



Robert P. Astorino
County Executive

County Planning Board

December 13, 2012

Adam R. Kaufman, AICP, Director of Planning
Town of North Castle
15 Bedford Road
Armonk, NY 10504

**Subject: Referral File No. NOC 12-015B – Brynwood Golf & Country Club
Draft Scope**

Dear Mr. Kaufman:

The Westchester County Planning Board has received a copy of a SEQR Positive Declaration as well as a draft scope for the preparation of an environmental impact statement for the proposed development of an adult oriented residential community at the existing Brynwood Golf & Country Club and improvements to the club facilities and amenities at the golf course. The residential neighborhood would include 88 units in a mix of sizes and configurations. The proposed action includes amendments to the Town Zoning Ordinance and applications for special permit and site plan approvals. Approval may also be required to subdivide the “golf course community” from the golf/country club. Amendments to the Town Comprehensive Plan may also be required.

We have reviewed the draft scoping document under the provisions of Section 239 L, M and N of the General Municipal Law and Section 277.61 of the County Administrative Code and offer the following comments for your consideration:

1. Fair and affordable housing. The submitted materials do not indicate if any of the proposed units will be affordable. *Section II.C.3* of the draft scope references “Middle Income Housing,” however our understanding is that the Town definition for this type of housing does not match County guidelines. We recommend that the scope be revised to require a discussion of how the project will relate to the Town’s efforts to promote the construction of affordable affirmatively furthering fair housing (AFFH) units that meet the requirements of the County’s Housing Settlement with the federal government.

As you know, the County Planning Board has endorsed the “Model Zoning Ordinance Provisions for Affordable Affirmatively Furthering Fair Housing Units” as included in the *Westchester County Fair and Affordable Housing Implementation Plan* (dated August 9, 2010). These provisions include, among other recommended requirements, that:

Within all residential developments of 10 or more units created by subdivision or site plan approval, no less than 10% of the total number of units must be created as affordable AFFH

units. In residential developments of five to nine units, at least one affordable AFFH unit shall be created.

Research conducted in preparation of the Model Ordinance Provisions found that the 10% inclusionary requirement should be possible without the use of public funding subsidy. More detailed information on the Implementation Plan can be found on the County's website at <http://homes.westchestergov.com> under the "Housing Settlement" tab.

As a separate matter, we encourage the Town to give consideration to amending the Town zoning ordinance so as to adopt language from the model ordinance provisions to ensure that all future residential developments in the Town include a fair and affordable component.

2. Provisions for recycling. We recommend that the scope include a discussion of recycling under *Section L. Community Facilities and Services*. The applicant should be required to verify that there will be a sufficient mechanism within the development to accommodate the expanded County recycling program that includes plastics with numbers 1 through 7. County regulations for plastic recycling may be found at: <http://environment.westchestergov.com>.

Since a renovation of the club house and banquet facilities are proposed, we also recommend that the scope include a discussion of the possibility of an on-site food composter for any foodservice operations. Inclusion of a composter will serve to mitigate any increase in solid waste that must be processed by taking food waste out of the waste stream.

Thank you for the opportunity to comment on this matter.

Respectfully,
WESTCHESTER COUNTY PLANNING BOARD

Req:
By:



Edward Buroughs, AICP
Commissioner

EEB/LH