



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.
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.
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.

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.”

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?

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

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.

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.

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:
 - *“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 1A-5 and 1A-6 should include additional information on the number of trees that will be preserved and their locations on the site plan. Response to comment 1A-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.

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.
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.
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.
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.
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.
9. In the response to comment IB-10, please provide a table of the proposed unit types, sizes, and bedrooms.
10. In the response to comment IB-11, please provide how the proposed project will include accessibility for various income levels.
11. Response to comment IB-12 is not adequate. Please explain how the affordable units will comply with the Town Code.
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.
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.
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.

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

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

The response to comment 8-1 should include responses to these questions. Consultation with the Town Engineer is recommended.

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.
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.

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.
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.
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.
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.
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.

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
101 Route 9A
PO Box 1166
Ossining, New York 10562
bldgdept@townofossining.com

RECEIVED

JUL 12 2022

Town of Ossining
Building & 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/1631897728626/210831_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.⁶

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-FOUNDATION.html?soid=1126605899251&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, I-14, IV-1>

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
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JUL 12 2022

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Building & Planning Department

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 might 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's 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."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 impermeable surfaces that increase the risk of flooding and pollution within the local watershed.⁴

¹ 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/1631897728626/210831_WXY_OssiningCompPlan_Objectives_gies_FINAL_DRAFT.pdf

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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-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 : 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 10, 2014.

Supervisor Levenberg & Members of the Town of Ossining Board & Town of Ossining Planning Board
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July 12, 2022

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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 Dam 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?

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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-14, IV-1>

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, III.C-10>

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.