing. The general description and discussion should be added, as required by the Scope. (*Scope Chapter II.C.1*)
15. Page 2-6, Section C, Wetlands, Wetland Buffers, Watercourses and Hydrology: The narrative in the section discusses stormwater management, instead of generally describing and discussing wetlands, wetland buffers, watercourses and the hydrology of the site, as required by the Scope. The current narrative should be replaced by the appropriate descriptions and discussion. (*Scope Chapter II.C.2*)

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16. Page 2-6, Section C, Aesthetic Resources and Scenic Views: The narrative in the section discusses the design of the project, instead of generally describing and discussing the aesthetic resources and scenic views of the site, as required by the Scope. The current narrative should be replaced by the appropriate descriptions and discussion. (*Scope Chapter II.C.3*)
17. Page 2-7, Section C, Flora and Fauna, Including But Not Limited to Trees Regulated by the Town Code: The narrative in the section should be general descriptions and discussions of the vegetation, wildlife, habitats and regulated trees on the site, as required by the Scope. The current narrative should be replaced by the appropriate descriptions and discussion. (*Scope Chapter II.C.4*)
18. Pages 2-7 and 2-8, Section C, Potential for Contamination From On-Site Underground Fuel Tanks: The narrative in the section is based on a Phase 1 Environmental Site Assessment (Phase 1 ESA) dated 2006, which is six years before operation of the hospital ceased in 2012, and 11 years from the current condition of the site in 2017. This report cannot be relied upon for determination of the present potential for subsurface contamination from underground fuel tanks, medical waste, or other hazardous waste on the property. A new investigation should be performed and the report from the new investigation should be provided and used as the basis for the narrative discussion, and to determine the potential for contamination on the property. (*Scope Chapter II.C.5, 6, and 7*)
19. Page 2-8, Section D, Components of the Project: The following items, required by the Scope, are not included in the narrative in this section: (a) the size and number of bedrooms of both the market-rate units and the affordable dwelling units broken down by each type; (b) the total amount of open space to be provided; and (c) the total number of parking spaces required and the total number of spaces provided by the current plan. The missing information and discussion should be provided. (*Scope Chapter II.D*)
20. Page 2-12, Section G, Plans for Maintenance of the Common Elements of the Proposed Project, Including Roads, Utilities, and Passive Open Space, and Section H, Plans and Timeline for Ongoing Maintenance of All Proposed Mitigation for the Proposed Project: Discussion of both maintenance plans are missing from the narratives in these two sections. The draft maintenance plan for the common elements of the project, and the draft maintenance plan and timeline for maintenance for all mitigation measures should be added to the Appendices, and the current narratives in both sections should be replaced with descriptions of the maintenance plans, agreements, timelines, etc., and discussions regarding the particulars of the plans. (*Scope Chapter II.G and H*)

WETLANDS (DEIS Chapter 3A)

21. Pages 3A-1, Section A, Existing Conditions, including Figures 3.A-1, 3.A-2, and 3.A-3, and Appendix G, Wetlands Delineation Memorandum: The narrative in this section does not include discussion of a functional analysis, the wetland buffer, the hydrology of the wetlands present, hydric soils, vernal pools, ephemeral streams, or connectivity of wetlands and streams, as required by the Scope. Appendix G includes US Army Corps of Engineers Wetland Determination Data Sheets for “Wetland A” on the property dated September 14, 2015, but no other wetland related reports, jurisdictional determinations, wetland or watercourse maps, a delineation based on the Town Wetland Code, or functional analyses are provided, as required by the Scope. Since the site was visited in September, no vernal pools would have been present to record. The wetland investigations are incomplete and should be updated, the site revisited in the Spring, and the narrative and Appendix G should be revised to include the missing information, investigations, delineations, documents and analyses. (*Scope Chapter III.A.1*)
22. Page 3A-2, Section B, Potential Impact of the Proposed Project: The discussion does not discuss and evaluate potential impacts to the hydrology of the site, wetlands, watercourses, vernal pools (if found), or wetland buffers based on a complete hydrological and wetland investigation of the site, as required by the Scope. When a complete investigation of the site is performed, the discussion should be revised. (*Scope Chapter III.A.2*)
23. Page 3A-2, Section C, Mitigation of Potential Impacts: Based on a complete investigation of the site when performed, the discussion included in this section may need to be revised according to the specific items required by the Scope. (*Scope Chapter III.A.3*)

SOILS, TOPOGRAPHY (STEEP SLOPES) AND GEOLOGY (DEIS Chapter 3B)

24. Figure 3.B-1: This figure is referenced in the narrative regarding locations of soil types on the property and is labeled “Soils and Topography.” However, it does not show the soil type boundaries on the site, which should be corrected. (*Scope Chapter III.B.1*)
25. Page 3B-3, Section titled Steep Slopes: The narrative references “Figure 3.B-3,” which is missing from the document. The missing figure should be included in the document. (*Scope Chapter III.B.1*)

VEGETATION AND WILDLIFE (DEIS Chapter 3D)

26. General Comments Regarding Chapter 3D, Vegetation and Wildlife: The following items required by the Scope are missing from the narrative and discussions in the chapter: (a) specifications for all outdoor lighting, and illustration and analysis of night-lighting trespass into

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habitats; (b) a tree preservation plan to protect vegetation and habitats during construction; (c) description and details of measures to reverse soil compaction caused by construction activities; (d) a written list of all existing regulated trees on the property indicating species, and DBH, keyed to a location plan; and (e) the field study report submitted and the identity and qualifications of the professional wildlife biologist who performed the field study and provided the report. (*Scope Chapter III.D.1, 2, and 3*)

27. Page 3D-1, Section A. Existing Conditions: The first paragraph of the narrative states that field visits to the site were performed on September 14, 2015 and October 17, 2016. However, the Scope also specifically requires an early-season spring visit to identify and catalog ephemeral spring habitats, plants and wildlife, such as those associated with vernal pools, wetlands in spring and early-spring wooded upland areas. (*Scope Chapter III.D.1*)

HISTORIC AND ARCHEOLOGICAL RESOURCES (DEIS Chapter 3E)

28. Pages 3E-1 thru 3E-4: The narrative in this section states that the Phase 1A Archeological Documentary Study requested through the NYS Cultural Resource Information System (CRIS) on October 20, 2015 was performed in January 2017, and the study will be submitted to NYS OPRHP. Further along in the narrative, the section regarding architectural resources states that in comments received by letter dated October 20, 2015, OPRHP requested additional information regarding the history of the hospital and the 19th Century residence that became its main building, and the proposed DEIS again states that the information will be submitted to OPRHP. These submissions, if not already accomplished, should be performed immediately. The DEIS will not be complete until the results of all archeological and historic resources investigations and determinations are finalized and documented in the narrative, and the reports prepared by the Applicant and determinations from agencies are included in the Appendices. If a Phase 1B investigation or other work is required, the report(s) of these investigations should be discussed in the narrative and included in the Appendices as well. (*Scope Chapter III.E.1*)

The narratives in this section regarding potential impacts to archeological and historic resources and any mitigation proposed are currently irrelevant as the sequence of investigation, agency oversight and determinations is not yet completed. Based on the completion and results of all necessary investigations, the narratives in this section regarding potential impacts to archeological and historic resources, and any mitigation proposed for such impacts should be revised as necessary.

29. Appendix L: The letter dated October 20, 2015 from OPRHP requesting additional information regarding the history of the hospital and the 19th Century residence on the property referenced in the narrative on Page 3E-3 in Chapter 3E of the DEIS is missing. The missing letter and any

additional correspondence received from OPRHP should be included in Appendix L. (*Scope Chapter III.E.*)

LAND USE, COMPREHENSIVE PLAN, ZONING AND COMMUNITY CHARACTER (DEIS Chapter 3G)

30. Pages 3G-3 and 3G-4, Community Character: Though the character of the site is discussed at length, its character in relation to the surrounding neighborhood and the character of the surrounding community are not described or analyzed as required by the Scope. The narrative should be revised to include photographs, descriptions and analyses of the building types, building sizes, architecture and open space of the neighborhoods surrounding the site and the current respective characters of the site and the community compared and contrasted. (*Scope Chapter III.G.1*)
31. Picture 3, Figure 3.G-3b: Picture 3 is incorrectly captioned. The caption, which should be revised, should state that the photo is a “View of the Main Building.”
32. Page 3G-4, Section B, Potential Impact, Land Use: Most of the narrative here is opinion that is not supported by analyses, and it is incomplete. The section should be revised to describe and discuss the impact that a very large-scale multiple dwelling, located at the top of a hill, would have on a neighborhood of single-family dwellings located at the foot of the hill.

Photo renderings of the developed site from only three vantage points outside the site are included in Chapter 3G, which does not give a complete analysis of the impact of development. The discussion should include the effect of night-lighting on views to the redeveloped site, and more photo renderings of summer views, winter views and night views into the developed site from residences directly adjacent to or across the road from the site. Sections through the site and surrounding properties in addition to the photo renderings should be provided. (*Scope Chapter III.G.2.a*)

33. Figures 3.G-4a thru 3.G-4e: The summer/winter photo renderings of the developed site should be created from photos of the site taken before development and the “before” photos should be presented with the after-development photo renderings. All the viewpoints of all photos depicting views into the site should be located on a map and the direction of the views graphically noted on the map. All photos and photo renderings should be labeled to describe what is illustrated.

Page 3G-5, Recreation: The narrative does not include discussion regarding the reservation of parkland or the option of a payment in lieu of reservation as required by the Scope. The required discussion should be provided. (*Scope Chapter III.G.2.c*)

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34. Page 3G-7, Westchester County Fair and Affordable Housing Implementation Plan: The section does not present whether or not the 19 proposed affordable housing units would qualify as “fair and affordable” units as defined by the County and the settlement. (*Scope Chapter III.G.2.d*)
35. Pages 3G-7 and 3G-8, MF-2 Zoning District, Zoning: Discussion regarding the potential impact of approval of the MF-2 district and the potential for and impact of other areas of the Town being re-zoned into the new district are not included in the section, as required in the Scope. The missing discussion should be added to the section. (*Scope Chapter III.G.2.e*)

TRAFFIC AND TRANSPORTATION (DEIS Chapter 3H), EXECUTIVE SUMMARY (DEIS Chapter 1), CONSTRUCTION IMPACTS (DEIS Chapter 3K), AND APPENDIX D (DEIS Disk Attachment)

36. Overall Comment: A more detailed review of the Traffic and Transportation section of the DEIS included in both Chapter 3H and Appendix D will be undertaken after the DEIS has been accepted as complete for purposes of public review. A detailed review of the components of this subsection during the next substantive review stage may result in additional comments that could potentially require the complete and/or partial revision of certain aspects of the Traffic Access and Impact Study and the DEIS narrative.
37. Pages 1-8 and 1-9, Chapter 1, Executive Summary: An overview of the Traffic Study and mitigation are provided and are complete. (*Scope Chapter I*)
38. Page 2-10, Chapter 2E, Vehicular Access and Circulation of the Proposed Project: A description of site access and a summary of the Traffic Study and proposed mitigation are provided and are complete. (*Scope Chapter II.E*)
39. Pages 1 thru 5, Appendix D, Section II.A., Existing Roadway Network: A detailed inventory of the Study Area roadways and intersections are provided and are complete. (*Scope Chapter 3.H.1*)
40. Pages 3H-1 and 3H-2, Chapter 3H.A., and Pages 3 and 5 Appendix D, Sections II.A and II.B., Existing Traffic Conditions: All intersections listed in the Scope were counted for a weekday morning, weekday afternoon and Saturday midday peak periods, and are complete. The traffic counts were conducted during the time periods required by the Scope. The first paragraph under Section B on page 3H-2 should be located in Section A. (*Scope Chapter III.H.1*)
41. Page 5 and Figures 1 thru 3, Appendix D, Section II.B and Appendix B., Existing Traffic Volumes: Peak hour volumes are illustrated for Study Area intersections and are complete. The peak hours were identified and are complete. The Applicant has not provided the

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weather conditions on the day of the counts as required by the Scope, which should be provided. (*Scope Chapter III.H.1*)

42. Pages 3H-3 and 3H-4, Chapter 3H.B, Pages 8 and 9, Appendix D, Section II.D. and Tables 2 thru 4, Appendix D, Appendix A, Capacity Analysis - Existing Conditions: An analysis for all nine Study Area intersections was provided for the weekday morning, weekday afternoon and Saturday midday peak hours. A summary table of the results of the analysis was provided and included the Level of Service, vehicle delay and v/c ratio. There were no tables provided for the storage/queue analysis as required by the Scope, which should be provided. (*Scope Chapter III.H.1*)
43. Chapter 3 and Appendix D, Accident History: The accident history was not provided as required by the Scope, which should be provided. (*Scope Chapter III.H.1*)
44. Page 3H-4, Chapter 3H.B, Public Transportation: A description of current public transportation available and its capacity were not provided. Bus schedules for the identified bus routes should be provided. (*Scope Chapter III.H.1*)
45. Page 3H-2, Chapter 3H.B, Pages 9 and 10, and Figures 4 thru 11, Appendix D, Section III.A. and Appendix B - 2022 No-Build Conditions: A general growth rate of one percent per year was employed. The Applicant noted that traffic for three other developments was included in the general growth and the Parth Knolls development was added. There was no reference to the Parth Knolls development in Chapter 3H.B. The general growth and volumes for the Parth Knolls development are graphically illustrated. (*Scope Chapter III.H.2.a*)
46. Pages 3H-3 and 3H-4, Chapter 3H.B, Page10, Appendix D, Section III.A, and Tables 2 thru 4, Appendix D, Appendix A - 2022 No-Build Conditions Capacity Analysis: An analysis for all nine Study Area intersections was provided for the weekday morning, weekday afternoon and Saturday midday peak hours. A summary table of the results of the analysis was provided and included the Level of Service, vehicle delay and v/c ratio. However, as required by the Scope, there are no tables provided for the storage/queue analysis, which should be provided. (*Scope Chapter III.H.2.b*)
47. Pages 3H-2 and 3H-3, Chapter 3H.B, Page11, Appendix D, Section III.B, and Table 1, and Appendix D, Appendix A - Site Traffic Generation: Site traffic generation for the proposed 188 apartments was illustrated in a tabular format for the three peak hours and is complete. (*Scope Chapter III.H.3.a*)
48. Pages 3H-3 and 3H-4, Chapter 3H.B, Tables 2 thru 4, Appendix D, Appendix A - 2022 Build Conditions Capacity Analysis: An analysis for all nine Study Area intersections was provided for the weekday morning, weekday afternoon and Saturday midday peak hours.

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- A summary table of the results of the analysis was provided and included the Level of Service, vehicle delay and v/c ratio. However, as required by the Scope, tables were not provided that include a storage/queue analysis, which should be provided. (*Scope Chapter III.H.3.b*)
49. Page 3H-1, Chapter 3H.A and Page 11, Appendix D, Section IV. - Mitigation: A mitigation plan is recommended by the Applicant to address capacity issues at the signalized intersection of NYS Route 9D at Croton Dam Road and it is complete. (*Scope Chapter III.H.3.c*)
50. Chapter 3H, Appendix D, and the Site Plan - Sight Distance Analysis: An Intersection Sight Distance (ISD) analysis was not provided for the site access drive, as required by the Scope, which should be provided. (*Scope Chapter III.H.3.d*)
51. Page 3H-4, Chapter 3H.B, and Pages 3K-1 thru 3K-3, Chapter 3K.B, Construction Impacts: A brief description of construction traffic was provided in Chapter 3H.B. The estimated number of trucks, by size, has not been provided, as required by the Scope. Details of the phases of development and employees have not been provided in a tabular format, as required by the Scope. The missing information should be added. (*Scope Chapter III.H.3.e*)
52. Page 3H-4, Chapter 3H.B, Public Transportation Impacts: There is no description of the impacts to public transportation, as per the Scope. There is no description provided for potential impacts to school bus routes and stops, as per the Scope. The missing information should be added. (*Scope Chapter III.H.3.f*)
53. Page 3H-1, Chapter 3H.A, and Page 11, Appendix D, Section IV - Mitigation: A discussion is provided for improvements to the intersection of NYS Route 9D at Croton Dam Road and is complete. (*Scope Chapter III.H.3.g*)
54. Pages 3H-2 and 3H-3, Chapter 3H.B, Page 11, Appendix D, Section III.B, and Table 1, Appendix D, Appendix A - Previous Development: An analysis was not provided for when the hospital was in operation to a Build Condition with the Proposed Action, as per the Scope. Accident data has not been provided for the last three, full years of operation at the hospital for the Study Area, as per the Scope. The missing information should be added. (*Scope Chapter III.H.3.h*)
55. Pages 3H-2 and 3H-3, Chapter 3H.B, Page 11, Appendix D, Section III.B, and Table 1, Appendix D, Appendix A - Jitney Service: The proposed jitney service was factored into the analysis, as per the Scope. (*Scope Chapter III.H.3.i*)

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56. Page 3H-5, Chapter 3H.B, Impacts to Pedestrians and Bicyclists: There is no description of the impacts to pedestrians and bicyclists, as per the Scope, which should be provided. *(Scope Chapter III.H.3.j)*

COMMUNITY FACILITIES (DEIS Chapter 3I)

57. Page 3I-2, Emergency Services: All correspondence from the Applicant and its consultants to police, fire and emergency service providers, school districts, etc., and all responses from these agencies should be included in the Appendices for substantiation of the information and discussion provided in the DEIS narrative. All responses received should be discussed in the narrative. The response and information received from the Ossining Volunteer Ambulance Corps, located in Appendix C, is not reflected in the discussion in this section, which should be revised to update the information regarding ambulance services. *(Scope Chapter III.I.1)*
58. Pages 3I-2 thru 3I-5, Section B, Potential Impact of the Proposed Project: Regarding the discussions of all impacts to all of the community services described in the chapter, comparisons of projected future demand for the services comparing a fully built site to the un-built site that takes estimated Town growth into consideration are required by the Scope. The chapter should be revised to provide the required analyses for each community service. *(Scope Chapter III.I.2)*

FISCAL IMPACTS (DEIS Chapter 3J)

59. Pages 3J-1 thru 3J-7: Regarding the discussion of all fiscal impacts to the Town and the community services it and the school district provide, the Scope requires the comparison of revenue generated by the residents of River Knoll to the cost of providing community services to these residents, which includes costs to the Town government and other agencies. With the exception of the discussion and analysis of school district fiscal impacts, the chapter does not include generated revenue to cost comparisons for the other services and facilities provided. The chapter should be revised to provide the required comparisons. *(Scope Chapter III.J.2)*

CONSTRUCTION IMPACTS (DEIS Chapter 3K)

60. Page 3K-1, Section A, Existing Conditions: The description and discussion required by the Scope in this section is missing. The section should be completely revised to provide the required discussion regarding the nature and methods of the construction proposed. *(Scope Chapter III.K.1)*

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61. Page 3K-7, Potential Impacts on Vegetation and Wildlife: The description and discussion required by the Scope in this section is missing. The section should be completely revised to provide the required discussion regarding potential impacts to vegetation and wildlife during construction. (*Scope Chapter III.K.2.f*)
62. Page 3K-7, Performance and Maintenance Guarantees: The description and discussion required by the Scope in this section is missing. The section should be completely revised to provide the required discussion regarding the specific guarantees to be utilized to ensure the correction of damage caused by construction, and the continued maintenance of facilities. (*Scope Chapter III.K.2.g*)
63. Page 3K-7, Potential Impacts Relating to Potential Underground Fuel Tanks, and Hazardous Waste: The description and discussion required by the Scope in this section is missing. The section should be completely revised to provide the required discussion regarding the specific impacts that may be encountered during construction from underground fuel tanks, on-site hazardous waste, and hospital waste. (*Scope Chapter III.K.2.h*)
64. Page 3K-8, Section C, Mitigation: The draft construction management plan required by the Scope is not included in the DEIS or discussed in this section. A draft construction management plan should be added to the document and the discussion in this section should be revised to discuss the construction management plan. (*Scope Chapter III.K.3*)

ADVERSE ENVIRONMENTAL IMPACTS THAT CANNOT BE AVOIDED (DEIS Chapter 4)

65. Entire Chapter 4: The chapter should discuss short-term and long-term impacts from development in the proposed MF-2 district that would be unavoidable or cannot be adequately mitigated. Short-term impacts include construction traffic, increased storm water run-off during construction, and construction noise and vibrations from construction equipment and activities. Long-term impacts include loss of open space and vegetation to impervious surface coverage, permanent alteration of topography, permanent alteration of drainage patterns, loss of wildlife habitat, increased traffic, increased use of energy, increase in potable water demand, increase in sewage generation, and increase in solid waste generation. All of which should be added to the narrative in this chapter. (*Scope Chapter IV*)

ALTERNATIVES (DEIS Chapter 5)

66. Entire Chapter 5, Alternatives: Each of the alternatives required by the Scope must be depicted graphically on plans, otherwise the section is incomplete. There should be a full-sized

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map of a maximum buildout of each of alternatives, which should be provided. (*Scope Chapter V*)

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES (DEIS Chapter 6)

67. Entire Chapter 6, Irreversible and Irretrievable Commitment of Resources: The Scope requires evaluation of the natural resources to be consumed, converted, or made unavailable by the development of the Proposed Action. The chapter should be revised to provide the required discussion. The opinions of the Applicant should be removed. (*Scope Chapter VI*)

GROWTH INDUCING IMPACTS (DEIS Chapter 7)

68. Entire Chapter 7, Growth-Inducing Impacts: The Scope requires evaluation of the potential for the Proposed Action to induce growth based on anticipated local expenditures by new residents for goods and services, and the potential for additional residential development based on the proposed MF-2 zoning. The chapter should be revised to provide the required discussion. The opinions of the Applicant should be removed. (*Scope Chapter VII.A and B*)

EFFECTS ON THE USE AND CONSERVATION OF ENERGY RESOURCES AND SOLID WASTE MANAGEMENT (DEIS Chapter 8)

69. Entire Chapter 8, Effects on the Use and Conservation of Energy Resources and Solid Waste Management: The Scope requires the discussion to include the energy sources to be used, the anticipated levels of energy consumption, the standards of the NYS Energy Code and NYSEERDA programs, and the management of solid waste, which are not included in the current discussion. The Scope also requires analysis of the potential and feasibility of the use of alternative energy resources for heating, cooling, and power, including solar energy, which also is not included in the current discussion. The chapter should be revised to provide the required discussions. The opinions of the Applicant should be removed. (*Scope Chapter VIII*)

APPENDICES (DEIS Disk Attachment)

70. Appendix F, Phase 1 Environmental Site Assessment (Phase 1 ESA): The Phase 1 ESA is outdated and should be replaced by a current investigation and report (See Comment 18).
71. Appendix J, Natural Resources: The original report and the supporting field notes, species lists and documents from which Chapter 3D was written is not included in Appendix J.

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PLANNING, TRANSPORTATION, ENVIRONMENT AND DEVELOPMENT
RYE, NEW YORK FAIRFIELD, CONNECTICUT

PLANS

72. A tree preservation plan should be provided. (*Scope Chapter III.D.3*)
73. Site plans for each of the alternatives required by the Scope should be provided. (*Scope Chapter V*)

We look forward to discussing our comments with you.

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