

11.A. INTRODUCTION

This chapter analyzes the potential for the Proposed Action to impact the character of the community surrounding the Project Site and the potential for the Proposed Project to create a significant adverse visual impact. As demonstrated by the before and after photosimulations from representative Vantage Points surrounding the Project Site, the appearance of the Site will change with the implementation of the Proposed Project. The potential significance of the changes in visibility as a result of the Proposed Project is evaluated using the thresholds established by the New York State Department of Conservation (NYSDEC), specifically that “mere visibility of a project should not be a threshold for decision making. Instead, a project, by virtue of its visibility, must clearly interfere with or reduce the public’s enjoyment or appreciation of the appearance of a significant place or structure.”¹

Based on the following analysis, it is the Applicant’s opinion that the Proposed Action and Proposed Project would not result in significant adverse impacts to the visual resources. The introduction of residential uses within the DOB-20A is consistent with the Town’s Comprehensive Plan and would allow vacant and underutilized parcels to return to productive use. The new buildings proposed on the Project Site would be set back from public Vantage Points (i.e., King Street) and would be set behind existing and new landscaping. As such, the visibility of these buildings would be limited and the resulting visual character of the Site would be similar to the current character of the DOB-20A district that features large, relatively modern buildings set within landscaped settings and screened by vegetation.

It is noted that the Lead Agency is not expressing an opinion on the Applicant’s visibility analysis at this time nor is it presenting its opinion on whether or not the Proposed Action would have a significant adverse visual impact. Rather, the only determination made by the Lead Agency in this DEIS is that the analysis presented in this chapter meets the requirements of the adopted Scoping Outline and provides sufficient information for the public to evaluate the potential impacts and mitigation associated with the Proposed Action. Subsequent to the DEIS, and based on the Lead Agency’s evaluation of the Applicant’s analysis, the Lead Agency will determine whether it believes the Proposed Action results in a significant adverse visual impact. Based on this evaluation, the Lead Agency will also decide whether further mitigation measures (such as the preservation of additional trees or the provision of additional new visual screening) or modifications to the concept plan (such as increased setbacks and reductions in building height) are required to address potential impacts to visual resources and community character.

¹ https://www.dec.ny.gov/docs/permits_ej_operations_pdf/visualpolicydep002.pdf

11.B. EXISTING CONDITIONS (DEIS)

This section describes the visibility and character of the Project Site from locations within, and along the perimeter of, the Project Site. **Figures 11-1a through 11-1e** include a photo reference map and photographs of existing conditions from eight locations across the Project Site. At present, the southern portion of the Project Site is currently improved with what was previously MBIA's corporate headquarters and contains a vacant, three-story, approximately 100,000-sf office building in the southwest corner; another vacant, three-story, approximately 161,000-sf office building immediately north of the 100,000-sf building; approximately 328 surface parking spaces (two surface lots); a three-story parking structure containing approximately 316 parking spaces; a circa 1820s farmhouse and accessory shed/barn (used for storage and maintenance purposes); a water feature/stormwater pond; and landscaping. The northern portion of the Project Site contains meadows, landscaping, and outdoor amenities for the uses described above, including paved tennis courts, a volleyball court, and walking paths.

11.B.1. EXISTING VIEWS OF PROJECT SITE FROM SURROUNDING AREA (DEIS)

The following sections describe the visibility and character of the Project Site based on photographs taken from the selected off-Site Vantage Points depicted on **Figure 11-2**.

11.B.1.a. *Vantage Point 1 – King Street/American Lane Intersection Looking Northwest*

Vantage Point 1 presents the view of the Project Site (and its main signalized entrance) from a point just south of the intersection of King Street and American Lane (see **Figure 11-3a**). With the exception of shorter shrubbery and coniferous trees framing the entrance drive to the Project Site, the view into the Project Site from this location is dominated by tall deciduous trees that have grown along the existing berm and stone wall along the Project Site's eastern boundary. The eastern façade of the Project Site's existing northern office building is partially visible from this Vantage Point during leaf-off conditions. It is important to note that the interior of the Project Site is not visible from locations to the south of this Vantage Point owing to the roadway geometry and the topography and vegetation of intervening properties. As such, the interior of the Project Site is only visible to motorists traveling northbound on King Street as they approach the main Site driveway.

From this Vantage Point, several utility poles can be seen on the west side of King Street, between the Project Site's perimeter stone wall and the roadbed of King Street. As shown in the photograph, the extent of utility poles along the Project Site's eastern boundary is limited. At a point approximately 250 feet north of the entrance driveway, utility lines cross over King Street and continue along the western boundary of the Greenwich American Center and Citigroup Conference Center properties for the remainder of the Project Site's frontage. Therefore, views into the Project Site from the remaining three Vantage Point include no intervening utility poles.

11.B.1.b. *Vantage Point 2 – King Street (600 ft. north of Vantage Point 1) Looking Northwest*

Vantage Point 2 presents the northwesterly view of the Project Site from King Street approximately 600 feet north of Vantage Point 1 (see **Figure 11-3a**). The existing view into the Project Site from this location is dominated by a

linear stand of tall trees (primarily deciduous) that have grown along and adjacent to the existing berm and stone wall at the Project Site's eastern boundary. From this Vantage Point, the existing on-Site structures are not visible and the berm, which consists of manicured lawn, fully screens from view the existing surface parking lot to the north of the Project Site's existing northern office building. Several tall light poles are located within this parking lot, and are either fully or partially screened from view by the berm and associated change in elevation from King Street. Leaf-off conditions at this Vantage Point provide a distant view towards a cluster of deciduous and coniferous trees that separate the currently developed portions of the Project Site from the undeveloped portion of the Site within Cooney Hill area. Vantage Point 2 represents the approximate location of the northernmost point at which motorists traveling north on King Street could view the interior of the Project Site. North of this location, King Street curves to the east, away from the Project Site, which precludes motorists from looking to the west, into the Project Site. Therefore, the interior of the Project Site, through intervening vegetation, is only visible to motorists traveling north on King Street from just south of the main Site driveway to the approximate location of Vantage Point 2.

11.B.1.c. Vantage Point 3 – King Street (800 ft. north of Vantage Point 2) Looking Southwest

Vantage Point 3 presents the southwesterly view of the Project Site from King Street approximately 800 feet north of Vantage Point 2 (see **Figure 11-3b**). The view into the Project Site from this location is dominated by a dense arrangement of short and tall deciduous and coniferous trees/shrubs along and adjacent to the existing berm and stone wall at the Project Site's eastern boundary. There is a gain in elevation at this location relative to Vantage Point 2 which, when combined with the dense screening provided by the existing planted buffer, obscures from view the Project Site's existing improvements. The view of the Project Site from Vantage Point 3 would be seen by motorists traveling south along King Street. South of this Vantage Point, the road curves to the east, restricting view of the Project Site for southbound motorists.

11.B.1.d. Vantage Point 4 – Project Site from King Street/Cooney Hill Road Intersection Looking Southwest

Vantage Point 4 presents the southwesterly view of the Project Site from the intersection of King Street and Cooney Hill Road (see **Figure 11-3b**). The view from this location is dominated by a dense arrangement of mainly coniferous trees along and adjacent to the existing stone wall at the Project Site's eastern and northern boundaries. As discussed in Chapter 6, "Vegetation and Wildlife," the northern portion of the Project Site is categorized as mixed upland forest/field, where, in the absence of development, dense grasses and forbs occupy the area of the former residential subdivision. The remaining single-family lot at 3 Cooney Hill Road is located approximately 200 feet beyond the right side of the photograph, and its perimeter is also heavily screened by trees and shrubs. The easterly curve of King Street at this location, coupled with the gain in

elevation from Vantage Points 2 and 3, offers no view of the Project Site's existing improvements during leaf-off conditions.

Vantage Point 4 is the approximately northern most location where the Project Site is visible from King Street. This view would only be seen by motorists traveling south along King Street.

11.B.2. EXISTING VISUAL RESOURCES AND COMMUNITY CHARACTER OF THE DOB-20A DISTRICT (GEIS)

The Town's Designated Office Business 20A (DOB-20A) zoning district is a low-density zoning district created to accommodate large corporate business park uses (e.g. Swiss Re, Citigroup, and MBIA) situated on large parcels offering secluded settings. Currently, with the exception of the single-family house near the northeast corner of the Project Site, the character of the district is primarily defined as a commuter area consisting of workers traveling to and from corporate campuses during weekdays. King Street also serves as a means for through-traffic among destinations including but not limited to North White Plains; White Plains; Westchester County Airport, I-684; Greenwich, Connecticut; and the hamlet of Armonk.

Based on the above characteristics, the primary Vantage Point for viewing DOB-20A properties is along King Street from a moving vehicle. The existing minimum front and rear yard setback requirements in the DOB-20A district (150 feet and 300 feet, respectively) are among the most restrictive of the Town's 32 zoning districts. In addition, the minimum lot size requirement is 20 acres and building coverage is limited to 10 percent of total lot area. These requirements have created a visual character where existing development on the DOB-20A office campus properties (office buildings, parking lots/structures, and the Swiss Re solar field) are barely visible from King Street due to large setbacks, varying topography, and screening elements including stone walls and earthen berms. Evergreen and deciduous trees and other plantings, particularly during leaf-on conditions, provide additional visual screening.

The Kensico Reservoir, which is adjacent to the DOB-20A district, is considered a visual resource in the Town of North Castle, and views to the reservoir are offered from certain locations along the King Street corridor. However, in the vicinity of the DOB-20A district parcels, including the Project Site and Swiss Re parcel, the reservoir is not visible from King Street due to existing topography.

11.C. POTENTIAL IMPACTS OF THE PROPOSED PROJECT (DEIS)

11.C.1. PROPOSED PROJECT VISIBILITY ANALYSIS (PHOTOSIMULATIONS)

This section describes the potential visibility of the Proposed Project from Vantage Points 1 through 4, and assesses potential significance of the changes in visibility in context with existing structures on the Project Site and in the area, using the thresholds established by the NYSDEC. Specifically, the NYSDEC guidance states that "mere visibility of a project should not be a threshold for decision making. Instead, a project, by virtue of its visibility, must clearly interfere with or reduce the public's enjoyment or appreciation of the appearance of a significant place or structure."

A conceptual rendering of the proposed multifamily building is shown on **Figures 11-4a through 11-4c**. As shown, the materials currently envisioned for the building include a mix of grey colored brick and fiber cement siding panels with wood-like finishes. It is important to note that the façade design and materials and colors have not been finalized at this time. Instead, the renderings present a conceptual image of potential façade treatment for the proposed multifamily building.

To evaluate the potential visual and aesthetic impacts of the Proposed Project, a three-dimensional computer model of the proposed multifamily building and townhomes was created to represent the massing and general architecture of the proposed new buildings. The model was then superimposed on photographs taken from each Vantage Point during leaf off conditions. For Vantage Points 2 and 3, the photo simulations present (conceptually) some elements of the multifamily building's architectural features and the Project Site's proposed perimeter landscaping program intended to enhance the existing planted buffer along King Street.

11.C.1.a. Vantage Point 1 – King Street/American Lane Intersection Looking Northwest

During leaf-off conditions, the eastern façade of the Project Site's existing northern office building is partially visible from Vantage Point 1, as is the top portion of the proposed multifamily building's façade. As shown in **Figure 11-5**, the top portion of the proposed multifamily building façade is moderately visible through the deciduous screening in the leaf-off condition. During leaf-on conditions, the building would not be visible. Although the proposed multifamily building would be approximately 30 feet taller than the existing northern office building, the change in grade between the Project Site and Vantage Point 1 as well as the relative distance from the Vantage Point to both structures, results in both buildings appearing complementary in terms of bulk and height. It is the Applicant's opinion that the proposed multifamily building would not aesthetically conflict with the existing northern office building; the conceptual architectural treatments, building materials, and colors envisioned for the multifamily building would complement the context of its surroundings.

Due to the lower elevation of Vantage Point 1 compared to the Cooney Hill area, none of the 22 proposed townhomes would be visible from this location.

As noted above, the interior of the Project Site is not visible from locations south of this Vantage Point along King Street. In addition, the Project Site is only visible to motorists driving north along King Street. The distance to the new buildings and the short duration of time during which a traveling motorist could view the new buildings during the leaf-off conditions limits the potential impact of this change in visibility.

Based on the above analysis, it is the Applicant's opinion that from this Vantage Point, the Proposed Project would not result in a significant adverse visual impact. As noted above, the Lead Agency has not determined the potential significance of the Proposed Action's visual impact at this time. Based on the Lead Agency's determination, additional mitigation measures or modifications to the concept plan may be required.

11.C.1.b. Vantage Point 2 – King Street (600 ft. north of Vantage Point 1) Looking Northwest

From this Vantage Point, due the seasonal nature of the deciduous vegetative buffer along the eastern boundary of the Project Site, the proposed multifamily building would be moderately visible during leaf-off conditions (see **Figure 11-6**). Specifically, a more prominent view of the eastern façade is provided from this location, including the undulating exterior of the building's eastern façade, as well as the uniform penetrations and perforations of windows and balconies. It is important to note that this view would only be visible to motorists driving north on King Street. For the several seconds a motorist would be driving north from Vantage Point 1 to Vantage Point 2, the proposed multifamily building would be moderately visible behind trees that would appear taller than the building due to their proximity to King Street. Once the motorist passes Vantage Point 2, the multifamily building would no longer be visible.

It is the Applicant's opinion that the proposed enhanced perimeter landscaped buffer would reduce the visibility of the multifamily building from this Vantage Point during leaf-on conditions. The dense deciduous perimeter envisioned masks the majority of the proposed multifamily building's façade, maintaining a more landscaped character to the area.

The 22 proposed townhomes would not be visible from Vantage Point 2 under leaf-off conditions.

Based on the above analysis, it is the Applicant's opinion that from this Vantage Point, the Proposed Project would not result in a significant adverse visual impact when compared to the existing aesthetics and character of its surroundings. The addition of a five-story multifamily building located behind significant vegetation and visible only for a few seconds while driving on King Street would not fundamentally change the character of the Project Site of the larger area. As noted above, the Lead Agency has not determined the potential significance of the Proposed Action's visual impact at this time. Based on the Lead Agency's determination, additional mitigation measures or modifications to the concept plan may be required.

11.C.1.c. Vantage Point 3 – King Street (800 ft. north of Vantage Point 2) Looking Southwest

Vantage Point 3 provides similar views of the proposed multifamily building to those offered from Vantage Point 2, the primary difference being the southerly downward grade of King Street faced by the observer, which offers more distant views to the south and west (see **Figure 11-7**). Like Vantage Point 2, the proposed multifamily building's eastern façade would be moderately visible from Vantage Point 3 during leaf-off conditions, with a more prominent view of the building's fenestration and architectural elements than what is offered from a distance. The view of the building would be similar in nature to the views offered by existing buildings in the DOB-20A district (i.e., buildings that are set back from the road and visible to motorists through intervening vegetation).

It is the Applicant's opinion that the proposed enhanced perimeter landscaped buffer would reduce the visibility of the multifamily building from this Vantage Point during leaf-on conditions. The dense deciduous perimeter envisioned masks the majority of the proposed multifamily building's façade, providing a more forested character to the area.

The 22 proposed townhomes would not be visible from Vantage Point 3 under leaf-off conditions.

Based on the above analysis, it is the Applicant's opinion that from this Vantage Point, the Proposed Project would not result in a significant adverse impact when compared to the existing aesthetics and character of its surroundings. The addition of a five-story multifamily building located behind significant vegetation and visible only for a few seconds while driving would not fundamentally change the character of the Project Site or the surrounding area. As noted above, the Lead Agency has not determined the potential significance of the Proposed Action's visual impact at this time. Based on the Lead Agency's determination, additional mitigation measures or modifications to the concept plan may be required.

11.C.1.d. Vantage Point 4 – King Street/Cooney Hill Road Intersection looking Southwest

As noted above, Vantage Point 4 is dominated by a dense arrangement of mainly coniferous trees that have grown along and adjacent to the existing stone wall at the Project Site's eastern and northern boundaries. The depth and density of vegetation creates a more unruly and forested character at this intersection. The single-family home at 3 Cooney Hill Road is located approximately 200 feet beyond the right side of the photograph, further setback from the property line, and is heavily screened and layered by trees and shrubs. As shown in **Figure 11-8**, the easterly curve of King Street at this location, coupled with the gain in elevation from Vantage Points 2 and 3, provide only a partial, distant view of the proposed multifamily building's northern façade during leaf-off conditions.

The 22 proposed townhomes would not be visible from Vantage Point 4 under leaf-off conditions.

Based on the analysis above, it is the Applicant's opinion that from this location, the proposed multifamily building would not overpower the observer and would be similar in nature to views of other buildings in the DOB-20A (e.g., larger, modern buildings set back from the road and set among a landscaped setting). Therefore, it is the Applicant's opinion that the Proposed Project as a whole would not result in a significant adverse impact when compared to the existing aesthetics and character of its surroundings. As noted above, the Lead Agency has not determined the potential significance of the Proposed Action's visual impact at this time. Based on the Lead Agency's determination, additional mitigation measures or modifications to the concept plan may be required.

11.C.1.e. View of Proposed Project from 3 Cooney Hill Road

It is the Applicant's opinion that the Proposed Project would not significantly impact the views into the Project Site currently offered from the existing residence at 3 Cooney Hill Road. As discussed above, the boundaries of this property are heavily screened with vegetation under the existing condition, offering minimal views into the Project Site currently. The Applicant's conceptual landscaping plan proposes additional coniferous/evergreen trees adjacent to this property to further screen the Proposed Project from view. Since the 3 Cooney Hill Road property is located at a higher elevation than the proposed multifamily building, any view provided of the multifamily building would be distant, limited to a portion of the northern façade during leaf-off conditions, and is not considered significant. In addition, the low-rise nature of the proposed townhomes, coupled with the coniferous/evergreen screening program proposed by the Applicant's landscaping plan, would further limit views of the Proposed Project from this property. Potential views of the two-story townhouses from the existing house at 3 Cooney Hill Road would be similar in scale and character to the previous residential subdivision that occupied this area.

11.C.2. POTENTIAL IMPACTS FROM PROPOSED LIGHTING PLAN

The Project Site currently has exterior lighting on its driveways, walkways, and parking areas. As discussed in Chapter 2, "Project Description," similar to the existing condition, the Proposed Project would incorporate Site lighting along proposed driveways, parking areas, and certain walking paths. The lighting design would be compliant with Section 355-45(M) of the Town Code, which requires that the source of light not be visible from adjoining streets or residential properties and would not provide objectionable glare. The exact lighting fixtures that would be used for the Proposed Project have not been finalized; however, the lighting plan provided in Figure 2-11 of Chapter 2, "Project Description," includes preliminary information on the quantity, wattage, and height of fixtures to be considered for each lighting zone on the Project Site.

In addition to the Project Site's existing lighting program supporting the existing office buildings and parking structure, the lighting plan for the Proposed Project consists of three additional lighting zones: The multifamily building zone, the currently approved but not yet constructed 94-space parking expansion area, and the townhomes zone. The average lighting level at the ground surface would be approximately 2.03 foot candles (fc) in the multifamily building zone, 1.35 fc in the parking expansion area, and approximately 1.44 fc in the townhomes zone.

New fixtures would utilize cut-off luminaires, be Dark-Sky compliant, and the distribution patterns would prevent light spillover onto adjacent properties to the maximum extent practicable. The final lighting design will adhere to the best current practice in specifying light sources, spectra, glare reduction, and cut-off fixtures in order to reduce the effect of lighting on-site occupants and neighbors while meeting safety, security, and energy efficiency requirements.

11.D. MITIGATION MEASURES FOR THE PROPOSED PROJECT (DEIS)

While the Proposed Project would result in physical changes to the Project Site, in the Applicant's opinion, which is based on the results of the visibility analysis presented above, the Proposed Project would not result in an adverse impact to visual resources or community character. As noted above, the Lead Agency has not determined the potential significance of the Proposed Action's visual impact at this time. Based on the Lead Agency's determination, additional mitigation measures or modifications to the concept plan may be required.

In the Applicant's opinion, the Proposed Project, inclusive of the building designs (e.g., articulation, façade materials, height, roof line), location on-Site, and the grading and proposed landscaping program would improve the visual character of the Project Site by constructing buildings with increased visual interest within an already established campus setting. The Proposed Project would also return the Site to active use, which is consistent with the goals of the Town's Comprehensive Plan. As demonstrated by the visual simulation analyses presented above, the existing topography and perimeter landscaping features of the northern (Cooney Hill) portion of the Project Site preclude the proposed townhomes from being visible from the Vantage Points. The proposed multifamily building would be moderately visible through intervening vegetation. However, visibility would be restricted to the area between Vantage Points 4 and 3 when traveling south on King Street and between Vantage Points 1 and 2 when traveling north. In these locations, the multifamily building would only be visible through existing and new trees, which would nearly eliminate the building's visibility during leaf-on conditions. The visibility of the proposed multifamily building would, in the Applicant's opinion, be consistent with the character of existing development in the DOB-20A. Specifically, the new multifamily building would be a larger-format modern building located within a large, landscaped parcel, set back from King Street, and visually screened by existing and new landscape plantings. In addition, the impact of the change in visibility of the Site would be mitigated by the relatively small geographic extent from which it would be visible by motorists traveling along King Street.

Several measures have been incorporated into the Proposed Project's design and layout to avoid, minimize, and mitigate potential impacts to visual resources and community character, including the following:

- The new multifamily building and townhomes would be designed to appropriately relate to the character of the area surrounding the Project Site, and would be reflective of other residential development in the Town;
- The proposed multifamily building and townhomes have been sited to take advantage of the Project Site's topography. The proposed building placement also allows for the preservation of existing visual screenings and buffers along the perimeter of the Project Site, which include existing landscaped berms, stone walls, and evergreen trees to remain undisturbed and in certain locations, enhanced; and
- As illustrated through the photo simulation analysis above, the Proposed Zoning's front yard setback of 65 feet for multifamily buildings, when considered together with the existing berm and landscaping along King Street (to be preserved/enhanced), significantly reduces the potential impacts of the maximum building height proposed.

While the amount of building area on the Project Site would increase with the Proposed Project, a significant amount of open space and landscaped perimeter berms would remain undisturbed (and in certain locations, enhanced), which is consistent with the King Street frontages of neighboring properties in the DOB-20A district. In the Applicant's opinion, the proposed

enhancement of the existing perimeter screening along King Street and Cooney Hill Road is an important visual and community benefit of the Proposed Project.

In the Applicant's opinion, the character of the surrounding community would not be adversely affected by other potential impacts of the Proposed Project. Specifically, as noted in Chapter 10, "Traffic and Transportation," the Proposed Project's mix of uses would generate significantly lower levels of vehicle trips than the full occupancy of the existing office buildings on the Site, as well as the Project Site's currently approved but not constructed office expansion plan.

Therefore, in the Applicant's opinion, no significant adverse visual impacts are anticipated and no additional mitigation measures are required. As noted above, the Lead Agency has not determined the potential significance of the Proposed Action's visual impact at this time. Based on the Lead Agency's determination, additional mitigation measures or modifications to the concept plan may be required.

11.E. POTENTIAL IMPACTS OF, AND MITIGATION FOR, THE PROPOSED ZONING (GEIS)

As described in Chapter 2, "Project Description," the theoretical maximum development scenario under the Proposed Zoning, when accounting for the maximum buildout potential of both the Project Site and the adjacent Swiss Re parcel, is a total of 750 residential units and an 80-room hotel.

It is important to note that no specific proposal is being made at this time to effectuate the maximum hypothetical development of these two sites and any future plans would be subject to review by the Town, including a full environmental review incorporating a detailed visibility analysis.

As described in Chapter 3, "Land Use, Zoning, and Public Policy," redevelopment of the Swiss Re parcel in a manner similar to the Applicant's current proposal for the Project Site would not introduce land uses that are inconsistent with the existing land uses surrounding these sites. Similar to the Proposed Project, potential redevelopment of the Swiss Re parcel would serve to activate an area of the Town that, over the last 15 years, has seen limited interest from corporate office tenants and has been lacking a traditional neighborhood identity.

The Proposed Zoning would allow the Town Board, by special permit, to increase the maximum allowable building height in the DOB-20A district from 45 feet to 85 feet for multifamily buildings proposed under the office to residential conversion parameters. The modified height requirement could permit the construction of multifamily apartment buildings on the Project Site and the Swiss Re parcel that could be as much as 40 feet taller than currently allowed. While there are no detailed redevelopment plans available for the GEIS development assumptions, it is reasonable to assume that, similar to the Proposed Project, a new 85-foot-tall multifamily building on the Swiss Re parcel could be developed. The similarities of both sites being large parcels with substantial frontage along King Street as well as the opportunities provided by both Sites for large setbacks and visual screenings make these parcels suitable for larger multifamily buildings, in the Applicant's opinion. Specifically, new multifamily construction on both sites would likely include larger-format modern buildings located within large, landscaped parcels, set back from King Street, and visually screened by existing and new landscape plantings. In addition, the impact of the change in visibility of the sites would be mitigated by the relatively small geographic extent from which they could be visible by motorists traveling along King Street. To confirm this analysis, in the event that a proposal on the Project Site or the Swiss Re site were advanced that differs from the Proposed Project, the Town would require further study of the potential visual

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impacts of that proposal as part of any future site plan approvals. Mitigation for any potential impacts to visual resources and community character would be expected to be consistent with those identified for the Proposed Project. *



 Project Site



Photo View Direction and Reference Number

0 500 FEET





Project Site existing entrance signage at signalized intersection with King Street

1



Looking east towards King Street from Project Site's existing entrance drive

2



Looking south from Project Site's entrance drive
toward existing farmhouse and parking structure

3



Existing stormwater pond and southern office building

4



Existing northern office building 5



Looking south toward existing northern office building from surface parking lot 6



Looking north toward undeveloped Cooney Hill area of
Project Site from surface parking lot

7



Looking south into Project Site from Cooney Hill Road and former Weber Place

8



 Project Site

 Photo View Direction and Reference Number

0 500 FEET




Vantage Point 1

Vantage Point 2





Vantage Point 3

Vantage Point 4



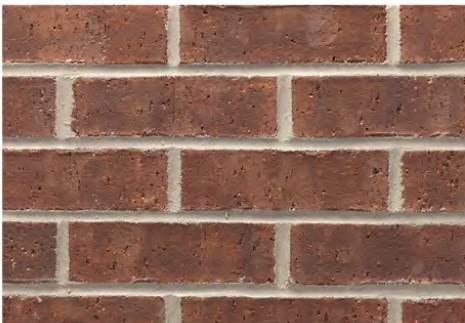
Existing Views from Vantage Points
Figure 11-3b

MATERIAL 1: BRICK

OPTIONS:



ACME BRICK - SLATE GRAY



ACME BRICK - BURGUNDY



ACME BRICK - ROSEBUD



MATERIAL 2:
FIBER CEMENT SIDING

OPTIONS:



ALLURA - FLAG STONE



NICHIIHA - VINTAGE WOOD - ASH



JAMES HARDIE - COBBLE STONE

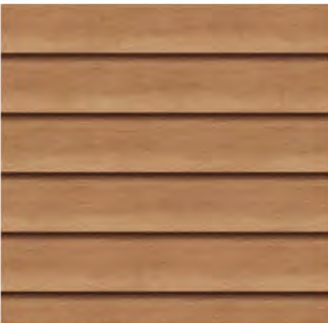


MATERIAL 3:
FIBER CEMENT SIDING

OPTIONS:



NICHIHA - VINTAGE WOOD - SPRUCE



ALLURA - CEDAR



JAMES HARDIE - HEATHERED MOSS

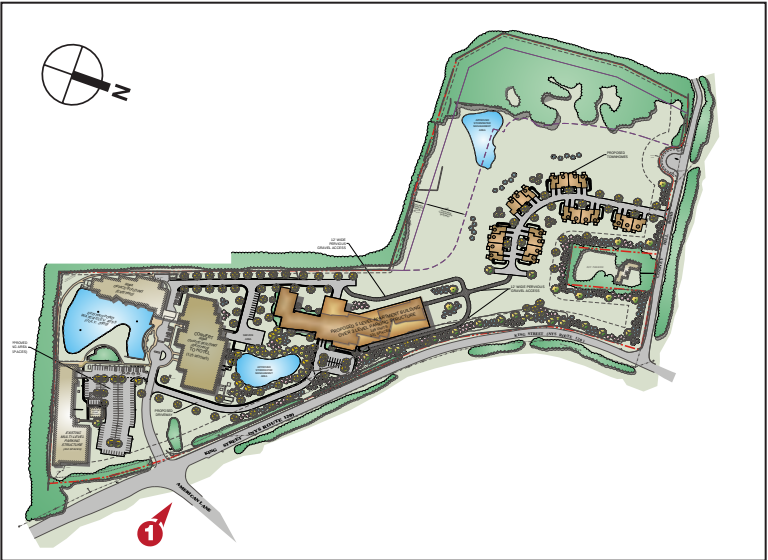




Existing Condition (Leaf-off)



Proposed Condition (Leaf-off)





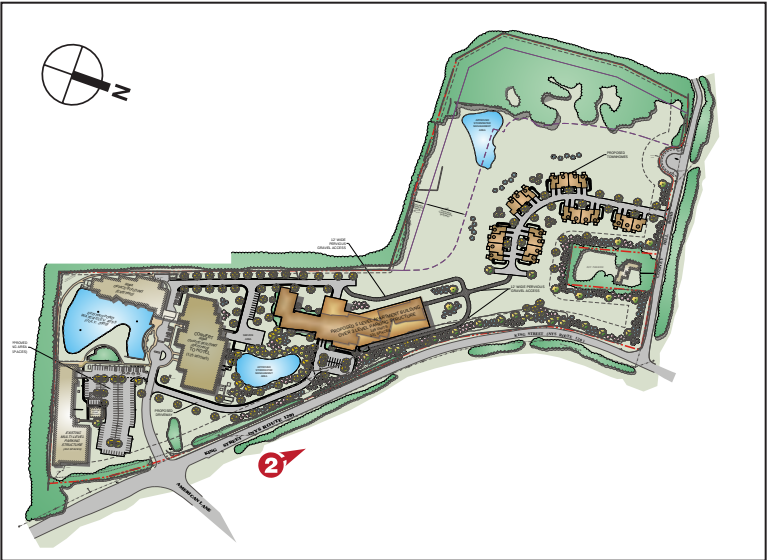
Existing Condition (Leaf-off)



Source: Perkins-Eastman

Proposed Condition (Leaf-off)

Proposed Condition (Leaf-on)





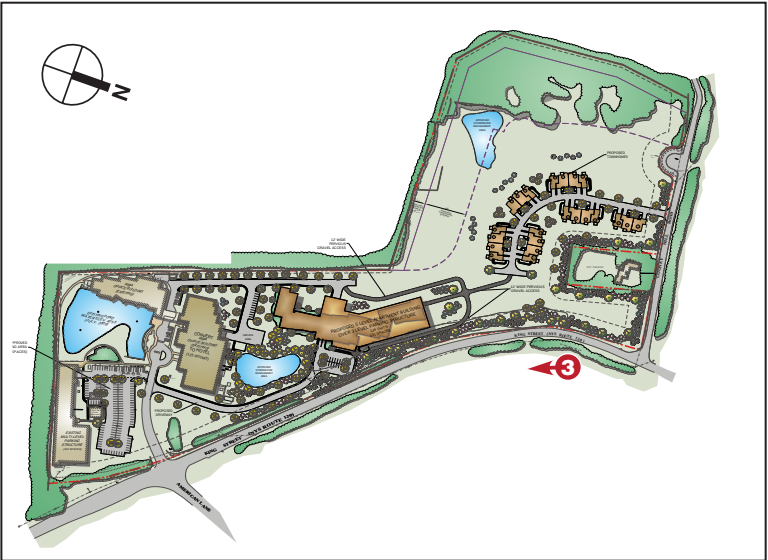
Existing Condition (Leaf-off)



Source: Perkins-Eastman

Proposed Condition (Leaf-off)

Proposed Condition (Leaf-on)

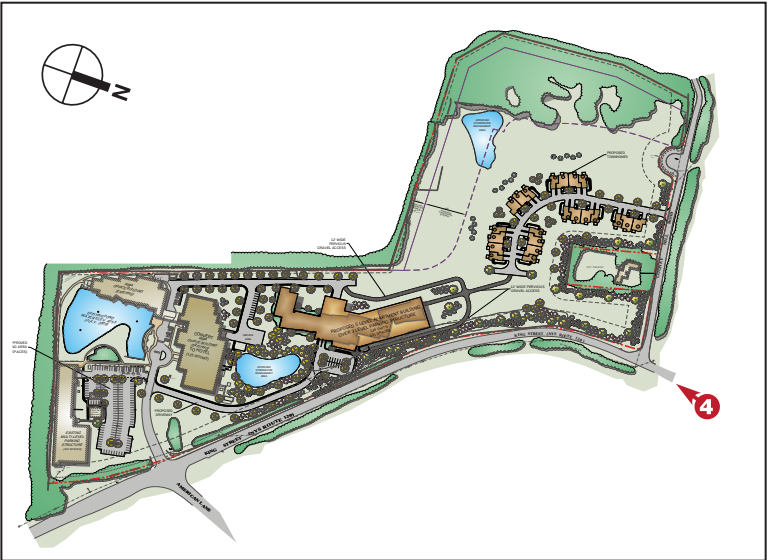




Existing Condition (Leaf-off)



Proposed Condition (Leaf-off)



12.A. INTRODUCTION

This chapter addresses the potential impacts of the Proposed Action on community facilities and services, including public schools, police protection services, fire protection services, and emergency medical services (EMS).

As described below, it is the Applicant's opinion that the Proposed Project would not have a significant adverse impact on the provision of community services or on community facilities. The Proposed Project's residential component could generate up to 27 public school-age children (PSAC) and the Proposed Project would result in an increased need for emergency services (e.g., police, fire, and EMS); however, the increased cost associated with providing these services would be more than offset by increases in property tax revenue associated with the Proposed Project.

12.B. PUBLIC SCHOOLS

This section assesses the current and future utilization of the schools within the Byram Hills Central School District ("BHCS D" or "the District") and the Proposed Action's potential impact on the District. Based on the analysis below, it is the Applicant's opinion that the Proposed Project would not result in a significant adverse impact on the District.

12.B.1. EXISTING CONDITIONS (DEIS AND GEIS)

The BHCS D contains four schools: Coman Hill Elementary School, Wampus Elementary School, H.C. Crittenden Middle School, and Byram Hills High School (see **Figure 12-1**). Grades K–2 attend the Coman Hill Elementary School, grades 3–5 attend the Wampus Elementary School, grades 6–8 attend the H.C. Crittenden Middle School, and grades 9–12 attend the Byram Hills High School.

12.B.1.a. Existing and Projected Enrollment

As presented in **Table 12-1** below, the BHCS D had a total enrollment of 2,300 students (pre-K to 12th grade) in 2018–2019.¹ This is approximately 18 percent lower than BHCS D's most recent peak of 2,818 students in the 2007–2008 school year.² Based on correspondence from BHCS D Superintendent Dr. Jen Lamia regarding the Proposed Project (see **Appendix H-4**), the District's most recent enrollment peak "had the District at capacity."

¹ Cornell Program on Applied Demographics. Pad.human.cornell.edu/schools/enrollment.cfm.

² Since the 2007–2008 peak, enrollment in BHCS D has declined each year.

Table 12-1
Byram Hills Central School District Enrollment

Year	Enrollment (K-12)	Percent of Change in Enrollment from Previous Year
2004/05	2,795	--
2005/06	2,811	+0.6%
2006/07	2,808	-0.1%
2007/08	2,818	+0.4%
2008/09	2,815	-0.1%
2009/10	2,795	-0.7%
2010/11	2,714	-3.0%
2011/12	2,647	-2.5%
2012/13	2,643	-0.2%
2013/14	2,583	-2.3%
2014/15	2,538	-1.8%
2015/16	2,467	-2.9%
2016/17	2,372	-4.0%
2017/18	2,349	-1.0%
2018/19	2,300	-2.1%

Sources: Cornell Program on Applied Demographics – Total Enrollment

Enrollment projection data provided by BHCS D Superintendent Dr. Jen Lamia for use in the Eagle Ridge DEIS, which also has applicability for the Proposed Project, is shown in **Table 12-2**. As shown, enrollment from the 2019–2020 to 2024–2025 school years is predicted to continue declining. The school district enrollment projected by BHCS D for the 2024–2025 school year (2,224) indicates a decline of approximately 76 students, or 3.3 percent, from the 2018-2019 enrollment (2,300). As noted by Dr. Lamia in her correspondence regarding the Proposed Project (see **Appendix H-4**), “enrollment projections for the district indicate that there will **not be** any additional significant enrollment decline” (emphasis in the original). Dr. Lamia also notes that the District’s enrollment projections “may be affected by the [COVID-19] pandemic” and that other proposed housing developments within the District may also increase the District’s enrollment.

Table 12-2
Byram Hills Central School District Enrollment Projections 2019–2024

School Name	2019–2020	2020–2021	2021–2022	2022–2023	2024–2025
Coman Elementary School	475	485	485	468	462
Wampus Elementary School	535	501	496	510	520
HC Crittendon Middle School	557	580	557	536	503
Byram Hills High School	727	709	709	700	739
Total	2,294	2,275	2,247	2,214	2,224

Sources: BHCS D Superintendent Lamia; Eagle Ridge DEIS, 2019

12.B.1.b. District Budget

The total BHCSD 2019–2020 budget is \$94,534,535, which is an approximately 2.4 percent increase from the 2018–2019 budget.³ For the 2019–2020 school year, the District expects to receive approximately \$4,624,001 in state aid, which is approximately 5 percent of the 2019–2020 estimated revenue. Approximately 88 percent of the 2019–2020 estimated revenue is raised from the Tax Levy, and approximately 3 percent is raised from Payment in Lieu of Taxes (PILOT) payments (see **Table 12-3**).

Table 12-3
2019–2020 Byram Hills Central School District Budget Detail

	Source/Use	Budget	Percentage of Total
Expenses	Administrative	\$10,965,433	11.6%
	Program (Instructional)	\$66,426,693	70.3%
	Capital	\$17,142,409	18.1%
	Total Expense	\$94,534,535	--
Revenue	Tax Levy	\$82,825,305	87.6%
	State Aid	\$4,624,001	4.9%
	Reserve/Fund Balance	\$3,041,584	3.2%
	Payment in Lieu of Taxes (PILOT)	\$3,010,645	3.2%
	Miscellaneous	\$1,033,000	1.1%
	Total Revenue	\$94,534,535	--

Source: BHCSD 2019–2020 Budget Statement

The District groups their expenditures into three parts: administrative, program, and capital. For the 2019–2020 budget, the District has allocated \$66,426,693, or 70.3 percent, for its program budget, which includes instructional, programmatic, transportation, athletics, health services costs, and employee benefits for non-administrative employees. Based on the 2018–2019 school year enrollment of 2,300 students, this equates to a per student programmatic cost of approximately \$28,881, \$26,282 (or 91 percent) of which would be funded by property tax and PILOT payments.

Voters in the BHCSD approved the establishment of a Capital Reserve Fund to be designated as the “Buildings and Facilities Improvement Reserve Fund.” The fund would be used to pay all or a portion of the costs of renovation, construction, reconstruction, and improvements to the District’s facilities. While no building or facility expansions are currently planned, this fund would reduce or eliminate the need for the District to bond for future capital improvements.

12.B.2. POTENTIAL IMPACTS OF THE PROPOSED PROJECT (DEIS)

The Proposed Project’s residential uses would consist of 149 multifamily apartments and 22 townhomes. Of the 149 multifamily units, approximately 39 units would be one-

³ Byram Hills Central School District 2019–2020 Budget Statement: https://www.byramhills.org/uploaded/BOE/2019-20_Budget/Budget_Statement_2019-20.pdf

bedroom apartments and 110 units would be two-bedroom apartments. All 22 townhomes would contain three bedrooms.

For purposes of estimating the number of PSAC within the Proposed Project, it is assumed that all 22 townhomes would be fee-simple owner-occupied units and the multifamily units would be rental.

There are two primary methods used by planners to estimate the number of PSAC that may live within a particular project.

1. Use of a “multiplier” of the number of PSAC per housing unit based on US Census data and specific to housing unit type, size (e.g., bedroom count), and value; and
2. Use of case study data obtained from local school districts for the number of public school students per address for representative developments.

Both approaches have limitations related to quality and age of data, and must be seen as approximations of the number of actual PSAC that may live within a project. However, both methods are widely used by communities as an effective method for anticipating potential effects of new development on schools.

12.B.2.a. Estimated PSAC – Rutgers Multiplier Method

For more than a decade, the standard multiplier used to estimate project-generated PSAC was the Rutgers University’s Center for Urban Policy Research (CUPR) 2006 “multipliers” based on 2000 Census data (the “Rutgers Study”). Specifically, CUPR queried the Public Use Microdata Sample (PUMS) from the 2000 Census to determine the population characteristics of various types of housing. The population characteristics queried included average household size, total number of PSAC, and number of PSAC by grade range. The housing characteristics queried included the state of residence, housing tenure (i.e., owner or renter), housing size (e.g., number of bedrooms), housing type (e.g., single- or multifamily), and housing price. Only housing built between 1990 and 2000 was queried. Based on these queries, CUPR published a series of state-specific tables that included various population characteristics, including the number of public school-aged children for various types and sizes of housing. These became known as the “Rutgers multipliers.”

Today, these multipliers are widely viewed as overly conservative (i.e., they predict that many more public school children will reside in new developments than is actually observed) based on several reasons, including the fact that data from New York City skew the multipliers unnecessarily high. Nevertheless, these multipliers are still commonly used by communities throughout the region and, as such, the analysis in the DEIS has included an estimate of the number of PSAC that may live at the Proposed Project based on these multipliers.

As shown in Table 3-1 of the Rutgers Study (see **Appendix H-1**), the multipliers vary significantly based on the value of the unit. Housing values in the Rutgers Study are arrayed by terciles (i.e., thirds) and are based on housing prices in 2005.

To calculate the number of PSAC, AKRF applied the top tercile (>\$1,000) multiplier for buildings with five or more rental units (multifamily), which is 0.07 for 1-bedroom units and 0.16 for two-bedroom units. Using these multipliers, it is estimated that there would be 20 or 21 PSAC living in the proposed 149-unit multifamily building. Similarly, to calculate the number of PSAC living in the townhomes, AKRF applied the top tercile (>\$269,500) multiplier for single-family attached units, which is 0.28 for 3-bedroom units. Using this multiplier, it is estimated that there would be six or seven PSAC generated by the 22 proposed townhomes.

In summary, using the Rutgers multiplier method, it is reasonable to assume that there could be a total of approximately 27 PSAC living within the Proposed Project (see **Table 12-4**).

Table 12-4
Proposed Project – Estimated Public School Age Children: Rutgers Method

Type of Unit	Number of Units	Multiplier	Public School Age Children
MULTIFAMILY BUILDING			
1-BR 5+ Units – Rent*	39	0.07	2.7
2-BR 5+ Units – Rent**	110	0.16	17.6
TOTAL	149		20.3
TOWNHOMES			
3-BR Single-Family Attached***	22	0.28	6.2
TOTAL	171		26.5
Note: Bedroom (BR) Sources: * Rutgers University Center for Urban Policy Research; New York Table 3-1 All Public School Children: School-Age Children in Public School (PSAC); 5+ Units – Rent, 1 BR; More than \$1,000 ** Rutgers University Center for Urban Policy Research; New York Table 3-1 All Public School Children: School-Age Children in Public School (PSAC); 5+ Units – Rent, 2 BR; More than \$1,100 *** Rutgers University Center for Urban Policy Research; New York Table 3-1 All Public School Children: School-Age Children in Public School (PSAC); Single-Family Attached, 3 BR; More than \$269,500			

12.B.2.b. Estimated PSAC – Case Study Multiplier Method

To augment the use of the Rutgers multipliers, AKRF requested data from school districts in which comparable multifamily developments are located. Developments with building sizes, unit sizes, and school districts comparable to the Proposed Project were chosen for this study. This data was then used to approximate the number of PSAC that could live within the Proposed Project.

The following high-end multifamily apartment buildings were analyzed: Avalon Bronxville (125 Parkway Road, Bronxville), Villa BVX (15 Kensington Road, Bronxville), The Avenue at Crestwood (300 Columbus Avenue, Tuckahoe), Marbury Corners (55 First Street, Pelham), Quarry Place (64 Midland Place, Tuckahoe), and Avalon Willow (746 Mamaroneck Avenue, Mamaroneck) (see **Table 12-5**).

Using the information on PSAC residing at these developments, it is reasonable to assume that there could be a total of approximately 14 PSAC living within the multifamily component of the Proposed Project. When

accounting for the six PSAC derived for the 22 townhomes based on the Rutgers multiplier method shown in **Table 12-4**, the case study multiplier method assumes an estimated total of 20 PSAC generated by the Proposed Project (see **Table 12-5**). As noted by BHCSD Superintendent Dr. Jen Lamia in her correspondence regarding the Proposed Project (see **Appendix H-4**), the ratio of PSAC per unit varies within the case study developments. This variance is likely attributable to a combination of unit mix (i.e., how many 1, 2-, 3-bedroom units), municipality, and location. As such, the DEIS assumes the mean ratio of PSAC per unit for the Proposed Project, which as noted in **Table 12-5**, is a higher ratio than was observed in all but one of the developments studied.

Table 12-5

Proposed Project – Estimated Public School Age Children: Case Study Method

Development	Unit Mix	School District	No. of Students Enrolled*	Total No. of Units	Ratio	Ratio Applied to Proposed Multifamily Building
125 Parkway Road (Avalon)	1-BR, 2-BR, and 3-BR units	Bronxville	31	110	0.282**	42
15 Kensington Road (Villa BVX)	1-BR, 2-BR, and 3-BR units	Bronxville	4	53	0.076	11
300 Columbus Avenue (The Avenue at Crestwood)	41 Studio, 6 1-BR units	Eastchester Union Free	2	47	0.043	6
55 First Street (Marbury Corners)	55 Condos and 6 Lofts	Pelham Union Free	4	61	0.066	10
64 Midland Place (Quarry Place)	1-BR, 2-BR, and 2-BR + Den	Tuckahoe Union Free	4	108	0.037	6
746 Mamaroneck Avenue (Avalon Willow)	1-BR, 2-BR, and 3-BR units	Mamaroneck Union Free	14	227	0.060	9
Total			59	606	0.097	14.4

Notes:

*Based on average enrollment of 2015–2016 through 2018–2019 school years, where available.

** Ratio inflated due to the number of three-bedroom rental units within the Avalon building. As supported by the Rutgers CUPR multipliers (see **Table 12-4**), three-bedroom units can be expected to have a greater number of school age children. The Proposed Project does not include any three-bedroom rental units.

Bedroom (BR)

Square Feet (SF)

Sources:

Bronxville School District; Eastchester Union Free School District; Pelham Union Free School District; Tuckahoe Union Free School District; and Mamaroneck Union Free School District;
www.apartments.com, <http://theavenueatcrestwood.com/>, www.trulia.com, https://gdcllc.com/portfolio_item/marbury-corners/, <https://quarryplaceattuckahoe.com/find-your-apartment/>, <http://www.trinityassociatesllc.com/our-projects/>

12.B.2.c. Potential Fiscal Impacts to the School District

To consider the potential fiscal impacts to the School District, it is important to consider the magnitude of the potential number of school-age children that could live in the Proposed Project. As estimated above, 20–27 public school students could live in the Proposed Project and attend Byram Hills' schools. Spread out over all grades, that is 1.7 to 2.1 students per grade. This relatively low number of additional children is unlikely to require the addition of new

teachers or other staff. Put another way, between the 2016/17 and 2017/18 school year, the district experienced an enrollment decline of 23 students. Between 2017/18 and 2018/19, the District experienced an additional loss of 51 students. In this context, the Proposed Project can be seen as slowing the decline in enrollment within the school district, while at the same time adding to the District's tax base.

Applying the per pupil programmatic cost (net of state aid and other revenues) of \$26,282 to the new students projected by the two methods utilized (20 from the case study multiplier method and 27 from the Rutgers multiplier method) results in a potential annual additional cost to the BHCD District ranging from \$525,640 to \$709,614. It is important to note, however, that the per pupil programmatic cost to the school district is likely much higher than the actual marginal cost of adding students to the district. Specifically, the largest portions of the District's programmatic budget are salaries and employee benefits (65 percent). As described above, it is unlikely that the Proposed Project would require the District to hire more teachers or other staff. Therefore, it is likely that the actual cost to the district of an additional student would be approximately 35 percent of the total programmatic cost, or \$183,974 to \$248,365 per year.

These figures can be compared to the estimated \$291,870 increase in property tax revenues that the District would receive annually from the Proposed Project as documented in Chapter 13, "Fiscal and Market Impacts," when compared to the existing tax revenue generated by the Project Site.

12.B.2.d. Potential Impacts on Public School Transportation

The Project Site is located at a distance no greater than six miles from any of the four District schools. According to information received from the BHCS District Transportation Department, the portion of King Street/Route 120 adjacent to the Project Site is part of an established District bus route. However, this route currently provides limited service to the middle school and high school for a select population of students. Correspondence from the BHCS District Superintendent, Dr. Jen Lamia (see **Appendix H-4**), indicates that the Proposed Project "will require additional busses and drivers/monitors." The Applicant would coordinate with the District and the Town regarding appropriate bus pick-up and drop-off points to ensure safe passage for children to all District schools. The potential cost of this transportation service is included in the programmatic budget costs estimated above.

12.B.2.e. Conclusions

The Proposed Project includes housing types that, in the Applicant's opinion, are not necessarily conducive to, nor do they typically result in, large numbers of school-age children. The potential increase in enrollment of 20 to 27 students represents a minor increase (approximately 0.9 percent to 1.2 percent) in the student population (based on the 2018–2019 K–12 BHCS District enrollment of 2,300). As noted above, the number of PSAC that may live at the Proposed Project (up to 27) is less than the projected decrease in enrollment (76) that it expected to occur without the Proposed Project. Additionally, it is assumed that not all PSAC generated by the Proposed

Project would be attending any single public school; rather, they would be distributed throughout various grades within the District's four schools. As a result, the distribution of public-school age children among the various grades (approximately 1.5 to 2.1 students per grade) would further ameliorate their impact on the District.

Declining enrollment within the District has created excess capacity such that the addition of 20–27 public-school age children could be accommodated by the District's existing infrastructure and would not likely require the hiring of additional teachers or staff. Therefore, the likely marginal cost to the District as a result of the Proposed Project is approximately \$183,974 to \$248,365 per year. This increase in costs would be offset by the approximately \$291,870 in additional property taxes that could be generated for the District by the Proposed Project as compared to current property tax generation.

12.B.3 MITIGATION MEASURES FOR THE PROPOSED PROJECT (DEIS)

In the Applicant's opinion, and based on the foregoing analyses, the Proposed Project is not anticipated to have a significant adverse impact on public schools. The Applicant would coordinate with the District regarding logistics for safe bus pick-up and drop-off locations. The estimated \$291,870 in additional property tax revenues that the District would receive annually from the Proposed Project would outweigh the per pupil instructional cost to the District (including transportation costs) and serve to adequately mitigate any potential impact to the District.

12.C. POLICE, FIRE, AND EMS PROTECTION

The Project Site is served by the Armonk/Banksville EMS, the Town of North Castle Police Department (NCPD), and the North Castle Fire District No. 2, otherwise known as the Armonk Fire Department (AFD). On behalf of the Applicant, and at the request of the Town, AKRF sent correspondence to each of the emergency service providers serving the Site. AKRF requested information about each department's current level of staffing, description of equipment and personnel, anticipated response time to the Project Site, and number and types of all services calls by each department to the Project Site from the year 2014 to present, as well as the total number of calls from the Town since 2014. In addition, AKRF requested the number and types of calls to Swiss Re America, Citigroup Armonk Conference Center, IBM World Headquarters, and Greenwich American Center, from 2014 to present, and any anticipated changes to service. The information found below for existing conditions and potential impacts are based upon responses AKRF has received from the service providers, which are included in **Appendices H-2 and H-3**.

12.C.1. EXISTING CONDITIONS (DEIS AND GEIS)

12.C.1.a. Police Services

The NCPD is a full-time municipal police department providing police services to the three hamlets in the Town of North Castle: Armonk, Banksville, and North White Plains. These services are carried out under the

direction of Police Chief Peter J. Simonsen. The NCPD consists of 32 officers and three volunteer civilian staff members.⁴

The NCPD is divided into the Patrol Division and the Detective Division. The Patrol Division is commanded by a Police Lieutenant and is staffed by sworn officers who provide police coverage on a 24-hour basis, divided into three eight-hour shifts. There are three patrol sectors, which generally correspond to each hamlet's geographic boundaries and encompass the 26 square miles of the Town. Within the Patrol Division, there are a number of units that carry out specialized services and community policing initiatives, including the Emergency Service Unit, the Bicycle Patrol Unit, the Child Safety Unit, the School Resource Officer Unit, the Commercial Vehicle Enforcement Unit and the Accident Investigation Unit. A Detective Sergeant commands the Detective Division, and this Division investigates reported crimes and deploys a number of initiatives for crime prevention purposes.

The NCPD provides police services to the community with a fleet of 17 vehicles with varying equipment including mobile computers, license plate readers, and emergency medical equipment. The NCPD also has eight mountain bicycles and two motorized all-terrain vehicles.

The NCPD headquarters is located in Armonk, within the Town Hall building. The hamlet of North White Plains has a police sub-station located in the community center/library which enables officers assigned to that patrol sector to interact with community members and prepare reports without leaving their patrol area.

From January 1, 2016 through the end of 2018, the NCPD responded to a total of 31 calls to the Project Site and responded to an aggregate of 81 calls to the Swiss Re site during the same three-year timeframe (see **Table 12-6**). These incident numbers reflect calls for service or officer-initiated events (ie. car stop) at the listed locations. The NCPD addresses a number of traffic issues in the area of both sites, due to Route 120 South being a main artery for motorists accessing the Airport, Interstate 684, or traveling to Connecticut. The NCPD addresses these issues with directed traffic enforcement and increased police presence.

Table 12-6
Police Response to the Project Site (2016–2018)

Year	Calls to Swiss Re Site	Calls to Project Site
2016	31	6
2017	26	16
2018	24	9
Source: North Castle Police Department, 2021		

⁴ Letter from North Castle Police Department on the Proposed Project dated April 22, 2021 (see **Appendix H-3**).

12.C.1.b. Fire and EMS

As stated in the correspondence included in **Appendix H-2**, the AFD is a 100 percent volunteer department that consists of approximately 61 volunteers, including 20 members who are certified as New York State Emergency Medical Technicians (EMT). The AFD not only provides fire suppression, but also EMS to Armonk and Banksville. The AFD is also the primary responding agency for the Westchester County Airport and the Kensico Reservoir. The AFD's workweek hours are from 6 AM to 6 PM, with a contract EMT on duty during those hours at fire headquarters.

The Department's apparatus includes the following:

- Class A 1500 gpm pumper – (3)
- Class A pumper/Rescue combination – (1)
- Class A Pumper/Tanker with 3,000 tank – (1)
- Ambulances – (3)
- All-terrain Vehicle – (1)
- Boat – (1)
- Chief's Vehicles – (3)
- Utility Vehicle – (1)

The AFD firehouse is the only firehouse serving Armonk, located at 400 Bedford Road. It is approximately 3.9 miles from the Project Site.

The AFD responds to approximately 1,100 medical and fire calls per year throughout Armonk, Banksville, and surrounding communities. Response times to the Project Site vary due to the large geographic area of North Castle Fire District #2, which covers approximately 17 square miles. Average response time from when the apparatus leaves the firehouse is less than 12 minutes.

From January 1, 2016 through the end of 2018, the AFD has responded to a total of eight calls to the Project Site (see **Table 12-7**). The Armonk Fire Department also responded to an aggregate of 27 calls to the Swiss Re site during the same three-year timeframe.

Table 12-7
Fire/EMS Response to the Project Site (2016–2018)

Year	Calls to Swiss Re Site	Calls to Project Site
2016	13	1
2017	7	4
2018	7	3

Source: Armonk/Banksville EMS

12.C.2. POTENTIAL IMPACTS OF THE PROPOSED PROJECT (DEIS)

12.C.2.a. Police Services

Based on a review of the correspondence received from the NCPD as part of the Eagle Ridge DEIS (see **Appendix H-3**), the Department currently

operates at an efficient level with the Town's existing population. It is likely that the Proposed Project may result in the need for additional resources within the NCPD. As shown in **Table 12-8**, the 22 townhomes and 149 apartments would increase the population of the Town of North Castle by approximately 375 residents. If all of these residents were new to North Castle, the population of the Town would increase by approximately 3 percent based on the Town's estimated 2017 population of 12,388.⁵

Table 12-8
Proposed Project – Resident Population Projections

Residence Type	Number of Units	Multiplier	Projected Population
1-Bedroom Apartment	49	1.67	82
2-Bedroom Apartment	100	2.31	231
3-Bedroom Townhouse	22	2.83	62
Total	171	--	375
Sources: <i>Residential Demographic Multipliers, Estimates of the Occupants of New Housing</i> , Rutgers University, Center for Urban Policy Research, 2006			

In their April 2021 correspondence, the NCPD did not provide an expected number of police calls from the Proposed Project's mix of uses. However, it is the Applicant's opinion that the volume of calls from the Proposed Project would not be significantly higher than the volume of calls if the Project Site were to be fully occupied with office uses.

To quantify the proportional increase in the demand for police services, the planning standards set forth in the Eagle Ridge DEIS were assumed. These standards are found in the Urban Land Institute's (ULI) Development Assessment Handbook⁶, and correspond to increases in the residential population of new developments. The ULI standards do not apply to non-residential uses, such as a hotel. In order to offer a conservative estimate of police service impacts, the hotel use was included in the overall calculation utilizing the industry occupancy rate of 1.25 individuals per occupied hotel room⁷. Assuming that all rooms are occupied, a hotel population of 156.25 individuals for the 125 hotel rooms is projected. The projected increase in police personnel, equipment, and facilities attributable to the Proposed Project's population is presented in **Table 12-9**.

⁵ U.S. Census Bureau Quick Facts – Town of North Castle

⁶ Model Factors for Social Impact Analysis (Police), Development Impact Assessment Handbook, Urban Land Institute, 1994.

⁷ Eagle Ridge DEIS, 2019.

Table 12-9

Projected Police Service Level Increase

Police Service	Multiplier	Estimated Population	Projected Service Level Increase
Personnel	2/1,000 population	531	1.0 police personnel
Vehicles	0.6/1,000 population	531	0.32 vehicles
Facilities	200 sf/1,000 population	531	106 sf of facility space
Sources: Model Factors for Social Impact Analysis (Police), Development Impact Assessment Handbook, ULI, 1994; Eagle Ridge DEIS, 2019.			

It is likely that the Proposed Project, when considered together with other proposed developments in the Town, would require additional police personnel and associated equipment. Based on a review of the Town's adopted 2020 budget, the starting salary of a NCPD officer is assumed to be approximately \$74,724 and benefits for sworn officers, including health and retirement, are equal to 91.8 percent of the salary.⁸ Therefore, the "fully loaded" cost of an entry-level officer, including benefits, is assumed to be approximately \$143,303. In addition, the 2020 Town Budget allocates approximately \$9,963 per officer for supplies and training, bringing the total cost for an additional police officer to approximately \$153,266 per year. As described in Chapter 13, "Fiscal and Market Impacts," the Proposed Project is expected to result in an increase of approximately \$228,615 per year in property and hotel occupancy taxes to the Town, which would be more than sufficient to cover the portion of the increase in NCPD costs attributable to the Proposed Project. Therefore, the Proposed Project is not anticipated to have a significant adverse impact with respect to the provision of police services.

12.C.2.b. Fire and EMS

In their November 20, 2019 correspondence, the AFD stated that they respond to approximately 1,100 medical and fire calls annually throughout Armonk, Banksville, and surrounding communities. Also provided was a detailed estimate of the number of annual fire and EMS calls that would be expected from each component of the Proposed Project, based on current and similar developments and their call volume over the last two years (see **Table 12-10**).

⁸ https://www.northcastleny.com/sites/northcastleny/files/uploads/2020_adopted_budget_-_final.pdf.

Table 12-10

Proposed Project – Estimated Annual Fire and EMS Calls

Project Component	Estimated Fire Calls	Estimated EMS Calls	Total Calls
Hotel	6	9	15
Hotel Restaurant/Bar	9	5	14
Southern Office Building	5	10	15
Multifamily Building (including fitness center/pool)	32	14	46
Townhomes	6	3	9
Total	58	41	99
Total Net New*	38	17	55
Existing Annual Calls**	--	--	1,100
Net New – Percent of Total	--	--	5%
Notes: * Estimated calls for Proposed Project's multifamily and townhouse uses are categorized as net new calls ** AFD responds to approximately 1,100 medical and fire alarms annually, but a specific breakdown of fire vs. EMS was not provided. Source: Armonk Fire Department, 2019			

The AFD estimates that the Proposed Project could add an additional 99 calls, representing a 9 percent increase over the existing condition. However, it should be noted that the AFD's estimates include calls to the existing southern office building and the proposed re-use of the existing northern office building as a hotel. Although currently vacant, both existing office buildings have been fully occupied for office use in recent years and were also proposed for continued office use through the currently approved MBIA expansion plan for the Project Site, which was reviewed by the AFD in 2003. Therefore, approximately 55 of the 99 calls can be categorized as net new calls, since they would be attributable to the new residential uses proposed on the Project Site. The 55 net new calls represent an increase of 5 percent over the existing condition.

Similar to the discussion of police services above, re-occupying the southern office building as an office, and repurposing the northern office building as a hotel would generate fire and EMS demand. However, it is assumed that the AFD is positioned to adequately serve these existing buildings, as well as the additional office space contemplated by the approved MBIA expansion plan which was subject to AFD review prior to receiving approvals from the Town in 2003.

Considering the scale of the project and the amount of livable space not within reach of ground ladders, specifically residential units, the AFD believes it will be crucial for the department to have a ladder truck to help ensure the safety of all new residents at the Project Site. In their November 20, 2019 letter, the AFD emphasized that they do not possess a ladder truck and must rely on mutual aid from the North White Plains, Chappaqua, Purchase, and Bedford Hills Fire Departments.

The AFD has stated that the Proposed Project, together with other proposed developments, is creating an increased need for fire and EMS services. The AFD expressed concern that the increase in demand may end up creating

additional tax burdens to the residents while at the same time the AFD is being constrained to the 2 percent New York State tax cap. In addition, the AFD contends that the Proposed Project will increase emergency call volumes, but will not provide opportunities for new volunteers to move into the community or increase membership.

12.C.3. MITIGATION MEASURES FOR THE PROPOSED PROJECT (DEIS)

12.C.3.a. Police Services

In order to service the Proposed Project and any cumulative increase in demand from several proposed projects within the Town, additional police officers may be needed. The Applicant estimates the cost of one additional police officer to be approximately \$153,266, with the Applicant's proportionate share of that cost some fraction of that amount. As discussed above, the Proposed Project is estimated to generate an additional approximately \$228,615 per year in tax revenue for the Town, which is in excess of the cost of the Applicant's share of providing a single police officer.

12.C.3.b. Fire and EMS

According to the AFD, the Proposed Project could result in an additional 99 calls annually, representing a 9 percent increase over the existing condition. However, as noted above, net new calls to the Project Site correspond to an additional 55 calls annually, representing a 5 percent increase over the existing condition. The increase in fire and EMS calls, and expenditures, would be offset by an increase in revenue. As discussed in Chapter 13, "Fiscal and Market Impacts," the Proposed Project would result in the generation of approximately \$30,825 in property taxes for the Fire and Ambulance Districts, an increase of \$8,217 from the amount currently generated by the Project Site. This revenue could be utilized to offset the potential impacts of the Proposed Project.

The AFD has opined that they will need a ladder truck to serve the Proposed Project's new construction. The Applicant understands that this need is the result of several proposed projects within the Town. As such, the Applicant is willing to contribute its fair share towards a potential district-wide solution to this potential issue, which may include the purchase of a new ladder truck.

The Proposed Project would increase the taxable value of the Project Site and the Town. Under New York State Law, a jurisdiction's tax levy is permitted to increase in proportion to the increase in assessed value that is due to property improvements. This increase does not count against a jurisdiction's "2%" tax cap. As such, the increase in property taxes attributable to the improvements to the Project Site would not adversely affect the fire district's ability to increase the tax levy within New York State's property tax cap.

The AFD has opined that new residential developments, including those similar to the Proposed Project, have brought an increase in call volume, but not a similar increase in volunteer membership. The Applicant understands this to be a problem faced more broadly by the fire district and the Town and is not a specific impact of the Proposed Project. Nevertheless, the Applicant

is committed to contributing its fair share to the fire district, inclusive of district-wide initiatives that may be undertaken in the future with respect to staffing.

All components of the Proposed Project will contain fire suppression sprinklers and will adhere to all local and state fire prevention codes. Standpipes will be installed in the stair towers, per code requirements. Knox boxes will be provided at the building lobby entrances in agreed upon locations with the AFD. Building elevators will be sized to accommodate a 24" x 84" stretcher.

Water supply, including demand for fire flow, is anticipated to be adequate. See Chapter 9, "Utilities," for additional discussion of water flow to the Project Site. The Applicant will coordinate the location of hydrants with the AFD.

The multifamily building's parking garage will include a gated access. Emergency service providers will be provided with access to the garage in a manner determined in coordination with the providers during site plan review. The gates will also be designed to break away and be driven through in an emergency situation. In the case of a power outage, the gate will default to the open position.

Emergency driveway access is provided around the proposed multifamily building, and direct rooftop access will be provided from the upper floor of the building. The emergency access driveway proposed between the northern and southern portions of the Project Site will be improved to meet the standards and requirements of the AFD. The townhomes will be constructed to comply with all local and state fire prevention codes. All townhomes will have direct street access.

12.D. POTENTIAL IMPACTS OF, AND MITIGATION FOR, THE PROPOSED ZONING (GEIS)

As described in Chapter 2, "Project Description," the theoretical maximum development scenario under the Proposed Zoning, when accounting for the maximum build-out potential of both the Project Site and the adjacent Swiss Re parcel, is a total of 750 residential units and an 80-room hotel.

It is important to note that no specific proposal is being made at this time to effectuate the maximum hypothetical development of either of these two sites and any future plans would be subject to review by the Town, including a full environmental review.

12.D.1. PUBLIC SCHOOLS (GEIS)

In keeping with the analytical approach applied for the Proposed Project's estimated PSAC, analyses were conducted to estimate the number of PSAC that could live within a hypothetical maximum building out of 750-units. Both the Rutgers multiplier method and case study multiplier method were utilized, and the results are summarized below.

12.D.1.a. Estimated PSAC (GEIS) – Rutgers Multiplier Method

To calculate the number of PSAC under the GEIS scenario using the Rutgers multiplier method, it was assumed that all 750 residential units would be

rental apartments. Of the total 750 units, it was assumed that 188 would be one-bedroom units, 375 would be two-bedroom units, and 187 would be three-bedroom units. Similar to the Proposed Project, the top tercile (>\$1,000) multiplier was applied for buildings with five or more rental units (multifamily), which is 0.07 for 1-bedroom units, 0.16 for two-bedroom units, and 0.63 for three-bedroom units. Using the Rutgers multiplier method, it is reasonable to assume that there could be a total of approximately 190 PSAC living within a hypothetical maximum build-out of 750 rental units (see **Table 12-11**).

Table 12-11

GEIS Scenario – Estimated Public School Age Children: Rutgers Method

Type of Unit	Number of Units	Multiplier	Public School Age Children
1-BR 5+ Units – Rent*	188	0.07	13
2-BR 5+ Units – Rent**	375	0.16	60
3-BR 5+ Units – Rent***	187	0.63	117
Total	750		190
Note: Bedroom (BR) Sources: * Rutgers University Center for Urban Policy Research; New York Table 3-1 All Public School Children: School-Age Children in Public School (PSAC); 5+ Units – Rent, 1 BR; More than \$1,000 ** Rutgers University Center for Urban Policy Research; New York Table 3-1 All Public School Children: School-Age Children in Public School (PSAC); 5+ Units – Rent, 2 BR; More than \$1,100 *** Rutgers University Center for Urban Policy Research; New York Table 3-1 All Public School Children: School-Age Children in Public School (PSAC); 5+ Units – Rent, 3 BR; More than \$1,250			

12.D.1.b. Estimated PSAC (GEIS) – Case Study Multiplier Method

To calculate the number of PSAC under the GEIS scenario using the case study multiplier method, it was assumed that all 750 residential units would be rental apartments. Using the same group of comparable residential developments that were studied for the Proposed Project’s case study multiplier estimate of PSAC, it is reasonable to assume that there could be a total of approximately 73 PSAC living within a hypothetical maximum build out of 750 rental units (see **Table 12-12**).

Table 12-12

GEIS Scenario – Anticipated Number of Public School Age Children: Case Study Method

Development	Unit Mix	School District	No. of Students Enrolled*	Total No. of Units	Ratio	Ratio Applied to GEIS Unit Count
125 Parkway Road (Avalon)	1-BR, 2-BR, and 3-BR units	Bronxville	31	110	0.282**	211
15 Kensington Road (Villa BVX)	1-BR, 2-BR, and 3-BR units	Bronxville	4	53	0.076	57
300 Columbus Avenue (The Avenue at Crestwood)	41 Studio, 6 1-BR units	Eastchester Union Free	2	47	0.043	32
55 First Street (Marbury Corners)	55 Condos and 6 Lofts	Pelham Union Free	4	61	0.066	49
64 Midland Place (Quarry Place)	1-BR, 2-BR, and 2-BR + Den	Tuckahoe Union Free	4	108	0.037	27
746 Mamaroneck Avenue (Avalon Willow)	1-BR, 2-BR, and 3-BR units	Mamaroneck Union Free	14	227	0.060	45
Total			59	606	0.097	73

Notes:

*Based on average enrollment of 2015–2016 through 2018–2019 school years, where available.

** Ratio inflated due to the number of three-bedroom rental units within the Avalon building. As supported by the Rutgers CUPR multipliers (see **Table 12-4**), three-bedroom units can be expected to have a greater number of school age children.

Bedroom (BR)

Square Feet (SF)

Sources: Bronxville School District; Eastchester Union Free School District; Pelham Union Free School District; Tuckahoe Union Free School District; and Mamaroneck Union Free School District.

www.apartments.com, <http://theavenueatcrestwood.com/>, www.trulia.com, https://gdcllc.com/portfolio_item/marbury-corners/, <https://quarryplaceattuckahoe.com/find-your-apartment/>, <http://www.trinityassociatesllc.com/our-projects/>

12.D.1.c. Conclusion

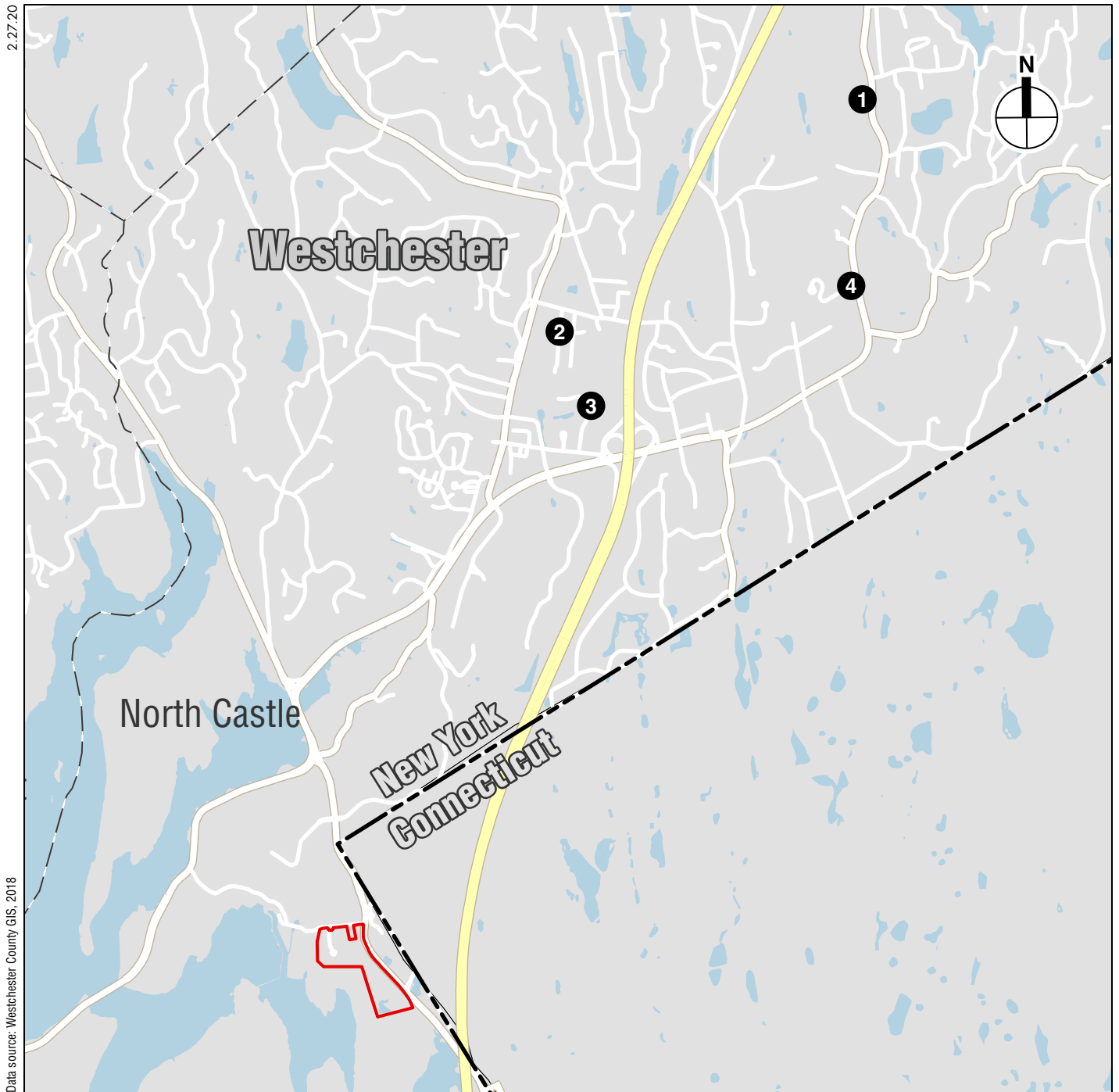
Applying the per pupil instructional cost of \$28,880 to the new students projected by the two methods utilized (73 from the case study multiplier method and 190 from the Rutgers multiplier method) results in an additional annual cost to the BHCD District ranging from \$2,108,240 to \$5,487,200. The potential increase in enrollment of up to 190 students under the GEIS scenario represents an increase in student population of approximately 8.2 percent (based on the 2018–2019 K–12 BHCD enrollment of 2,300). This would bring the BHCD enrollment back to a level experienced in 2015, which would still be more than 300 fewer students than the 2007/2008 peak district enrollment.

As part of any future Town review of the potential redevelopment of the Project Site and adjacent Swiss Re parcel that differs from the Proposed Project, these quantitative estimates would be refined to fit the development program. Future enrollment projections and capacity would also be studied, and the costs to the District would be compared to the estimated property tax revenues that the District would receive annually from the project. Feasible and practicable measures would be developed to mitigate potential impacts, and those measures would be appropriately weighed against any future project's benefits.

12.D.2. POLICE, FIRE, AND EMS PROTECTION (GEIS)

In the absence of detailed site plans for the scenarios assumed in the GEIS, including the types and sizes of residential units proposed, a total residential population and hotel population cannot be estimated at this time. However, it can be assumed that potential demand for police, fire, and EMS protection would be greater than that of the Proposed Project. In addition, the projected tax revenues for the Town would be greater as a result of the development projected under the GEIS scenario when compared to the Proposed Project.

As part of any required environmental review process for the GEIS scenario, coordination with the AFD and NCPD would be required to determine the project-specific potential impacts to police, fire, and EMS protection. Feasible and practicable measures would be developed to mitigate potential impacts, and those measures would be appropriately weighed against any future project's benefits. *



Data source: Westchester County GIS, 2018



Project Site School

1

Byram Hills High School

2

Coman Hill Elementary School

3

H.C. Crittenden Middle School

4

Wampus Elementary School

Public Schools Serving Project Site

Figure 12-1

13.A. INTRODUCTION

This chapter analyzes the potential impacts of the Proposed Action on fiscal and market conditions. As such, these analyses address the potential for the Proposed Action to have one or more significant adverse environmental impacts that were identified in the Lead Agency’s Positive Declaration and adopted DEIS Scoping Document (see **Appendix A-1**).

The Proposed Action would permit a wider range of uses on the Project Site than is currently permitted. Specifically, residential uses—including multifamily and townhomes—would be permitted, as would hotel uses. As discussed in more detail below, it is the Applicant’s opinion that there is a strong market demand for residential uses in the region. The analysis also indicates that, in the Applicant’s opinion, there is a demand for another hotel use in the Town of North Castle. As such, permitting these uses in the DOB-20A zoning district is likely to increase the economic viability of the Project Site.

The Proposed Project would generate approximately \$137.28 million in total construction expenditures into the local economy, resulting in an estimated 821 person-years of employment,¹ \$79.75 million in labor income, and \$170.65 million in total economic output. The annual operation of the Proposed Project would generate approximately \$1.97 million in taxes, including approximately \$1.67 million in property tax revenue annually to various taxing jurisdictions, an increase of more than \$400,000 in property taxes annually over the current taxes. The Proposed Project would generate an increase of approximately \$228,000 in tax revenues to the Town of North Castle (including real estate and hotel occupancy taxes for a total of approximately \$422,890 including the town’s Special Districts) and \$291,870 in tax revenues to the Byram Hills School District (for a total of approximately \$1,094,861). As discussed below, it is the Applicant’s opinion that the Proposed Project would have a beneficial fiscal impact on the Town and the region.

13.B. EXISTING CONDITIONS

13.B.1. MARKET OVERVIEW (DEIS AND GEIS)

In order to evaluate the economic viability of the elements included in the Proposed Action, AKRF completed a market assessment of townhouse, multifamily, and hotel markets.

13.B.1.a. Townhomes

There are several townhouse communities located in the Town of North Castle, including approximately 100 total units in Cider Mill, Whippoorwill Ridge, and Whippoorwill Hills, within the Armonk Hamlet, a short drive from Downtown Armonk. These townhomes are located in gated communities that include more than one type of housing (e.g., single-family

¹ A “person-Year” is a metric used to characterize construction-based employment, and is the equivalent of one person working full time for one year.

detached, garden apartment, etc.). The townhomes were built in the early 2000s, and consist of three-story, three- and four-bedroom townhouse units, often with a basement and garage, and range in size from 2,500 to 3,850 square feet. The townhomes range in market value from approximately \$800,000 to \$1.3 million, indicating high market demand for this product within the Town (see **Appendix I-1**, Table I-1-1).

The overall demand for newly constructed townhomes within the suburbs is influenced by many factors, including the growth of the millennial population and associated lifestyle trends. In 2014, Commercial Real Estate Service (CBRE) reported that nationwide, of younger millennials aged 20 to 24 years old, 721,000 moved out of cities to the suburbs, while 554,000 left the suburbs to pursue city life. Among the oldest millennials and the tail end of the Gen X population, 1.2 million people aged 30 to 44 moved from cities to suburbs, while 540,000 did the reverse. As such, millennials have become one of the drivers in the suburban residential market, showing interest in properties that offer more space in newly constructed homes or developments.² In general, millennials prefer open concept floor plans, special-use rooms, work-from-home spaces, green spaces, and outdoor areas—features that are often lacking in Manhattan or the outer boroughs, as well as from older housing stock in the suburbs.³ In areas like Westchester and Fairfield, townhomes often offer larger floorplans, communal spaces, greenery, and convenient commutes—modern amenities that could be seen as desirable to millennials ready to move from city centers and downsizers ready to move from larger homes.

The existing Armonk townhouse communities offer quiet and natural settings, larger unit sizes, and luxury community spaces. In addition, they offer access to parks, restaurants, gyms, and shops, access to I-684, and a 10-minute commute to the North White Plains Metro-North train station. As an example, the Whippoorwill Hills townhouse community borders a nature preserve with walking and hiking trails, is less than a mile from Interstate 684, and is a 10–15 minute drive to the North White Plains Train Station.

The strong market demand for townhomes is consistent with regional trends that show millennials are seeking a diversity of housing type, with access to on- and off-site amenities. Part of the surge in suburban sales in Westchester, Putnam, and other metro suburban markets is due to renters and homebuyers seeking to escape New York City's high housing costs or lack of affordable housing.⁴ Realtors point out that townhomes appeal to both first-time homebuyers and downsizers, two of the largest populations fueling the current housing industry.⁵ This is primarily due to the burdens associated with owning a home, such as the time and cost associated with property maintenance, and the high costs of

² Jordan, Jon. Real Estate In-Depth. "Debunking the Myth that Millennials Hate the Suburbs." August 2016.

³ Goodwin, Debra. Westfair Communications. "Millennial Desires and the Impact on Real Estate." July 16, 2019

⁴ Jordan, Jon. Real Estate In-Depth. "Debunking the Myth that Millennials Hate the Suburbs." August 2016.

⁵ Cesarano, Joe. Westchester Magazine. "Limited Inventory Fuels a Hot Westchester Real Estate Market." April 2018.

property taxes for single-family homes.⁶ Townhomes provide options to rent as well as own, with a homeowner's association acting as management in some locations. In addition, people moving from urban centers are often seeking larger living areas, green space, and an assortment of amenities. Suburban townhouse communities offer these on-site amenities such as larger living areas, communal spaces, as well as off-site amenities such as proximity to parks, hamlet centers and downtowns, and mass transit.

The existing high market values of townhomes in Armonk and the surrounding area, coupled with the growing demand for suburban housing, indicates that, in the Applicant's opinion, there is a strong market for the Proposed Project's townhomes.

13.B.1.b. Multifamily

The demand for multifamily buildings in general, and in Westchester County specifically, remains strong. In Westchester County, average asking rent has steadily increased by around 4 percent annually for the past three years.⁷ In 2017, CBRE reported that out of a total \$453 billion investment in U.S commercial real estate, \$153 billion—the largest single market share—was dedicated towards multifamily.⁸ Within Westchester, over the last two quarters of 2018, approximately 700 new residential units were built in the area south of I-287, and yet occupancy and pricing strengthened.⁹ According to the 2019 Cushman & Wakefield Q1 multifamily report, Westchester County's asking rent growth was 3.9 percent as of Q1 2019 and has averaged 4.1 percent over the past three years.¹⁰ Additionally, CBRE noted that in the first quarter of 2019, the County's vacancy rate was approximately 3 percent, even with high asking rents per unit, indicating a strong market for multifamily.¹¹ Multifamily buildings offer a diversity of choices and a variety of floorplan formats that can be suitable to a wide range of people. As noted by many in the industry, many households favor this housing format due to the flexibility and affordability it offers its tenants.¹²

Similarly, multifamily investments in Westchester can be an attractive option due to their resilience in varying economic environments, diversity of unit sizes, range of price points, amenities, and commute times that rival those

⁶ Forni, Aleesia. Westchester Magazine. "Why Own When You Can Rent?" April 2019.

⁷ Cushman & Wakefield. "Market Insight: Multifamily Report Q1 2019."

⁸ Rice, Jeanette. Urban Land Institute: "State of the Multifamily Market – Macroview." 19 April 2018.

⁹ Houlihan Lawrence Commercial Group. "Commercial Market Report: First Quarter 2019." Westchester County.

¹⁰ Cushman & Wakefield. "Market Insight: Multifamily Report Q1 2019."

¹¹ Houlihan Lawrence Commercial Group. "Commercial Market Report: First Quarter 2019." Westchester County.

¹² Houlihan Lawrence Commercial Group. "Commercial Market Report: First Quarter 2019." Westchester County.

offered in developments located in popular boroughs of New York City.¹³ Market research also suggests that rising City rental prices are pushing people into the suburbs, at the same time as rising home prices, higher mortgage rates and limited availability of moderately priced homes may be turning people away from buying homes.¹⁴ As a result, multifamily buildings in the suburbs have become a favorable alternative, addressing this gap in the market.

As was the case with townhouse demand, the increase in demand for multifamily has been partially attributed to the millennial influence on lifestyle trends and social culture. CBRE research shows that millennial lifestyle trends such as delayed marriage, delayed childbearing, and preference for renting (vs. owning) for financial flexibility and mobility are likely to sustain multifamily demand in 2019.¹⁵ Davin Mellott, director at CBRE, suggests that millennials are influencing the evolution of commercial real estate, giving rise to hybrid environments, where suburban areas with urban characteristics are thriving.¹⁶ Studies suggest that the millennial population prefers to live in walkable cities and towns where they can walk or Uber to mass transit, restaurants, entertainment, retail and other services. According to the Westchester Business Journal, millennials tend to prioritize socialization outside of the home, primarily in community and amenity areas of buildings that offer diversity and cultural experiences. Thus, amenity packages have become an important aspect of marketing new housing, as amenity spaces are viewed as extensions of the square footage that tenants are renting outside of their living space, especially for multifamily products outside of downtown centers. Many multifamily developments cater to this need, in that they offer an assortment of benefits on-site and are a favorable alternative to the expenses of city life, burdens of home ownership, and seclusion of single-family suburban life.¹⁷

In recent years, there has also been a rise in demand for multifamily rental products by downsizers, who consist of Gen-Xers and baby boomers looking to move out of their homes to simplify their lifestyles. This trend is supported by real estate data that shows senior citizen renters are the fastest growing renter segment in the U.S. and that the number of renters over age 55 has increased by 28 percent.¹⁸ In addition, some baby boomers, primarily affluent empty nesters or retirees, prefer to sell their homes after their children have left, and pay rental costs to downsize their lifestyles and stay in their community. Amenity-rich, newly constructed multifamily apartment buildings are attractive offerings for this demographic due to their move-in ready and open concept apartment plans. These developments often offer

¹³ Houlihan Lawrence Commercial Group. "Commercial Market Report: First Quarter 2019." Westchester County.

¹⁴ Levy, Spencer. CBRE Research. "U.S Real Estate Market Outlook 2019."

¹⁵ Levy, Spencer. CBRE Research. "U.S Real Estate Market Outlook 2019."

¹⁶ Ibid

¹⁷ Why Own When you can Rent – Westchester Magazine. April 2019.

¹⁸ Northeast Private Client Group. "Desire for Walkability Fuels Strong Multifamily Demand."

access to amenities such as pools, gathering spaces, and cafes that provide a sense of community and culture without the burdens of home ownership.

Modern lifestyle trends have influenced the suburban commercial market, creating a demand in multifamily units that are in proximity to mass transit, jobs, and lifestyle amenities. RXR Realty's former Executive Vice President, Seth Pinsky, states that, "there's an interest in living in walkable, diverse areas with real character," allowing people the opportunity to seek diverse neighborhoods with the "amenities and convenience of urban life, but also the subdued atmosphere of Westchester."¹⁹ Multifamily investors have found opportunity to maintain strong occupancy rates and create optimal conditions to raise asking rents by investing in assets that are near mass transit and urban centers.²⁰ Though transformations to instill more walkable communities in suburban downtown centers of Westchester's most populous cities, such as Yonkers, Mount Vernon, New Rochelle, and White Plains are ongoing, other suburban locations prime for multifamily development have reversed previous policies and are now welcoming multifamily development as well. This shift is in response to the market demand as well as an attempt to curb the loss of population and employees.²¹ Multifamily developments like The Lofts on Saw Mill River, Danforth Apartments, Apex at 290, Elm, and The View on Nob Hill are examples of attractive multifamily communities that, while not directly in a hamlet center or downtown, are within driving distance to main streets and hamlet/village centers, mass transit, and highways (see **Table 13-1**).

13.B.1.c. Hotel

Currently, North Castle has one place of accommodation open to the public: La Quinta Inn & Suites, an upper midscale class, 140-room hotel located in the Westchester Business Park (see **Table 13-2**).²² Three other hotels were identified within an approximately 10-minute drive of the Project Site: Doral Arrowwood, Hyatt House White Plains, and Renaissance Westchester Hotel.

Smith Travel Research (STR, recently acquired by CoStar), the leading independent provider of hotel operating statistics data in the U.S., sought to determine the optimum occupancy for each type of hotel, with respect to profitability.²³ Using more than 5,000 hotels that submitted HOST data for 2015, and dividing hotels into segments based on full-service versus limited service, class and average daily rate (ADR), STR determined the maximum gross operating profit (GOP) when compared to occupancy percentage. Hotels classified as full service and upscale—such as Hyatt House White Plains (\$100–120 ADR)—reached a maximum GOP of 47.9 percent when

¹⁹ Zawacki, Kevin. Westchester Magazine. "Westchester 2.0: An Urban Oasis." September 2016.

²⁰ Northeast Private Client Group. "Desire for Walkability Fuels Strong Multifamily Demand."

²¹ Jordan, John. Real Estate in Depth: "Multifamily Boom Takes hold in NYC Suburbs." March 2017.

²² The IBM Learning Center in Armonk is not open to the public unless the interested party has rented out conference rooms. Therefore, this facility was not included in the hotel demand analysis.

²³ Joseph Rael, "Research: Maximizing hotel profitability potential" *Hotel News Now*. December 06, 2016, <http://www.hotelnewsnow.com/Articles/88558/Research-Maximizing-hotel-profitability-potential>. (accessed December 5, 2019).

hotel occupancy reached 75.1 percent. Hotels classified as full service and upper-upscale—such as Doral Arrowwood and Renaissance Westchester Hotel (\$140–160 ADR)—reached a maximum GOP of 39.7 percent when hotel occupancy was 84.6 percent. Hotels classified as limited-service, upper-midscale—like the La Quinta Inn & Suites (\$80–100 ADR)—reached a maximum GOP of 40.5 percent when hotel occupancy was at 71.4 percent.

The year-to-date average of hotel occupancy for the four studied hotels was 62.8 percent, approximately 12.3 percentage points lower than the optimal rate for full service, upscale hotels; 22.0 percentage points lower than the optimal rate for hotels classified as full service, and upper-upscale (the majority of the hotels studied); and 8.6 percentage points lower than the optimal rate for upper-midscale, limited service hotels. It is likely that the overall occupancy rate for the four studied hotels is affected by the underperformance of Doral Arrowwood. The 369-key hotel changed management in March 2019, and ceased operation in mid-January 2020.²⁴ Therefore, it is likely that if Doral Arrowwood was excluded from the sample, the average occupancy rate would be higher.

Compared to hotels within an approximately 15-minute drive of the Project Site, the four hotels closest to North Castle had lower occupancy rates. The 11 hotels within this larger area, inclusive of the four hotels closest to the Project Site, had a year-to-date occupancy rate as of September 2019 of 71 percent, 8.2 percentage points higher than the four hotels closest to North Castle.²⁵ The mix of hotel service and class, access to public transit, and proximity to downtown White Plains may have contributed to higher occupancy rates throughout the region.²⁶

The southern part of Westchester is experiencing a boom in hotel development due to its proximity to New York City and the Hudson Valley.²⁷ Since 2009, four new hotels have opened in Yonkers, one hotel is proposed in New Rochelle, and another in Tuckahoe. The last hotel to open in the northern part of Westchester, within the geographic area of the studied hotels, was Cambria Suites in White Plains, in 2014, which is over 30 minutes away from the southern part of Westchester. Over the last five years, the 130-room hotel has maintained a nearly 86 percent occupancy rate, indicating relatively high demand for an upscale, full service hotel.²⁸

²⁴ Bill Hetzel, “Doral Arrowwood resort saved from the brink as judge appoints a receiver” *Westfaire Communications*. March 23, 2019, <https://westfaireonline.com/112019/doral-arrowwood-resort-saved-from-the-brink-as-judge-appoints-receiver/>

²⁵ Hotels studied include upper-midscale, upper-upscale, upscale, luxury, and economy classes.

²⁶ Bill Fallon, “The Driving Force Behind Westchester’s Robust Hotel Industry,” *Westchester Magazine*, 2019, <http://www.westchestermagazine.com/914-INC/Q4-2019/Westchester-Hotel-Industry/>. (accessed December 6, 2019).

²⁷ Akiko Matsuda, “Lots of new hotels going up in Westchester. Here’s where, why” *Lohud*. October 3, 2016, <https://www.lohud.com/story/money/business/2016/10/03/westchester-hotel-construction/90692286/>. (accessed December 5, 2019).

²⁸ Bill Fallon, “The Driving Force Behind Westchester’s Robust Hotel Industry,” *Westchester Magazine*, 2019, <http://www.westchestermagazine.com/914-INC/Q4-2019/Westchester-Hotel-Industry/>. (accessed December 6, 2019).

Table 13-1
Comparable Multifamily Properties

	Developmental Name	Location	Year Built	Unit Mix	No. of Units	Average Size of Units	Stories	Property Rents	Market Values	Distance from Town Center	Distance from Train Center	Sources
1	The Lofts on Saw Mill River	425 Saw Mill River Rd, Hastings-On-Hudson, NY 10706	2016	1–3 beds with 1.5–2.5 baths	67	952–1,738 sq ft	3	1 Bed \$3,495–\$3,645 2 Beds \$3,995–\$5,445	\$9,137,100	Approximately 1-2 miles from CVS Plaza, Ardsley Shopping Plaza, and Ardsley Mall	Hastings-on-Hudson Station – 2.3 mi Dobbs Ferry Station – 3.2 mi Scarsdale Station – 2.6 mi	Trulia.com, ApartmentFinder.com, 2019 Tax Roll
2	Danforth Apartments	100 Danforth Ave, Dobbs Ferry, NY 10522	2017	1–2 beds with 1–2 baths	203	802–1,328 sq ft	4	1 Bed \$2,603+ 2 Beds \$3,752+	\$42,894,100	Approximately 2-3.5 miles from town center	Dobbs Ferry Station – 2 mi Ardsley-on-Hudson Stations – 2 mi	ApartmentFinder.com, 2019 Tax Roll
3	Apex at 290	290 E Main St, Elmsford, NY 10523	2016	1–2 beds with 1–2 baths	81	838–1,316 sq ft	4	1 Bed \$2,499+ 2 Beds \$3,220+	\$20,094,700	Approximately 0.8-2.5 mi from Elmsford Center/Plaza, Rosemont Plaza, Premier Plaza, White Plains Mall/Shopping Center, and Greenville Center	White Plains Station – 2.8 mi North White Plains Station – 2.9 mi	ApartmentFinder.com, 2019 Tax Roll
4	Elm	35 Valley Ave, Elmsford, NY 10523	2018	studio, 1–2 bed apartments	94	543–1,418 sq ft	4	1 Bed \$2,366+ 2 Beds \$3,200+	\$14,009,600	Approximately 2.7 mi from Starbucks, 2.6 mi from Trader Joes, and 3.8 mi from Whole Foods Right off Saw Mill River Parkway and close to Main Street	White Plains Station – 3.5 mi Irvington Station – 4 mi Tarrytown Station – 4mi	Realtor.com, RentElm.com, Rentcafe.com, 2019 Tax Roll
5	The View on Nob Hill	32 Nob Hill Dr., Elmsford, NY 10523	1993	1–3 beds with 1–2 baths	417	652–1,304 sq ft	2	1 Bed \$1,875 2 Beds \$2,186+	\$906,700	Approximately 1-4 mi from Greenberg Shopping Center, 1.8 mi from Rosemont Plaza, 2.5 mi from Parkway Plaza, 3.2 mi from Ardsley Shopping Plaza, and 3.5 mi from Scarsdale Center/Mall	Tarrytown Station – 3.7 mi North White Plains Station – 4 mi	Apartments.com, Trulia.com, 2019 Tax Roll

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Table 13-2

Hotels within 10-Minute Drive Time of Project Site

Name of Establishment	City and State	Zip Code	Class	Open Date
La Quinta Inns & Suites Armonk Westchester County Airport	Armonk, NY	10504	Upper Midscale	Jan 1973
Doral Arrowwood	Rye Brook, NY	10573	Upper Upscale	Jun 1983
Hyatt House White Plains	White Plains, NY	10604	Upscale	Jan 2000
Renaissance Westchester Hotel	West Harrison, NY	10604	Upper Upscale	Apr 1981
Source: STR, Trend Report: Westchester Hotels, January 2013—September 2019, Created October 25, 2019				

North Castle’s 2018 Comprehensive Plan calls for an additional 300 rooms to enter the hotel market, based on analysis of hotel rooms per Management Professional Employee employed.²⁹ This metric was used by the Town of North Castle because almost all hotel demand in Westchester can be attributed to business travelers. The 2018 Comprehensive Plan posits that if 300 rooms were to be added within North Castle, the ratio of rooms per worker would increase to that of White Plains (using 2014 employment data). A recent EIS completed in August 2019 and currently undergoing review by the Town—Eagle Ridge—proposes a boutique 91-key hotel, described as “highly amenitized.” The addition of another 125-key hotel, as proposed by the Applicant, would not exceed the proposed room range determined by the 2018 Comprehensive Plan, thus satisfying demand within North Castle’s hotel sector, especially given the Project Site’s proximity to Westchester County Airport.

13.B.2. PROJECT SITE TAX REVENUES (DEIS)

The Project Site has an existing assessed value of \$1,146,000.³⁰ The 2019 property tax rate for the Town of North Castle is 169.52 per \$1,000 assessed value; the 2019 property tax rate for the Byram Hills Central School District is 700.69 per \$1,000 assessed value; and the 2019 property tax rate for Westchester County is 140.39 per \$1,000 assessed value.

According to 2019 property tax bills, the property taxes paid on the three tax parcels that comprise the Project Site totaled \$1,230,656, including \$802,991 in taxes to the Byram Hills Central School District. Using the assessed value and the mill rates listed above, AKRF estimates that, of the total taxes generated by the site in 2019, approximately \$194,275 was generated for the Town of North Castle, and \$160,885 was generated for Westchester County. In addition, the Project Site generated approximately \$72,505 in special district taxes, including \$22,607 for the Fire and Ambulance Districts.

The office buildings on the Project Site are currently vacant and have been for approximately the past five years.³¹ During this time, the assessed value of the Project

²⁹ The Comprehensive Plan Steering Committee, *The Town of North Castle Comprehensive Plan*, 2018, North Castle: Town of North Castle, 2018. <https://politics.ucsc.edu/undergraduate/chicago%20style%20guide.pdf>

³⁰ The existing assessed value is inclusive of the assessed values all three tax parcels included in the Project Site, as defined in Chapter 2, “Project Description.”

³¹ Cary, Bill. Lohud. “Former MBIA Headquarters has been Sold.” May 2015.

Site has not decreased. In the absence of re-occupancy of the existing buildings or redevelopment, it is likely that the assessed value of the Project Site and, consequently, the taxes paid on the Project Site, would decrease in the future as a result of the continued vacancy.

As the Project Site is currently vacant, it does not generate sales tax revenue for New York State or other entities.

13.B.3. CONDITIONS IN THE DOB-20A (GEIS)

The tax parcel occupied by Swiss Re Life and Health America at 175 King Street has an assessed value of \$1,787,920. The assessed value of the parcel has decreased by approximately 39 percent since 2016 when it had an assessed value of \$2,908,200 (see **Table 13-3**). According to 2019 tax bills, the taxes paid on the property were \$2,170,098, including \$1,413,994 to the Byram Hills Central School District. The tax parcel generated approximately \$342,101 to the Town of North Castle, \$283,302 to Westchester County, and approximately \$130,702 to special districts.³²

Table 13-3
Assessed Value of the Swiss Re Parcel

	2016	2017	2018	2019
Assessed Value	\$2,908,200	\$2,908,200	\$2,018,000	\$1,787,920
Source: Town of North Castle Tax Final Tax Roll 2016, 2017, 2018, 2019				

13.C. POTENTIAL IMPACTS OF THE PROPOSED PROJECT (DEIS)

AKRF, Inc. estimated construction period and annual operational economic benefits to the local economy resulting from the Proposed Project. The Proposed Project includes approximately 225,465 gross square feet (gsf) of multifamily residential development (149 units) in five floors positioned above three floors of structured parking (approximately 134,470 gsf); approximately 67,760 gsf of attached townhouse development (22 units); approximately 100,000 gsf of office space (within an existing vacant building); and a 125-key, limited-service hotel (161,000 gsf to be converted from an existing vacant office building).

13.C.1. METHODOLOGY

To estimate the construction period and annual operational economic and fiscal benefits of the Proposed Project, AKRF conducted an economic impact analysis using IMPLAN (Impact Analysis for PLANing), an economic input-output modeling system. IMPLAN was developed by the U.S. government and subsequently privatized by professors at the University of Minnesota. IMPLAN uses the most recent economic data from sources such as the U.S. Bureau of Economic Analysis, the U.S. Bureau of Labor Statistics, and the U.S. Census Bureau to predict effects on the local economy from changes in direct non-payroll expenditures and employment (e.g., during annual operation). The model contains zip code level and Westchester County data for 536 economic sectors, showing how each sector affects every other sector as a result of a change in the quantity of its product or service.

³² Tax allocation to Town of North Castle, Westchester County, and Special Districts is estimated based on 2019 mill rates.

Using IMPLAN terminology, the following reporting categorizes total economic impacts into three components:

1. Direct effects represent the initial benefits to the economy of a specific new investment; e.g., including on-site employment (during construction and operations) and associated labor income.
2. Indirect effects represent the benefits generated by industries purchasing from other industries as a result of the direct investment. For example, indirect employment resulting from the Proposed Project's operational expenditures would include jobs in industries that provide goods and services to the proposed residences and businesses.
3. Induced effects represent the impacts caused by increased household income in a region. Direct and indirect effects generate more worker income by increasing employment and/or salaries in certain industries. Households spend some of this additional income on local goods and services, such as food and drink, recreation, and medical services.

13.C.2. INPUTS AND ASSUMPTIONS

13.C.2.a. Construction

The Proposed Project would generate approximately \$137.28 million in total construction costs into the local economy, including hard and soft costs, excluding costs for land acquisition, financing, and escalation (see **Table 13-4**). Hard costs include construction materials and labor. Soft costs include fees for architecture and engineering, legal, and environmental consulting services.

AKRF assigned the construction expenditures to IMPLAN sectors that most closely matched the description of the type of construction. The construction dollars by sector provided the inputs into the model, from which the direct, indirect, and induced benefits to the Town of North Castle (Zip Code 10504) and the surrounding region (Westchester County) during the construction period were derived.

13.C.2.b. Annual Operations

The Proposed Project is estimated to result in approximately 473 full- and part-time jobs annually during operations (see **Table 13-5**), or approximately 5 percent of the Town's total employment.³³ These jobs would be distributed across several industry sectors including the following: professional, scientific, and technical services (approximately 400 employees); administrative, support, waste management, remediation, and other services (approximately 10 employees); and accommodation and food services (approximately 63 employees).

³³ The Town of North Castle (10504) employs approximately 9,893 full- and part-time employees based on 2017 IMPLAN data.

Table 13-4

Construction Period Modeling Assumptions

IMPLAN Sector	Description	Cost
57	Construction of new commercial structures ¹	\$25,549,300
58	Construction of other new nonresidential (non-building) ²	\$6,415,425
59	Construction of new single-family residential structures ³	\$9,147,600
60	Construction of new multifamily structure	\$42,838,350
62	Maintenance and repair nonresidential construction ⁴	\$35,420,000
447	Legal Services (50% in Westchester Less 10504)	\$5,968,534
449	Architecture and Engineering (50% in Westchester Less 10504)	\$5,968,534
455	Environmental Consulting (100% in Westchester Less 10504)	\$5,968,534
Total Hard and Soft Construction Costs		\$137,276,277
Notes: Hard and soft costs were modeled in a zip-code based Town of North Castle model in IMPLAN, except where otherwise noted. ¹ Parking garage ² Site improvements ³ Townhomes ⁴ Renovation and conversion of existing office building for hotel Sources: AKRF, December 3, 2019; Costs provided by the Applicant		

Table 13-5

Annual Operational Period Modeling Assumptions

IMPLAN Sector	Description	Employees
468	Services to buildings (e.g., residential cleaning services/maintenance workers)	6
469	Landscape and horticultural services	1
512	Personal services (includes garage attendants)	3
440, 449, 438, 448	Real estate, Architectural, Accounting, Insurance	400
499	Hotels	63
Total Annual Operational Jobs		473
Note: Estimated employment was derived based on the size of the proposed use and industry employment ratios from comparable projects in Westchester County. Source: AKRF, December 3, 2019		

13.C.3. CONSTRUCTION PERIOD FISCAL IMPACTS

Key project-generated construction benefits to the local economy are summarized herein and presented in **Table 13-6**.

- Total direct construction employment in the Town of North Castle is estimated at 565 person-years. Jobs would include onsite construction managers and workers as well as direct employment in support industries, such as architecture and engineering and legal services.
- Indirect and induced economic activity that occurs off-site as a result of the Proposed Project's construction is estimated at 179 person-years, for a total construction employment of 568 person-years in the Town of North Castle and 821 person-years in Westchester County.
- Direct labor income (on- and off-site) is equal to about \$65.75 million. Including indirect and induced activity that occurs off-site, total labor income from the Proposed Project during construction is estimated at \$56.72 million in the Town of North Castle and \$79.75 million in Westchester County.

- The direct output to the local economy (i.e., the value of production) is \$137.28 million. Including indirect and induced activity, the Proposed Project's total annual output to the local economy is estimated at \$125.92 million in the Town of North Castle and \$170.65 million in Westchester County overall.
- AKRF estimated sales tax on construction materials from the Proposed Project at \$6.71 million annually, including \$2 million for the Town of North Castle, \$1.91 million for Westchester County, \$0.3 million for Metropolitan Transportation Authority (MTA), and \$3.21 million for New York State.

**Table 13-6
Estimated Construction Benefits**

	In Town of North Castle	In Westchester County Total
Employment (Person-Years) ¹		
Direct	565	642
Indirect	2	150
Induced	1	29
Total	568	821
Labor Income ² (millions of 2019 dollars)		
Direct	\$56.45	\$65.75
Indirect	\$0.25	\$12.03
Induced	\$0.02	\$1.97
Total	\$56.72	\$79.75
Output ³ (millions of 2019 dollars)		
Direct	\$125.34	\$137.28
Indirect	\$0.53	\$28.08
Induced	\$0.05	\$5.29
Total	\$125.92	\$170.65
Taxes ⁴ (millions of 2019 dollars)		
Town	\$2.23	
County	\$1.91	
State	\$5.42	
Total	\$9.56	
Notes:		
¹ IMPLAN reports employment in full- and part-time jobs. AKRF converted employment to person-years using IMPLAN's conversion rates for converting IMPLAN's employment to full-time equivalents. One person-year is the equivalent of one person working full-time for a year.		
² Labor income includes employee compensation and proprietor income.		
³ Output is the total value of industry production and is inclusive of all taxes. For manufacturing industries output includes sales plus/minus change in inventory; for service sector industries, output is total sales; for retail and wholesale trade industries, output is gross margin.		
⁴ Includes all non-property related direct, indirect, and induced taxes paid to the Town of North Castle and Westchester County (including special districts) and New York State (e.g., payroll, sales, corporate, personal, and other taxes).		
Sources: The 2017 IMPLAN model and AKRF, December 3, 2019		

13.C.4. OPERATIONAL PERIOD FISCAL IMPACTS

The Proposed Project's estimated economic benefits during annual operations are presented in **Table 13-7**. This analysis has identified the following principal points regarding the Proposed Project's economic benefits to the local economy during the annual operational period:

- Total direct (on-site) annual employment is estimated at 473 full- and part-time jobs. Jobs would include residential building maintenance workers, landscapers, office employees, parking garage attendants, and hotel employees.
- Including the indirect and induced economic activity that occurs off-site, total annual employment from the Proposed Project is estimated at 477 full- and part-time jobs in the Town of North Castle and 627 employees in Westchester County.
- Direct annual labor income (on-site) is equal to about \$39.19 million. Including indirect and induced activity that occurs off-site, total employee compensation from the Proposed Project is estimated at \$39.46 million in the Town of North Castle and \$50.81 million in Westchester County.
- The direct annual output to the local economy, measured as sales or revenues, is \$89.12 million. Including indirect and induced activity, the Proposed Project's total annual output to the local economy is estimated at \$89.85 million in the Town of North Castle and \$118.98 million in Westchester County.
- Revenue from the proposed hotel is estimated at approximately \$5 million annually. Westchester County and the Town of North Castle each impose a 3 percent hotel occupancy tax (estimated at approximately \$158,000 to each annually).

Table 13-7
Estimated Annual Operations Benefits

	In Town of North Castle	In Westchester County Total
Employment (Full- and Part-Time Jobs)		
Direct ¹	473	473
Indirect	3	148
Induced	1	6
Total	477	627
Labor Income ¹ (millions of 2019 dollars)		
Direct	\$39.19	\$39.19
Indirect	\$0.26	\$11.24
Induced	\$0.01	\$0.38
Total	\$39.46	\$50.81
Output ² (millions of 2019 dollars)		
Direct	\$89.12	\$89.12
Indirect	\$0.69	\$28.85
Induced	\$0.04	\$1.01
Total	\$89.85	\$118.98
Taxes ³ (millions of 2019 dollars)		
Town	\$0.23	
County	\$0.43	
State	\$1.83	
Total	\$2.49	
Notes:		
¹ Labor income includes employee compensation and proprietor income.		
² Output is the total value of industry production and is inclusive of all taxes. For manufacturing industries, output includes sales plus/minus change in inventory; for service sector industries, output is total sales; for retail and wholesale trade industries, output is gross margin.		
³ Includes all non-property related direct, indirect, and induced taxes paid to the Town of North Castle and Westchester County (including special districts) and New York State (e.g., payroll, sales, hotel, corporate, personal, and other taxes).		
Sources: The 2017 IMPLAN model and AKRF, December 3, 2019.		

13.C.4.a. Property Taxes

The estimated taxable assessed property value of the Proposed Project would be \$1.56 million, as shown in **Table 13-8**. This is a 36 percent increase from the Project Site's current assessed value. The future assessed value was determined using an income-based approach for the office, multifamily, and hotel portions of the Proposed Project. The income-based approach estimates annual net operating income based on average rents, room rates, other sources of revenue, industry-standard operational expenses, and the amount expected to be earned (capitalization rate).

Table 13-8
Taxable Assessed Property Value

Use	Taxable Assessed Value
Office	\$182,134
Multifamily	\$536,548
Town Homes	\$489,391
Hotel	\$354,472
Total	\$1,562,545
Notes: Equalization rate of 2.3 percent. Assessed value is for the purpose of environmental review and is not binding. Actual assessed property value would be determined by the Town of North Castle Assessor. Source: AKRF, Inc., December 2019.	

The assessed value of the townhomes was determined by comparing the property to similar properties in the Town of North Castle (see **Appendix I-1, Table I-1-1**). As required, it was assumed that 10 percent of townhomes would be affordable for households at 80 percent area median income (AMI). Multifamily rent was assumed to be approximately \$2,500 for a one-bedroom and \$3,200 for a two-bedroom. Multifamily rents were determined based on the average listing price for apartments in comparable multifamily buildings in Westchester. As required, 10 percent of apartments were assumed to be affordable for households at 60 percent AMI. For the office building, total rent paid (including any common area maintenance or other fees) was assumed to be approximately \$30 per sf. Office rent was determined based on listings for other office buildings in Armonk and the current listed rents for the existing office property. For the hotel, the average room rate was assumed to be approximately \$154. All assumptions for the hotel were based on data from STR on local hotel performance (see **Appendix I-2 and I-3**).

As shown in **Table 13-9**, the Proposed Project would generate approximately \$1.67 million in property tax revenue annually to various taxing jurisdictions. The Proposed Project would generate approximately \$264,890 for the Town of North Castle, \$1.09 million for the Byram Hills School District, and \$219,362 for Westchester County. The Fire and Ambulance Districts would receive \$30,825 of property tax revenue, a portion of the "Special Districts" revenue listed in **Table 13-9**. Net new tax revenue, above existing conditions, from the Project Site would total \$439,730, including \$70,615 to the Town of North Castle, \$291,870 to the Byram Hills Central School District, \$58,477 to

Westchester County, and \$8,217 to the Fire and Ambulance Districts. As noted above, in the Future with or without the Proposed Project, the Project Site is not anticipated to continue generating the existing amount of property taxes as it is likely that the assessed value of the Project Site would decline in a manner similar to what occurred on the Swiss Re site.

**Table 13-9
Estimated Property Tax Revenue**

Taxing Jurisdiction	Existing Tax Payments	Estimated Tax Payment with Proposed Project¹	Net New Tax Revenue
Town of North Castle	\$194,275	\$264,890	\$70,615
Byram Hills Central School District	\$802,991	\$1,094,861	\$291,870
Town of North Castle Special Districts	\$72,505	\$91,273	\$18,768
Westchester County	\$160,885	\$219,362	\$58,477
Total	\$1,230,656	\$1,670,386	\$439,730³
Notes: ¹ Estimated tax payments are for the purpose of environmental review and are not binding. Actual tax levy would be determined by the Town of North Castle Assessor. ² Total Special District taxes include Fire District #2, Ambulance District #2, Blind Brook Sewer District, and Sewer District #3. The increase in taxes to Sewer District #3 from the Proposed Project cannot be calculated as this payment varies by parcel. For the purposes of a conservative analysis, the estimate of Special Districts taxes for the Proposed Project assumes that the taxes paid to Sewer District #3 would be equal to the existing taxes, though it is likely that taxes would increase. ³ Total shown does not reflect hotel occupancy taxes estimated at \$158,000 annually (refer to Section 13.C.4) Source: Westchester County Property Tax Rates			

13.D. MITIGATION MEASURES FOR THE PROPOSED PROJECT (DEIS)

The Proposed Zoning would permit a wider range of uses on the Project Site, increasing the economic viability of development on the Project Site that could maintain or increase property tax payments to the Town. The Proposed Project would transform an underutilized property that is currently improved for a singular, outdated use into a mixed-use development that would strengthen the economic viability and vitality of each separate use proposed. As the Proposed Project would increase the tax revenue received by the Town by more than \$300,000 per year (inclusive of real estate and hotel tax) and would increase the tax revenue to the school district by \$670,248 per year, no further mitigation is proposed.

13.E. POTENTIAL IMPACTS OF, AND MITIGATION FOR, THE PROPOSED ZONING (GEIS)

As described in Chapter 2, "Project Description," the theoretical maximum development scenario under the Proposed Zoning, when accounting for the maximum buildout potential of both the Project Site and the adjacent Swiss Re parcel, is a total of 750 residential units and an 80-room hotel. It is important to note that no specific proposal is being made at this time to effectuate the maximum hypothetical development of these two sites and any future plans would be subject to review by the Town, including a full environmental review.

As stated above, The Proposed Zoning would permit a wider range of uses within the DOB-20A zoning district, increasing the economic viability of development within the district. New development has the potential to maintain or increase property tax payments to the Town from the current condition and the condition that could occur if the Project Site continues to remain vacant

and the Swiss Re parcel continues to experience declining assessed value. The extent of future property and/or hotel tax benefits to the Town and other taxing jurisdictions would be dependent on the specific program and site plan(s) proposed. *

14.A. INTRODUCTION

This chapter considers the potential of the Proposed Action to affect cultural resources, which include both architectural and archaeological resources, on the Project Site and in the surrounding study area.

As described below, as there are no properties that are listed on or determined eligible for listing on the State or National Register of Historic Places (S/NR) on the Project Site or in the surrounding study area, in the Applicant's opinion, the Proposed Project would have no significant adverse impacts on historic architectural resources. With regard to archaeological resources, the Phase 1A Archaeological Documentary Study prepared for the Project Site recommended Phase 1B archaeological testing in the northern portion of the Project Site. With the completion of the Phase 1B Archaeological Investigation and any subsequent archaeological investigations that may become necessary (e.g., a Phase 2 Survey/Evaluation or a Phase 3 Mitigation/Data Recovery) and continued consultation and coordination with the New York State Office of Parks, Recreation, and Historic Preservation during all phases of archaeological work, it is the Applicant's opinion that the Proposed Project will not result in an adverse impact on archaeological resources.

14.B. EXISTING CONDITIONS**14.B.1. HISTORIC ARCHITECTURAL RESOURCES (DEIS)***14.B.1.a. Project Site*

As per the New York State Office of Parks, Recreation and Historic Preservation Office (OPRHP)'s Cultural Resource Information System (CRIS), there are no properties listed on or formally determined eligible for listing on the State/National Register of Historic Places (S/NR) on the Project Site.¹ The Project Site is the former location of the Municipal Bond Insurance Association's (MBIA) corporate headquarters and is occupied by two currently vacant three-story office buildings, an early- to mid-20th century farmhouse and recent accessory shed/garage (used for storage and maintenance purposes), surface parking lots and tennis courts, and a three-story parking structure. The office buildings, parking garage, and smaller garage were constructed between the early 1980s through the early part of the 21st century and do not possess historical or architectural significance.

The farmhouse was constructed in the early- to mid-20th century and is located just north of the large three-story parking structure that is located at the south end of the Project Site. The farmhouse is a wood frame structure

¹ <https://cris.parks.ny.gov>

with a gable roof and clad in wood clapboards. A wood porch fronts along its primary east (King Street) elevation; there are carvings on the wood posts. The house is set on a raised rubble stone foundation, with a cedar shake roof. The interior retains original features such as wide wood plank floors and original wood staircase. The house has also been altered, including a modern kitchen and removal of original features such as fireplace and mantel in the living room. Information regarding the history of the farmhouse, which is associated with the Griffin (or Griffen) family, and photographs of the building are located in **Appendix J-1**, which contains information provided to OPRHP so that OPRHP could make a determination regarding the significance of the farmhouse.²

The farmhouse originally had a barn or shed located directly west of it. The barn or shed was demolished sometime between 1976 and 1990 and a new and larger garage with four vehicular doors was built in roughly the same location as the barn or shed by 2000. This garage has a concrete foundation with stone facing, and is clad in wood clapboards with a cedar shake roof and centrally located cupola.

The setting of the farmhouse has been substantially altered through its incorporation into the MBIA corporate headquarters, including removal of the original barn or shed, construction of a surface parking lot west of the garage, and construction of the large three-story parking structure directly south of it.

In a letter dated August 7, 2019, the New York State Historic Preservation Office (SHPO) determined that the farmhouse “is not eligible for listing on the National Register of Historic Places due to significant loss of integrity, most notably the setting, design, feeling and association. The house was formerly part of a complex that included outbuildings and fields that would’ve conveyed the historic agricultural context of the property. In its present state the remaining farmhouse is simply a fragment of a larger resource and does not on its own possess the significance required to be considered eligible for the National Register” (see **Appendix J-2**).

A mortared stone retaining wall is located south of the house, in proximity to the parking garage. There are also rubble stone walls along the west side of King Street, bordering the east end of the Project Site; along the south side of Cooney Hill Road bordering the north end of the Project Site; along the west side of the Project Site; along the south side of the Project Site; and with additional rubble stone walls located in the vicinity of the existing tennis courts and also potentially remaining in the locations of residential properties, which have been demolished, which were located at the north end of the Project Site.

² AKRF spoke with Sharon Tomback at the North Castle Historical Society to discuss the farmhouse and whether there were any other properties of significance in the area; no additional properties of significance were identified (personal communication, July 8, 2019).

14.B.1.b. Study Area and DOB-20A Zoning District

There are no properties listed on, or determined eligible for listing on, the S/NR within ½-mile of the Project Site or within the remainder of the DOB-20A zoning district.³ Properties in the study area include a residence on the south side of Cooney Hill Road built between 1953 and 1960 as part of a larger subdivision of houses that are no longer extant. The Swiss Re Life and Health America complex to the north of Cooney Hill Road was built between 1990 and 2000, and appears to have retained two earlier structures related to earlier development on the property, but these are fragments of the original development. DEP's Shaft Site 17 building, which was completed between 1937 and 1942 as part of the construction of the Delaware Aqueduct, is within ½-mile of the Project Site but was determined by OPRHP as not eligible for listing on the State/National Registers in 2003.⁴ Across King Street, the Citigroup Armonk Conference Center was built sometime between 1990 and 2001.

14.B.2. ARCHAEOLOGICAL RESOURCES (DEIS)

Pursuant to Section 14.09 of the New York State Historic Preservation Act, consultation was initiated with OPRHP. In a comment letter dated September 26, 2018 (see **Appendix J-2**), OPRHP determined that a Phase 1 Archaeological Survey should be completed for those portions of the Project Site that would experience ground disturbance as a result of the Proposed Action unless prior disturbance could be documented within the Project Site. A Phase 1A Archaeological Documentary Study ("Phase 1A Study") of the Project Site was prepared by AKRF in August 2019 pursuant to OPRHP's request.⁵ While a Phase 1 Archaeological Survey typically includes a combination of documentary research (i.e., "Phase 1A") and field testing (i.e., "Phase 1B"), this report summarizes the results of extensive documentary research designed to identify areas of potential archaeological sensitivity where Phase 1B Archaeological Testing will be necessary to confirm the presence or absence of archaeological resources and the need for additional phases of analysis as necessary. The conclusions of the Phase 1A Study are summarized below. In a comment letter dated August 28, 2019, OPRHP concurred with the conclusions and recommendations of the Phase 1A Study (see **Appendix J-2**).

14.B.2.a. Precontact Archaeological Sensitivity

In general, Native American habitation sites in the northeastern United States are correlated with level topography (typically less than 12 to 15 percent slopes), access to natural resources such as fresh water and lithic source material, and well-drained soils. The potential presence of Native American

³ <https://cris.parks.ny.gov>

⁴ *Phase 1A Archaeological Investigation of the Delaware Aqueduct Shaft 17 Project Area, Town of North Castle, Westchester County, New York*, prepared by Malcolm Pirnie, Inc. March 2004, page 41, and January 24, 2003 letter from OPRHP contained in Appendix A of that report.

⁵ AKRF, Inc. (2019): "Proposed Redevelopment of 113 King Street; Tax Map Parcels 118.02-1-1, 113.04-1-13, and 113.04-1-14; Town of North Castle, Westchester County, New York: Phase 1A Archaeological Documentary Study." Revised August 2019. Prepared for: Airport Campus I-V LLC; Pound Ridge, NY (**Appendix J-1**).

activity near a project site can also be predicted by the presence of previously identified resources in the vicinity. However, precontact archaeological sites tend to be relatively shallow, often within five feet of the original ground surface. As documented in the Phase 1A Study, multiple Native American sites used for short- and long-term occupation were previously reported in the vicinity of Rye Pond, which was historically located a short distance to the south of the Project Site. It is therefore highly likely that some Native American activity occurred on the more level portions of the Project Site (i.e., those areas with slopes less than 12 percent). In the vicinity of the former MBIA campus, the original ground surface appears to have been extensively disturbed as a result of the construction of the existing office buildings, the large decorative pond, infrastructure, and other features such as tennis courts. That portion of the site was determined to have no sensitivity for precontact archaeological resources. However, portions of the ground surface in the northern portion of the site have been disturbed as a result of the construction and demolition of homes. The extent to which these level areas were disturbed could not be documented. Therefore the northern portion of the Project Site (see **Figure 14-1**) was determined to have low to moderate sensitivity for precontact archaeological resources.

14.B.2.b. *Historic Period Sensitivity*

The earliest map-documented structure on the Project Site was located at its southern end and may be the same farmhouse that is currently located on the former MBIA campus. Several outbuildings (e.g., sheds or barns) are known to have been situated in the vicinity of the house in the late 19th and early 20th centuries. Other farm-related structures were located along the western side of King Street in the northern portion of the Project Site. Prior to the construction of residential homes on the property in the late-20th century, the northern portion of the Project Site was occupied almost entirely by farmland and orchards. The areas of highest historic period archaeological sensitivity, in the vicinity of the former MBIA campus, are also the most disturbed. The area surrounding the historic farmhouse on the property is determined to have low to moderate sensitivity for 18th or 19th century shaft features (e.g., privies, cisterns, or wells) that would have been used by the residents of the home before the advent of indoor plumbing and septic systems. Such features were often filled with domestic refuse following the period of their active use. The area immediately surrounding the Project Site is not expected to be impacted as a result of the Proposed Project. The remainder of the site is determined to have low sensitivity for historic period archaeological resources.

14.C. POTENTIAL IMPACTS OF THE PROPOSED PROJECT (DEIS)

14.C.1. HISTORIC ARCHITECTURAL RESOURCES

As there are no properties that are listed on or determined eligible for listing on the S/NR on the Project Site or in the study area, the Proposed Project would have no adverse impacts on historic architectural resources.

The stone walls at the perimeter of the Project Site, including along King Street, Cooney Hill Road, and on the south and west sides of the Project Site would not be affected by the Proposed Project. It is anticipated that portions of the stone walls at the locations of the existing tennis courts, and if existing on the former residential properties at the north end of the Project Site, would need to be removed. The stone from these walls would be salvaged and reused elsewhere on the Project Site to repair the perimeter stone walls or would be utilized elsewhere in the landscaping plan.

14.C.2. ARCHAEOLOGICAL RESOURCES

The Phase 1A Study recommended Phase 1B archaeological testing in the northern portion of the Project Site as indicated on **Figure 14-1**. Phase 1B archaeological testing includes conducting test pits within areas of potential disturbance to determine the presence or absence of significant archaeological resources. This analysis is only required to be conducted in areas within which a specific construction program could disturb potential resources; it is not conducted to proactively identify potential resources. The testing would be designed to confirm the presence or absence of precontact archaeological resources within the Project Site. Testing was not recommended in areas that have been graded or paved or in areas with slopes greater than 12 percent.

It was recommended that the Phase 1B testing be implemented in the northern portion of the Project Site once the Applicant is prepared to seek site plan approval from the Town and the project design and limits of disturbance are finalized. This would allow testing locations to be determined based on the location of project impacts as compared to areas of known disturbance. No testing was proposed in the vicinity of the historical farmhouse. However, if project plans change that would result in more substantial disturbance (e.g., greater than 1.5 to 2 feet below the existing ground surface) to the areas in immediate proximity of the farmhouse, archaeological testing might be needed in consultation with OPRHP. In a comment letter dated August 28, 2019, OPRHP concurred with the conclusions and recommendations of the Phase 1A Study (see **Appendix J-2**).

With the completion of the Phase 1B Archaeological Investigation and any subsequent archaeological investigations that may become necessary (e.g., a Phase 2 Survey/Evaluation or a Phase 3 Data Recovery) and continued consultation and coordination with OPRHP during all phases of archaeological work, it is the Applicant's opinion that the Proposed Project would not result in an adverse impact to archaeological resources.

14.D. MITIGATION MEASURES FOR THE PROPOSED PROJECT (DEIS)

14.D.1. HISTORIC ARCHITECTURAL RESOURCES

As the proposed project would have no adverse impact on historic architectural resources, no mitigation measures would be required.

14.D.2. ARCHAEOLOGICAL RESOURCES

As described previously, the Phase 1A Study recommended Phase 1B archaeological testing in the northern portion of the Project Site as indicated on **Figure 14-1**. Phase 1B archaeological testing includes conducting test pits within areas of potential disturbance to determine the presence or absence of significant archaeological resources. This analysis is only required to be conducted in areas within which a specific construction program

could disturb potential resources. With the completion of the Phase 1B Archaeological Investigation and any subsequent archaeological investigations that may become necessary (e.g., a Phase 2 Survey/Evaluation or a Phase 3 Mitigation/Data Recovery) and continued consultation and coordination with OPRHP during all phases of archaeological work, it is the Applicant's opinion that the Proposed Project will not result in impacts on archaeological resources.

14.E. POTENTIAL IMPACTS OF, AND MITIGATION FOR, THE PROPOSED ZONING (GEIS)

As described in Chapter 2, "Project Description," the theoretical maximum development scenario under the Proposed Zoning, when accounting for the maximum buildout potential of both the Project Site and the adjacent Swiss Re parcel, is a total of 750 residential units and an 80-room hotel.

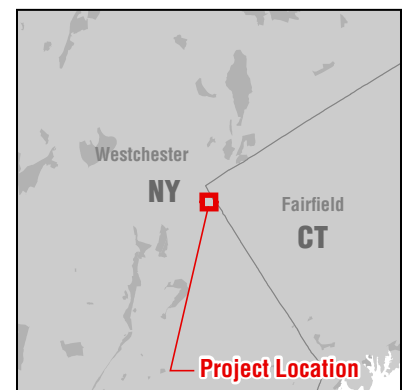
It is important to note that no specific proposal is being made to effectuate this maximum, hypothetical, development. If, in the future, a specific plan was developed for either of these two parcels that differs from what is outlined above, the Town would be required to conduct a separate environmental analysis of that project in connection with the discretionary actions to be sought (e.g., site plan and special permit approvals).

As noted above, there are no historic architectural properties listed on or determined eligible for listing on the S/NR within ½-mile of the Project Site or within the remainder of the DOB-20A zoning district. The Swiss Re complex was built between 1990 and 2000, and appears to have retained two earlier structures related to earlier development on the property, but these are fragments of the original development.

In terms of archaeological resources, any future development plans for the Swiss Re parcel pursuant to the Proposed Zoning, as well as any future development plans for the Project Site pursuant to the Proposed Zoning in excess of the current PDCP, would be subject to consultation with OPRHP as required under SEQRA.

With regard to the Project Site, it is likely that the limits of disturbance and extent of new building footprints necessary to provide up to 500 units of housing would be beyond what has been established for the Proposed Project, and it is likely that OPRHP would require an update to the Proposed Project's Phase 1A Study. Similar to the Proposed Project, recommendations for a Phase 1B investigation would likely apply under this scenario, particularly with regard to the archaeological sensitivity of the northern portion of the Project Site as well as the area around the historic farmhouse—areas which may be subject to more disturbance than what has been identified for the Proposed Project. Completion of the Phase 1B Archaeological Investigation and any subsequent archaeological investigations that may become necessary (e.g., a Phase 2 Survey/Evaluation or a Phase 3 Mitigation/Data Recovery) would depend on the nature of the redevelopment program.

According to CRIS and the New York State Department of Environmental Conservation's Environmental Resources Mapper, the Swiss Re parcel is located within an area of potential archaeological sensitivity. Redevelopment of the Swiss Re parcel pursuant to the Proposed Zoning would therefore be subject to consultation with OPRHP, and a Phase 1A Study would be required as a first step in OPRHP's review. Subsequent OPRHP review of additional studies, identification of potential impacts, and any mitigation measures deemed necessary would depend on the findings of the Phase 1A Study. *



Area of Archeological Sensitivity
Figure 14-1

15.A. INTRODUCTION

This chapter analyzes the potential for the Proposed Action to impact ambient air quality from stationary sources (e.g., fossil fuel-fired equipment) and from mobile sources (i.e., traffic generated by the Proposed Project). As the new buildings included in the Proposed Project have not yet been fully designed, the fuel source for the heating, ventilation, and air conditioning (HVAC) systems has not yet been determined. Therefore, for purposes of analyzing the worst-case impacts to air quality, this analysis conservatively assumes that the proposed residential uses (multifamily building and townhomes) would utilize distillate fuel oil-fired HVAC systems.

In addition to air quality impacts generated by stationary sources, the Proposed Project would result in Project-generated traffic that would affect traffic conditions within the area of the Site (see Chapter 10, “Traffic and Transportation”). The potential for mobile source air quality impacts from the Proposed Project was analyzed using the screening procedures found in the New York State Department of Transportation’s (NYSDOT) *The Environmental Manual (TEM)*.

State Environmental Quality Review Act (SEQRA) regulations state that the significance of a predicted consequence of a project (i.e., whether it is material, substantial, large, or important) should be assessed in connection with its setting (e.g., urban or rural), probability of occurrence, duration, irreversibility, geographic scope, magnitude, and number of people affected. In terms of the magnitude of air quality impacts, any action predicted to increase the concentration of a criteria air pollutant to a level that would exceed the concentrations defined by the National Ambient Air Quality Standards (NAAQS) would be deemed to have a potential significant adverse impact.

As discussed below, the maximum pollutant concentrations and concentration increments from mobile sources with the Proposed Project are projected to be lower than the corresponding ambient air quality standards. Based on a stationary source screening analysis, there would be no potential for significant adverse air quality impacts from emission of nitrogen dioxide, sulfur dioxide, and particulate matter in connection with the Proposed Project’s HVAC systems. Therefore, the Proposed Project would not have significant adverse air quality impacts.

15.B. EXISTING CONDITIONS (DEIS AND GEIS)

Air quality is affected by air pollutants produced by both motor vehicles and stationary sources. Emissions from motor vehicles are referred to as mobile source emissions, while emissions from fixed facilities are referred to as stationary source emissions. Emissions from Project-generated traffic are also referred to as indirect effects, while stationary sources on-Site are considered to be direct effects. Ambient concentrations of carbon monoxide (CO) are predominantly influenced by mobile source emissions. Particulate matter (PM), volatile organic compounds (VOCs), and nitrogen oxides (nitric oxide [NO] and nitrogen dioxide [NO₂], collectively referred to as NO_x) are emitted from both mobile and stationary sources. Fine PM is also formed when emissions of NO_x, sulfur oxides (SO_x), ammonia, organic compounds, and other gases react or condense in the

atmosphere. Emissions of sulfur dioxide (SO₂) are associated mainly with stationary sources, and some sources utilizing non-road diesel such as large international marine engines. On-road diesel vehicles currently contribute very little to SO₂ emissions since the sulfur content of on-road diesel fuel, which is federally regulated, is extremely low. Ozone is formed in the atmosphere by complex photochemical processes that include NO_x and VOCs. Ambient concentrations of CO, PM, NO₂, SO₂, ozone, and lead are regulated by the U.S. Environmental Protection Agency (EPA) under the Clean Air Act (CAA), and are referred to as “criteria pollutants,” emissions of VOCs, NO_x, and other precursors to criteria pollutants are also regulated by EPA.

As required by the CAA, primary and secondary NAAQS have been established for six major air pollutants: CO, NO₂, ozone, respirable PM (both PM_{2.5} and PM₁₀), SO₂, and lead. The primary standards represent levels that are requisite to protect the public health, allowing an adequate margin of safety. The secondary standards are intended to protect the nation’s welfare, and account for air pollutant effects on soil, water, visibility, materials, vegetation, and other aspects of the environment. The primary standards are generally either the same as the secondary standards or more restrictive.

The most recent concentrations of all criteria pollutants at the New York State Department of Environmental Conservation (NYSDEC) air quality monitoring stations nearest to the Project Site are presented in **Table 15-1**. As shown, the recently monitored levels for all pollutants other than ozone did not exceed the NAAQS. For most pollutants, the concentrations presented in **Table 15-1** are based on recent measurements obtained in 2018, the most recent year for which data are available.

Table 15-1
Representative Monitored Ambient Air Quality Data

Pollutant	Location	Units	Averaging Period	Concentration	NAAQS
CO	Botanical Garden (Pfizer Lab), Bronx	ppm	8-hour	1.7	9
			1-hour	2.3	35
SO ₂	Botanical Garden (Pfizer Lab), Bronx	µg/m ³	3-hour	23	1,300
			1-hour	16.3 ⁽¹⁾	196
PM ₁₀	IS 52, Bronx	µg/m ³	24-hour	39	150
PM _{2.5}	White Plains, Westchester	µg/m ³	Annual	6.0 ⁽²⁾	12
			24-hour	15.7 ⁽²⁾	35
NO ₂	Botanical Garden (Pfizer Lab), Bronx	µg/m ³	Annual	32.4	100
			1-hour	103.9 ⁽³⁾	188
Lead	IS 52, Bronx	µg/m ³	3-month	0.0033 ⁽⁴⁾	0.15
Ozone	White Plains, Westchester	ppm	8-hour	0.075+ ⁽⁵⁾	0.070

Notes:

+ Indicated values exceeding the NAAQS.

⁽¹⁾ The 1-hour value is based on a 3-year average (2016–2018) of the 99th percentile of daily maximum 1-hour average concentrations. EPA replaced the 24-hour and the annual standards with the 1-hour standard.

⁽²⁾ Annual value is based on a 3-year average (2016–2018) of annual concentrations. The 24-hour value is based on the 3-year average of the 98th percentile of 24-hour average concentrations.

⁽³⁾ The 1-hour value is based on a 3-year average (2016–2018) of the 98th percentile of daily maximum 1-hour average concentrations.

⁽⁴⁾ Based on the highest quarterly average concentration measured in 2018.

⁽⁵⁾ Based on the 3-year average (2016–2018) of the fourth highest daily maximum 8-hour average concentrations.

Sources:

1. New York State Air Quality Report Ambient Air Monitoring System, NYSDEC

2. EPA AirData

15.C. POTENTIAL IMPACTS OF THE PROPOSED PROJECT (DEIS)

15.C.1. STATIONARY SOURCES

The Proposed Project involves the new construction of multiple residential buildings on the Site: a five-story approximately 149-unit multifamily building and approximately 22 three-story townhomes with a site-wide total of approximately 293,225 gsf of residential floor area.¹ As the new buildings included in the Proposed Project have not yet been fully designed, the fuel source for the HVAC systems has not yet been determined. Therefore, to ensure a conservative analysis the newly constructed buildings of the Proposed Project were assumed to utilize distillate fuel oil-fired HVAC systems to provide space heating, air conditioning, and domestic hot water. The potential for adverse air quality impacts from the combustion sources of these new buildings was assessed.

There would be no nearby sensitive receptors at building heights similar to or greater than the proposed multifamily building—sensitive receptors considered are those that contain sensitive uses (i.e., residential) in buildings of similar or greater height than the proposed buildings. However, one sensitive residential receptor at ground level is located approximately 110 feet to the north and east of the townhomes (3 Cooney Hill Road). Based on experience with similarly sized sources in much denser urban areas (i.e., where background concentrations are higher), and using screening procedures outlined in the 2014 *City Environmental Quality Review (CEQR) Technical Manual*,² sources of the size proposed would not cause any exceedance of NO₂ standards at elevated sensitive receptor locations nearest to the Project Site. Additionally, it was conservatively assumed that all emissions would exhaust from a single stack from the top of the multifamily building—conservatively combining emissions from all residential uses. Given the low background concentrations, the level of emissions from the multifamily building, and the distance to nearby sensitive receptors, no significant adverse air quality impacts would be expected from the multifamily building on lower elevations.

In order to assess maximum ground-level impacts, potential 1-hour and annual average NO₂ as well as 24-hour and annual average PM_{2.5} impacts were evaluated using EPA's AERSCREEN model (version 16216 EPA, 2016). The AERSCREEN model predicts worst-case 1-hour average concentrations downwind from a point, area, or volume source. AERSCREEN generates application-specific worst-case meteorology using representative minimum and maximum ambient air temperatures, and site-specific surface characteristics such as albedo, Bowen ratio, and surface roughness length. The model incorporates the Plume Rise Model Enhancements (PRIME) downwash algorithm, which is designed to predict impacts in the "cavity region" (i.e., the area around a structure which under certain conditions may affect an exhaust plume, causing a portion of the plume to become entrained in a recirculation region). Furthermore, AERSCREEN utilizes the Building Profile Input Program (BPIPPRM) model enhancement to assess downwash influences by direction. For this analysis, it was conservatively assumed that emissions

¹ Impacts from the existing office buildings on-Site, which are proposed to be re-used as office and hotel uses, were excluded from this analysis as their emissions would not be new sources; rather, they would be a continuation of existing sources.

² New York City Mayor's Office of Environmental Coordination, *CEQR Technical Manual*, Chapter 17, section 322.1, March 2014.

from the 22 townhomes would exhaust from a single stack from the top of the unit closest to the sensitive receptor at 3 Cooney Hill Road—conservatively combining emissions from all proposed townhomes.

Maximum projected concentrations that were generated from the AERSCREEN model for the multifamily building's combined HVAC system are presented in **Table 15-2**. Maximum projected concentrations that were generated from the AERSCREEN model for the combined HVAC system emission point for the townhomes (assumed emitted from a single unit) are presented in **Table 15-3**. The maximum projected NO₂, SO₂, and PM_{2.5} concentrations with the addition of the Proposed Project at any ground-level receptor would not result in an exceedance of the NAAQS. Therefore, the Proposed Project would not result in potential significant adverse air quality impacts from stationary sources, such as the proposed HVAC systems.

Table 15-2
Maximum Modeled Pollutant Concentrations from Multifamily Building

Pollutant	Averaging Period	Maximum Modeled Impact	Background Concentration ⁽¹⁾	Total Concentration	NAAQS
NO ₂	1-hour	76	103.9	180.3	188
	Annual	23.3	32.4	55.62	100
PM _{2.5}	24-hour	5.1	15.7	20.8	35
	Annual	0.2	7.1	7.3	12
SO ₂	1-hour	1.2	16.3	17.5	196
Note: ⁽¹⁾ See Table 13-1					

Table 15-3
Maximum Modeled Pollutant Concentrations from Townhomes

Pollutant	Averaging Period	Maximum Modeled Impact	Background Concentration ⁽¹⁾	Total Concentration	NAAQS
NO ₂	1-hour	75.6	103.9	179.5	188
	Annual	23.0	32.4	55.4	100
PM _{2.5}	24-hour	5.0	15.7	20.7	35
	Annual	0.2	7.1	7.3	12
SO ₂	1-hour	1.2	16.3	17.5	196
Note: ⁽¹⁾ See Table 13-1					

15.C.2. MOBILE SOURCES

An assessment of the potential air quality effects of CO emissions that would result from vehicles coming to and departing from the Project Site was performed following the procedures outlined in the NYSDOT TEM. As discussed in Chapter 10, "Traffic and Transportation," the study area includes fifteen locations. The screening procedure described below relied on the results of the traffic impact study summarized in Chapter 10, "Traffic and Transportation," and included as **Appendix G-1**. As described below, the results of the screening analysis shows that one of the 15 study area locations would require a detailed microscale air quality analysis.

15.C.2.1. CO Screening Criteria

Screening criteria described in the TEM were employed to determine whether the Proposed Project requires a detailed air quality analysis at the intersections

in the study area. Before undertaking a detailed microscale modeling analysis of CO concentrations at the study area intersections, the *TEM*'s screening criteria first determine whether the Proposed Project would increase traffic volumes or implement any other changes (e.g., changes in speed, roadway width, sidewalk locations, or traffic signals) to the extent whereby significant increases in air pollutant concentrations could be expected. The following multistep procedure outlined in the *TEM* was used to determine if there is the potential for CO impacts from the Proposed Project:

- **Level of Service (LOS) Screening:** If the Build condition LOS is A, B, or C, no air quality analysis is required. For intersections operating at LOS D or worse, proceed to Capture Criteria.
- **Capture Criteria:** If the Build condition LOS is at D, E, or F, then the following Capture Criteria should be applied at each intersection or corridor to determine if an air quality analysis may be warranted:
 - 10 percent or more reduction in the distance between source and receptor (e.g., street or highway widening); or
 - 10 percent or more increase in traffic volume on affected roadways for the Build year; or
 - 10 percent or more increase in vehicle emissions for the Build year; or
 - any increase in the number of queued lanes for the Build year (this applies to intersections); it is not expected that intersections in the Build condition controlled by stop signs would require an air quality analysis; or
 - 20 percent reduction in speed when Build average speeds are below 30 miles per hour (mph).

If a project does not meet any of the above criteria, a microscale analysis is not required. If a project is located within ½-mile of any intersections evaluated in the CO State Implementation Plan (SIP) Attainment Demonstration, (as identified in the NYSDOT *TEM*'s Chapter 1.1, Table 2 by county), more stringent screening criteria are applied at Project-affected intersections. Should any one of the above criteria be met in addition to the LOS screening, then a Volume Threshold Screening analysis is performed, using traffic volume and emission factor data to compare with specific volume thresholds established in the *TEM*.

Both the Capture Criteria and Volume Threshold Screening were developed by NYSDOT to be conservative air quality estimates based on worst-case assumptions. The *TEM* states that if the Project-related traffic volumes are below the volume threshold criteria, then a microscale air quality analysis is unnecessary even if the other Capture Criteria are met for a location with LOS D or worse, since a violation of the NAAQS would be extremely unlikely.

15.C.2.2. LOS Screening Analysis

Results of the traffic capacity analysis performed for the 2024 Build Year condition, for the AM, midday (MD), and PM peak periods, were reviewed at each of the study area intersections to determine the potential need for a

microscale air quality analysis. The LOS screening criteria were first applied to identify those intersections with approach LOS D or worse. Based on the review of the intersections analyzed, ten intersections were projected to operate at a LOS D or worse on approaches for any of the peak traffic periods. The intersections are as follows:

- NYS Route 22 and NYS Route 120 N
- NYS Route 120 and American Lane
- NYS Route 120 and Cooney Hill Road
- NYS Route 120 and 113 King Street Driveway/American Lane
- NYS Route 120 and New King Street
- NYS Route 120 and Airport Road
- Airport Road and I-684 NB On/Off Ramp
- Airport Road and I-684 SB On/Off Ramp
- NYS Route 22 and N Broadway/Sir John's Plaza
- NYS Route 22 and Central Westchester Expressway and Reservoir Road/Church Street

15.C.2.3. *Capture Criteria Screening Analysis*

Further screening on the intersections identified in the LOS Screening Analysis were conducted using the Capture Criteria. This screening analysis indicated that one intersection met the Capture Criteria of a 10 percent or more increase in traffic volume on affected roadways for the Build year: NYS Route 120 and Cooney Hill Road.

15.C.2.4. *Volume Threshold Screening*

Since one of the capture criteria listed above was triggered, a volume threshold screening analysis was conducted to further determine the need for a microscale air quality analysis. The volume thresholds (provided in the *EPM*) establish traffic volumes below which a violation of the NAAQs for CO is extremely unlikely. This approach uses project area specific emissions data to determine corresponding vehicle thresholds. For intersections where approach volumes are equal to or less than the applicable thresholds, microscale air quality analysis is not required. Based on the volume threshold screening, the project-related traffic volume at the studied intersection would be below the volume threshold criteria. Therefore, detailed mobile source analysis for the Proposed Project was not warranted and Project-generated traffic would not result in a significant air quality impact.

15.D. MITIGATION MEASURES FOR THE PROPOSED PROJECT (DEIS)

As demonstrated in the analyses above, it is the Applicant's opinion that the Proposed Project would not result in potential significant adverse air quality impacts from stationary sources or mobile sources. Therefore, the Proposed Project would not have significant adverse air quality impacts.

15.E. POTENTIAL IMPACTS OF, AND MITIGATION FOR, THE PROPOSED ZONING (GEIS)

As described in Chapter 2, “Project Description,” the hypothetical maximum buildout of the Project Site would involve a complete conversion from office to residential space, totaling 558,500 sf (500 units). Additionally, the hypothetical maximum buildout of the adjacent Swiss Re parcel would involve converting the existing 360,000 sf of office space into 110,000 sf of hotel space (80 rooms) and 250,000 sf of residential space (250 units). In total, the hypothetical maximum buildout of the Project Site and adjacent Swiss Re parcel would result in 750 new residential units, 80 new hotel rooms, and a reduction of 859,000 sf of office space.

It is important to note that no specific proposal is being made to effectuate this maximum, hypothetical, development. If, in the future, a specific plan was developed for either of these two parcels that differs from what is outlined above, the Town would be required to conduct a separate environmental analysis of that project in connection with the discretionary actions to be sought (e.g., site plan and special permit approvals).

15.E.1. STATIONARY SOURCES (GEIS)

In the absence of detailed site plans for the scenarios assumed in the GEIS, including the layout of buildings and the locations and heights of HVAC system exhaust points, stationary screening procedures similar to those completed for the Proposed Project are not possible at this time. However, given the density and land use pattern in this area of the Town, similar to the Proposed Project, the new buildings that could be developed on either site are likely to be located at a considerable distance from nearby sensitive receptors of equal or greater height. Any new development under these scenarios would likely comply with height and setback requirements that ensure adequate spacing between both on-site and off-site sensitive receptors. If future redevelopment plans for either site pursuant to the Proposed Zoning come before the Town with requests for waivers to bulk and setback requirements, an analysis of potential air quality impacts would need be undertaken to ensure that development did not have the potential for significant adverse air quality impacts.

15.E.2. MOBILE SOURCES (GEIS)

Table 10-3 in Chapter 10, “Traffic and Transportation,” summarizes the trips generated at the Project Site and adjacent Swiss Re parcel, for both the existing office space, as well as the residential units and hotel rooms proposed in the hypothetical maximum buildout. The table can be summarized as follows: the maximum build out would result in a total reduction of 338 trips during weekday peak AM hours and a total reduction of 246 trips during weekday peak PM hours. Therefore, the Proposed Zoning would not result in potential significant adverse air quality impacts from mobile sources. *

16.A. INTRODUCTION

This chapter considers the potential for the Proposed Action to result in significant adverse noise impacts by summarizing the results of a noise analysis. The noise analysis establishes existing noise levels through ambient noise measurements in the study area and considers whether a Proposed Action would generate a significant mobile or stationary source noise, or be located in an area with high ambient noise levels. The analysis concludes by examining the action for its potential effects on sensitive noise receptors, and the effects on the interior noise levels of residential and commercial uses.

The analysis included in this chapter finds that noise associated with the Proposed Project would be in compliance with the Town of North Castle's code restrictions on noise. Additionally, the Proposed Project would not result in significant adverse noise impacts at the residential receptor immediately adjacent to the Project Site (3 Cooney Hill Road) according to the NYSDEC noise guidance document. Finally, the analysis concludes that future noise levels at the buildings included in the Proposed Project would be considered acceptable for residential use according to the NYSDEC guidance document.

16.B. NOISE FUNDAMENTALS

Sound is a fluctuation in air pressure. Sound pressure levels are measured in units called "decibels" ("dB"). The particular character of the sound that we hear (a whistle compared with a French horn, for example) is determined by the speed, or "frequency," at which the air pressure fluctuates, or "oscillates." Frequency defines the oscillation of sound pressure in terms of cycles per second. One cycle per second is known as 1 Hertz ("Hz"). People can hear over a relatively limited range of sound frequencies, generally between 20 Hz and 20,000 Hz, and the human ear does not perceive all frequencies equally well. High frequencies (e.g., a whistle) are more easily discernible and therefore more intrusive than many of the lower frequencies (e.g., the lower notes on the French horn).

16.B.1. "A"-WEIGHTED SOUND LEVEL (DBA)

In order to establish a uniform noise measurement that simulates people's perception of loudness and annoyance, the decibel measurement is weighted to account for those frequencies most audible to the human ear. This is known as the A-weighted sound level, or "dBA," and it is the descriptor of noise levels most often used for community noise. As shown in **Table 16-1**, the threshold of human hearing is defined as 0 dBA; very quiet conditions (as in a library, for example) are approximately 40 dBA; levels between 50 dBA and 70 dBA define the range of noise levels generated by normal daily activity; levels above 70 dBA would be considered noisy, and then loud, intrusive, and deafening as the scale approaches 130 dBA.

Table 16-1
Common Noise Levels

Sound Source	dBA
Military jet, air raid siren	130
Amplified rock music	110
Jet takeoff at 500 meters	100
Freight train at 30 meters	95
Train horn at 30 meters	90
Heavy truck at 15 meters	80–90
Busy city street, loud shout	80
Busy traffic intersection	70–80
Highway traffic at 15 meters, train	70
Predominantly industrial area	60
Light car traffic at 15 meters, city or commercial areas, or residential areas close to industry	50–60
Background noise in an office	50
Suburban areas with medium-density transportation	40–50
Public library	40
Soft whisper at 5 meters	30
Threshold of hearing	0
Note: A 10 dBA increase in level appears to double the loudness, and a 10 dBA decrease halves the apparent loudness. Sources: Cowan, James P. <i>Handbook of Environmental Acoustics</i> , Van Nostrand Reinhold, New York, 1994. Egan, M. David, <i>Architectural Acoustics</i> . McGraw-Hill Book Company, 1988.	

In considering these values, it is important to note that the dBA scale is logarithmic, meaning that each increase of 10 dBA describes a doubling of perceived loudness. Thus, the background noise in an office, at 50 dBA, is perceived as twice as loud as a library at 40 dBA. For most people to perceive an increase in noise, it must be at least 3 dBA. At 5 dBA, the change will be readily noticeable.

16.B.2. NOISE DESCRIPTORS USED IN IMPACT ASSESSMENT

Because the sound pressure level unit of dBA describes a noise level at just one moment and very few noises are constant, other ways of describing noise over extended periods have been developed. One way of describing fluctuating sound is to describe the fluctuating noise heard over a specific time period as if it had been a steady, unchanging sound. For this condition, a descriptor called the “equivalent sound level,” L_{eq} , can be computed. The L_{eq} represents the constant sound level that, in a given time period (e.g., 1 hour, denoted by $L_{eq(1)}$, or 24 hours, denoted as $L_{eq(24)}$), conveys the same sound energy as the actual time-varying sound. Statistical sound level descriptors such as L_1 , L_{10} , L_{50} , L_{90} , and L_x , are used to indicate noise levels that are exceeded 1, 10, 50, 90 and x percent of the time, respectively. Discrete event peak levels are given as L_1 levels. L_{eq} is used in the prediction of future noise levels, by adding the contributions from new sources of noise (i.e., increases in traffic volumes) to the existing levels and in relating annoyance to increases in noise levels.

The relationship between L_{eq} and levels of exceedance is worth noting. Because L_{eq} is defined in energy rather than straight numerical terms, it is not simply related to the levels of exceedance. If the noise fluctuates very little, L_{eq} will approximate L_{50} or the median level. If the noise fluctuates broadly, the L_{eq} will be approximately equal to the L_{10} value. If extreme fluctuations are present, the L_{eq} will exceed L_{90} or the background level by 10

or more decibels. Thus the relationship between L_{eq} and the levels of exceedance will depend on the character of the noise. In community noise measurements, it has been observed that the L_{eq} is generally between L_{10} and L_{50} . The relationship between L_{eq} and exceedance levels has been used in this analysis to characterize the noise sources and to determine the nature and extent of their impact at all receptor locations.

For the purposes of this DEIS analysis, the maximum one-hour equivalent sound level ($L_{eq(1)}$) has been selected as the noise descriptor to be used in the noise impact evaluation. $L_{eq(1)}$ is the noise descriptor used by most governmental agencies, including the New York State Department of Environmental Conservation (NYSDEC) for noise impact evaluation, and is used to provide an indication of highest expected sound levels.

16.B.3. NOISE STANDARDS AND IMPACT CRITERIA

16.B.3.a. Town of North Castle Noise Control Law

The Town of North Castle Noise Control Law, Chapter 210 of the Municipal Code of North Castle, prevents “any loud, unnecessary or unusual noise or any noise which annoys, disturbs, injures or endangers the comfort, repose, health, peace or safety of others within the Town of North Castle, New York.”

16.B.3.b. New York State Department of Environmental Conservation

NYSDEC has published a policy and guidance document, *Assessing and Mitigating Noise Impacts* (DEP-00-1, February 2, 2001), which presents noise impact assessment methods, identifies thresholds for significant impacts, and discusses potential avoidance and mitigative measures to reduce or eliminate noise impacts.¹

NYSDEC’s guidance document sets forth thresholds that can be used in determining whether a noise increase due to a project may constitute a significant adverse impact, noting that these thresholds should be viewed as guidelines subject to adjustment as appropriate for the specific circumstances. According to DEP-00-1:

- Increases in noise ranging from 0 to 3 dBA should have no appreciable effect on receptors;
- Increases of 3 to 6 dBA may have the potential for adverse impacts only in cases where the most sensitive of receptors (e.g., hospital or school) are present;
- Increases of more than 6 dBA may require a closer analysis of impact potential depending on existing noise levels and the character of surrounding land use and receptors; and
- Increases of 10 dBA or greater deserve consideration of avoidance and mitigation measures in most cases.

The guidance document also sets forth noise thresholds that can be used in identifying whether a noise level due to a project should be considered a significant adverse impact. According to the guidance, the addition of any noise source in a non-industrial setting should not raise the ambient noise

¹ http://www.dec.ny.gov/docs/permits_ej_operations_pdf/noise2000.pdf.

level above a maximum of 65 dBA, and ambient noise levels in industrial or commercial areas may exceed 65 dBA with a high end of approximately 79 dBA. As set forth in the guidance, projects that exceed these levels should explore the feasibility of implementing mitigation.

16.B.4. PROJECT IMPACT CRITERIA

For purposes of this impact assessment, consistent with NYSDEC guidance, operations that would result in an increase of more than 6 dBA in ambient $L_{eq(1)}$ noise levels at receptor sites and produce ambient noise levels of more than 65 dBA at residences or 79 dBA at an industrial or commercial area will be considered to be a significant adverse noise impact resulting from the Proposed Action. These criteria are consistent with the NYSDEC guidance document. It is assumed that the Proposed Project's mechanical equipment will be designed to avoid significant increases in noise levels at nearby noise-sensitive uses (e.g., residences).

16.C. EXISTING CONDITIONS (DEIS AND GEIS)

16.C.1. SELECTION OF NOISE RECEPTOR LOCATIONS

In consultation with the Town, a total of three receptor locations were selected for evaluation of existing and future noise levels. These locations are detailed below in **Table 16-2** and are shown in **Figure 16-1**. The receptor locations were selected to allow for analysis of potential impacts near the Project Site, as well as at areas of potential Project impact.

Table 16-2
Noise Measurement Locations

Noise Receptor	Location
1	113 King Street – Proposed Project Site
2	King Street / Route 120 Between Cooney Hill Road and American Lane (to the south)
3	Cooney Hill Road west of King Street / Route 120

Each of the three receptors represent the noise levels experience in one portion of the project site. Additionally, receptor 3 represents the existing residence at 3 Cooney Hill Road, west of King Street, at which traffic associated with the Proposed Project would have the potential to result in noise level increases.

16.C.2. NOISE MONITORING

At each receptor location, existing noise levels were determined by field measurements. Noise monitoring was performed on August 20, 2019. At each receptor location, 20-minute measurements were conducted. All measurements were performed during the weekday AM peak period (7:30 to 9:30 AM), weekday midday (MD) peak period (11:30 AM to 1:30 PM) and the weekday PM peak period (4:00 to 6:00 PM). At locations where traffic noise is a primary contributing or dominant source of noise, 20-minute noise measurements are a statistical representation of the hourly equivalent noise level, allowing sufficient time for L_{eq} values, as well as other statistical noise descriptors, to stabilize and not fluctuate based on individual noise events (e.g., vehicle pass-bys). A 20-minute measurement will include several cycles of any nearby traffic lights and the traffic cycles

associated with those light cycles, as well as any other natural short-term traffic cycles that would manifest themselves within a single hour. Since the 20 minutes of traffic accounted for by the 20-minute noise measurement would be comparable to a full hour of traffic at the same location, and traffic is the dominant source of noise at the location, the 20-minute noise measurement provides a representation of the one-hour noise level, generally within 1–3 dBA.

Measurements were performed using a Brüel & Kjær Type 2270 Sound Level Meter (SLM), Brüel & Kjær Type 4189 1/2-inch microphone, and Brüel & Kjær Type 4231 Sound Level Calibrators. The Brüel & Kjær SLM is a Type 1 instrument according to ANSI Standard S1.4-1983 (R2006). The SLM has a laboratory calibration date within the past year at the time of use. At all locations, the microphone was mounted at a height of approximately five feet above the ground surface on a tripod and approximately six feet or more away from any large sound-reflecting surface to avoid major interference with sound propagation. The SLM was calibrated before and after readings with a Brüel & Kjær Type 4231 Sound Level Calibrator using the appropriate adaptor. The data were digitally recorded by the SLMs and displayed at the end of the measurement period in units of dBA. Measured quantities included the L_{eq} , L_1 , L_{10} , L_{50} , and L_{90} . Windscreens were used during all sound measurements except for calibration. All measurement procedures were based on the guidelines outlined in ANSI Standard S1.13-2005.

16.C.3. EXISTING NOISE LEVELS AT NOISE RECEPTOR LOCATIONS

16.C.3.a. Project Site and Surrounding Roadways

The results of the measurements of existing noise levels are summarized in **Table 16-3**. Traffic on nearby roadways was the dominant noise source for all receptor locations, with contribution from occasional aircraft flyovers. Noise levels within the Project Site are low, with traffic on the nearby King Street/Route 120 being the dominant noise source. Noise levels along adjacent roadways in the study area are low, reflecting the level of vehicular activity present on Cooney Hill Road and American Lane. As shown below in **Table 16-3**, the measured existing L_{eq} values at Site 2 exceed the NYSDEC's threshold of 65 dBA for a non-industrial setting. At all other sites, the measured existing L_{eq} values are below this threshold.

Table 16-3
Existing Noise Levels (in dBA)

Receptor	Measurement Location	Time	L _{eq}	L ₁	L ₁₀	L ₅₀	L ₉₀
1	113 King Street - Proposed Project Site	AM	60.6	72.5	60.1	57.5	55.7
		MD	57.7	70.7	57.0	51.6	47.8
		PM	56.8	68.6	57.3	53.7	49.5
2	King Street / Route 120 Between Cooney Hill Road and American Lane (to the south)	AM	72.5	80.0	76.3	69.8	57.3
		MD	69.3	78.9	74.1	61.2	46.7
		PM	71.7	78.4	75.7	69.0	54.5
3	Cooney Hill Road west of King Street / Route 120	AM	56.7	62.8	58.2	55.9	53.7
		MD	54.1	64.2	57.3	50.6	45.9
		PM	56.8	68.6	57.3	53.7	49.5
Note: Field measurements were performed by AKRF, Inc. on August 20, 2019 (see Appendices K-1 and K-2)							

16.C.3.b. DOB-20A District

In addition to the Project Site, the DOB-20A zoning district includes the 127-acre Swiss Re parcel to the north, the 27-acre Citigroup parcel to the east, a 1-acre residential parcel along Cooney Hill Road, and a 1-acre vacant parcel to the east of King Street, across from the main Site driveway. As is the case for the Project Site, the dominant source of noise at the adjacent DOB-20A parcels is traffic from nearby King Street/Route 120 with occasional aircraft flyovers. Given the proximity of the DOB-20A parcels to the Project Site, the similar nature of the uses within the other DOB-20A parcels, and the homogeneity of the adjacent roadway network and surrounding land uses, the existing noise levels measured at Receptors 1 and 2 are representative of the maximum noise levels anticipated at the other DOB-20-A parcels.

16.C.4. AIRPORT SOURCES

The DNL (Day-Night Average Sound Level) metric has been established by the Federal Aviation Administration (FAA) for evaluating aircraft noise. The DNL represents the total accumulation of sound energy throughout the day, with a 10 dB penalty for aircraft noise generated between 10 PM and 7 AM. **Figure 16-2** shows the most recently published noise contours for the nearby Westchester County Airport. As can be seen, a portion of the southwest corner of the Project Site, where the southern office building is proposed to remain, is within the 65 DNL Contour. The area of the Project Site proposed for residential uses is within the 60 DNL Contour, which is below the 65 DNL threshold for significant aircraft noise exposure. It should be noted that according to the Town's noise consultant, Westchester County Airport ("HPN") has recently presented to the public and the FAA updated (2018) noise contours that show the entire Project Site falls outside of the 65 DNL Contour. However, this map was not formally published on HPN's website at the time the DEIS was prepared and is therefore not referenced in this analysis².

Westchester County, the owner and operator of HPN, has established noise monitoring locations in the area surrounding the airport and publishes data collected from those monitors, as well as other relevant airport operating statistics and the number of noise complaints monthly. A review of this data, available from 2015, indicates that the total number of airport operations, operations by aircraft category, and operations during overnight hours (i.e., midnight to 6:30 AM), have remained relatively consistent from 2015 through 2019.³ From 2015 to the middle of 2017, the County received between 50 and 200 noise complaints per month. In November 2017, the County received 1,807 noise complaints; in July 2018, the County received approximately 4,400 noise complaints; and in November 2019, the last month for which data are available, the County received 12,012 noise complaints. Of the 12,012 noise complaints, the County report notes that those complaints were made by a total of 89 households, with 50 households making more than 10 complaints and one household making 1,807 complaints. The majority of

² Most recently published contour map from Westchester County Airport (HPN): <https://airport.westchestergov.com/images/stories/pdfs/noise/ContourMap.pdf>

³ Westchester County Airport (HPN) Noise Monitor Reports: <https://airport.westchestergov.com/environmental-management-system/monitor-reports>, accessed May 13, 2020.

complaints were received from Purchase, NY (7,673 complaints by 40 households) followed by Armonk, NY (1,808 complaints by 2 households).

16.D. POTENTIAL IMPACTS OF THE PROPOSED PROJECT (DEIS)

16.D.1. MOBILE SOURCES

The noise measurements indicate that traffic along King Street is the dominant source of noise within the study area. Because future traffic volumes along King Street are not expected to quadruple with the Proposed Project, future noise levels would not increase by 6 dBA. Therefore, according to NYSDEC noise impact criteria, the Proposed Project would not result in a significant adverse impact. Additionally, increases in noise levels resulting from the Proposed Project's land uses would not be expected to cause an exceedance of 65 dBA at the nearby residential receptor, 3 Cooney Hill Road.

Further, because the dominant noise source at each of these noise receptor sites is vehicular traffic along King Street, and expected changes in traffic volume on King Street that result from the Proposed Action would be small compared to existing volume, such that those changes would not appreciably affect the level of noise along the street, the measured existing noise levels at these sites were conservatively used to represent levels in the Future with the Proposed Action.

16.D.2. NOISE EXPOSURE AT PROPOSED USES

Noise levels on the currently developed portion of the Project Site (proposed for office and hotel use) are represented by noise receptor site 1, which is located adjacent to the existing site entrance and northern office building (proposed for reuse as a hotel). At receptor site 1, the existing and future noise levels from all sources are expected to be less than 79 dBA, which is considered acceptable for non-residential use according to NYSDEC noise evaluation criteria.

Noise levels at areas of the Project Site proposed for residential use are best represented by noise receptor sites 2 and 3. At these sites, maximum measured and predicted noise levels from all sources would be between 65 and 70 dBA, which are up to 5 dBA greater than the NYSDEC noise evaluation criteria of 65 dBA for residential areas. However, the proposed multifamily building and townhomes would include setbacks from King Street of at least 65 feet and 200 feet, respectively. The setback areas include a landscaped buffer with earthen berms, large trees to remain, and other native plantings. Furthermore, the proposed residential buildings would utilize standard industry practices for multifamily and attached townhouse uses, resulting in at least 20 dBA of building façade attenuation such that interior noise levels in the residences would be less than 45 dBA, which is considered an acceptable level for residential use. Consequently, the predicted noise exposure at the proposed uses would not constitute a significant adverse impact.

16.D.3. STATIONARY SOURCES

It is assumed that the building mechanical systems (i.e., HVAC systems) would be appropriately screened and designed to meet all applicable noise regulations and avoid producing levels that would result in any significant increase in ambient noise levels at nearby noise-sensitive uses (e.g., residences). Consequently, the building mechanical

systems that would be included as part of the Proposed Project would not result in a significant adverse noise impact.

16.D.4. AIRPORT SOURCES

As described above, based on the most recently published contour maps, a portion of the southwest corner of the Project Site, where the southern office building is proposed to remain, is within the 65 DNL Contour; and the area of the Project Site proposed for residential uses is within the 60 DNL Contour, which is below the 65 DNL threshold for significant aircraft noise exposure.

Although the contribution of aircraft overflights to the noise levels varies day-to-day due to flight conditions, review of the measured existing noise levels, from which aircraft noise was not excluded, and the published airport noise contours indicate noise levels at the Proposed Project site that would be appropriate for residential use. Additionally, standard construction methods are expected to provide at least 20 dBA of window/wall attenuation to further reduce interior noise levels at noise-sensitive receptors. In the Applicant's opinion, the reintroduction of residential uses to the Project Site, while at a higher density than the previous 17-lot subdivision, would not represent a unique condition when compared to historic and existing land uses surrounding the airport. The proposed residential uses on the Project Site would be located approximately one mile from the airport's runways, which is farther from the airport than other existing residential development in adjacent municipalities, including the Golf Club of Purchase development (Purchase, New York), the Bellfaire subdivision (Rye Brook, New York), and scattered neighborhoods within Greenwich Connecticut to the east of I-684.

16.E. POTENTIAL IMPACTS OF, AND MITIGATION FOR, THE PROPOSED ZONING (GEIS)

As described in Chapter 2, "Project Description," the theoretical worst-case development scenario under the Proposed Zoning, when accounting for the maximum buildout potential of both the Project Site and the adjacent Swiss Re parcel, is a total of 750 residential units and an 80-room hotel.

It is important to note that no specific proposal is being made at this time to effectuate the maximum hypothetical development of either of these two sites and any future plans would be subject to review by the Town, including a full environmental review and an assessment of compatibility with published airport noise contour maps.

16.E.1. STATIONARY SOURCES

Similar to the Proposed Project, it is assumed that mechanical systems associated with the GEIS scenario (i.e., HVAC systems) would be subject to review by the Town as part of any future site plan application, and appropriately screened and designed to meet all applicable noise regulations and avoid producing levels that would result in any significant increase in ambient noise levels at nearby noise-sensitive uses (e.g., residences).

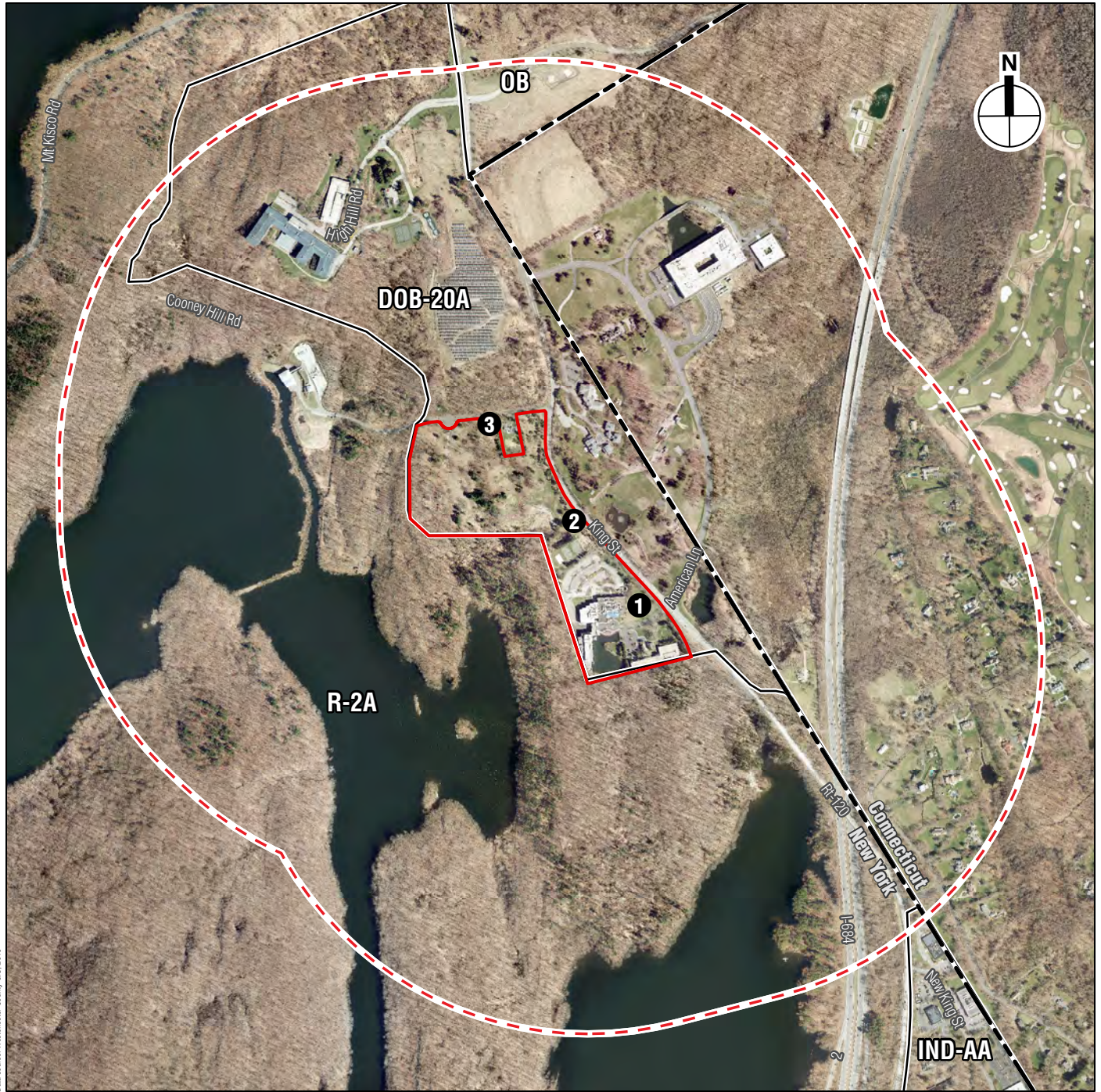
16.E.2. MOBILE SOURCES

In the absence of detailed site plans for the scenarios assumed in the GEIS, including the layout and orientation of buildings and site access points, noise monitoring and predicted noise levels at building facades is not possible at this time. However, similar to the Proposed Project, it is assumed that any proposed residential/hotel buildings would utilize standard industry practices, resulting in at least 20 dBA of building façade attenuation such that interior noise levels would be less than 45 dBA.

As discussed in Chapter 10, “Traffic and Transportation,” the conversion to residential/hotel from office under the Proposed Zoning would generate fewer trips than the full occupancy of each site’s existing office uses (the assumed No Build scenario). Table 10-4 in Chapter 10, “Traffic and Transportation,” summarizes the trips generated at the Project Site and adjacent Swiss Re parcel, for both the existing office space, as well as the residential units and hotel rooms proposed in the hypothetical maximum buildout. The table can be summarized as follows: the maximum build out would result in a total reduction of 338 trips during weekday peak AM hours and a total reduction of 246 trips during weekday peak PM hours. Therefore, it is unlikely that the GEIS scenario assumed under the Proposed Zoning would result in potential significant adverse noise impacts from mobile sources.

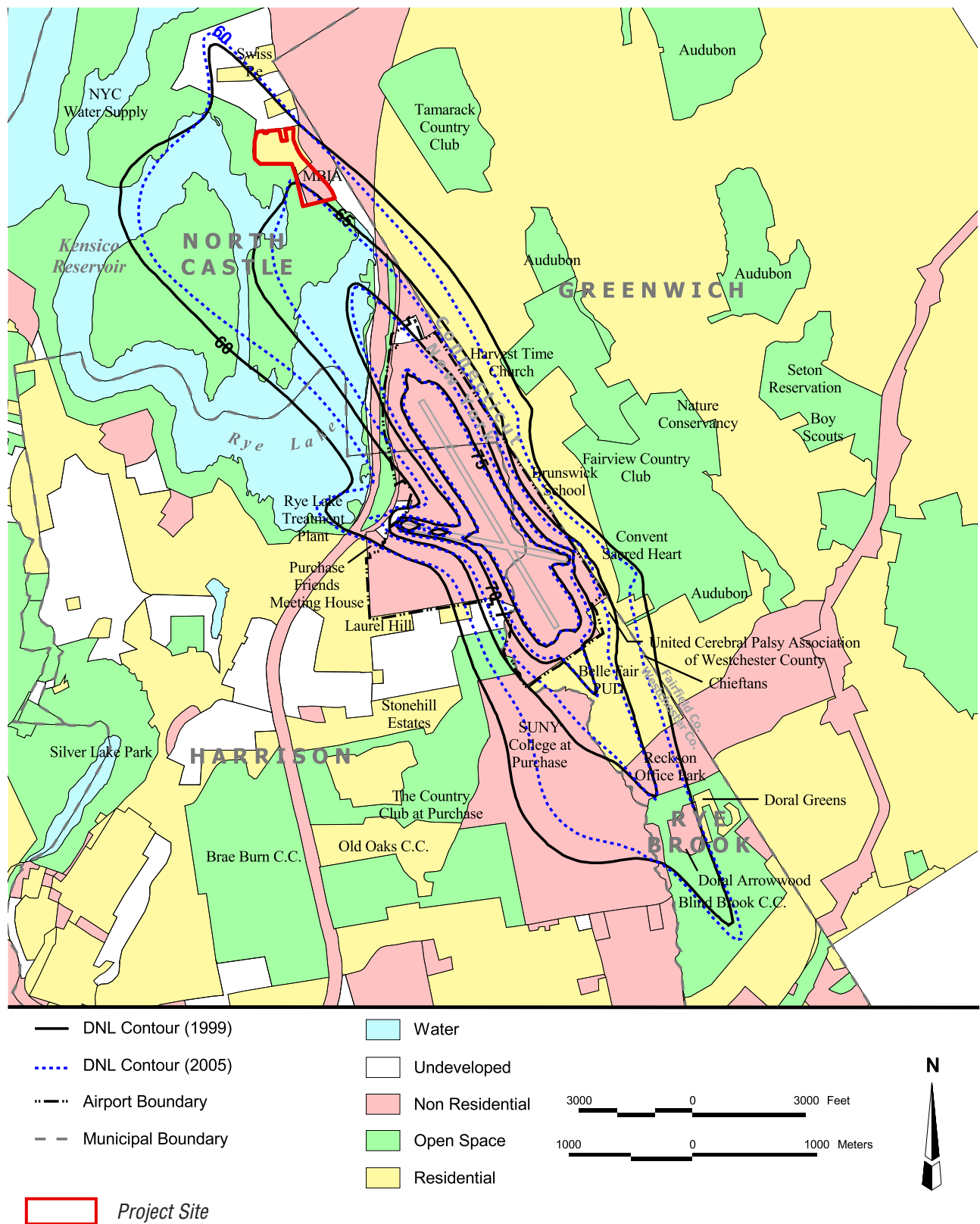
16.E.3. AIRPORT SOURCES

The Swiss Re parcel, which is further away from the Westchester County Airport than the Project Site, is also partially within the 60 DNL Contour for the airport, which is below the 65 DNL threshold for significant aircraft noise exposure (see **Figure 16-2**). Although the contribution of aircraft overflights to the area’s ambient noise levels varies day-to-day due to flight conditions, review of the published airport noise contours indicate noise levels at the Swiss Re parcel that would be appropriate for residential use. Additionally, as noted above, standard construction methods are expected to provide at least 20 dBA of window/wall attenuation to further reduce interior noise levels at noise-sensitive receptors. It is likely that the Town would request a noise monitoring program in connection with any future site plan application for the GEIS scenario, which would account for any future changes to published airport noise contour maps, as well as aircraft overflights to the extent practicable. *



-  Project Site
-  Study Area (Half-mile radius)
-  State Line
-  Zoning District
-  Noise Receptor

0 2,000 FEET



Westchester County Airport
DNL Contours
Figure 16-2

17.A. INTRODUCTION

This chapter describes the anticipated construction phases of the Proposed Project and analyzes the potential for temporary adverse environmental impacts as a result of that construction. Adverse impacts from the construction of the Proposed Project would be avoided and minimized through the implementation of a detailed Construction Management Plan (CMP) prepared during Site Plan approval. The CMP would be prepared in close coordination with Town staff and consultants, and would be approved as part of the final Site Plan approval and be made a condition thereof. The Town would therefore be able to enforce the provisions of the CMP throughout the construction process. The CMP would provide for implementation of the Stormwater Pollution Prevention Plan (SWPPP) and Erosion and Sediment Control Plan (ESCP), as well as the measures to avoid impacts related to traffic, air quality, noise, blasting (if necessary), and hazardous materials, as described below. An outline of a CMP for the Proposed Project is provided as **Appendix L**. It is important to note that the CMP will be specific to the site plan(s) approved. The CMP outline is included in order to document the topics that would be addressed as well as the mitigation measures likely to be included in future construction.

17.B. CONSTRUCTION PHASES, DURATION, AND STAGING (DEIS)

The construction program for the Proposed Project is anticipated to occur in four phases, as shown in **Figure 17-1** and described below. The duration and timing of the construction phases are estimates, and overlaps would occur among the various construction phases. The sequencing is also subject to change and is dependent on market demand. Regardless, the method for performing each activity would meet industry standards for construction and comply with the Town of North Castle's regulations. These phases may occur consecutively or completely or partially concurrently. Similarly, they may occur in a different order.

17.B.1. PHASING SUMMARY*17.B.1.a. Hotel Phase*

The Hotel Phase of construction envisioned for the PDCP involves the conversion of the existing northern office building to a 125-room hotel and related infrastructure improvements. This phase is estimated to take 8 to 12 months.

Since the majority of work associated with this phase consists of interior and exterior building renovations, any necessary site work would be very limited and would likely consist of restoration work following the façade upgrades. It is anticipated that existing utility services would be adequate to serve the building. The interior renovation would run the entire 8 to 12 month period,

with the building façade upgrades occurring during the final 4 to 6 months of the interior renovation timeframe.

It is anticipated that approximately 50 to 75 construction workers would be on-Site for the Hotel Phase of construction.

17.B.1.b. Townhouse Phase

The Townhouse Phase would involve the construction of the 22 townhomes on the northern portion of the property, along with the access driveway from Cooney Hill Road and installation of related infrastructure and utilities. This phase would include the construction of a temporary stormwater sediment basin on the southwest side of the proposed townhomes for erosion and sediment control purposes. The temporary basin would be converted to a permanent stormwater pond at the end of this phase for stormwater management. This phase is estimated to last between 18 and 24 months.

It is anticipated that the construction process for this phase would begin with clearing, grading and driveway construction lasting up to 3 months, followed by foundation construction over the next 4 to 6 months, and construction of the residential units lasting 12 to 15 months.

It is anticipated that approximately 35 to 55 construction workers would be on-Site for the Townhouse Phase of construction.

17.B.1.c. Multifamily Phase

This phase involves the construction of the 149-unit multifamily building with associated parking structure. This phase would include the construction of access drives on the east and west sides of this building. This phase would also include construction of a temporary stormwater sediment basin on the east side of the proposed building for erosion and sediment control purposes. The temporary basin would be converted to a permanent stormwater pond upon completion of the building for stormwater management. This phase is estimated to last between 18 and 24 months.

It is anticipated that the construction process for this phase would begin with clearing, grading and access drive construction lasting up to 3 months, followed by foundation and parking structure construction over the next 6 to 7 months, and construction of the residential building lasting 10 to 14 months.

It is anticipated that approximately 60 to 75 construction workers would be on-Site for the Multifamily Phase of construction.

17.B.1.d. Parking Lot Expansion Phase (Currently Approved)

This phase involves implementation of the currently approved, but not yet constructed, expansion of the existing 43-space parking area located adjacent to the farmhouse in the southern portion of the Project Site. The site plan and SWPPP approvals currently in place with the Town allow for a parking expansion of 94 spaces in this area (for a total of 137 spaces), with associated curbing, utility, and stormwater management improvements. This phase is estimated to last between 3 to 4 months.

It is anticipated that the construction process for this phase would begin with demolition, clearing, grading and installation of the stormwater management system which would last approximately 2 months, followed by the installation of curbing, pavement and lighting which would last up to 2 months.

It is anticipated that approximately 10 to 15 construction workers would be on-Site for the Parking Lot Expansion Phase of construction.

17.B.2. CONSTRUCTION WORKERS

Construction of the Proposed Project would generate vehicular trips from workers traveling to and from the Project Site, as well as the movement of goods and equipment. The estimated average number of construction workers on-site at any one time would vary depending on the phase of construction. Over the life of the project, it is estimated that a total of approximately 155 to 220 workers would be utilized, although it is highly unlikely all phases would occur simultaneously.

Work on weekdays would generally begin at 7:30 AM and conclude at 5:30 PM with the major construction activity ending at 4:30 PM allowing the last hour of the work day for site clean-up activities. There is the potential that work may occur on Saturdays, and any such work would be performed in accordance with Chapter 210 of the Town Code. While the number of workers at the site at any one time would vary based on the phase of construction, it is anticipated the maximum number of workers at any one time would be approximately 75.

17.B.3. CONSTRUCTION STAGING AND PARKING

While placement of individual equipment will not be determined until a detailed schedule has been completed (likely at the point of Site Plan approval), it is currently anticipated that all staging and parking areas for construction activities/workers would be fully accommodated through utilizing a combination of the Project Site's existing paved parking lot areas, the parking structure, and other site areas within the Proposed Project's limit of disturbance. Furthermore, depending on the timing of the parking lot expansion phase described above, additional surface parking for construction vehicles and equipment may be available.

17.C. POTENTIAL CONSTRUCTION PERIOD IMPACTS (DEIS)

17.C.1. CONSTRUCTION PERIOD TRAFFIC

Construction of the Proposed Project would create daily construction-related traffic to and from the Project Site, including construction workers and the delivery of materials and equipment. The numbers and types of vehicles would vary depending on the phase of construction, as described above. All construction equipment, materials, deliveries, and worker parking would be accommodated on-Site and would generally occur during off-peak hours.

As discussed in Section 17.B.2 above, while the number of workers at the Project Site at any one time would vary based on the phase of construction, it is anticipated that the maximum number of workers at any one time would be approximately 75.

Construction truck movements would be spread throughout the day and would generally occur between the hours of 7:30 AM and 4:30 PM, depending on the period of construction. Heavy construction equipment is typically brought to the Site at the beginning of the project and kept on-Site for the duration of the project, thereby minimizing trips.

It is anticipated that a maximum of approximately 10 delivery trucks would enter and exit the site per day. Regarding earthwork operations, as indicated in Chapter 4, “Geology and Soils,” it is anticipated that some 13,324 cubic yards of soil will need to be exported from the site. This would require approximately 666 20-yard trucks. Assuming 20 trucks a day, this would result in about 30 days of trucking, or 6.7 weeks based on a 5-day work week.

Based on the anticipated construction phasing and duration schedule outlined above, Site-generated traffic during construction of the site would be less than both the No-Build Condition (with the re-occupancy of the two office buildings) and the Build Condition with the Proposed Project during the weekday peak AM, weekday peak midday, and weekday peak PM hour analyses summarized in Chapter 10, “Traffic and Transportation.” Therefore, the traffic analysis included for the operation of the Proposed Project would more than account for the temporary construction period traffic volume.

17.C.2. CONSTRUCTION PERIOD EROSION AND SEDIMENT CONTROL

Potential impacts associated with construction activities include sediment deposition and erosion, and the potential for causing turbidity within receiving waterbodies, specifically the Kensico Reservoir, which is part of the New York City watershed and regulated by NYCDEP. To avoid an adverse impact from soil erosion, the Applicant’s engineer has designed erosion and sediment control measures that would conform to the requirements of NYSDEC State Pollution Discharge Elimination System (SPDES) General Permit for Stormwater Discharges Associated with Construction Activity Permit No. GP-0-20-001, the “New York State Standards and Specifications for Erosion and Sediment Control,” dated July 2016, and Chapter 267, “Stormwater Management,” of the Town Code, and the applicable requirements of NYCDEP. The SPDES permit requires that projects disturbing more than 1 acre of land develop a Stormwater Pollution Prevention Plan (SWPPP), containing both temporary erosion control measures during construction and post-construction stormwater management practices to avoid flooding and water quality impacts in the long term.

To avoid and mitigate the potential for adverse erosion and sediment impacts, the Applicant’s engineer developed an ESCP (see **Appendix E-2**) that depicts the measures that will be implemented to control erosion during construction and reduce the potential for sediment to leave the Site. These measures, described in Section 17.D.2 below, include stabilized construction accesses (SCAs), the limit of disturbance beyond which no soil disturbance is to occur, the installation of silt fencing, temporary sediment basins, inlet protection and other measures, which would be used throughout the construction period to minimize the potential for erosion and sedimentation impacts from construction of the Proposed Project.

17.C.3. CONSTRUCTION PERIOD AIR QUALITY

Air quality impacts associated with construction activities are typically the result of fugitive dust or emissions from vehicles or equipment—primarily during excavation and

foundation construction tasks when pollutant emission levels would be greatest. The approach and procedures for constructing the proposed buildings would be typical of the methods utilized in other building construction projects throughout the region and therefore would not be considered out of the ordinary in terms of intensity. The air pollutant emission levels associated with construction of the Proposed Project are typical of ground-up building construction in the region that would require excavation and foundation construction (where large equipment such as excavators and loaders would be employed).

Fugitive dust can result from earth moving, including grading and excavation, and from driving construction vehicles over dry, unpaved surfaces. While a large proportion of fugitive dust would be of relatively large particle size and would be expected to settle within a short distance of being generated and thus not affect off-Site receptors, measures to minimize and avoid this potential impact to the maximum extent practicable would be incorporated into the Proposed Project and would be included in the Construction Management Plan (CMP) which would be reviewed and approved by the Town during Site Plan approvals. These measures are described in Section 17.D.3 below.

Vehicle emissions from construction vehicles and equipment have the potential to result in elevated levels of nitrogen oxides (NO_x), particulate matter (PM), and CO. The greatest potential for impact is typically associated with heavy duty equipment that is used for short durations. In the Applicant's opinion, the period of greatest potential for emissions would likely occur during the excavation and foundation tasks of the Townhouse, Multifamily, and Parking Lot Expansion phases. During these three phases, the greatest number of construction equipment would be operating simultaneously in short durations and would include the greatest potential for fugitive dust emissions due to earth moving, including grading and excavation activities. The Hotel Phase would not include excavation or foundation tasks. In the Applicant's opinion, emissions from other less intensive construction activities (i.e., superstructure, interior and exterior fit-out, and building renovations) would have less potential for adverse impacts. Measures to minimize and avoid (to the maximum extent practicable) impacts from construction vehicle and equipment emissions would be incorporated into the CMP, which would be reviewed and approved by the Town during Site Plan approvals. These measures are described in Section 17.D.3 below.

17.C.4. CONSTRUCTION PERIOD NOISE

Construction of the Proposed Project would generate noise and vibration from construction equipment, construction vehicles, and delivery vehicles traveling to and from the Project Site. Noise levels caused by construction activities would vary widely, depending on the phase of construction and the specific task being undertaken.

Local, state, and federal requirements mandate that certain classifications of construction equipment and motor vehicles be used to minimize adverse impacts. Thus, construction equipment would meet specific noise emission standards. Usually, noise levels associated with construction and equipment are identified for a reference distance of 50 feet, as shown in **Table 17-1**.

Table 17-1
Typical Noise Emission Levels For Construction Equipment

Equipment Item	Noise Level at 50 Feet (dBA)
Air Compressor	80
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Vibrator	76
Crane (derrick)	88
Crane (mobile)	83
Dozer	85
Generator	81
Grader	85
Impact Wrench	85
Jack Hammer (Paving Breaker)	88
Mounted Impact Hammer (for rock breaking/crushing)	90
Paver	85
Pile-Driver (Impact)	101
Pump	77
Rock Drill	85
Roller	85
Shovel	82
Truck	84
Sources: Transit Noise and Vibration Impact Assessment, FTA, September, 2018; Roadway Construction Noise Model User Guide, FHWA, January, 2006.	

Significant noise levels typically occur nearest the construction activities, and may reach as high as 90 A-weighted decibels (dBA) under worst-case conditions. The level of noise at local receptors would depend on the construction activities involved, the noise emission of the involved equipment, the location of the equipment, and the hours of operation. Noise levels would decrease with distance from the construction site. Increased noise levels due to construction activity would be highest during the early construction phases such as grading, excavation, and foundation work. These phases would be relatively short in duration and noise generated would be intermittent based on the equipment in use and the work being done. While the exact numbers of construction equipment that would be utilized has not been finalized, it is known that certain equipment including excavators, bulldozers, backhoes, graders, cranes, and dump trucks would be required. Construction operations, for some limited time periods, would result in increased noise levels that may be intrusive and annoying and may significantly increase ambient noise levels in the immediate vicinity of the Project Site.

Based on the Project Site's locational characteristics and surrounding land uses, there are no sensitive receptors in the immediate vicinity, with the exception of the single family house near the northeast corner of the Project Site (3 Cooney Hill Road).

General site work, including excavation and grading, would occur during only a short period of time. Site work related to the Townhouse Phase, which would be proximate to the Project Site's only sensitive off-Site receptor—the single-family house located at 3 Cooney Hill Road—would be limited to 6 to 9 months. Site work for the multifamily building phase would be expected to last approximately 8 to 10 months, but would occur

at considerable distance (over 900 feet) down gradient from 3 Cooney Hill Road, and would therefore be expected to result in a small increase in noise levels at this receptor.

Construction activities would comply with the hour limitations set forth in Chapter 210 of the Town Code, to minimize noise intrusion from construction activities during weekends and nights when most families are at home. In addition, construction equipment utilized would incorporate sound attenuation practices to further reduce the potential impact to sensitive receptors. Based on the temporary and intermittent nature of construction noise incident at surrounding noise receptors, together with the fact that the construction activities with the most potential to create a significant noise impact would occur proximate to the only identified sensitive receptor for a short period of time, it is the Applicant's belief that the potential noise generated by construction of the Proposed Project would not create a significant adverse noise impact to off-Site receptors. In addition, several measures are proposed to mitigate construction noise levels, particularly during the townhouse construction phase, which would take place within close proximity to the sensitive receptor described above (3 Cooney Hill Road). These measures are described under Section 17.D.4 below.

17.C.5. CONSTRUCTION PERIOD BLASTING

Based on preliminary geotechnical investigations, construction of the Proposed Project may require limited blasting activities for development of the northeast corner of the proposed multifamily building's parking structure, which may extend approximately ten feet into a rocky area of the site. There is no other potential rock removal or rock crushing anticipated as part of construction. Final determination of whether blasting needs to occur and, if so, to what extent would be made by the Applicant's contractor in coordination with the Applicant's geotechnical engineer. While a single blast would create an instantaneous noise level that is greater than other excavation methods, such as rock hammering, it would only last a moment. As such, if required, blasting would reduce the duration of excavation activities and the duration of attendant increases in noise levels.

Blasting during the construction of the Proposed Project would be done in accordance with the Town of North Castle's Blasting Protocol (Town Code Chapter 122, "Blasting and Explosives"). The site-specific blasting protocol, which would be finalized during Site Plan Review based on the final site design and updated geotechnical investigations, would ensure that all blasting activities would be protective of public health and safety to the maximum extent practicable. The specific measures to be taken in the event blasting is required are discussed further below under Section 17.D.5.

17.C.6. CONSTRUCTION PERIOD HAZARDOUS MATERIALS

A Phase I Environmental Site Assessment (ESA) of the Project Site was completed in 2013 by EFI Global, Inc. (the "2013 Phase I ESA," see **Appendix B-5**). The 2013 Phase I ESA revealed no evidence of Recognized Environmental Conditions ("REC") in connection with the Project Site, except for the following:

- The 2013 Phase I ESA notes the absence of available closure reports and/or regulatory closure status for the heating oil tanks associated with the four former residences in the northern/currently undeveloped portion of the Project Site: 129 King Street, 137 King Street, 1 Cooney Hill Road and 7 Cooney Hill Road. As such, these potentially four remaining tanks were considered RECs in the 2013 Phase I ESA.

- The 2013 Phase I ESA notes that the currently developed portion of the Project Site contains three registered underground storage tanks (USTs) that are identified as a 6,000-gallon diesel tank, a 15,000-gallon No. 2 fuel oil tank, and a 10,000-gallon No. 2 fuel oil tank. The 6,000-gallon diesel UST was installed in 1990 and is a double-walled tank equipped with interstitial monitoring. The 15,000-gallon fuel oil UST was installed in 1996 and is a double-walled tank equipped with interstitial monitoring. The 10,000-gallon fuel oil UST was installed in 1998 and is a double-walled tank equipped with interstitial monitoring. The three USTs are tested for integrity/"tightness" annually. Given the underground storage of petroleum products, the three active USTs are considered RECs; however, given the registered regulatory status and annual integrity testing, no further action was deemed warranted in the 2013 Phase I ESA.

Development on the Project Site would involve renovation of the two existing office buildings as well as excavation for the proposed residential construction. The potential for hazardous materials exposure for each of the project's components is summarized below.

17.C.6.a. Existing Office Building Renovation/Reuse

The existing office buildings on the Project Site, along with associated parking structures, were constructed between the early 1980s and the early part of the 21st century. Due to the age of the buildings, the presence of lead-based paint (LBP) and asbestos containing materials (ACM) cannot be ruled out. As discussed further in Section 17.D.6 below, in the Applicant's opinion, standard measures, including building surveys and adherence to applicable Occupational Safety and Health Administration (OSHA) regulations prior to and during the renovations, would address these potential conditions. This includes completion of surveys that are required as part of the building permit approval process with the Town.

17.C.6.b. Multifamily and Townhouse Construction

As described in Chapter 14, "Historic and Cultural Resources," and as noted in the 2013 Phase I ESA of the Project Site (**Appendix B-5**), prior to the construction of a residential subdivision in the central/northern area of the Project Site in the late-20th century, since removed but for one lot (as discussed further below), this area of the Project Site was occupied almost entirely by farmland, including orchards and a Christmas tree farm, as well as scattered outbuildings (e.g., sheds and barns).

The area of the Project Site where the new townhomes and a portion of the northern wing of the multifamily building are proposed currently contains meadows, landscaping, and outdoor amenities for the Project Site's existing office buildings, including paved tennis courts, a volleyball court, and walking paths. The southerly portion of the proposed multifamily building would be developed on what is currently a large surface parking lot.

As discussed elsewhere in the D/GEIS, prior to the issuance of permits and approvals for the currently approved MBIA expansion plan, MBIA acquired 16 of the 17 single-family residential lots in the Cooney Hill area. Subsequent to receiving site plan approval, and as part of implementing the first phase of that approval, all of the homes, foundations, associated septic systems, fuel

oil tanks,¹ and paved surfaces (including driveways and Weber Place) were demolished/removed and replaced with a system of mulched walking/exercise trails, tennis courts and a sand volleyball court. In accordance with the Town of North Castle's demolition permit requirements, it is assumed that the demolition process for these homes also included documentation of LBP and ACM in all of the homes and handling/disposal of these materials in accordance with applicable regulations.²

Construction of the proposed townhomes and the multifamily building (which proposes underground parking) would involve demolition of paved surfaces (tennis courts and parking), excavation, and grading. As discussed above, the 2013 Phase I ESA identified a REC in connection with missing information on fuel oil tank removal/regulatory closure. In the absence of available subsurface (Phase II) testing, the environmental characteristics of the Project Site's subsurface soil and groundwater are currently unknown. Therefore, during subsurface disturbance associated with construction of the new residential uses, the potential exists for exposure to hazardous materials as a result of unexpected discoveries. The Proposed Project, however, would incorporate standard and appropriate controls, as described in Section 17.D.6 below, to avoid the potential for adverse impacts to construction workers and community members.

17.D. MITIGATION MEASURES FOR THE PROPOSED PROJECT (DEIS)

Adverse impacts from the construction of the Proposed Project would be avoided and minimized through the implementation of a detailed Construction Management Plan (CMP) prepared during Site Plan approval. The CMP would be prepared in close coordination with Town staff and consultants, and would be approved as part of the final Site Plan approval and be made a condition thereof. The Town would therefore be able to enforce the provisions of the CMP throughout the construction process. The CMP would provide for implementation of the Stormwater Pollution Prevention Plan (SWPPP) and Erosion and Sediment Control Plan (ESCP), as well as the measures to avoid impacts related to traffic, air quality, noise, blasting (if necessary), and hazardous materials, as described below.

17.D.1. CONSTRUCTION PERIOD TRAFFIC MITIGATION

As discussed above, temporary construction period traffic associated with the Proposed Project would not result in any significant adverse impacts to area roadways. However, the following measures would be implemented during construction of the Proposed Project to ensure that construction vehicles, equipment, and materials are safely interfacing with King Street and Cooney Hill Road:

- There would be no construction equipment, truck, material, or worker parking, queuing, or staging permitted on King Street or Cooney Hill Road at any time. This requirement, as well as a detailed plan that delineates areas of construction worker

¹ Oil Tank Removal Closure Reports: 129, 131, 133, 135 King Street; 1,5,7 Cooney Hill Road; 1,5,6,8,9 Weber Place, Armonk NY, prepared by Nesbro Corporation, January 2004 (Appendix B-3)

² <https://www.northcastleny.com/sites/northcastleny/files/file/file/demochcklist.pdf>

parking, truck queuing and unloading, and material and equipment staging, would be included in the CMP to be prepared during Site Plan approval.

- As part of the proposed stabilized construction access (described below), truck mats or anti-tracking pads would be installed to reduce the amount of site material tracking onto area roadways.

17.D.2. EROSION AND SEDIMENT CONTROL MITIGATION

To mitigate the potential for soils exposed during construction to erode and for sediment to travel downstream and adversely affect the Kensico Reservoir and the on-Site and off-Site stormwater systems, a preliminary Erosion and Sediment Control Plan (ESCP) has been developed for the Proposed Project by the Applicant's engineer. The ESCP is detailed in **Appendix E-2** and summarized below. The final ESCP would be developed in accordance with the "New York State Standards and Specifications for Erosion and Sediment Control," dated July 2016 and would be subject to the review and approval of the Town of North Castle, the New York State Department of Environmental Conservation (NYSDEC), and the New York City Department of Environmental Protection (NYCDEP).

At a minimum, the ESCP would include the following elements:

- **Stabilized Construction Access-** A stabilized construction access, which is a minimum of 50 feet in length and 20 feet in width, would be installed using 8 inches of crushed rock at the specific locations where construction vehicles would enter onto vegetated areas of the Project Site.
- **Silt Fence**—Silt fence would be installed on the down-gradient edge of disturbed areas parallel to existing or proposed contours or along the property line as perimeter control. Silt fence would be used where stakes can be properly driven into the ground as per the Silt Fence detail in the NYSDEC Standards and Specifications for Erosion and Sediment Control in locations shown on the full-sized drawings (**Appendix E-2**). Silt fence controls sediment runoff where the soil has been disturbed by slowing the flow of water and encouraging the deposition of sediment before the water passes through the straw bale or silt fence. Built-up sediment would be removed from silt fences when it reaches one-third the height of the bale/fence and would be properly disposed.
- **Storm Drain Inlet Protection**—Inlet protection would be installed at all inlets where the surrounding area has been disturbed. The inlet protection would be constructed in accordance with NYSDEC Standards and Specifications for Erosion and Sediment Control. Typically, they would be constructed to pass stormwater through, but prevent silt and sediment from entering the drainage system.
- **Stockpile Detail**—Stockpiled soil would be protected, stabilized, and sited in accordance with NYSDEC requirements in locations shown on the ESCP (**Appendix E-2**). Soil stockpiles and exposed soil would be stabilized by seed, mulch, or other appropriate measures when activities temporarily cease during construction for 7 days or more in accordance with NYSDEC requirements.
- **Dust Control**—During the demolition and construction process, debris and disturbed earth would be wet down with water, if necessary, to control dust. After demolition

and construction activities, disturbed areas would be covered and/or vegetated to provide for dust control on the Site.

- **Temporary Seeding and Stabilization**—In areas where demolition and construction activities, clearing, and grubbing have ceased, temporary seeding or permanent landscaping would be performed to control sediment laden runoff and provide stabilization to control erosion during storm events. This temporary seeding/stabilization or permanent landscaping would be in place no later than 14 days after demolition and construction activity has ceased.
- **Sump Pit**—Depending on the results of the geotechnical investigations, a temporary pit may be necessary to trap and filter water for pumping to a suitable discharge area. The purpose of the pit would be to remove excessive water from excavations. Sump pits would be constructed when water collects during the excavation phase of construction.
- **Dewatering**—Depending on the results of the geotechnical investigations, there may be areas of construction where the groundwater table would be intercepted and dewatering activities would take place. Site-specific practices and appropriate filtering devices would be employed by the contractor so as to avoid discharging turbid water to the surface waters of the State of New York.
- **Temporary Sediment Basin**—The purpose of a sediment basin is to intercept sediment-laden runoff and filter the sediment laden stormwater runoff leaving the disturbed area in order to protect drainage ways, properties, and rights-of-way below the sediment basin. The basin would be installed down-gradient of construction operations that expose critical areas to soil erosion. The basin would be maintained until the disturbed area is protected against erosion by permanent stabilization.
- **Materials Handling**—The contractor would store construction and waste materials as far as practical from environmentally sensitive areas (e.g., wetlands). Where possible, materials would be stored in a covered area to minimize runoff. The contractor would incorporate storage practices to minimize exposure of the materials to stormwater, and spill prevention and response where necessary. Prior to commencing construction activities, the contractor would obtain all necessary permits or verify that all permits have been obtained.

In accordance with the ESCP, the installation of erosion and sediment control measures for the Hotel, Townhome, Multifamily, and Parking Lot Expansion phases would include stabilized construction access, silt fence, storm drain inlet protection, soil stockpile, dust control, and temporary seeding and stabilization. In addition, the Townhome and Multifamily phases would include the construction of temporary stormwater sediment basins for erosion and sediment control purposes. The temporary basins would be converted to permanent stormwater ponds at the end of these phases for ongoing stormwater management.

A continuing maintenance program would be implemented for the control of sediment transport and erosion control after construction and throughout the useful life of the construction project. In the Applicant's opinion, with the implementation and continuing maintenance of the ESCP that would be approved by the Town, NYSDEC, and NYCDEP, construction of the Proposed Project would not be expected to result in a significant adverse impact from sedimentation or erosion.

17.D.3. CONSTRUCTION PERIOD AIR QUALITY MITIGATION

To minimize fugitive dust emissions to the maximum extent practicable, the following measures would be implemented during construction of the Proposed Project:

- Minimizing the area of soil that is disturbed at any one time;
- Minimizing the amount of time during which soils are exposed;
- Installing truck mats or anti-tracking pads at egress points to clean the trucks' tires prior to leaving the Project Site;
- Watering of exposed areas during dry periods;
- Using drainage diversion methods (e.g., silt fences) to minimize soil erosion during Site grading;
- Covering stored materials with a tarp to reduce windborne dust;
- Limiting on-Site construction vehicle speed to 5 miles per hour (mph); and
- Using truck covers/tarp rollers that cover fully loaded trucks and keep debris and dust from being expelled from the truck along its haul route.

To minimize emissions from construction vehicles and equipment to the maximum extent practicable, the following measures would be implemented at the Project Site:

- Ultra-low sulfur diesel would be utilized for construction equipment and vehicles;
- All equipment would be properly maintained; and
- Idling of construction or delivery vehicles or other equipment would not be allowed when the equipment is not in active use.

It is the Applicant's opinion that implementation of the measures listed above would avoid and minimize potential adverse impacts to air quality during construction of the Proposed Project to the maximum extent practicable.

17.D.4. CONSTRUCTION PERIOD NOISE MITIGATION

The following noise control measures would be implemented during construction of the Proposed Project and would reduce potential noise impacts to the single off-Site sensitive noise receptor. These measures include a variety of source and path controls. Implementation of all the noise reduction measures would result in approximately 5 to 10 dBA noise level reduction at the construction noise receptor.

With respect to source controls (i.e., reducing noise levels at the source or during the most sensitive time periods), the following measures would be implemented during construction of the Proposed Project:

- Construction activities would be conducted in compliance with the Town of North Castle's existing noise regulations (Chapter 210 of the Town Code), including local day and hour construction limitations. As required, construction activities on the Project Site would be limited to the hours of 7:30 AM–7:00 PM during the week and from 9:00 AM–5:00 PM on weekends and legal holidays.
- As early in the construction period as logistics would allow (likely by the start of the superstructure phases of construction pending service provisions from the local utility provider), diesel- or gas-powered equipment would be replaced with electrical-

powered equipment such as welders, water pumps, bench saws, and table saws (i.e., early electrification) to the extent feasible and practicable;

- Where feasible and practicable, the construction site would be configured to minimize back-up alarm noise. In addition, trucks would not be allowed to idle more than 3 minutes at the construction site; and
- Contractors and subcontractors would be required to properly maintain their equipment and mufflers.

With respect to path controls (e.g., placement of equipment, implementation of barriers or enclosures between equipment and sensitive receptors), the following measures would be implemented to the extent feasible and practicable during construction of the Proposed Project:

- Where logistics allow, noisy equipment, such as cranes, concrete pumps, concrete trucks, and delivery trucks, would be located away from, and shielded from, the identified sensitive receptor (3 Cooney Hill Road);
- During the townhouse construction phase, noise barriers constructed from plywood or other materials surrounding the construction site would be utilized to provide shielding for the single-family residence at 3 Cooney Hill Road.

The exact manner in which these controls would be implemented (e.g., location of equipment, etc.) would be determined during Site Plan approval. Implementation of these measures would be made a condition of any future Site Plan approval.

17.D.5. CONSTRUCTION PERIOD BLASTING MITIGATION

As discussed above, construction of the Proposed Project may require limited blasting activities for development of the northeast corner of the proposed multifamily building's parking structure, which may extend approximately ten feet into a rocky area of the site. There is no other potential rock removal or rock crushing anticipated as part of construction. Final determination of whether blasting needs to occur and, if so, to what extent, would be made by the Applicant's contractor in coordination with the Applicant's geotechnical engineer.

Any blasting during the construction of the Proposed Project would be performed in accordance with the Town of North Castle's regulations and protocols on blasting and explosives (Town Code Chapter 122, "Blasting and Explosives") including but not limited to the following:

- No blasting would take place without applying for proper permits to be issued by the Town of North Castle Building Inspector;
- An application for a blasting permit would include the name of the licensed blaster and satisfactory evidence of compliance with the Town's licensing and insurance requirements;
- An application for a blasting permit would include a specific Blasting Plan prepared for the proposed work in accordance with Section 122-6(A)(8) of the Town Code;
- Not more than 30 days nor less than 72 hours prior to the intended blasting activities, all residents within 500 feet of the proposed blast location would be served with a notice of intent to blast, indicating the date and time that blasting would take place;

- All buildings and residences within 500 feet of the proposed blast location would be provided a pre-blast survey that would create a photographic record of structural conditions;
- Blasting activities would be monitored by an independent testing agency at the applicant/blasting contractor's expense, and would only be conducted between 8:00 a.m. and 5:00 p.m. Monday through Saturday. Permission would be sought from the Building Inspector to perform blasting on Sundays or federal holidays, in the case of emergency or necessity; and
- Reports of each blast would be sent to the Building Inspector to ensure compliance with all requirements, including maximum particle velocity.

Furthermore, as documented in Chapter 6, "Vegetation and Wildlife," to the extent practicable, blasting or the use of explosives for site grading and development (if necessary) would be limited to the period between October 1 and December 1 to avoid impacts to nest building and other sensitive bald eagle activities.

With the implementation of these measures, the potential impacts of any on-Site blasting activities would be avoided and minimized to the maximum extent practicable. No significant adverse impacts as a result of potential blasting activities would be expected.

17.D.6. CONSTRUCTION PERIOD HAZARDOUS MATERIALS MITIGATION

The potential for adverse impacts from hazardous materials would be avoided by making the following measures a condition of any future Site Plan approval:

- The previously completed Phase I ESA of the Project Site identifying areas of environmental concern would be made available for review by the Town as part of future Site Plan approvals.
- Areas of environmental concern will be addressed by Phase II soil testing to determine suitability for on-site reuse and/or off-site disposal requirements.
- Prior to obtaining permits from the Town, ACM surveys would be conducted throughout the existing office buildings proposed for renovation. All ACM would be handled by a licensed asbestos abatement contractor in accordance with applicable regulatory requirements.
- Renovation activities within the existing office buildings with the potential to disturb LBP would be performed in accordance with the applicable Occupational Safety and Health Administration regulation (OSHA 29 CFR 1926.62—Lead Exposure in Construction).
- Soil or fill excavated in connection with construction of the multifamily building and townhomes would be managed in accordance with applicable regulations. Soil/fill intended for on-site reuse will be tested in accordance with procedures consistent with State requirements to confirm whether the soil meets the established State criteria for the intended site use. Transportation of soil leaving for off-Site disposal would be in accordance with requirements covering licensing of haulers and trucks, placarding, truck routes, manifesting, etc.
- If storage tanks or contaminated soil are encountered during redevelopment, such tanks should be registered with NYSDEC and/or the Westchester County Department

of Health (WCDOH), if required, and closed and removed along with any contaminated soil in accordance with applicable regulations.

- If dewatering is required, treatment and discharge of dewatering fluids would be conducted in accordance with all applicable regulations and guidance, including obtaining appropriate permits.
- Appropriate erosion and sediment controls would be implemented in accordance with NYSDEC Stormwater Pollution Prevention Plan (SWPPP) requirements.
- A Construction Management Plan (CMP) would be prepared to identify the specific procedures for soil and stockpile management, soil reuse, offsite disposal, and would include contingency measures to address unforeseen conditions (i.e., unknown tanks, petroleum contamination) that potentially could be encountered during redevelopment.

With implementation of these measures, the potential impacts of construction period hazardous materials exposure would be avoided and minimized to the maximum extent practicable. No significant adverse impacts would be expected.

17.E. POTENTIAL IMPACTS OF, AND MITIGATION FOR, THE PROPOSED ZONING (GEIS)

As described in Chapter 2, “Project Description,” the theoretical maximum development scenario under the Proposed Zoning, when accounting for the maximum buildout potential of both the Project Site and the adjacent Swiss Re parcel, is a total of 750 residential units and an 80-room hotel.

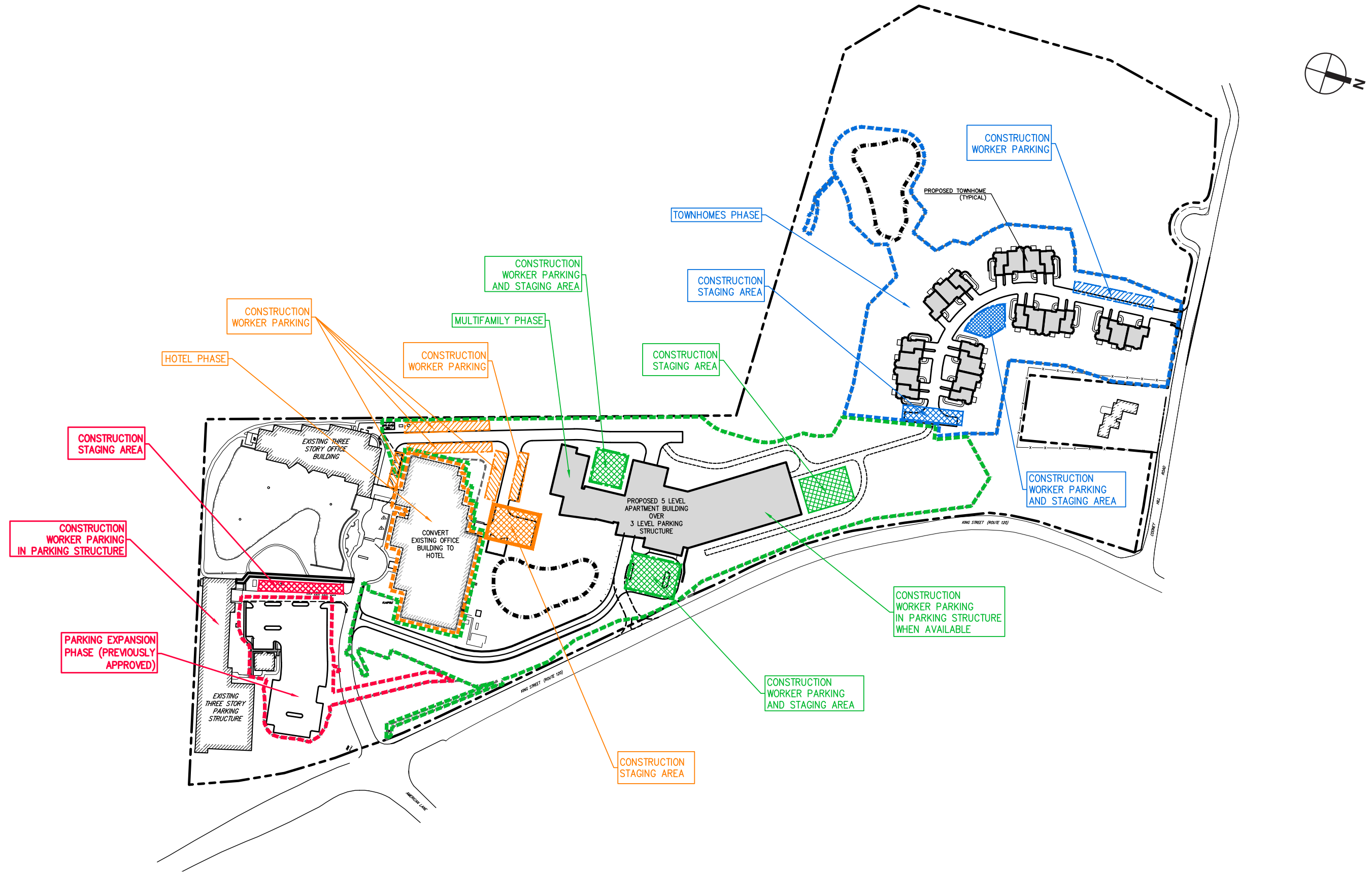
It is important to note that no specific proposal is being made at this time to effectuate the maximum hypothetical development of these two sites and any future plans would be subject to review by the Town, including a full environmental review.

Detailed site plans for the scenario assumed in the GEIS are not available, and the phasing/duration of construction, including the extent of concurrent/overlapping activities and the number of workers, is also unknown at this time. However, based on the land use history and geographic characteristics of the two parcels, the type of new construction practices anticipated to effectuate a mixed-use residential/hotel development, and the distance to off-site sensitive receptors (single family residence at 3 Cooney Hill Road and the Kensico Reservoir). While off-site sensitive receptors are located at a greater distance from the two parcels than the Proposed Project Site, it is the Applicant’s opinion that the potential exists for impacts similar to those identified for the Proposed Project related to erosion and sediment control, air quality, noise, blasting, and hazardous materials. Measures to mitigate these potential impacts would be similar to those identified for the Proposed Project, and would be based on the site plan(s) being proposed.

With regard to construction period traffic under this maximum hypothetical development scenario, it is assumed that due to the size of both parcels, all construction equipment, materials, deliveries, and worker parking would be accommodated on-site. In the absence of detailed site plans (including phasing), the number of construction period workers on site at any one time is not quantifiable. However, as discussed in Chapter 10, “Traffic and Transportation,” the anticipated traffic volumes estimated for the future condition absent the Proposed Zoning and Proposed Project (i.e., the “No Build” condition) accounted for full occupancy of existing office uses at the Project Site and Swiss Re parcel (approximately 700 trips in both the weekday peak AM and weekday peak PM hours). For the temporary construction period associated with this maximum

development scenario, the number of construction worker trips during these same peak hours would be significantly less than 700 trips.

Any future plans on either parcel would be subject to site plan review as well as a full environmental review by the Town. While it is the Applicant's opinion that construction activities at either parcel would result in impacts similar to those identified for the Proposed Project, concurrent construction activities at both parcels cannot be ruled out; therefore, cumulative impacts would need to be considered and appropriately coordinated among the developers, the Town, and other interested/involved agencies in the event of concurrent construction. Cumulative impacts on the surrounding area related to erosion and sediment control, noise, air quality, and traffic are of particular importance if such concurrent construction was to take place and would be evaluated at the time of site plan approvals based on detailed site plan applications. *



18.A. INTRODUCTION

The State Environmental Quality Review Act (SEQRA) requires a description and evaluation of a range of reasonable alternatives to the Proposed Action that are feasible, considering the objectives and capabilities of the Applicant. This chapter describes and analyzes the potential environmental impacts of the alternatives to the Proposed Project that were identified in the adopted Draft Environmental Impact Statement (DEIS) Scoping Document (see **Appendix A-1**) and evaluates the relevant potential environmental impacts of those alternatives. These alternatives include the following:

- Alternative 1: No Action – Currently Approved Development Plan
- Alternative 2: No Action – Existing Site Conditions
- Alternative 3: Reduced Height Multifamily Building
 - Option 1: 45 feet
 - Option 2: 4 stories
- Alternative 4: Static Density
- Alternative 5: Multifamily Building in Cooney Hill Area
- Alternative 6: Senior Housing
- Alternative 7: Increased Townhouse Density
- Alternative 8: Combined Alternative

Pursuant to SEQRA, the description and evaluation of the alternatives should be at a level of detail sufficient to permit a comparative assessment of the alternatives discussed and a comparison with the Proposed Project. Detailed, quantitative analyses of each environmental impact category for each alternative are not presented; rather, the level of analysis provided varies to allow for a sufficient characterization of the relevant relative difference in environmental impacts from the Proposed Project and the Proposed Zoning. Therefore, if the impacts of a specific alternative for a given environmental impact category are expected to be the same as the Proposed Project, a brief description of the assessment is provided. For environmental categories where the potential impact of the alternative is anticipated to be materially different from that of the Proposed Project, a more detailed analysis is provided. **Table 18-1** (included at the end of this chapter) provides a summary of the potential environmental impacts of each alternative and the Proposed Project.

18.B. ALTERNATIVE 1: NO ACTION – CURRENTLY APPROVED PLAN**18.B.1. DESCRIPTION OF ALTERNATIVE**

On October 8, 2003, the Town Board adopted a SEQRA Findings Statement and approved the necessary zoning amendments, including an amended PDCP, to permit an office

expansion on the Project Site. Subsequently, the Town Board granted special permit approval and the Planning Board granted amended site plan approval to permit the Site's previous owner, MBIA, to develop an additional 238,000 sf of office and related amenity space, including a 20,000-sf meeting house. These approvals, which are still in effect, allow for an increase of office space on the Project Site from approximately 261,000 sf of office and related amenity space that exists today to approximately 499,000 sf of office and related amenity space, including the proposed meeting house. This approval also provided for the construction of a parking structure containing approximately 1,000 parking spaces.

Subsequent site plan and Stormwater Pollution Prevention Plan (SWPPP) approvals, which are also still in effect, were granted by the Town for the expansion of the existing 43-space parking area located adjacent to the farmhouse in the southern portion of the Project Site. The approvals allow for a parking expansion of 94 spaces (for a total of 137 spaces), with associated curbing, utility, and stormwater management improvements.

A site plan delineating the currently approved development plan is shown in **Figure 18-1**. While the approvals for the expansions have been granted extensions by the Town and remain in full force and effect today, no new buildings have been constructed pursuant to those approvals. However, several site improvements were made pursuant to those approvals. Specifically, the 16 single-family homes within the Cooney Hill area were demolished and their associated infrastructure (e.g., oil tanks, septic systems) were removed. Similarly, Weber Place was de-mapped by the Town and demolished. Several walking paths were introduced in the northern portion of the Site. The improvement most visible from off-Site was the creation of the landscaped berm along King Street. This berm, planted with woody vegetation, significantly screens the interior of the Project Site from motorists traveling along King Street.

18.B.2. POTENTIAL IMPACTS – NO ACTION (CURRENTLY APPROVED PLAN)

The potential environmental impacts of the currently approved development plan were presented in the previously completed and approved Draft Environmental Impact Statement (2002), Final Environmental Impact Statement (2003), and Statement of Findings (2004). The environmental review also considered the demolition of the former Weber Place and 16 single family homes in the Cooney Hill area.

The Statement of Findings for the currently approved development plan is attached as **Appendix A-4**, and **Table 18-1** provides a comprehensive summary of the anticipated impacts of this plan for purposes of comparison with the Proposed Project and the other alternatives discussed in this chapter. The section below presents a summary of the impacts of the currently approved plan to relevant environmental categories.

As with the Proposed Project, the currently approved development plan would not have any direct impact to the on-site delineated wetlands. Portions of a driveway, parking structure, a stormwater basin, and a 4-foot wide mulched walking trail would impact approximately 1.0 acres of the 100-foot Town regulated wetland buffer, which was proposed to be enhanced as part of the project.

The Statement of Findings notes that the office expansion plan would decrease the amount of impervious surfaces from the prior building condition (e.g., that condition with the prior subdivision and Weber Place) by 11,700 sf to approximately 9.93 acres of impervious

surface within the Project Site. The subsequently approved parking lot expansion permitted an additional 0.58 acres of impervious surface on the Site. Together, the currently approved development plan for the Project Site permits 10.51 acres of impervious surfaces on the Project Site, which is 0.55 acres more than would be developed with the Proposed Project. Similar to the Proposed Project, two SWPPPs were developed for the currently approved development plan in order to reduce rate and volume of runoff for all modeled storms. As discussed above, both SWPPPs have been approved and remain in full effect today.

Potable water demand for the currently approved project is estimated to be 70,900 gpd, an increase of 12,300 gpd over the Proposed Project's estimated demand of 58,600 gpd. With the currently approved project, water would be provided by private wells on the Project Site. The Statement of Findings notes that up to three or more additional wells may be required to meet the envisioned supplemental demand for domestic supply and building cooling systems.

The Statement of Findings notes that the currently approved development plan would generate a total of 441 AM peak hour vehicular trips and 401 PM peak hour vehicular trips. Of the total trips, there would be 222 AM peak hour and 165 PM peak hour trips at the northern (Cooney Hill Road) entrance of the project and 219 AM peak hour and 236 PM peak hour trips would use the main site driveway.

In the Applicant's opinion, and for the reasons discussed below, the potential visual impacts of the currently approved development plan would be of similar significance to those discussed for the Proposed Project, though the visibility of the structures proposed would be different. As with the Proposed Project, views of this alternative are limited to motorists traveling on King Street, primarily at the signalized intersection for the Project Site's main entrance. For southbound motorists on King Street a portion of the six-level parking structure would be visible just south of the intersection with Cooney Hill Road. The six-level parking structure would be located in the same area of the Site as the currently proposed multifamily building, but would be approximately 25-30 feet shorter in height. Therefore, the potential visibility of this alternative, and the potential significance of its impacts, would likely be similar to the Reduced Height Multifamily Option 1, discussed below. Measures proposed by MBIA to avoid and minimize potential visual impacts from the parking structure and new office building include plantings for sufficient visual screening around the remaining single-family home at 3 Cooney Hill Road, and vegetated berms between the parking structure and King Street. As noted above, the berms have been constructed and vegetated with trees and additional landscaping has been provided around the single-family home at 3 Cooney Hill Road. As noted in Chapter 11, "Visual Resources and Community Character," the Lead Agency has not determined the potential significance of the Proposed Action's visual impact at this time, nor has it determined the significance of the potential visual impacts of the alternatives studied in this chapter.

18.C. ALTERNATIVE 2: NO ACTION – EXISTING SITE CONDITIONS

18.C.1. DESCRIPTION OF ALTERNATIVE

Under the No Action – Existing Site Conditions alternative, the Proposed Zoning would not be adopted and the existing DOB-20A zoning district regulations would remain in

place for the entirety of the district. The Project Site would continue to accommodate approximately 261,000 square feet (sf) of office space (within two three-story buildings), a circa 1820s farmhouse and accessory shed/barn (assumed to continue as a storage/maintenance use), surface parking lots (approximately 328 spaces in two lots), a three-story parking structure (approximately 316 spaces), a water feature/stormwater pond, landscaping, and outdoor amenities (including paved tennis courts, a volleyball court, and walking paths). This alternative assumes that absent the Proposed Action, both office buildings would be fully occupied with office tenants and no new structures or site improvements would be constructed (see **Figure 18-2**).

18.C.2. POTENTIAL IMPACTS – NO ACTION – EXISTING SITE CONDITIONS

In the Applicant’s opinion, implementing this alternative (i.e., leaving the site as is and re-tenanting the existing office buildings) is not economically viable nor would it be consistent with the Applicant’s goals and objectives. As discussed in Chapter 2, “Project Description,” changing market conditions have put significant pressure on large office campus parcels. Since its acquisition of the property in 2015, the Applicant has been marketing the property to potential tenants, to date without success. As shown in Chapter 13, “Fiscal and Market Impacts,” the assessed value of the Project Site has declined over the past several years, leading to the reduction of property tax payments to the various taxing jurisdictions. While full occupancy of the office buildings would be anticipated to increase the assessed value of the Project Site, such an increase, if even possible, would likely not be stable or sustainable over the long term.

As discussed in Chapter 3, “Land Use, Zoning, and Public Policy,” as part of the Town’s efforts to update the Comprehensive Plan (the update was adopted on April 25, 2018), the Town considered, among numerous other matters, current market conditions with respect to office campuses such as the Project Site. The Project Site is specifically referenced in several places in the updated Comprehensive Plan with respect to both its locational importance and the need to expand its development potential to accommodate a mix of infill development including, but not limited to, residential, office and hotel uses. Therefore, this alternative, maintaining the existing condition, would not be consistent with the Town’s Comprehensive Plan.

This alternative would not alter the existing condition of the Site’s wetlands, geology, soils, or topography. There would be no new ground disturbance, no new construction activities and no increase to impervious surfaces over the existing condition. The stormwater management infrastructure currently in place at the Project Site would remain unchanged.

Since the buildings have been vacant for several years, renovations may be necessary. Necessary construction-related traffic would access the Project Site from the existing signalized driveway intersection with King Street. Existing parking and loading areas would be expected to adequately support staging for these activities, and such renovation activities would likely be confined to the interior of the structures, with little to no noise impacts.

No changes to the existing vegetation and wildlife composition of the Project Site would occur under this alternative, and the Applicant’s Integrated Pest Management (IPM) plan would remain as part of the Project Site’s existing landscaping and maintenance program.

According to the Applicant's engineer, full occupation of both office buildings for office use would be expected to generate a water and wastewater demand of approximately 26,100 gallons per day (gpd). This is approximately 32,500 gpd less than the daily demand anticipated for the Proposed Project (58,600 gpd). As discussed in Chapter 9, "Utilities," the increase in daily water/sewer demand necessary to serve the Proposed Project, when compared to the existing condition, would not have an adverse impact on the water or wastewater systems serving the Project Site.

Since no residential use would be introduced on the Project Site under this alternative, there would no increase in public school students, and returning the Project Site to fully occupied office use is expected to have little to no effect on existing police, fire, and EMS services.

With regard to traffic and transportation, full occupancy of the existing office buildings would generate approximately 300 peak hour vehicle trips. This is 15-50 more peak hour trips than would be generated by the Proposed Project (see **Table 18-2**).

Table 18-2
Trip Generation Comparison – No Action Alternative (Existing Conditions)

Peak Hour	Proposed Project			No Action Alternative (Existing Site Conditions)		
	Entry Volume	Exit Volume	Total Volume	Entry Volume	Exit Volume	Total Volume
Weekday Peak AM	153	100	253	261	42	303
Weekday Peak Midday*	68	68	136	76	76	152
Weekday Peak PM	117	168	285	47	253	300
Notes: * 50 percent of average of weekday peak AM hour and weekday peak PM hour with a 50/50 entry/exit split. Sources: Maser Consulting P.A.; Institute of Transportation Engineers (ITE) Trip Generation Handbook – 10th Edition, 2017, Land Uses 710 (office), 310 (hotel), 220 (multifamily housing)						

As described in Section 11.B.1, "Existing Views of the Project Site from Surrounding Area," the interior of the Project Site, including the existing buildings and parking areas, is limited. The Project Site is only visible to motorists traveling along King Street. Based on the topography of the Site and the existing vegetated berm along King Street, one of the existing office buildings is partially visible during "leaf-off" conditions from a point just south of the main driveway. From other locations along King Street, the existing office buildings, located in the southern portion of the Project Site, are not visible.

18.D. ALTERNATIVE 3: REDUCED HEIGHT MULTIFAMILY BUILDING

18.D.1. DESCRIPTION OF ALTERNATIVE

This alternative would have the same general program as the Proposed Project, but has been developed to primarily evaluate the change in the potential visibility of the proposed multifamily building (and to a lesser extent, the townhomes) from King Street. To evaluate this change, the Applicant has developed two plans that reduce the maximum elevation (above average grade) of the proposed multifamily building, which would be located closest to King Street:

- **Reduced Height Multifamily Option 1:** reduction in height from what is currently proposed (approximately 78 feet above average grade) to the maximum allowable building height of the existing DOB-20A zoning district as defined in Section 355-30.J(3)(c), which is 45 feet; and
- **Reduced Height Multifamily Option 2:** reduction in height to approximately 67 feet above average grade, which would fall between the maximum allowable height in the existing DOB-20A district (45 feet) and the currently proposed height of 78 feet.

The Applicant has developed conceptual site plans for both options considered under this alternative, as illustrated in **Figures 18-3a and 18-3b**. Both of the options outlined above would result in a multifamily building with less overall height, less gross floor area, fewer residential units and fewer parking spaces when compared to the currently proposed multifamily building. The total number of residential units on the Project Site would decrease under both options when compared to the Proposed Project, but the total number of townhomes would increase. The total gross land coverage (impervious surfaces) would increase under both options when compared to the Proposed Project, primarily due to a larger number of townhomes and related access roads/driveways. A comparison of the conceptual programming of these two reduced height options and the Proposed Project is included in **Table 18-3**.

Table 18-3
Development Comparison
Proposed Project vs. Reduced Height Multifamily Alternative

Development Details	Proposed Project (PDCP)	Reduced Height MF Alternative – Option 1	Reduced Height MF Alternative – Option 2
Office (gsf)	100,000	No change	No change
Hotel (gsf)	161,000 (125 rooms)	No change	No change
MF Building Height (feet above average grade)	78 feet	45 feet	67 feet
Total MF Units	149 units	83 units	135 units
MF Bedroom Count	249 bedrooms	148 bedrooms	228 bedrooms
Total MF Parking Spaces	331 spaces	183 spaces	299 spaces
Total Townhomes	22 units	56 units	29 units
Townhomes Bedroom Count	66 bedrooms	168 bedrooms	87 bedrooms
Total Dwelling Units	171 units	139 units	164 units
Total Bedroom Count	315 bedrooms	316 bedrooms	315 bedrooms
Note: Total Project Site area = 1,645,697 gsf (37.78 acres)			
Sources: Perkins-Eastman, JMC, Airport Campus I-V LLC			

18.D.2. POTENTIAL IMPACTS – REDUCED HEIGHT MULTIFAMILY OPTION 1

Under Option 1 of this alternative, the proposed multifamily building would rise to a maximum height of approximately 45 feet above average grade, with approximately three fewer floors (approximately 66 fewer units) than the Proposed Project's multifamily building. In order to maintain a similar overall residential density to the Proposed Project, as required by the DEIS scope, this option would have considerably more townhomes when compared to the Proposed Project. While this alternative would result in the same mix of uses as the Proposed Project (office, hotel, residential), the overall number of

dwelling units would decrease by approximately 32 units. This overall decrease in residential density is attributable to the site constraints associated with a shorter multifamily building. More land area is required to construct units in a clustered townhouse configuration (with associated roads and other infrastructure), and, based on the Applicant's desired unit mix and configuration, the Project Site would not be able to achieve the same residential density with a shorter multifamily building.

As a result of this alternative having the same general program as the Proposed Project, potential impacts with regard to land use, zoning, and public policy; utility demand; proximity to wetlands; historic resources; operational air quality; and fiscal/market conditions would be expected to be similar to, if not less than, those discussed for the Proposed Project.

Based on calculations provided by the Applicant's engineer, the increase in the number of townhomes under Option 1 of this alternative could result in a slight increase to water and wastewater demand (approximately 110 additional gallons per day) compared to the Proposed Project.

The number of public school-age children (PSAC) was estimated for Option 1 of this alternative using the two methodologies described in Chapter 12, "Community Facilities." When applying the Rutgers multiplier method, it is reasonable to assume that there could be a total of approximately 27 PSAC living on the Project Site under Option 1 of this alternative (see **Table 18-4**). Using the case study multiplier method and information on PSAC residing at comparable multifamily rental developments, it is reasonable to assume that there could be approximately 24 PSAC with this alternative; eight PSAC within the multifamily building and 16 within the townhomes. In summary, the estimated number of public school-aged children introduced to the local school district by Option 1 of this alternative (up to 27 children) would be the same as what was estimated for the Proposed Project. Therefore, similar to the Proposed Project, no significant adverse impacts to the district would be expected to occur with this alternative.

Table 18-4
Reduced Height Multifamily Alternative Option 1 – Estimated Public School-Age Children: Rutgers Method

Type of Unit	Number of Units	Multiplier	Public School-Age Children
MULTIFAMILY BUILDING			
1-BR 5+ Units – Rent*	18	0.07	1.3
2-BR 5+ Units – Rent**	65	0.16	10.4
TOTAL	83		11.7
TOWNHOMES			
3-BR Single-Family Attached***	56	0.28	15.7
TOTAL	139		27.4
Note: Bedroom (BR) Sources: * Rutgers University Center for Urban Policy Research; New York Table 3-1 All Public School Children: School-Age Children in Public School (PSAC); 5+ Units – Rent, 1 BR; More than \$1,000 ** Rutgers University Center for Urban Policy Research; New York Table 3-1 All Public School Children: School-Age Children in Public School (PSAC); 5+ Units – Rent, 2 BR; More than \$1,100 *** Rutgers University Center for Urban Policy Research; New York Table 3-1 All Public School Children: School-Age Children in Public School (PSAC); Single-Family Attached, 3 BR; More than \$269,500			

As with the Proposed Project, the portion of the extra costs associated with providing police, fire, and EMS services to Option 1 of this alternative would be expected to be offset by increases in property tax revenue to the Town.

In terms of potential construction impacts, a shorter multifamily building could potentially translate to a shorter overall construction duration during the multifamily phase. Although temporary, increases in potential construction traffic, air quality, and noise impacts would be likely for the duration of the townhouse phase, with more townhomes proposed in proximity to a sensitive receptor identified at 3 Cooney Hill Road.

As shown on the conceptual site plan for this alternative, the increased townhouse coverage in the northern portion of the Project Site under this alternative would encroach upon the revocable Conservation Easement area, an area that the Proposed Project's structures avoid. However, encroachment into this area as a result of this alternative may not result in significant impacts to vegetation and wildlife, as this area contains similar habitat to other portions of the Project Site and such development would be paired with appropriate stormwater management in compliance with NYCDEP and NYSDEC requirements.

The placement of additional townhomes in the northern portion of the Project Site would also result in a conflict with the minimum front yard (i.e., from King Street) setback distance of 200 feet proposed for townhomes in the Proposed Zoning. These proposed dimensional standards would therefore require modification under this alternative. However, as discussed in more detail below, locating the townhomes in this area of the Site, set back the same distance as the multifamily building, would not result in a significant adverse visual impact.

The total amount of impervious land coverage with this option, accounting for buildings (including parking structures), roads, parking lots, sidewalks, patios and emergency access driveways, would be approximately 12.76 acres. This is 2.8 acres more impervious coverage than the Proposed Project. To accommodate this increase in impervious land coverage, additional disturbance and grading would be required, but the potential impacts identified for geology/soils and topography/slopes are expected to be similar to those identified for the Proposed Project. However, the increase in site disturbance and overall land coverage under Option 1 of this alternative would result in an increase in stormwater runoff both during construction and operation when compared to the Proposed Project (as well as the currently approved development plan). Therefore, additional stormwater management infrastructure (basins, detention, etc.) would likely be needed. This potential increase in stormwater would occur as a result of the following factors of the conceptual alternative site plan:

- Removal of approximately 66 residential units from the multifamily building's upper floors and an increase in the number of townhomes in the northern portion of the Project Site (approximately 34 additional townhomes) to partially offset this loss in units;
- Increase in driveway length in the northern portion of the Project Site to accommodate the additional 34 townhomes;
- Increased footprint size of the multifamily parking structure to achieve the required number of parking spaces with one less parking level; and

- A larger area of disturbance due to the increased footprint of the townhouse development area.

This alternative, Reduced Height Option 1, would generate slightly fewer peak hour vehicle trips than the Proposed Project owing to the slightly reduced number of residential units (see **Table 18-5**).

Table 18-5

Trip Generation Comparison – Reduced Height Multifamily (Option 1)

Peak Hour	Proposed Project			Reduced Height Multifamily Alternative (Option 1)		
	Entry Volume	Exit Volume	Total Volume	Entry Volume	Exit Volume	Total Volume
Weekday Peak AM	153	100	253	150	89	239
Weekday Peak Midday*	68	68	136	64	64	128
Weekday Peak PM	117	168	285	106	162	268
Notes: * 50 percent of average of weekday peak AM hour and weekday peak PM hour with a 50/50 entry/exit split.						
Sources: Maser Consulting P.A.; Institute of Transportation Engineers (ITE) Trip Generation Handbook – 10th Edition, 2017, Land Uses 710 (office), 310 (hotel), 220 (multifamily housing)						

Although the overall trip generation would be less than the Proposed Project, mobile source noise levels along Cooney Hill Road could be slightly higher than what has been discussed for the Proposed Project, due to Cooney Hill Road being the primary access route for approximately 34 more townhomes than the Proposed Project.

The visibility of this Option was assessed from the four Vantage Points defined in Chapter 11, “Visual Resources and Community Character” (see **Figures 18-6 through 18-9**). The hypothetical 45-foot tall multifamily building would still be visible during leaf-off conditions from Vantage Point 1, but to a slightly lesser extent when compared to the Proposed Project. Aside from the loss of three floors with this alternative (approximately 33-feet in height as measured from average grade), leaf-off views of the multifamily building from Vantage Points 2, 3, and 4 would be similar to those for the Proposed Project. As shown in **Figures 18-7 through 18-9**, the reduction in height would not significantly reduce the building’s presence when viewed from Vantage Points 2, 3, and 4. Both buildings would be visible in leaf-off conditions through the existing vegetation on top of the berm and would only be visible to motorists driving on NYS Route 120 for a few moments. Therefore, in the Applicant’s opinion, while the *visibility* of this alternative would be different from the Proposed Project, the difference in proposed building height of this alternative would not result in significantly less visual *impact* than the Proposed Project.

As noted in Chapter 11, “Visual Resources and Community Character,” the Lead Agency has not determined the potential significance of the Proposed Action’s visual impact at this time nor has it determined the significance of the potential visual impacts of the alternatives studied in this chapter.

In the Applicant’s opinion, the most noticeable difference in visibility under this alternative would result from the introduction of townhomes closer to King Street. Due to the increased number of townhomes in the northern portion of the Site, resulting in clusters of townhomes closer to King Street than under the Proposed Project, structural elements

of approximately four townhomes would be visible from Vantage Point 2 during leaf-off conditions at the far northern portion of this view. As discussed in Chapter 11, “Visual Resources and Community Character,” the Proposed Project’s 22 townhomes would not be visible from any of the four vantage points during leaf off-conditions. The townhomes would only be visible to motorists traveling north on King Street from approximately the area of Vantage Point 2 to the approximate area of Vantage Point 3. The two-story townhomes would be set back at a distance greater than 65-feet from King Street and would be heavily screened by existing vegetation, which in the leaf-on condition would nearly eliminate views of these buildings. In the Applicant’s opinion, the limited visibility to motorists traveling within a small area of King Street of these two-story townhomes screened by intervening vegetation would not be a significant adverse visual impact.

18.D.3. POTENTIAL IMPACTS – REDUCED HEIGHT MULTIFAMILY OPTION 2

Under Option 2 of this alternative, the proposed multifamily building would rise to a maximum height of approximately 67 feet above average grade, with approximately one less floor (approximately 14 fewer units) than the Proposed Project’s multifamily building. To maintain the same residential density as the Proposed Project, as required by the approved scoping document, this Option increases the number of townhomes when compared to the Proposed Project. Similar to Option 1, this alternative would result in an overall decrease in residential units when compared to the Proposed Project. However, this decrease would be considerably less than Option 1 (i.e., a decrease of six units compared to 32 units).

Potential impacts of Option 2 with regard to land use, zoning, and public policy; utility demand; proximity to wetlands; vegetation and wildlife; historic resources; operational air quality; and fiscal/market conditions would be expected to be similar to those identified for the Proposed Project and Option 1 of this alternative. Similar to Option 1, although temporary, Option 2 increases in potential construction traffic, air quality, and noise impacts would be likely for the duration of the townhouse phase, with more townhomes proposed in proximity to a sensitive receptor identified at 3 Cooney Hill Road.

The number of PSAC was estimated for Option 2 of this alternative using the two methodologies described in Chapter 12, “Community Facilities.” When applying the Rutgers multiplier method, it is reasonable to assume that there could be a total of approximately 26 PSAC living on the Project Site under Option 2 of this alternative (see **Table 18-6**). Using the case study multiplier method and information on PSAC residing at comparable multifamily rental developments, it is reasonable to assume that there could be a total of approximately 21 PSAC (13 PSAC within the multifamily building and eight PSAC within the townhomes). In summary, the estimated number of public school-aged children introduced to the local school district by Option 2 of this alternative (up to 26 children) would be slightly less than what was estimated for the Proposed Project (up to 27 children). Therefore, similar to the Proposed Project and Option 1, no significant adverse impacts to the district would be expected to occur with this alternative.

Table 18-6

Reduced Height Multifamily Alternative Option 2 – Estimated Public School-Age Children: Rutgers Method

Type of Unit	Number of Units	Multiplier	Public School-Age Children
MULTIFAMILY BUILDING			
1-BR 5+ Units – Rent*	42	0.07	2.9
2-BR 5+ Units – Rent**	93	0.16	14.9
TOTAL	135		17.8
TOWNHOMES			
3-BR Single-Family Attached***	29	0.28	8.1
TOTAL	164		25.9
Note: Bedroom (BR)			
Sources:			
* Rutgers University Center for Urban Policy Research; New York Table 3-1 All Public School Children: School-Age Children in Public School (PSAC); 5+ Units – Rent, 1 BR; More than \$1,000			
** Rutgers University Center for Urban Policy Research; New York Table 3-1 All Public School Children: School-Age Children in Public School (PSAC); 5+ Units – Rent, 2 BR; More than \$1,100			
*** Rutgers University Center for Urban Policy Research; New York Table 3-1 All Public School Children: School-Age Children in Public School (PSAC); Single-Family Attached, 3 BR; More than \$269,500			

As with the Proposed Project and Option 1, the portion of the extra costs associated with providing police, fire, and EMS services to Option 2 of this alternative would be expected to be offset by increases in property tax revenue to the Town.

Similar to Option 1, the additional townhomes located in the northern portion of the Project Site under Option 2 would be closer to King Street than the currently proposed 200-foot setback contemplated by the Proposed Zoning. Therefore, with this option, the proposed dimensional standards would require modification. However, as was the case with Option 1, the proximity of these townhomes to King Street would not, in the Applicant's opinion, result in a significant adverse visual impact.

Under Option 2 of this alternative, the total amount of impervious land coverage would be 10.42 acres, which is 0.46 acres more than the Proposed Project and 2.34 acres less than Option 1. Similar to Option 1, additional disturbance and grading would be required, but the potential impacts identified for geology/soils and topography/slopes are expected to be similar to those identified for the Proposed Project. However, the increase in site disturbance and overall land coverage under Option 2 of this alternative would result in an increase in stormwater runoff both during construction and operation when compared to the Proposed Project (as well as the currently approved development plan). Therefore, additional stormwater management infrastructure (basins, detention, etc.) would likely be needed. This increase in stormwater would occur as a result of the following factors of the conceptual alternative site plan:

- Removal of approximately one floor from the multifamily building (approximately 14 multifamily building units) and an increase in the number of townhomes in the northern portion of the Project Site (approximately seven additional townhomes) to partially offset this loss in units;
- Increase in driveway length in the northern portion of the Project Site to accommodate the seven additional townhomes; and

- A larger area of disturbance due to the increased footprint of the townhouse development area.

Similar to Option 1, Option 2 would result in slightly fewer overall peak hour trips than the Proposed Project (see **Table 18-7**). The potential for impacts related to mobile sources of noise would be similar, if not slightly less than, what has been estimated for the Proposed Project.

Table 18-7
Trip Generation Comparison – Reduced Height Multifamily (Option 2)

Peak Hour	Proposed Project			Reduced Height Multifamily Alternative (Option 2)		
	Entry Volume	Exit Volume	Total Volume	Entry Volume	Exit Volume	Total Volume
Weekday Peak AM	153	100	253	153	97	250
Weekday Peak Midday*	68	68	136	68	68	136
Weekday Peak PM	117	168	285	114	167	281
Note: * 50 percent of average of weekday peak AM hour and weekday peak PM hour with a 50/50 entry/exit split. Sources: Maser Consulting P.A.; Institute of Transportation Engineers (ITE) Trip Generation Handbook – 10th Edition, 2017, Land Uses 710 (office), 310 (hotel), 220 (multifamily housing)						

The visibility of Option 2 was analyzed from the same four Vantage Points as the Proposed Project (see **Figures 18-6 through 18-9**). As shown in the leaf-off visibility analysis, the visibility of the approximately 67-foot tall multifamily building (approximately 11 feet shorter than the Proposed Project) would be quite similar to the visibility offered under the Proposed Project. The reduction of one floor (approximately 11 feet) would not significantly reduce the multifamily building's presence when viewed from the vantage points. Similar to what has been discussed for Option 1 above, the introduction of more townhomes closer to King Street under Option 2 would, in the Applicant's opinion, represent the most noticeable difference in visibility when compared to the Proposed Project. This difference, however, would not result in a significant adverse visual impact for the reasons set forth in the discussion of Option 1. As noted in Chapter 11, "Visual Resources and Community Character," the Lead Agency has not determined the potential significance of the Proposed Action's visual impact at this time nor has it determined the significance of the potential visual impacts of the alternatives studied in this chapter.

18.E. ALTERNATIVE 4: STATIC DENSITY ALTERNATIVE

18.E.1. DESCRIPTION OF ALTERNATIVE

The Proposed Zoning would allow each square foot of approved but unbuilt office and related amenity space to be converted into one and one-quarter (1.25) square feet of residential space. The Static Density alternative would result in the Proposed Zoning being amended to allow each square foot of approved but unbuilt office and related amenity space to be converted into one (1.00) square foot of hotel/residential space. As such, this alternative would reduce the proposed residential program on the Project Site from the currently proposed 293,225 gsf to 238,000 gsf, the latter number being equal to

the amount of office and related amenity space included in the currently approved but unbuilt development plan.

As shown in **Table 18-8**, under this alternative it is assumed that the two existing office buildings would be re-used in a similar manner to the Proposed Project (100,000 gsf office and 161,000 gsf hotel). The primary difference between this alternative and the Proposed Project would be a reduction in the residential development program by approximately 20 percent. The total number of dwelling units on the Project Site under this alternative would decrease from 171 to approximately 138. For purposes of this analysis, the 33-unit reduction is assumed to come entirely from a reduction in multifamily units and, therefore, this program could be accommodated in a similar layout to the Proposed Project. As such, a conceptual site plan was not developed for this alternative as the potential for environmental impacts to differ from the Proposed Project would result from the change in program and not layout. In addition, the several alternative layouts studied in this chapter identify the differences in impacts associated with various potential building layouts.

Table 18-8
Development Comparison
Proposed Project vs. Static Density Alternative

Development Details	Proposed Project (PDCP)	Static Density Alternative
Office (gsf)	100,000	No change
Hotel (gsf)	161,000 (125 rooms)	No change
Residential Gross Floor Area (gsf)	293,225	238,000
MF Building Height (feet above average grade)	78	Between 45 and 85
Total MF units	149	116
Total Townhomes	22	22
Total Dwelling Units	171	138
Sources: Perkins-Eastman, JMC, Airport Campus I-V LLC		

18.E.2. POTENTIAL IMPACTS – STATIC DENSITY ALTERNATIVE

Under the Static Density alternative, the proposed multifamily building would likely have a slightly smaller footprint, fewer floors, and a lower overall building height than the Proposed Project's multifamily building. While no site plan has been developed for this alternative, in order to accommodate 116 units and parking in a multifamily building that would be smaller in overall footprint when compared to the Proposed Project, it is assumed that the multifamily building's maximum height above average grade would be at a height between the maximum allowed under the existing DOB-20A zoning (45 feet) and the Proposed Project's multifamily building height of 78 feet. This assumption is predicated on the analysis completed for Option 1 of the reduced height multifamily alternative, which involved 83 proposed units within a 45-foot tall multifamily building. With 116 multifamily units proposed under this alternative within a smaller footprint, it is likely that the multifamily building would rise higher than 45 feet, but not more than the 85 feet permitted under the Proposed Zoning. Therefore, the visibility of this alternative would likely be similar to Option 2 of the Reduced Height Alternative.

Potential impacts of this alternative to land use, zoning, and public policy would be expected to be similar to those discussed for the Proposed Project owing to the similarities in the overall development program.

To estimate the anticipated number of PSAC that may live within this alternative, it was assumed that the multifamily building in this alternative would have the same ratio of one- to two-bedroom units (approximately 31 percent one-bedroom units and approximately 69 percent two-bedroom units). When applying the Rutgers multiplier method, it is reasonable to assume that there could be a total of approximately 22 PSAC living on the Project Site under the Static Density alternative (see **Table 18-9**). Using the case study multiplier method and information on PSAC residing at comparable multifamily rental developments, it is reasonable to assume that there could be a total of approximately 19 PSAC (13 PSAC within the multifamily building and six PSAC within the townhomes). In summary, the estimated number of public school-aged children introduced to the local school district by the Static Density alternative (up to 21 children) would be less than what was calculated for the Proposed Project (up to 27 children). Therefore, similar to the Proposed Project, no significant adverse impacts to the district would be expected to occur with this alternative.

Table 18-9
Static Density Alternative
Estimated Public School-Age Children: Rutgers Method

Type of Unit	Number of Units	Multiplier	Public School-Age Children
MULTIFAMILY BUILDING			
1-BR 5+ Units – Rent*	36	0.07	2.5
2-BR 5+ Units – Rent**	80	0.16	12.8
TOTAL	116		15.3
TOWNHOMES			
3-BR Single-Family Attached***	22	0.28	6.2
TOTAL	138		21.5
Note: Bedroom (BR) Sources: * Rutgers University Center for Urban Policy Research; New York Table 3-1 All Public School Children: School-Age Children in Public School (PSAC); 5+ Units – Rent, 1 BR; More than \$1,000 ** Rutgers University Center for Urban Policy Research; New York Table 3-1 All Public School Children: School-Age Children in Public School (PSAC); 5+ Units – Rent, 2 BR; More than \$1,100 *** Rutgers University Center for Urban Policy Research; New York Table 3-1 All Public School Children: School-Age Children in Public School (PSAC); Single-Family Attached, 3 BR; More than \$269,500			

As with the Proposed Project, the portion of the extra costs associated with providing police, fire, and EMS services to this alternative would be expected to be offset by increases in property tax revenue to the Town.

Based on calculations provided by the Applicant's engineer, this alternative could result in an average daily water demand of 53,320 gpd, which is 5,280 gpd less than the Proposed Project.

Potential impacts to geology, topography, proximity to wetlands, vegetation and wildlife, historic resources, operational noise and air quality, and construction would be expected to be similar to those identified for the Proposed Project, although the multifamily phase of construction could be shorter in overall duration due to a smaller multifamily building.

This alternative would result in slightly fewer overall peak hour trips than the Proposed Project (see **Table 18-10**). The potential for impacts related to mobile sources of noise would be similar to, if not slightly less than what has been analyzed for the Proposed Project.

Table 18-10
Trip Generation Comparison – Static Density Alternative

Peak Hour	Proposed Project			Static Density Alternative		
	Entry Volume	Exit Volume	Total Volume	Entry Volume	Exit Volume	Total Volume
Weekday Peak AM	153	100	253	150	89	239
Weekday Peak Midday*	68	68	136	64	64	128
Weekday Peak PM	117	168	285	106	161	267
Notes: * 50 percent of average of weekday peak AM hour and weekday peak PM hour with a 50/50 entry/exit split. Sources: Maser Consulting P.A.; Institute of Transportation Engineers (ITE) Trip Generation Handbook – 10th Edition, 2017, Land Uses 710 (office), 310 (hotel), 220 (multifamily housing)						

Due to an assumed decrease in site disturbance and overall land coverage under this alternative, a net decrease in impervious surfaces is likely when compared to the Proposed Project (as well as the currently approved development plan). Therefore, it is assumed that potential impacts related to stormwater would be less than the Proposed Project, and stormwater management infrastructure would be implemented at a slightly smaller scale.

18.F. ALTERNATIVE 5: MULTIFAMILY BUILDING IN COONEY HILL AREA

18.F.1. DESCRIPTION OF ALTERNATIVE

This alternative evaluates the potential environmental impacts of relocating the proposed multifamily building to the northern portion of the Project Site (i.e., the Cooney Hill area) and retaining the same overall program as the Proposed Project. The Applicant has developed a conceptual site plan for this alternative, as illustrated in **Figure 18-4**. The analysis of potential environmental impacts is based on the new locations of both proposed residential uses—multifamily building and townhomes—since the overall development program would remain the same.

18.F.2. POTENTIAL IMPACTS – MULTIFAMILY IN COONEY HILL AREA

As the overall residential density and programming would not change under this alternative, potential impacts to land use, zoning, and public policy; community facilities (schools, police, fire, EMS); utility demand; historic resources; operational air quality; and fiscal/market conditions would be expected to be similar to those identified for the Proposed Project.

With more paved surfaces necessary to provide adequate access and circulation under this alternative, greater potential impacts are likely with regard to geology and topography. Specifically, a larger area of disturbance would result in changes to the grading plan and amount of material cut and fill. Wider circulation drives may also result in encroachment into the Project Site's identified wetland buffers.

Relocating the multifamily phase of construction to the Cooney Hill area of the Project Site, the phase considered the most intense in terms of duration and extent of grading/excavation required, would likely result in greater construction traffic, air quality, and noise impacts to the sensitive receptor identified at 3 Cooney Hill Road.

As shown on the conceptual site plan for this alternative, relocation of the proposed multifamily building to the northern portion of the Project Site would result in the footprint of the multifamily building encroaching upon the revocable Conservation Easement area, an area that the Proposed Project's structures avoid. However, encroachment into this area as a result of this alternative may not result in significant impacts to vegetation and wildlife, as this area contains similar habitat to elsewhere within the Project Site and such development would be paired with appropriate stormwater management in compliance with NYCDEP and NYSDEC requirements.

Relocating the 22 proposed townhomes to the area of the Project Site currently proposed for multifamily use would locate these townhomes closer to King Street than the 200 feet contemplated by the Proposed Zoning. As such, with this alternative, the dimensional standards of the Zoning would require modification. However, as described below, locating the two-story townhomes in this area of the Project Site would not result in a significant adverse visual impact.

The total amount of impervious land coverage with this alternative would be 10.48 acres, which is 0.52 acres more than the Proposed Project. Although modest in comparison to the Proposed Project, the increase in site disturbance and overall land coverage under this alternative would result in an increase in stormwater runoff both during construction and operation when compared to the Proposed Project (as well as the currently approved development plan). Therefore, additional stormwater management infrastructure (basins, detention, etc.) would likely be needed. This potential increase in impervious area would be the result of:

- Increased paved surfaces necessary to provide adequate emergency and non-emergency circulation between the multifamily building and the remainder of the Project Site; and
- Increased disturbance and new impervious surfaces closer to NYCDEP-owned reservoir lands in the northern portion of the Project Site.

This alternative would result in identical peak hour trips to the Project Site when compared to the Proposed Project. However, this alternative is expected to potentially result in greater mobile source noise impacts along Cooney Hill Road due to the shift from providing access to approximately 22 townhomes under the Proposed Project to providing access to 149 apartments (with a parking garage) with this alternative.

The visibility of this alternative was assessed from the same four Vantage Points as the Proposed Project (see **Figures 18-6 through 18-9**). While a small portion of the multifamily building's roofline would be visible from Vantage Point 1 during leaf-off conditions, it would not be visible from the other three Vantage Points. Instead, the placement of 22 townhomes closer to King Street (at a distance less than 200 feet as contemplated by the Proposed Zoning) would result in some structural elements of the townhomes becoming visible from vantage points 2 and 3 during leaf off conditions. Intervening topography and vegetation would significantly screen these townhomes from view by motorists driving along King Street. As such, in the Applicant's opinion, this alternative would not result in a significant adverse visual impact. As noted in Chapter 11, "Visual Resources and Community Character," the Lead Agency has not determined the potential significance of the Proposed Action's visual impact at this time nor has it

determined the significance of the potential visual impacts of the alternatives studied in this chapter.

18.G. ALTERNATIVE 6: PROVISION OF SENIOR LIVING

18.G.1. DESCRIPTION OF ALTERNATIVE

This alternative evaluates the potential environmental impacts of replacing the currently proposed residential development program on the Project Site with “senior citizen housing” as defined by Section 355-4 of the Town Code. As discussed in Chapter 2, “Project Description,” and Chapter 3, “Land Use, Zoning, and Public Policy,” the Proposed Zoning includes a provision for density bonuses related to senior housing and assisted living facilities by allowing each square foot of approved but unbuilt office and related amenity space to be converted into 1.875 square feet of senior housing/assisted living space. This bonus is proposed in recognition of the relatively lower per-unit impacts of senior housing as compared to market rate housing.

This alternative would increase the square footage of the proposed residential program on the Project Site from the currently proposed 293,225 gsf to approximately 446,250 gsf. Under this alternative, it is assumed that the two existing office buildings would be re-used in a similar manner to the Proposed Project (100,000 gsf office and a 161,000 gsf hotel with 125 rooms). The total number of dwelling units on the Project Site under this alternative would increase from 171 to approximately 350. These units would be programmed appropriately for senior living and the buildings would likely include space for supplementary services, such as centralized dining and other activities. A conceptual site plan has not been developed for this alternative, but it is assumed that construction of more than one building would be necessary to achieve the targeted unit count of 350. It is further assumed that for operational efficiency, the building(s) in this alternative would be clustered together and located in similar areas of the Site to the buildings included in the Proposed Project.

18.G.2. POTENTIAL IMPACTS – PROVISION OF SENIOR LIVING

Because there is no specific proposed senior living site plan and because the relative environmental impacts of concentrating development in one part of the Site or another are analyzed elsewhere in this chapter, this section focuses on the potential environmental impacts associated with the program of senior living.

A senior housing program is likely to be developed with either an Independent Living (IL) or Assisted Living (AL) program, or a combination of both. IL is defined as senior housing for able-bodied, healthy seniors who can care for themselves within a setting that provides enhanced support and recreational services. IL units contain a full kitchen and full bathroom. However, IL residents have access to enhanced community services (e.g., recreational programs, transportation, etc.) as well as communal dining facilities. In most IL facilities, residents make use of the communal dining facility for the majority of their meals. AL facilities provide care for individuals who need help with one or more tasks of daily living, but who do not require skilled nursing care. AL units typically do not contain kitchens since meals are served in a common dining area.

Similar to the Proposed Project, development under this alternative would be consistent with existing land use and demographic trends in the Town, and the Town’s 2018 Comprehensive

Plan. According to the Comprehensive Plan, between 2000 and 2010, the Town of North Castle's population aged 50 or older grew by 1,012 residents, or 31.4 percent.¹ As discussed in Chapter 3, "Land Use, Zoning, and Public Policy," there is currently a senior housing project under construction in the Town at 125 Mt. Kisco Road (Madonna Senior Housing). As such, a senior housing program on the Project site would be expected to absorb a portion of the expected increase in demand owing to the Town's increasing senior population.

With regard to community facilities, no children attending public school would be expected to live at the Project Site under this alternative. Development of the Project Site with 350 IL and/or AL units would require some level of increased police, and EMS services. As with the Proposed Project, the portion of the extra costs associated with providing police and EMS services to this alternative would be expected to be offset by increases in property tax revenue to the Town. It is noted, however, that with this alternative there would likely be more EMS calls per unit than with the Proposed Project. To mitigate the potential impact, it is likely that an operator of a senior living facility would implement certain operational practices to limit potentially unnecessary EMS calls (e.g., "lift assist"). Similar to the Proposed Project, development with this alternative would not introduce new building or construction types to the Town and would therefore not be expected to have an adverse impact to the provision of fire protection services.

IL and AL facilities generally require more demand for water and wastewater than traditional residential developments. In order to establish a reasonable "worst-case" scenario for water usage, it is assumed that all 350 senior living units would be located in an IL facility and that the facility had a mix of one-, two-, and three-bedroom units as well as a communal dining room. This scenario results in an average daily water demand of approximately 84,180 gpd, which is 25,580 gpd more than the Proposed Project (see **Table 18-11**). As discussed in Chapter 9, "Utilities," and the Well Yield Summary Report prepared by WSP in January 2020 (see **Appendix F-1**), the combined yield of the Project Site's existing wells will be able to support an average water demand of 51,120 to 60,480 gpd. Therefore, additional capacity would need to be added to the on-Site water supply system to support this alternative. As noted in WSP's preliminary assessment, the potential exists for further improvements to the Project Site's water delivery system that could increase water capacity. These improvements, or other on- or off-Site improvements, would need to be made prior to development of a senior living program of the size contemplated in this alternative.

¹ https://www.northcastleny.com/sites/northcastleny/files/uploads/2018_comprehensive_plan_amended_2_6-12-19-compressed.pdf

Table 18-11
Calculated Daily Water Usage – Senior Living Alternative

Use	Area (sf)	Employees	Seats	Rooms	Units	Bedrooms	Usage Rate** (gpd/unit)	Usage (gpd)
Office	100,000	500					12	6,000
Hotel				125			110	13,750
Hotel Amenity (Restaurant)			150				28	4,200
Senior Living		90	50		350	525*	110	60,230
Senior Living Alternative Total (gpd)								84,180
Notes: *Assumes an Independent Living (IL) program with 60 percent 1-bedroom units, 30 percent 2-bedroom units, and 10 percent 3-bedroom units. **Projected flow rates are based upon expected hydraulic loading rates provided in “New York State Design Standards for Intermediate Sized Wastewater Treatment Systems,” 2014. Hydraulic loading is decreased by 20 percent in these installations serving premises equipped with certified water-saving plumbing fixtures. Sources: JMC and AKRF, Inc.								

Because IL and AL uses often involve a larger number of service and maintenance employees but a lower rate of residents driving than market-rate housing, overall parking, trip generation, and potential traffic impacts during peak hours would differ from the Proposed Project. As shown in **Table 18-12**, despite having more than twice as many dwelling units as the Proposed Project (350 units compared to 171 units), this alternative would result in comparable peak hour trips to the Project Site when compared to the Proposed Project, with the exception of the midday peak hour, when traffic would be slightly higher.

Table 18-12
Trip Generation Comparison – Senior Housing Alternative

Peak Hour	Proposed Project			Senior Housing Alternative		
	Entry Volume	Exit Volume	Total Volume	Entry Volume	Exit Volume	Total Volume
Weekday Peak AM	153	100	253	160	85	245
Weekday Peak Midday*	68	68	136	86	86	172
Weekday Peak PM	117	168	285	106	175	281
Notes: * 50 percent of average of weekday peak AM hour and weekday peak PM hour with a 50/50 entry/exit split. Sources: Maser Consulting P.A.; Institute of Transportation Engineers (ITE) Trip Generation Handbook – 10th Edition, 2017, Land Uses 710 (office), 310 (hotel), 220 (multifamily housing), 254 (senior housing)						

Due to an assumed increase in site disturbance and overall land coverage under this alternative (clustered building development in the northern and southern portions of the Project Site), a net increase in impervious surfaces is likely when compared to the Proposed Project (as well as the currently approved development plan). Therefore, it is assumed that potential impacts related to stormwater would be greater than the Proposed Project, and stormwater management infrastructure would need to be sized appropriately.

Since new buildings under this alternative are assumed at a height between 45 and 85 feet, development of this alternative could result in similar changes to visibility as those

discussed for the Proposed Project and Options 1 and 2 of the Reduced Height Multifamily Alternative, particularly for Vantage Points 1, 2, and 3. Whether or not structures would be visible from Vantage Point 4 would depend on the placement and orientation of the buildings on the Site.

18.H. ALTERNATIVE 7: INCREASED TOWNHOUSE DENSITY

18.H.1. DESCRIPTION OF ALTERNATIVE

This alternative evaluates the potential environmental impacts of eliminating the proposed multifamily building and maximizing the number of townhomes on the Project Site. The Applicant has developed a conceptual site plan for this alternative, as illustrated in **Figure 18-5**. This alternative would result in no programmatic changes to the office and hotel uses proposed by the Applicant, but would result in fewer dwelling units on the Project Site when compared to the Proposed Project. Under this alternative, no multifamily units would be built on the Project Site. All residential units would be in the form of two-story townhomes (see **Table 18-13**).

Table 18-13
Development Comparison

Proposed Project vs. Increased Townhouse Density Alternative

Development Details	Proposed Project (PDCP)	Increased Townhouse Density Alternative
Office (gsf)	100,000	No change
Hotel (gsf)	161,000 (125 rooms)	No change
Residential Gross Floor Area (gsf)	293,225	Approx. 238,000
Maximum Building Height (feet above average grade)	Approx. 78 feet	Approx. 32 feet
Total MF units	149 units	0
Total Townhomes	22 units	78 units
Total Dwelling Units	171 units	78 units

Sources: Perkins-Eastman, JMC, Airport Campus I-V LLC

18.H.2. POTENTIAL IMPACTS – INCREASED TOWNHOUSE DENSITY

Based on the nature of the program proposed for this alternative when compared to the Proposed Project, the potential for impacts to land use, zoning, and public policy; historic resources; operational air quality; and fiscal/market conditions would be expected to be similar to those of the Proposed Project.

With more land and associated paved surfaces necessary to provide adequate access and circulation for 78 townhomes, greater potential impacts are likely with regard to geology and topography. Specifically, a larger area of disturbance would result in changes to the grading plan and cut/fill quantities. Encroachment into the Project Site's identified wetland area buffer may also occur.

Since all 78 residential units under this alternative are assumed to be owner-occupied three-bedroom townhomes, the estimated number of children attending public school under this alternative was determined utilizing the top tercile (>\$269,500) Rutgers multiplier for single-family attached units, which is 0.28 for 3-bedroom units. Using this multiplier, it is estimated that there would be approximately 22 PSAC living within the 78 townhomes (see **Table 18-14**). The estimated number of public school-aged children

introduced to the local school district by this alternative (up to 22 children) would be slightly less than what was calculated for the Proposed Project (up to 27 children). Similar to the Proposed Project, no significant adverse impacts to the district would be expected to occur.

Table 18-14

**Increased Townhouse Density Alternative – Estimated Public School-Age Children:
Rutgers Method**

Type of Unit	Number of Units	Multiplier	Public School-Age Children
3-BR Single-Family Attached Townhomes*	78	0.28	21.8
Note: Bedroom (BR) Sources: * Rutgers University Center for Urban Policy Research; New York Table 3-1 All Public School Children: School-Age Children in Public School (PSAC); Single-Family Attached, 3 BR; More than \$269,500			

As with the Proposed Project, the portion of the extra costs associated with providing police, fire, and EMS services to this alternative would be expected to be offset by increases in property tax revenue to the Town.

A residential program comprised of 78 townhomes would result in changes to utility demand when compared to the Proposed Project. According to calculations provided by the Applicant's engineer, this alternative would result in water and wastewater demand of 49,690 gpd, which is 8,910 gpd less than the Proposed Project.

Under this alternative, the townhouse phase of construction would have a longer duration and may involve sub-phases depending on market factors. Although temporary in nature, more construction activity in the northern portion of the Project Site would be expected to occur for a longer duration than the Proposed Project. This construction would occur within close proximity to the identified sensitive receptor at 3 Cooney Hill Road, resulting in greater potential impacts related to construction traffic, air quality, and noise when compared to the Proposed Project.

As shown on the conceptual site plan, this alternative would result in the footprints of several townhomes and townhouse clusters encroaching upon the revocable Conservation Easement area, an area that the Proposed Project's structures avoid. However, encroachment into this area as a result of this alternative may not result in significant impacts to vegetation and wildlife, as this area contains similar habitat to elsewhere within the Project Site and such development would be paired with appropriate stormwater management in compliance with NYCDEP and NYSDEC requirements.

Similar to previously discussed alternatives that include an increase in townhouse development, a residential program comprised of 78 townhomes would include townhomes located closer than 200-feet from King Street. Therefore, the dimensional standards contemplated in the Proposed Zoning would require modification under this alternative. However, as with the other alternatives that considered townhomes closer to King Street, it is the Applicant's opinion that, for the same reasons discussed above, this alternative would not result in a significant adverse visual impact.

The total amount of impervious land coverage for this alternative would be 11.7 acres, which is 1.74 acres more than the Proposed Project. This increase in site disturbance and overall land coverage would result in an increase in stormwater runoff both during

construction and operation when compared to the Proposed Project (as well as the currently approved development plan), and there would likely be a need for more stormwater management infrastructure. This increase in coverage would be the result of:

- The amount of land and new impervious surface required to accommodate 78 three-bedroom townhomes when compared to a multifamily residential building;
- Increased paved surfaces necessary to provide adequate emergency and non-emergency access and circulation throughout the Project Site;
- Increased disturbance and new impervious surfaces closer to NYCDEP-owned reservoir lands in the northern portion of the Project Site; and
- A larger area of disturbance due to the increased footprint of the townhouse development area.

As shown in **Table 18-15**, development of approximately 78 townhomes would result in fewer peak hour trips to the Project Site when compared to the Proposed Project. Similar to previously discussed alternatives with increased townhouse density in the Cooney Hill area, there is the potential for increased mobile source noise along Cooney Hill Road under this alternative when compared to the Proposed Project. The conceptual site plan for this alternative also allows for an additional access drive from King Street, approximately 600 feet south of Cooney Hill Road.

Table 18-15
Trip Generation Comparison – Increased Townhouse Density

Peak Hour	Proposed Project			Increased Townhouse Density		
	Entry Volume	Exit Volume	Total Volume	Entry Volume	Exit Volume	Total Volume
Weekday Peak AM	153	100	253	144	67	211
Weekday Peak Midday*	68	68	136	56	56	112
Weekday Peak PM	117	168	285	84	150	234
Notes: * 50 percent of average of weekday peak AM hour and weekday peak PM hour with a 50/50 entry/exit split. Sources: Maser Consulting P.A.; Institute of Transportation Engineers (ITE) Trip Generation Handbook – 10th Edition, 2017, Land Uses 710 (office), 310 (hotel), 220 (multifamily housing), 254 (senior housing)						

Potential visual impacts with this alternative would be similar to what has been discussed at vantage points 2 and 3 for both options of the Reduced Height Multifamily alternative as well as the Multifamily in Cooney Hill Area alternative. Based on the conceptual site plan for this alternative, approximately 14 townhomes would be introduced within 200 feet of King Street, the setback contemplated by the Proposed Zoning. The comparable alternatives referenced above similarly propose townhomes in these locations. As discussed for the other similar alternatives, it is the Applicant's opinion that the introduction of townhomes set back less than 200 feet but more than 65 feet from King Street would not result in a significant adverse visual impact.

18.I. ALTERNATIVE 8: COMBINED ALTERNATIVE

18.I.1. DESCRIPTION OF ALTERNATIVE

This alternative combines elements of the Proposed Project, the Reduced Height Multifamily alternative and the Static Density alternative, as required by the DEIS Scoping Document. As shown in **Table 18-16**, this alternative would allow for the same office and hotel uses of the Proposed Project, a residential program with the same square footage as the currently approved office expansion (which equates to approximately 139 total residential units), and a multifamily building with a maximum height permitted by the existing DOB-20A zoning (45 feet). The primary differences between this alternative and the Proposed Project would be a shorter multifamily building and a reduction in the residential development program by approximately 20 percent. The total number of dwelling units on the Project Site under this alternative would decrease from 171 to approximately 139.

Table 18-16
Development Comparison
Proposed Project vs. Combined Alternative

Development Details	Proposed Project (PDCP)	Combined Alternative
Office (gsf)	100,000	No change
Hotel (gsf)	161,000 (125 rooms)	No change
MF Building Height (feet above average grade)	78 feet	45 feet
Total MF units	149 units	83 units
Total Townhomes	22 units	56 units
Total Dwelling Units	171 units	139 units
Sources: JMC, Airport Campus I-V LLC		

18.I.2. POTENTIAL IMPACTS – COMBINED ALTERNATIVE

Under the Combined Alternative, the multifamily building would have fewer floors and a lower overall building height than the Proposed Project's multifamily building. To offset the reduced height of the multifamily building while maintaining a static residential density, this alternative assumes that 34 additional townhomes would be constructed in the northern (Cooney Hill) portion of the Project Site.

While this alternative would result in the same general types of uses as the Proposed Project (office, hotel, residential) the overall number of dwelling units would decrease by approximately 32 units. Potential impacts to land use, zoning, and public policy; geology and topography; proximity to wetlands; and fiscal/market conditions would be expected to be similar to those identified for the Proposed Project, the Static Density alternative, and Option 1 of the Reduced Height Multifamily alternative.

This alternative has the potential to result in the same number of public school-aged children estimated to be introduced to the local school district as the Static Density alternative (up to 21 children), which would be less than what was calculated for the Proposed Project (up to 27 children). Similar to the Proposed Project, no significant adverse impacts to the district would be expected to occur with this alternative.

As with the Proposed Project, Option 1 of the Reduced Height Multifamily alternative, and the Static Density alternative, the portion of the extra costs associated with providing police, fire, and EMS services to this alternative would be expected to be offset by increases in property tax revenue to the Town.

The Combined alternative is estimated to result in a water and wastewater demand ranging between 53,320 and 58,710 gpd. This demand would be similar to the Proposed Project's estimated water and wastewater demand of 58,600 gpd and could be met by the existing on-Site water supply.

In terms of potential construction impacts with the Combined alternative, a shorter multifamily building could potentially translate to a shorter overall construction duration during the multifamily phase. Although temporary, increases in potential construction traffic, air quality, and noise impacts would be likely for the duration of the Townhouse Phase, with more townhomes proposed in proximity to the sensitive receptor at 3 Cooney Hill Road.

Although a conceptual site plan has not been developed for the Combined alternative, it is reasonable to assume that, similar to Option 1 of the Reduced Height Multifamily alternative, increased townhouse coverage in the northern portion of the Project Site under this alternative could face similar constraints and encroach upon the revocable Conservation Easement area, an area that the Proposed Project's structures avoid. However, encroachment into this area as a result of this alternative may not result in significant impacts to vegetation and wildlife, as this area contains similar habitat to elsewhere within the Project Site and such development would be paired with appropriate stormwater management in compliance with NYCDEP and NYSDEC requirements. Similarly, the placement of additional townhomes in the northern portion of the Project Site could also result in townhomes being located closer to King Street than the 200-feet contemplated by the Proposed Zoning. As discussed for the other alternatives that include townhomes in this area of the Site, it is the Applicant's opinion that development of these townhomes would not result in a significant adverse visual impact.

With the Combined alternative, the total amount of impervious land coverage on the Project Site would likely increase when compared to the Proposed Project in an amount similar to what was estimated for Option 1 of the Reduced Height Multifamily alternative. To accommodate this increase in impervious land coverage, additional disturbance and grading would be required, but the potential impacts identified for geology/soils and topography/slopes are expected to be similar to those identified for the Proposed Project. The increase in site disturbance and overall land coverage under this alternative would result in an increase in stormwater runoff both during construction and operation when compared to the Proposed Project (as well as the currently approved development plan), and there would likely be a need for additional stormwater management infrastructure. The increase in impervious surfaces would be the result of:

- Removal of approximately 66 residential units from the multifamily building's upper floors and an increase in the number of townhomes in the northern portion of the Project Site (approximately 34 additional townhomes) to partially offset this loss in units;
- A potential increase in driveway length in the northern portion of the Project Site to accommodate the additional 34 townhomes;

- A potential increased footprint size of the multifamily parking structure to achieve the required number of parking spaces with one less parking level; and
- A potentially larger area of disturbance due to the increased footprint of the townhouse development area.

The Combined alternative would result in the same number of vehicle trips as the static density alternative, which had slightly fewer overall peak hour trips than the Proposed Project (see **Table 18-17**).

Table 18-17
Trip Generation Comparison – Combined Alternative

Peak Hour	Proposed Project			Combined Alternative		
	Entry Volume	Exit Volume	Total Volume	Entry Volume	Exit Volume	Total Volume
Weekday Peak AM	153	100	253	150	89	239
Weekday Peak Midday*	68	68	136	64	64	128
Weekday Peak PM	117	168	285	106	162	268
Notes: * 50 percent of average of weekday peak AM hour and weekday peak PM hour with a 50/50 entry/exit split. Sources: Maser Consulting P.A.; Institute of Transportation Engineers (ITE) Trip Generation Handbook – 10th Edition, 2017, Land Uses 710 (office), 310 (hotel), 220 (multifamily housing)						

Although the overall trip generation would be less than the Proposed Project due to fewer residential units, mobile source noise levels along Cooney Hill Road could be slightly higher than what was identified for the Proposed Project due to the shift from Cooney Hill Road providing access to approximately 22 townhomes under the Proposed Project to providing access for up to 56 townhomes under this alternative.

While no site plan has been developed specific to the Combined Alternative, the visibility of the 45-foot tall multifamily building and additional townhomes under the Combined alternative are expected to be similar to what was discussed above for Option 1 of the Reduced Height Multifamily alternative. *

Table 18-1
Alternatives Impact Comparison

	Proposed Project	No Action – Currently Approved Plan (18.B)*	No Action – Existing Site Conditions (18.C)	Reduced Height Multifamily Option 1 (18.D)	Reduced Height Multifamily Option 2 (18.D)	Static Density (18.E)	Multifamily in Cooney Hill Area (18.F)	Senior Housing (18.G)	Increased Townhome Density (18.H)	Combined (18.I)
Land Use, Zoning, and Public Policy	- Change use of Site from vacant office buildings to a mixed-use development containing office, hotel, and residential uses. - Requires zoning amendment to permit residential and hotel uses. - Proposed 171 dwelling units in multifamily building (149 units) and townhouses (22 units). - Increases allowable height for new buildings that are set back from King Street and screened with vegetation. - Consistent with the 2018 Comprehensive Plan's recommendations that encouraged mixed-use development in office park properties that have become obsolete. Residential and hotel uses were specifically recommended for these properties.	- Construct expansion of office use on Project Site. - No zoning amendment required. - Office expansion not economically viable and does not meet purpose and need of Applicant. - Office expansion is inconsistent with Comprehensive Plan, which encourages developing a mix of uses, including residential and hotel uses, within business park properties.	- Hypothetical scenario where existing office buildings are re-occupied. - Not economically viable and does not meet purpose and need of Applicant. - No zoning amendment required. - Inconsistent with Comprehensive Plan, which encourages developing a mix of uses, including residential and hotel uses, within business park properties.	- Similar mix of uses as Proposed Project. (More townhouses and fewer multifamily units). - Multifamily building limited to 45-feet in height, which in Applicant's opinion is not economically viable for a multifamily building on this Site. - Requires zoning amendment to permit residential and hotel uses. - Consistent with the 2018 Comprehensive Plan's recommendations that encouraged mixed-use development in office park properties. - May require different townhouse setbacks than Proposed Project.	- Similar mix of uses as Proposed Project. (More townhouses and fewer multifamily units). - Multifamily building limited to 4-stories (approximately 67 feet). - Requires zoning amendment to permit residential and hotel uses. - Consistent with the 2018 Comprehensive Plan's recommendations that encouraged mixed-use development in office park properties. - May require different townhouse setbacks than Proposed Project.	- Similar mix of uses as Proposed Project. - Fewer overall units, less residential density permitted. - Requires zoning amendment to permit residential and hotel uses. - Increases allowable height for new buildings that are set back from King Street and screened with vegetation. - Consistent with the 2018 Comprehensive Plan's recommendations that encouraged mixed-use development in office park properties. - May require different townhouse setbacks than Proposed Project.	- Similar program as Proposed Project. - Requires zoning amendment to permit residential and hotel uses. - Increases allowable height for new buildings - Consistent with 2018 Comprehensive Plan. - Townhouses and multifamily building would 'switch' locations on Project Site, requiring a change to townhouse setbacks in Proposed Zoning.	- Multifamily & townhouse units replaced with up to 350 senior housing units in one or more buildings. - Requires zoning amendment to permit residential and hotel uses. - Increases allowable height for new buildings that are set back from King Street and screened with vegetation. - Consistent with the 2018 Comprehensive Plan. - May require different townhouses setbacks than Proposed Project.	- Residential component reduced to 78 townhouse units (no multifamily). - Overall number of residential units would decrease by 93 units. - Requires zoning amendment to permit residential and hotel uses. - Consistent with the 2018 Comprehensive Plan. - May require different townhouses setbacks than Proposed Project.	- Reduced residential density within buildings limited to 45 feet in height. - Limited height of multifamily building is not economically viable, in Applicant's opinion. - Requires zoning amendment to permit residential and hotel uses. - Consistent with the 2018 Comprehensive Plan.
Geology, Soils, and Topography	760,625 sf of Site disturbance. - Majority of disturbance within PnB soil type, "Paxton fine sandy loam, 2 to 8 percent slopes," which is appropriate for proposed development. - No impacts to Town-regulated steep slopes. - Limited blasting may be required for excavation of portion of multifamily parking structure. Code-compliant blasting protocol would be implemented. - Implementation of Town approved Stormwater Pollution Prevention Plan (SWPPP) and Erosion and Sediment Control Plan (ESCP) during construction. - No significant adverse impacts to on-Site geology, soils, topography.	- Majority of disturbance within PnB soil type, "Paxton fine sandy loam, 2 to 8 percent slopes," which is appropriate for proposed development. - No impacts to Town-regulated steep slopes. - Blasting may be required for office expansion, parking structure, service building. Code-compliant blasting protocol would be implemented. - SWPPP and ESCP implementation during construction.	No impacts to geology, soils and topography.	- Similar to Proposed Project - Additional site grading and disturbance due to increased number of townhomes in northern portion of the Project Site.	- Similar to Proposed Project - Additional site grading and disturbance due to increased number of townhomes in northern portion of the Project Site.	Similar to Proposed Project	- Similar to Proposed Project - Additional site grading and disturbance due to additional paved surfaces necessary to provide adequate circulation between uses.	- Similar to Proposed Project - Additional site grading and disturbance possible due to increased residential density.	- Similar to Proposed Project - Additional site grading and disturbance to accommodate more townhomes than Proposed Project.	Similar to Proposed Project
Wetlands	- No direct impacts to the on-site wetlands. 0.19-acre impact to Town-regulated wetland buffer by emergency access drive (gravel) - No significant impact to wetland hydrology from regrading. - Mitigation includes wetland buffer enhancement through proposed landscaping plan.	- No direct impacts to the on-site wetlands. 1.0-acre impact to Town-regulated wetland buffer by driveway, parking structure, stormwater basin, and mulched walking trail. - No significant impact to wetland hydrology from regrading. - Mitigation includes wetland buffer enhancement through proposed landscaping plan.	- No new impacts to wetlands or wetland buffers. - No enhanced wetland buffer plantings.	Similar to Proposed Project	Similar to Proposed Project	Similar to Proposed Project	Potential for more wetland buffer impacts from wider access drives necessary to provide adequate circulation between uses.	Dependent on potential site plan.	Potential for more wetland buffer impacts from wider access drives necessary to provide adequate circulation between uses.	Similar to Proposed Project
Vegetation and Wildlife	- Habitat and wildlife on-Site is typical of suburban environments, consisting of species relatively tolerant to humans. - No evidence of threatened or endangered species (TES) on-Site. - Temporary construction impacts to low-quality habitat. - Seasonally defined limits on certain activities to avoid potential impacts to TES with a potential to occur on-Site. - Removal of 368 Town-regulated trees. - Landscaping program includes planting of 422 new native trees. - Project Site's existing Integrated Pest Management (IPM) plan would be expanded to cover new project.	- Similar impacts to vegetation and wildlife as Proposed Project. - Landscaping plan proposed, some of which has already been implemented (e.g., vegetated berm along King Street). - Project Site's existing IPM plan would be expanded to cover new project.	- No tree removal or new tree planting. - Existing low-quality habitat to remain. - Existing IPM to remain.	- Similar to Proposed Project - Encroachment of additional townhomes into revocable Conservation Easement area, but may not be significant impact	- Similar to Proposed Project and Reduced Height Multifamily Option 1 - Encroachment of additional townhomes into revocable Conservation Easement area, but may not be significant impact	Similar to Proposed Project	- Similar to Proposed Project - Encroachment of relocated multifamily building into revocable Conservation Easement area, but may not be significant impact	Similar to Proposed Project	- Similar to Proposed Project - Encroachment of additional townhomes into irrevocable Conservation Easement area, but may not be significant impact	Similar to Proposed Project, Option 1 of Reduced Height Multifamily alternative and Static Density alternative.

Table 18-1 (cont'd)
Alternatives Impact Comparison

	Proposed Project	No Action – Currently Approved Plan (18.B)*	No Action – Existing Site Conditions (18.C)	Reduced Height Multifamily Option 1 (18.D)	Reduced Height Multifamily Option 2 (18.D)	Static Density (18.E)	Multifamily in Cooney Hill Area (18.F)	Senior Housing (18.G)	Increased Townhome Density (18.H)	Combined (18.I)
Stormwater Management	• 9.96 acres of impervious coverage. • Stormwater management program to reduce rate and volume of runoff for all modeled storms. • Modifications to currently approved development plan's SWPPP subject to Town and NYCDEP approval.	• 10.51 of impervious coverage • 0.55 acres more than Proposed Project • Stormwater management program to reduce rate and volume of runoff for all modeled storms. • Town and NYCDEP-approved SWPPPs remain in full effect.	• No changes to existing condition.	• 12.76 of impervious coverage, 2.8 acres more than Proposed Project • A larger area of disturbance due to the increased footprint of the townhome development area, resulting in additional stormwater management systems.	• 10.42 of impervious coverage, 0.46 acres more than Proposed Project • Increase in driveway length in the northern portion of the Project Site to accommodate the seven additional townhomes • A larger area of disturbance due to the increased footprint of the townhome development area.	• Similar to Proposed Project	• 10.48 acres of impervious coverage, 0.52 acres more than Proposed Project. • Increased disturbance and new impervious surfaces closer to NYCDEP-owned reservoir lands in the northern portion of the Project Site.	• Increase in site disturbance and overall impervious land coverage likely when compared to the Proposed Project	• 11.70 acres of impervious coverage, 1.74 acres more than Proposed Project • Increased disturbance and new impervious surfaces closer to NYCDEP-owned reservoir lands in the northern portion of the Project Site	• Similar to Proposed Project, Option 1 of Reduced Height Multifamily alternative and Static Density alternative.
Utilities	• Water/sewer demand of 58,600 gallons per day (gpd) • 72-hour pumping test (excluding best Well 8) shows existing Wells 3, 6, 7 would support an average daily demand of 49,320 gpd, which is 9,280 gpd less than above. Mitigation includes either utilizing existing Well 5 or drilling new well onsite. • North Castle Sewer District 3 infrastructure currently designed to handle cumulative flows from existing development and the Proposed Project. • Minor improvements to North Castle Sewer District 3 Pump Station Nos. 2 and 3 to correct existing deficiency.	• Water/sewer demand of 70,900 gpd, which is 12,300gpd more than Proposed Project. • SEQRA Statement of Findings notes up to three or more additional wells may be required to meet demand.	• Water/sewer demand of 26,100 gpd, which is 32,500 gpd less than Proposed Project. • Existing water and sewer system are adequate to meet demand.	• Water/sewer demand of approximately 58,710 gpd, 110 gpd more than Proposed Project. • Measures similar to those identified for the Proposed Project would meet demand.	• Similar to Proposed Project	• Water/Sewer demand of approximately 53,320 gpd, which is 5,280 gpd less than Proposed Project. • Measures similar to those identified for the Proposed Project would meet demand.	• Similar to Proposed Project	• Water/sewer demand of approximately 84,180 gpd, which is 25,580 gpd more than Proposed Project. • Additional on-Site water capacity required to meet need.	• Water/sewer demand of approximately 49,690 gpd, which is 8,910 gpd less than Proposed Project. • Measures similar to those identified for the Proposed Project would meet demand.	• Water/sewer demand between 53,320 and 58,710 gpd. Measures similar to those identified for the Proposed Project would meet demand.
Traffic and Transportation	• 253 AM Peak Hour Trips • 136 Midday Peak Hour Trips • 285 PM Peak Hour Trips • Similar levels of service and delays experienced at study area intersections as No-Build condition. • Signal re-timings with certain signal modifications at certain intersections could improve current and future operating conditions. • No significant impacts to public transportation.	• 441 Peak AM Hour Trips • 222 at Cooney Hill Road • 219 at Main Site Driveway • 401 Peak PM Hour Trips • 165 at Cooney Hill Road • 236 at Main Site Driveway	• 303 AM peak hour trips • 152 midday peak hour trips • 300 PM peak hour trips • No changes to existing roadway conditions or Site access. • No significant impacts to public transportation.	• 239 AM peak hour trips • 128 midday peak hour trips • 268 PM peak hour trips • Similar impacts as Proposed Project.	• 250 AM peak hour trips • 136 midday peak hour trips • 281 PM peak hour trips • Similar impacts as Proposed Project.	• Similar to Option 1 of Reduced Height Multifamily alternative. • 239 AM peak hour trips • 128 midday peak hour trips • 267 PM peak hour trips	• Similar to Proposed Project • 253 AM peak hour trips • 136 midday peak hour trips • 285 PM peak hour trips • More trips likely accessing Site via Cooney Hill Road than Proposed Project.	• 245 AM peak hour trips • 172 midday peak hour trips • 281 PM peak hour trips • More trips in midday than Proposed Project (36) • Similar impacts as Proposed Project.	• 211 AM peak hour trips • 112 midday peak hour trips • 234 PM peak hour trips • Fewer trips than Proposed Project in AM (42), midday (24) and PM (51)	• Similar to Option 1 of Reduced Height Multifamily alternative and Static Density alternative. • 239 AM peak hour trips • 128 midday peak hour trips • 268 PM peak hour trips
Visual and Community Character	• Proposed uses (office, hotel, residential) consistent with surrounding land uses, zoning, and 2018 Comprehensive Plan. • Approximately 78-foot-tall multifamily building visible through intervening vegetation in leaf-off conditions. • Visibility limited to motorists driving on King Street. • Existing vegetated berm screens view of townhomes and other site improvements • No off-Site impacts from lighting plan • Landscape plan includes retaining and enhancing vegetated berm along Site's King Street frontage.	• Proposed uses consistent with existing use. • Inconsistent with Comprehensive Plan. • Approved 5-story parking structure visible to motorists driving on King Street. Located in similar area of Site as proposed multifamily building. • Landscape plan proposed plantings around 3 Cooney Hill Road and landscaped berms along King Street. This plan was implemented and is reflected in the Site's existing condition.	• No changes to existing condition.	• Proposed uses consistent with surrounding uses and Comprehensive Plan. • Views of 45-foot-tall multifamily building similar to Proposed Project during leaf-off conditions. Visibility limited to motorists along certain areas of King Street. • Townhomes, set back more than 65 feet but less than the 200 feet contemplated by the Proposed Zoning are visible through intervening vegetation during leaf-off condition. Visibility is limited and would not cause a significant adverse impact. • Landscape plan similar in scope and impacts to Proposed Project.	• Proposed uses consistent with surrounding uses and Comprehensive Plan. • View of 67-foot-tall multifamily building Similar to Proposed Project The minor reduction in height is not significant. • Townhomes, set back between 65 feet and 200 are visible through intervening vegetation during leaf-off condition. Visibility is limited and would not cause a significant adverse impact. • Landscape plan similar in scope and impacts to Proposed Project.	• Similar to Option 2 of Reduced Height Multifamily alternative.	• Multifamily building townhomes switch locations on the Site • Townhomes, set back between 65 feet and 200 are visible through intervening vegetation during leaf-off condition. Visibility is limited and would not cause a significant adverse impact. • Small portion of multifamily building roofline would be visible from Vantage Point 1 during leaf-off conditions • Landscape plan similar in scope and impacts to Proposed Project.	• Similar to Option 1 and 2 of Reduced Height Multifamily alternative.	• Townhomes, set back between 65 feet and 200 are visible through intervening vegetation during leaf-off condition. Visibility is limited and would not cause a significant adverse impact. • No multifamily building proposed. • Landscape plan similar in scope and impacts to Proposed Project.	• Similar to Option 1 of Reduced Height Multifamily alternative.
Community Facilities	• 27 public school-age children (PSAC) anticipated with Proposed Project; 1-2 per grade. Additional staff not anticipated to meet need. Additional cost would be offset by property tax revenue. • Increased police services likely to be offset by additional property and hotel tax revenue. • Up to 55 new fire and EMS calls predicted by Armonk Fire Department (AFD). Additional tax revenue expected to offset increased demand. Potential need for a ladder truck to serve Project identified by AFD.	• No PSAC. • Additional demand for emergency services generated by office expansion. Emergency service providers indicated additional demand could be accommodated. • On-Site amenities for office workers.	• No changes to existing condition.	• Similar to Proposed Project	• 26 PSAC. • Similar impacts and mitigation to Proposed Project.	• 22 PSAC. • Similar impacts and mitigation to Proposed Project.	• Similar to Proposed Project	• No PSAC. • Additional EMS calls likely with senior living alternative. • Operational policies of senior living facility likely to mitigate unnecessary EMS calls. • Property tax revenue expected to offset cost of increased demand for community services.	• 22 PSAC • Similar impacts and mitigation to Proposed Project.	• Same as Static Density alternative.

Table 1-7 (cont'd)
Alternatives Impact Comparison

	Proposed Project	No Action – Currently Approved Plan (18.B)*	No Action – Existing Site Conditions (18.C)	Reduced Height Multifamily Option 1 (18.D)	Reduced Height Multifamily Option 2 (18.D)	Static Density (18.E)	Multifamily in Cooney Hill Area (18.F)	Senior Housing (18.G)	Increased Townhome Density (18.H)	Combined (18.I)
Fiscal and Market Impacts	- Assessed value of, and property taxes generate by, Project Site expected to decline without redevelopment. - Market demand for residential and hotel uses in the Town. - Construction would generate \$170.65 mm in total economic output and 821 person-years of employment. - Annual property and hotel taxes estimated at \$1.97mm, increase of \$755,728 from current condition. \$1.09mm to School District (\$0.29mm increase) \$352k to Town (\$229k increase) \$22.6k to fire & ambulance district (\$8.2k increase)	- It is noted that construction of this alternative is not economically viable. - Additional demand for police, fire, and ambulance services - No additional demand for school services	Likelihood of decreased property tax revenue owing to continued vacancy of Project Site.	- Similar to Proposed Project - Likely fewer construction- and operational-period economic benefits owing to reduced program.	- Similar to Proposed Project - Likely fewer construction- and operational-period economic benefits owing to reduced program.	- Similar to Proposed Project - Likely fewer construction- and operational-period economic benefits owing to reduced program.	Similar to Proposed Project	Similar to Proposed Project	- Similar to Proposed Project - Likely fewer construction- and operational-period economic benefits owing to reduced program.	Similar to Option 1 of Reduced Height Multifamily alternative and Static Density alternative.
Historic Resources	- No impacts to historic (architectural) resources. - Phase 1B archaeological testing in previously undisturbed areas and consultation with State based on final site plan.	Same as Proposed Project	Same as Proposed Project	Same as Proposed Project	Same as Proposed Project	Same as Proposed Project	Same as Proposed Project	Same as Proposed Project	Same as Proposed Project	Same as Proposed Project
Air Quality	No significant adverse impact from mobile or stationary sources.	Similar to Proposed Project	No changes to existing condition.	Similar to Proposed Project	Similar to Proposed Project	Similar to Proposed Project	Similar to Proposed Project	Similar to Proposed Project	Similar to Proposed Project	Similar to Proposed Project
Noise	No significant adverse impact from mobile or stationary sources.	Similar to Proposed Project	No changes to existing condition.	Similar to Proposed Project	Similar to Proposed Project	Similar to Proposed Project	Similar to Proposed Project	Similar to Proposed Project	Similar to Proposed Project	Similar to Proposed Project
Construction Impacts	- Four phases of construction proposed: Hotel phase (8-12 months), Townhome phase (12-15 months), Multifamily phase (18-24 months), Parking lot expansion phase (3-4 months). - Estimated 200 construction workers utilized over the life of the project (no more than 35 on-site at any one time). - Parking and staging provided on-Site for construction workers and equipment. No parking, queuing, or staging on King Street or Cooney Hill Road. - No impacts to study area intersections from construction traffic. - Construction limited to days and hours permitted by Town Code: 7:30 AM–7:00 PM during the week and from 9:00 AM–5:00 PM on weekends and legal holidays. - Construction Management Plan (CMP) prepared during Site Plan to codify construction-period coordination and mitigation, including: - Town-approved Erosion and Sediment Control Plan (ESCP) to prevent off-Site stormwater impacts. - Fugitive dust and construction vehicle emission reduction measures. - Construction sequencing plan. - Construction period traffic management plan. - Blasting protocol and mitigation measures, if blasting is necessary. - Plan to address unforeseen subsurface conditions (e.g., tanks) - To extent practicable, would locate noisy equipment away from 3 Cooney Hill Road. Potential exists for temporary, unavoidable construction-period noise impact to this residence. Proposed Project contemplates townhouses in this area, which requires less intensive construction than other project components.	- Similar to Proposed Project - Potential for additional blasting for parking structure. - Meeting House construction in similar location as Proposed Project's townhouses, resulting in similar impacts to 3 Cooney Hill Road.	- No changes to existing condition. - Construction possible with renovation of existing office buildings.	- Similar to Proposed Project - Potential for slightly shorter construction duration for multifamily building.	- Similar to Proposed Project - Potential for slightly shorter construction duration for multifamily building.	- Similar to Proposed Project - Potential for slightly shorter construction duration for multifamily building.	- Similar nature and duration of impacts to Proposed Project. - More intensive construction (i.e., multifamily) closer to 3 Cooney Hill Road.	- Dependent on Site Plan and final program. - Likely similar in nature and duration of potential impacts to Proposed Project.	- More construction proximate to 3 Cooney Hill Road. - Blasting would not be anticipated.	Similar to Proposed Project, Option 1 of Reduced Height Multifamily alternative and Static Density alternative.

Note: The summary of impacts for the Project Site’s currently approved development plan have been based on what was disclosed within the previously completed and approved Draft Environmental Impact Statement (2002), Final Environmental Impact Statement (2003), and Statement of Findings (2004), which analyzed the potential impacts of redeveloping the Project Site with expanded office uses (see **Appendix A-4**).

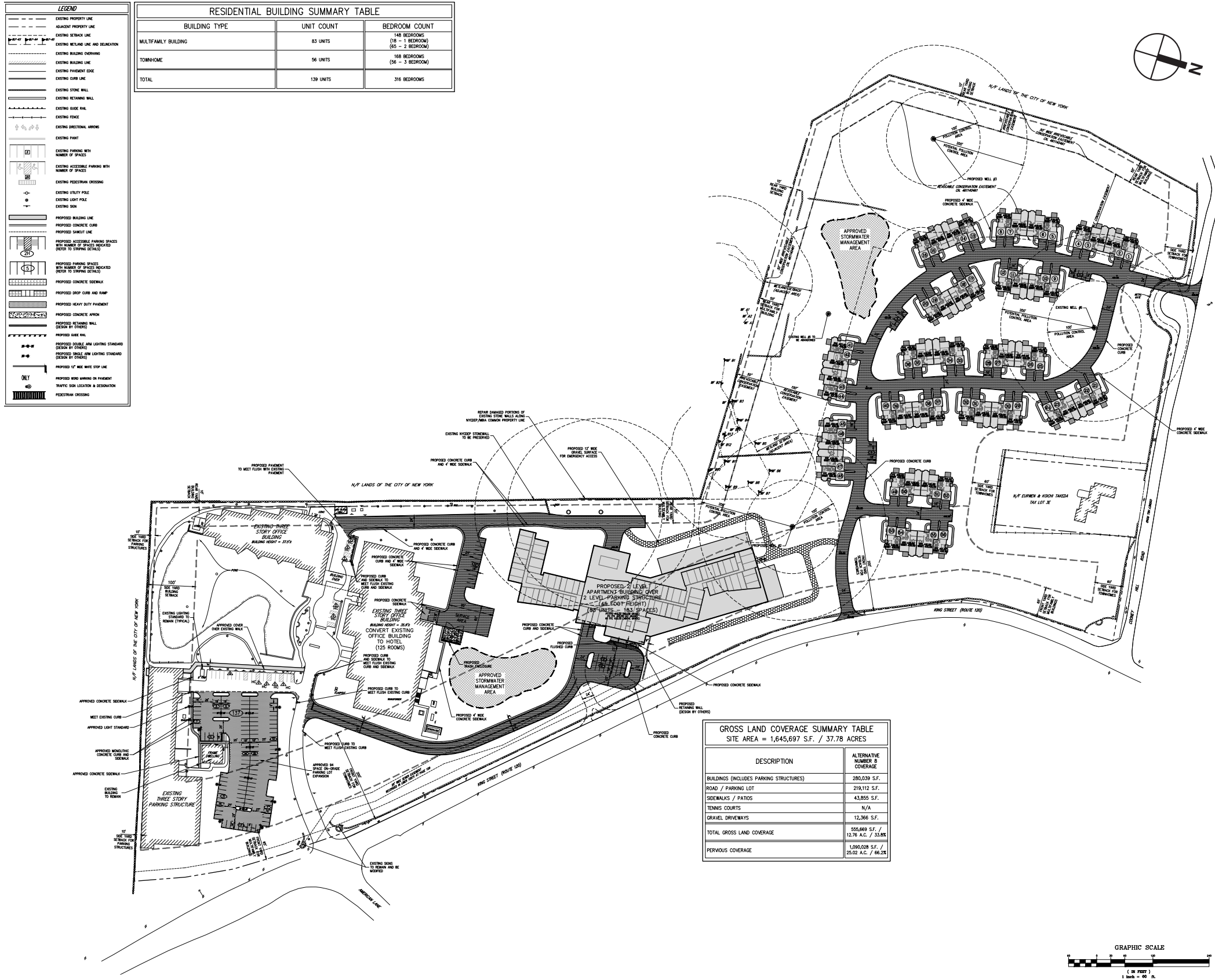


Alternative 1 - Currently Approved Development Plan

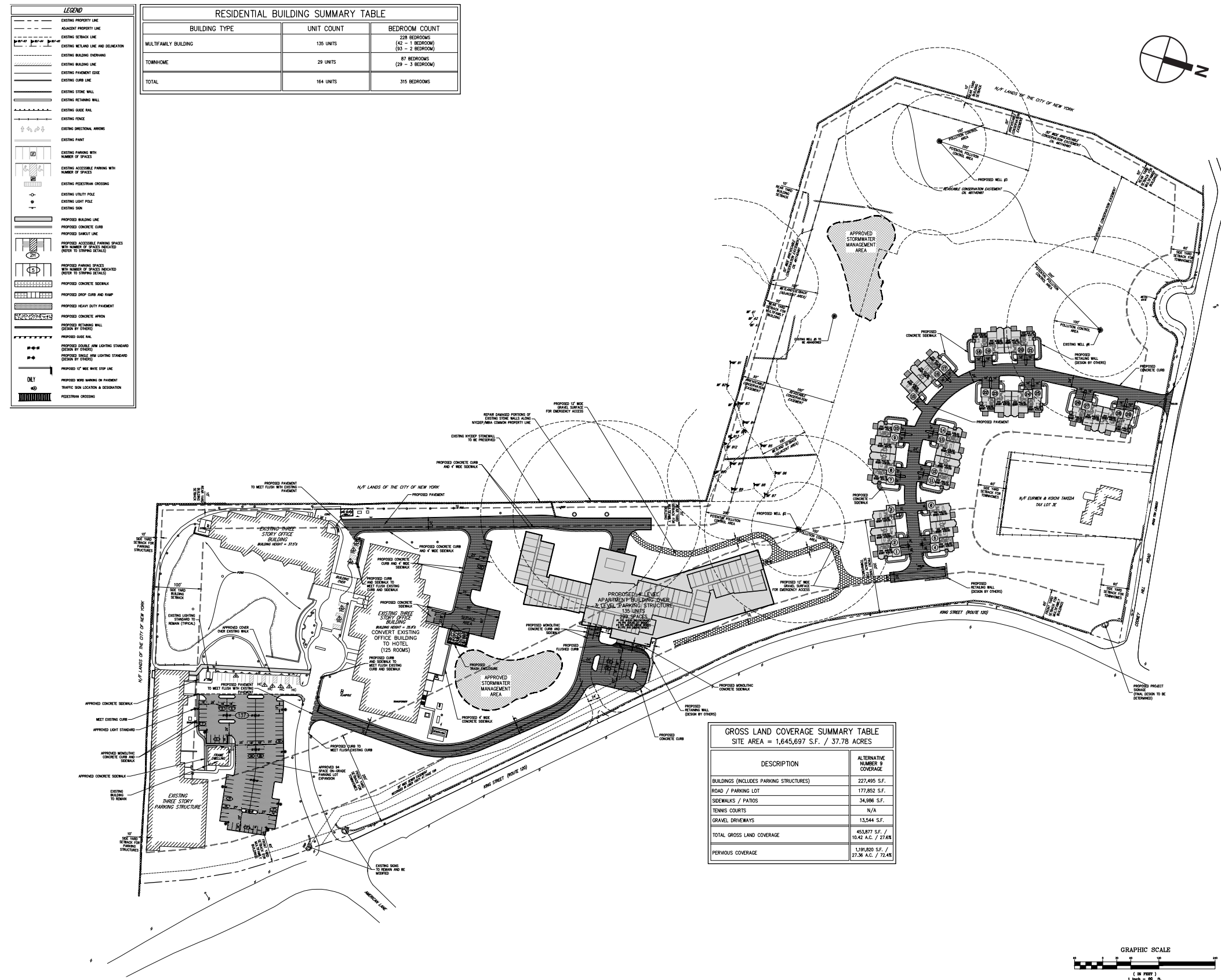


 Project Site

0 500 FEET

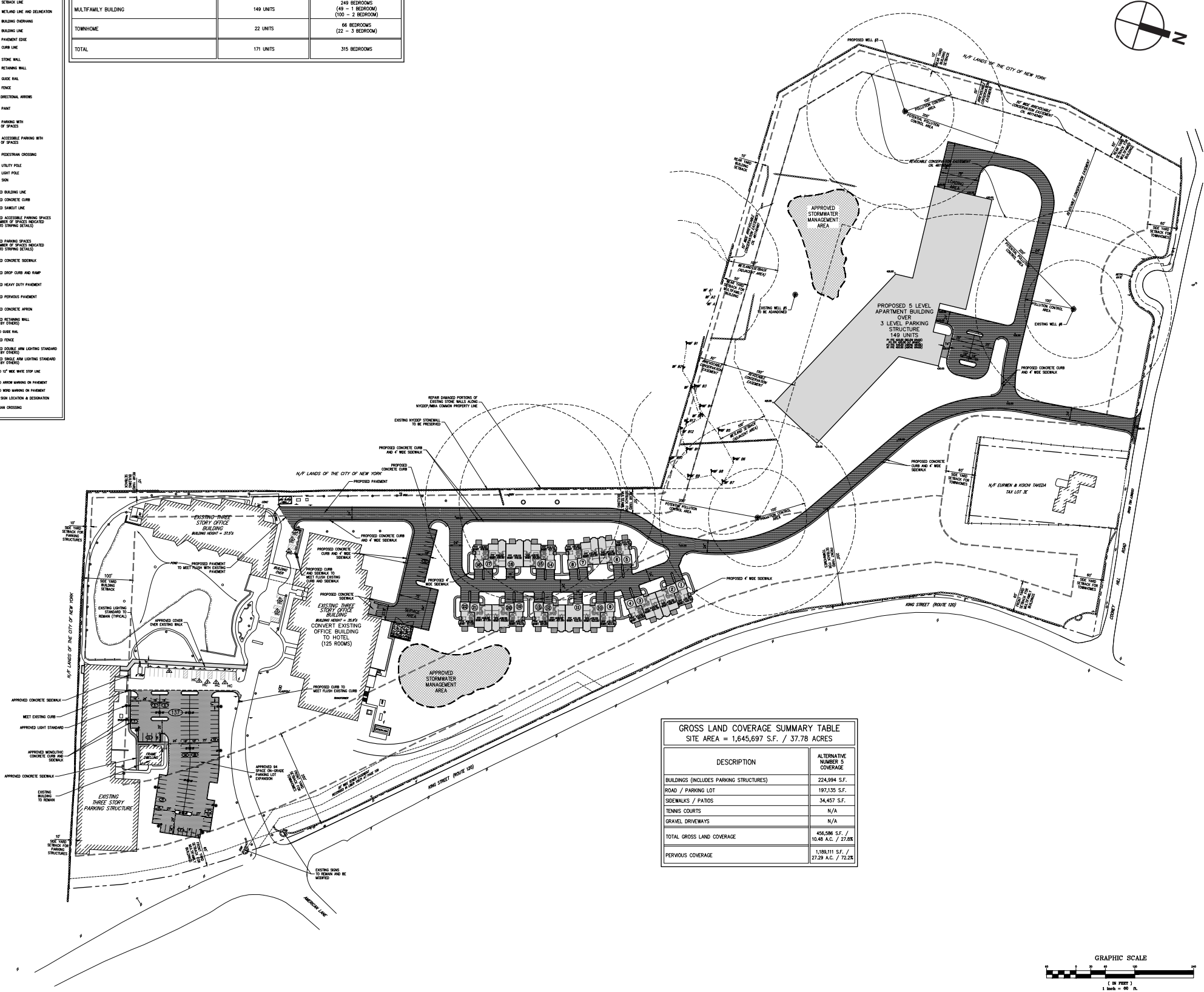



Alternative 3 - Reduced Height Multifamily - Option 1
Figure 18-3a

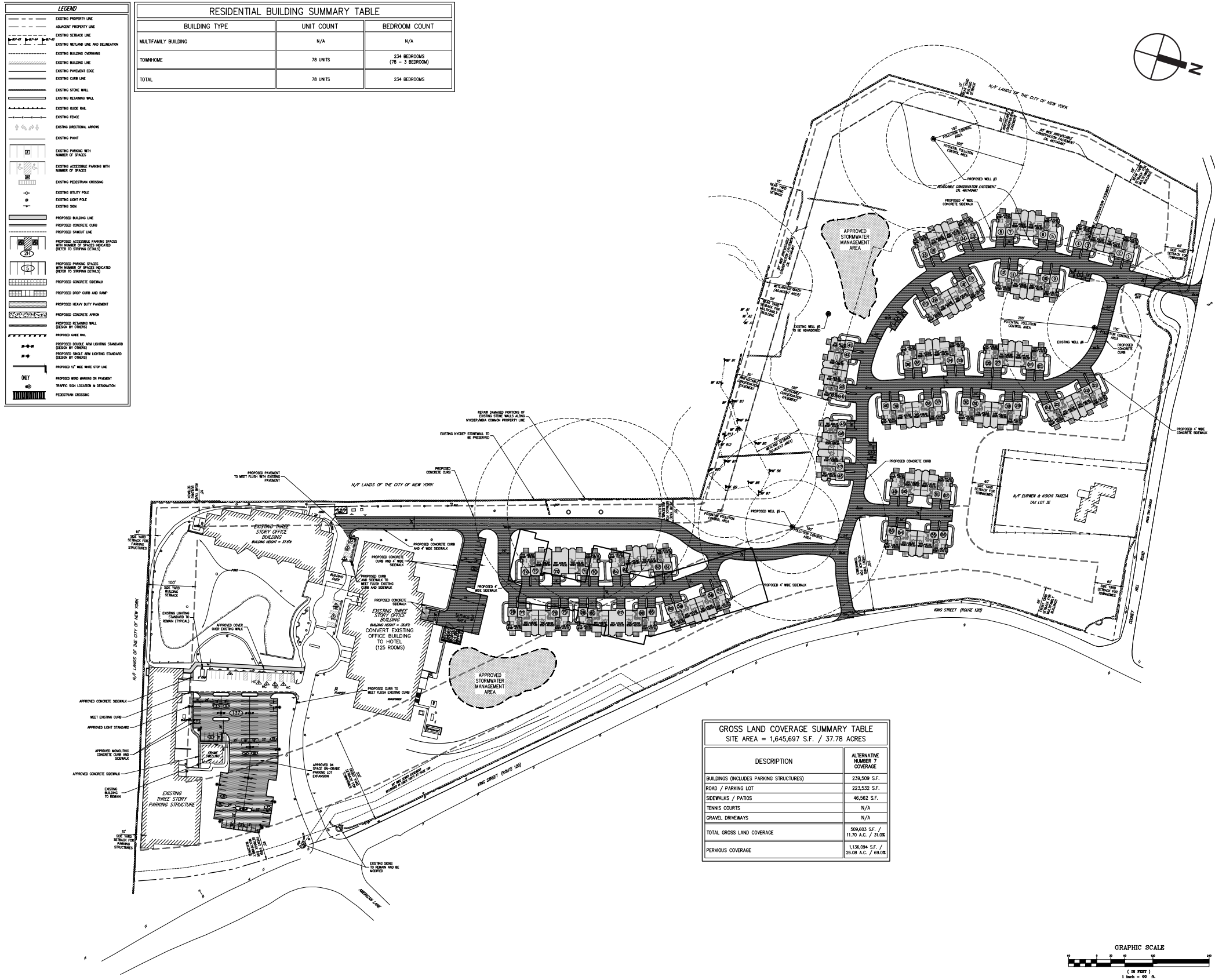


LEGEND	
	EXISTING PROPERTY LINE
	ADJACENT PROPERTY LINE
	EXISTING SETBACK LINE
	EXISTING WETLAND LINE AND DELINEATION
	EXISTING BUILDING FOOTPRINT
	EXISTING BUILDING LINE
	EXISTING PAVEMENT EDGE
	EXISTING CURB LINE
	EXISTING STONE WALL
	EXISTING RETAINING WALL
	EXISTING GRADE RAIL
	EXISTING FENCE
	EXISTING DIRECTIONAL ARROWS
	EXISTING POINT
	EXISTING PARKING WITH NUMBER OF SPACES
	EXISTING ACCESSIBLE PARKING WITH NUMBER OF SPACES
	EXISTING PEDESTRIAN CROSSING
	EXISTING UTILITY POLE
	EXISTING LIGHT POLE
	EXISTING SIGN
	PROPOSED BUILDING LINE
	PROPOSED CONCRETE CURB
	PROPOSED SIDEWALK LINE
	PROPOSED ACCESSIBLE PARKING SPACES WITH NUMBER OF SPACES INDICATED
	PROPOSED CONCRETE SIDEWALK
	PROPOSED DROP CURB AND RAMP
	PROPOSED HEAVY DUTY PAVEMENT
	PROPOSED PERVIOUS PAVEMENT
	PROPOSED CONCRETE APRON
	PROPOSED RETAINING WALL (DESIGN BY OTHERS)
	PROPOSED FENCE LINE
	PROPOSED DOUBLE ARM LIGHTING STANDARD (DESIGN BY OTHERS)
	PROPOSED SINGLE ARM LIGHTING STANDARD (DESIGN BY OTHERS)
	PROPOSED 12' WIDE WATER STOP LINE
	PROPOSED ARROW MARKINGS ON PAVEMENT
	PROPOSED WARNING MARKINGS ON PAVEMENT
	PROPOSED SIGN LOCATION & DESIGNATION
	PEDESTRIAN CROSSING

RESIDENTIAL BUILDING SUMMARY TABLE		
BUILDING TYPE	UNIT COUNT	BEDROOM COUNT
MULTIFAMILY BUILDING	149 UNITS	249 BEDROOMS (49 - 1 BEDROOM) (100 - 2 BEDROOMS)
TOWNHOME	22 UNITS	66 BEDROOMS (22 - 3 BEDROOM)
TOTAL	171 UNITS	315 BEDROOMS



GROSS LAND COVERAGE SUMMARY TABLE	
SITE AREA = 1,645,697 S.F. / 37.78 ACRES	
DESCRIPTION	ALTERNATIVE NUMBER 5 COVERAGE
BUILDINGS (INCLUDES PARKING STRUCTURES)	224,994 S.F.
ROAD / PARKING LOT	197,135 S.F.
SIDEWALKS / PATIOS	34,457 S.F.
TENNIS COURTS	N/A
GRAVEL DRIVEWAYS	N/A
TOTAL GROSS LAND COVERAGE	456,586 S.F. / 10.40 AC. / 27.08%
PERVIOUS COVERAGE	1,189,111 S.F. / 27.29 AC. / 72.25%





Existing Condition



Photo Key



Proposed Project



Reduced Height Multifamily (45 feet)



Reduced Height Multifamily (4-stories)



Multifamily in Cooney Hill



Existing Condition



Photo Key



Source: Perkins Eastman

Proposed Project



Source: Perkins Eastman

Reduced Height Multifamily (45 feet)



Source: Perkins Eastman

Reduced Height Multifamily (4-stories)



Source: Perkins Eastman

Multifamily in Cooney Hill



Existing Condition



Photo Key



Source: Perkins Eastman

Proposed Project



Source: Perkins Eastman

Reduced Height Multifamily (45 feet)



Source: Perkins Eastman

Reduced Height Multifamily (4-stories)



Source: Perkins Eastman

Multifamily in Cooney Hill



Existing Condition



Proposed Project



Reduced Height Multifamily (45 feet)



Photo Key



Reduced Height Multifamily (4-stories)



Multifamily in Cooney Hill

The Proposed Action, inclusive of the Proposed Zoning and the Proposed Project, is likely to result in physical changes to, and new construction and uses within, the Project Site as well as, potentially, the Swiss Re site. These changes will result in impacts to various environmental resources, as described in Chapters 3 through 17 of this DGEIS. As described therein, it is the Applicant's opinion that these potential impacts would not be significant. The design of the Proposed Action avoids significant adverse impacts and mitigates other potential impacts to levels that are not considered significant. *

20.A. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Certain resources, both natural and human-made, would be expended in the construction and operation of the Proposed Project and other construction permitted by the Proposed Action. These resources include use of the land, building materials, energy, and human effort (time and labor) required to develop, construct, and operate the Proposed Project. These resources are considered irretrievably committed because their reuse for some purpose other than the Proposed Project or Proposed Action would be highly unlikely.

The land that makes up the Project Site and the Swiss Re site is the most basic resource irretrievably committed. Should the Proposed Zoning be approved and the Proposed Project constructed, the existing office buildings on the Project Site would be reoccupied for office and hotel use, and the previously developed portion of the Project Site would be redeveloped with residential uses and would not be available for another future use for some period of time. Given that the southern portion of the Project Site is already developed and the northern portion was previously developed, the redevelopment of the Site for the Proposed Project is not considered a significant or an adverse impact. Similarly, if the Swiss Re site were redeveloped, it would be expected that the development would be concentrated in the portions of the Site previously developed, significantly reducing potential impacts to the land.

The actual building materials used in the construction of the Proposed Project or other construction permitted by the Proposed Action (e.g., wood, steel, concrete, and glass) and energy, in the form of gas, diesel, and electricity, consumed during the construction and operation of the Proposed Project or other construction permitted by the Proposed Action by construction equipment and the various mechanical systems (heating, hot water, and air conditioning) would be irretrievably committed. None of these impacts are considered significant.

20.B. IMPACTS ON THE USE AND CONSERVATION OF ENERGY

Electricity and gas service to the Project Site and Swiss Re site are provided by Con Edison. Electric and gas service are available along King Street via underground transmission lines and pressurized gas mains. The Project Site currently utilizes a minimal amount of energy as the existing office buildings are vacant.

The Proposed Project, and other development permitted by the Proposed Action, would require electricity and gas to power building systems. Con Edison would continue to provide electric service to the sites, which would be fed through underground service originating from King Street. This existing service would be tapped by the various uses on the Project Site or Swiss Re site through a series of pad-mounted utility transformers. It is anticipated that the existing electric service will accommodate the Proposed Project or other construction permitted by the Proposed

Action. At the time of site plan approval for development within the Project Site or Swiss Re site, confirmation of adequate electrical service from Con Edison will be required.

The Proposed Project, or other construction permitted by the Proposed Action, would be expected to be connected to the existing natural gas service along King Street. Each building would be metered separately. It is anticipated that the existing natural gas service would accommodate the Proposed Project. At the time of site plan approval for development within the Project Site or Swiss Re site, confirmation of adequate electrical service from Con Edison will be required.

The Proposed Project would incorporate energy-efficient features, including fixtures and HVAC and mechanical systems. The use of energy-efficient features would reduce the Site's energy consumption, which would also reduce the greenhouse gas emissions attributable to the Proposed Project. The specific energy-saving features of the Proposed Project, or other development permitted by the Proposed Action, would be dependent on the final site plan proposed.

20.C. GROWTH INDUCING ASPECTS OF THE PROPOSED ACTION

The Proposed Action, inclusive of the Proposed Zoning and Proposed Project, would not be expected to induce growth elsewhere in the Town of North Castle or region. The Proposed Project and Proposed Action are being proposed to serve a current and existing need. As shown in Chapter 2, "Project Description," Chapter 3, "Land Use, Zoning, and Public Policy," and Chapter 13, "Fiscal Impacts," both Westchester County and the Town of North Castle have recognized that there has been a decreased demand for corporate office park development and increased demand for mixed-use infill development, including hotels and a diverse housing stock. This is evident from the Applicant's unsuccessful attempts to market the Project Site for continued office use. The Proposed Zoning and PDCP for the Project Site represent the Applicant's attempt to respond to this trend, a trend that is expected to continue with or without the implementation of the Proposed Project.

The Proposed Action does not include the extension of any infrastructure, such as roadways, sewer or water systems, or electric or gas systems, into areas not currently served. As such, the Proposed Action's infrastructure improvements, as described in Chapter 9, "Utilities," would only serve the demands of the Proposed Project and would not induce additional growth elsewhere in the Town.

While the Proposed Project would introduce a 125-room hotel and approximately 171 residential units, this population would not be expected to create significant new commercial development pressure in the region. Rather, the Proposed Project, and other development permitted by the Proposed Action, would include on-Site amenities for Proposed Project office tenants, hotel guests, and residents, including a restaurant and indoor/outdoor exercise and fitness options. The off-Site spending of the Proposed Project's residents would therefore be expected to increase the patronage of existing regional businesses, and not create the demand for new development.

20.D. CUMULATIVE IMPACTS

The technical environmental analysis included in Chapters 3 through 17 of this DGEIS account for the potential for the Proposed Action to have a cumulative impact to environmental resources as it relates to the potential of other actions to impact those same resources. Most notably, the traffic analysis, described in Chapter 10, "Traffic and Transportation," accounts for potential traffic generated by other pending or recently approved projects. *