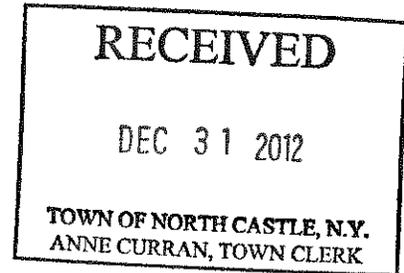


Anne Curran

From: robert greene <rmgclg@aol.com>
Sent: Sunday, December 30, 2012 2:31 PM
To: howardarden48@gmail.com; john@visiticket.com; Stephen D'Angelo; Michael Schiliro; Adam Kaufman; rbaroni@prodigy.net; Anne Curran; rmgclg@aol.com
Subject: Comments on the December 7, 2012, Final Draft Scope



December 30, 2012

To: North Castle Town Board
North Castle Planning Board

From: Robert Greene

**Brynwood Golf & Country Club
Draft Environmental Impact Statement (DEIS)**

Comments on the December 7, 2012, Final Draft Scope:

1. Page 5; Section III B. Detailed Description of Proposed Action:

An estimated construction budget, including hard and soft costs, should be provided for the elements set forth in subsections (a) Site Access; (b) Clubhouse; (c) Proposed Residential Development; (d) Golf Course and (e) Utilities.

An evaluation of projected construction cost is important because the applicant has presented an ambitious plan to make extensive improvements in each of these areas, all designed to transform the Brynwood Golf Club into a "world-class" facility. The expectation of success of its development plan is based on creating an exclusive, very high quality product.

However, unless a construction budget with reasonable detail is provided, the Town Board will have no way of judging whether the proposed investment will be sufficient to meet the applicant's high quality promise.

It is my experience that developers often promise more than they can reasonably deliver. Beautiful color renderings, impressive consultants, and optimistic projections are standard ingredients in most developer's grand plans. The only way to perform a reality check on this applicant's grand plan is to analyze its investment projections.

2. Page 8; Section IV. Economic Analysis:

The section on economic impact should require more detail in order to properly evaluate whether the proposed plan will, in fact, save the golf club.

From the outset, the applicant has insisted that it must be permitted to build condos in order to “save the golf club” because the current economic model for Brynwood, and similar golf clubs across the country, is not working. A direct quote from its public slide show presentation: “We are on an unsustainable long-term path for Brynwood”.

In short – the golf club is doomed to failure unless club membership can be boosted.

To solve its economic problems, Brynwood initially proposed to build 243 condos and require that all owners join the golf club and pay annual dues of \$30,000 to support its continued operation. If successful, that proposed plan would have produced an annual increase in revenue from dues of \$7,290,000. The current proposal to build 88 condos will reduce the dues potential by 64%.

Since the Town is being asked to approve a substantial zoning density bonus, it stands to reason that the applicant should be required to provide a narrative, supported by specific assumptions and financial projections, which will demonstrate how its “unsustainable long-term path” can be reversed and the golf club can be saved in light of the reduction from 243 to 88 of new dues paying members.

What will be the new dues structure? Has the \$30,000 dues requirement been increased? Exactly how will the addition of 88 new memberships solve Brynwood’s current financial problems? What other efforts will be made to arrest the declining membership? What is the minimum number of members needed to “save” the golf course? What assurance can be given that the applicant will continue to support and operate the golf course if membership falls below the minimum needed to operate at a profit?

An evaluation of this issue is critical because if the golf club operation is not saved, North Castle will lose the (fee simple) tax revenue from the Brynwood Golf & Country Club and be left with only the tax revenue from 88 condos. Since condo owners get a property tax discount of approximately 50%, the revenue stream from the proposed residential component alone -- will be less than the cost to provide municipal services.

3. Page 30; Section 1 (b). Impact on Schools:

This section asks for an analysis under two scenarios – (1) adult oriented vs. (2) primary residences. I suggest a third scenario is important – analysis as rentals.

In today’s multifamily residential market, condos are becoming increasingly difficult to sell because buyers cannot get a mortgage. Therefore, many condo developments (existing and planned) are being marketed as rentals. Since we don’t know what the future holds for this trend, it is important to evaluate the potential impact on the school system if the Brynwood development turns out to be occupied as rental units.

Since rental unit availability will be attractive to young families wishing to take advantage of the Byram Hills school system, it is particularly important to understand the economic impact of such a possibility.

4. Page 41; Section M; Socioeconomic/Fiscal Resources; 2. Impacts:

Subsection (f) should be clarified. It reads (emphasis added):

(f). Calculate projected tax revenues to the Town of North Castle, Byram Hills Central School District, Westchester County, and New York State from the club facility and proposed residential component. This analysis shall also include a comparison of the projected tax revenues resulting from the proposed project with current tax revenues generated from the existing club use on the project site as well as a discussion of the difference in projected tax revenues between a for-sale residential project and rental project.

I'm not sure what is defined as a "for-sale residential project". I'm guessing this is meant to ask for a calculation of estimated property tax revenue from a fee-simple vs. a condo ownership structure. If so, I suggest it would be more accurate to express it that way.

If not, I suggest that the requirement to present a calculation of the projected tax revenues for both fee-simple and condo ownership be added to this section.

5. Page 44; Section P. Hazardous Materials:

Expand this section to require a Phase 1 environmental study of all Brynwood golf club facilities including the sewer plant, golf cart barn, maintenance areas and buildings, storage sheds, and any other out buildings on the property.

The applicant is relatively new in the chain of title to the golf facility and therefore may be unaware of any former practices that may have been substandard and may have created an unsafe environmental issue. This is the perfect time to make such an examination.

I appreciate the opportunity to comment on the DEIS, and I thank the Town Board members for considering these suggestions.

Happy New Year to all,

Robert Greene
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