Airport Campus Redevelopment

preliminary Final Environmental Impact Statement (pFEIS)

February 3, 2023

Lead Agency:	Town of North Castle Town Board Town Hall 1 Bedford Road Armonk, New York 10504 Contact: Adam Kaufman, Director of Planning 914-273-3000 x43
SEQRA Classification:	Type I Action
Project Location:	Town of North Castle 113 King Street, Armonk, New York, 10504 Tax Map: 118.02-1-1, 113.04-1-13, 113.04-1-14, and 113.04-1-20
Applicant/Petitioner:	Airport Campus I LLC, Airport Campus II LLC, Airport Campus III LLC, Airport Campus IV LLC, and Airport Campus V LLC Contact: Geoff Ringler Phone: 914-764-1000
Prepared by:	AKRF, Inc. 34 South Broadway White Plains, New York 10601 Contact: Peter Feroe, AICP Phone: 914-922-2350
DEIS Acceptance Date:	June 23, 2021
DEIS Public Hearing:	July 28, 2021
DEIS Comments Accepted Through:	September 30, 2021
pFEIS Submitted:	September 29, 2022; February 3, 2023
FEIS Accepted:	_____

This document is the *preliminary* Final Environmental Impact Statement for the Airport Campus Redevelopment. Copies *of the accepted FEIS will be* available for review at the office of the Lead Agency, on the internet: https://www.northcastleny.com/home/pages/airport-campus, and at the North Castle Public Library.

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Traffic Engineer:	Colliers Engineering & Design 400 Columbus Avenue, Suite 180E Valhalla, New York 10595
Hydrogeologist:	WSP 4 Research Drive, Suite 204 Shelton, CT 06484
Wastewater Engineer:	Provident Design Engineering 7 Skyline Drive Hawthorne, NY 10532

The *accepted* FEIS *will be* sent to the following Involved and Interested Agencies:

Involved Agencies

Town of North Castle Town Board, Lead Agency
Town of North Castle Planning Board
Town of North Castle Architectural Review Board
Town of North Castle Engineering
Town of North Castle Water & Sewer Department
Town of North Castle Highway Department
Town of North Castle Building Department
Westchester County Department of Environmental Facilities
Westchester County Department of Health
Westchester County Department of Public Works
New York State Department of Environmental Conservation, Region 3
New York State Department of Transportation
New York State Office of Parks, Recreation and Historic Preservation
New York City Department of Environmental Protection

Interested Agencies

Armonk Fire Department
North Castle Police Department
Town of North Castle Conservation Board
Town of North Castle Open Space Committee
Town of North Castle Parks and Recreation Department
New York State Office of the Attorney General, Environmental Protection Bureau

Others

Byram Hills School District
Westchester County Planning Board
The Environmental Notice Bulletin (ENB), enb@gw.dec.state.ny.us

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Chapter 1: Project Description

1.A. INTRODUCTION

Airport Campus I LLC, Airport Campus II LLC, Airport Campus III LLC, Airport Campus IV LLC, and Airport Campus V LLC (collectively "the Applicant") is seeking discretionary approvals, including a zoning map and text change ("Revised Proposed Zoning"), from the Town Board of the Town of North Castle (the "Town Board" or "Lead Agency") in order to repurpose and redevelop approximately 38.8 acres of contiguous property known as "Airport Campus" located at 113 King Street (tax map parcels 118.02-1-1, 113.04-1-13, 113.04-1-14, and 113.04-1-20) in the Town of North Castle, Westchester County, New York (the "Project Site" or "Site"). The development of the Site as described below, together with the Revised Proposed Zoning, is referred to as the Proposed Action.

1.A.1. PROCEDURAL HISTORY

Pursuant to the rules and regulations of the State Environmental Quality Review Act ("SEQRA," Article 8 of the Environmental Conservation Law, and its implementing regulations at 6 NYCRR 617), the Town Board, acting as SEQRA Lead Agency, determined that the Proposed Action has the potential to result in one or more significant adverse environmental impacts. To identify appropriate measures to mitigate potential impacts and allow the public the greatest opportunity to comment on the potential impacts of the Proposed Action, the Town Board adopted a Positive Declaration on September 12, 2018, requiring the preparation of an Environmental Impact Statement (EIS). Public scoping for the EIS took place over two sessions (September 26th and October 10th, 2018) at the North Castle Town Hall (15 Bedford Road, Armonk, New York). The public comment period on the Draft Scoping Document concluded on October 26, 2018. On March 13, 2019, the Town Board adopted the Final Scoping Document, which sets forth the analyses required in the EIS (see DEIS Appendix A-1).

Subsequent to the adoption of the Final Scoping Document, the Applicant prepared a DGEIS/DEIS, which was reviewed by Town staff and consultants, as well as reviewed and accepted as complete by the Lead Agency. On June 23, 2021, the Lead Agency issued a Notice of Completeness of the DGEIS/DEIS, beginning a public comment period. Three duly noticed public hearings were held by the Lead Agency on July 28, 2021, September 9, 2021, and September 22, 2021. During the public comment period, which was open from June 23, 2021 to September 30, 2021, written comments were received from the public, Town staff and consultants, and other Involved and Interested Agencies.

1.A.2. PURPOSE OF THE FEIS

This document is a Final EIS (FEIS), which has been prepared pursuant to the requirements of State Environmental Quality Review Act ("SEQRA"). The purpose of this FEIS is to provide the Lead Agency's responses to the substantive comments (both

written and verbal) made on the DEIS during the public hearings and formal comment period. The full text of the comments received on the DEIS are presented in **Appendix A** and are summarized and responded to in Chapter 3, "Response to Comments." The DEIS is hereby incorporated by reference into this FEIS. Any terms relating to the DEIS Project described in the DEIS are also used in this FEIS.

1.A.3. ADDITIONAL PROJECT ALTERNATIVE

Consistent with SEQRA regulations at §617.9, and in response to comments from the Lead Agency, Interested and Involved Agencies, and the public, the Applicant has developed an additional alternative for achieving the purpose and need described in the DEIS that avoids, reduces and further mitigates the potential adverse impacts associated with the original project proposed in the DEIS (the "DEIS Project"). This additional alternative is iterative of the Alternatives presented in the DEIS and, as described in Chapter 2 of this FEIS, does not result in an adverse environmental impact that was not considered in the DEIS. The new alternative consists of developing a portion of the Site with 125 townhomes and re-using the existing southern office building as a 50-unit, age-restricted multifamily housing building. Throughout this FEIS, this new alternative is referred to as the "Residential Housing Alternative" or "Preferred Alternative." The other alternatives defined and analyzed in the DEIS, including the DEIS Project, remain unchanged.

The Applicant has amended its original petition (see **Appendix B**) to request that the Town Board map a portion of the Site around the office building slated for age-restricted multifamily reuse ("Senior Housing Portion") within the Town's existing R-MF-SCH Zoning District, and map the remaining portion of the Site ("Townhouse Portion") within the Town's existing R-MF-A Zoning District (collectively, the "Revised Proposed Zoning"). The Applicant is also requesting a minor zoning text amendment to the R-MF-SCH Residence District Regulations (Town Code §355-27(B)(2)).[1] The text amendment would preserve the Town Board's discretion in establishing R-MF-SCH sites, and would grant the Town Board the authority to establish the dimensional and design requirements, at the time of rezoning, when converting existing office space to senior multifamily residential use (as is the case here).

This additional alternative was developed in response to both evolving market needs and the comments received on the DEIS. Such comments included those that opined that the DEIS Project was too intense for the Project Site and that the proposed 5-story multifamily building proposed in the DEIS Project was too large and would create adverse visual impacts. In response, the Applicant developed the Residential Housing Alternative, described in more detail below, which includes:

- The construction of approximately 125, fee simple, 2-story, 3-bedroom townhouses;

[1] The text amendment would add a fourth sentence to Section 355.27(B)(2), as follows: "…Any conversion of an existing office building to multifamily senior citizen use shall not have a required FAR in the R-MF-SCH zoning district and the Town Board shall set and determine the dimensional standards and design considerations for any such site at the time of rezoning and notwithstanding requirements set forth in other sections of the Zoning Code."

- Removal of the Site's existing 29-foot tall, two-story, approximately 316-space parking garage and the 37.5-foot tall, three-story, approximately 161,000 square foot northern office building;
- Repurposing the Site's southern office building as approximately 50, two-bedroom dwelling units in a multifamily building, the occupancy of which would be age-restricted to those 55 years of age and older, as required by the Town's R-MF-SCH Zoning District, and permitted by the U.S. Fair Housing Act;
- Construction of a new, 2-story, approximately 60-space parking structure north of the multifamily building, which is anticipated to be connected to the multifamily building with an enclosed pedestrian walkway;
- Construction of site amenities, including a clubhouse, pool, and mulched walking trails; and,
- Construction of internal driveways, stormwater management features, and a site-wide landscaping program.

1.A.4. DEFERRAL OF GEIS

The DEIS prepared by the Applicant, and accepted by the Lead Agency, included consideration of the potential, hypothetical, development of sites other than the Project Site that could theoretically be permitted by the DEIS Zoning. These potential impacts were analyzed in the "generic" portion of the document, also referred to as the Draft Generic Environmental Impact Statement (DGEIS). As the Applicant has requested that the Town Board defer further consideration of the previously proposed amendments to the DOB-20A zoning district (which would have directly affected sites other than the Project Site) while it considers the Revised Proposed Zoning, a Final Generic Environmental Impact Statement (FGEIS) is not required to, and has not, been prepared.

1.B. REQUIRED APPROVALS

To redevelop the Project Site with the Preferred Alternative, the Applicant has amended its original petition to request that the Town Board map the Senior Housing Portion of the Project Site within the Town's existing R-MF-SCH Zoning District, and the Townhouse Portion within the Town's existing R-MF-A Zoning District (see **Appendix B**).[2] A list of the approvals known to be or potentially required to construct the Preferred Alternative is below. The governmental agencies responsible for those approvals, identified in parentheses, are identified as "Involved Agencies" pursuant to SEQRA. Consideration of the Preferred Alternative does not introduce any additional "Involved Agencies" from those previously identified in the DEIS.

- Zoning Map Amendment (Town Board)
- Zoning Text Change (Town Board)
- Site Plan Approval (Planning Board, Town of North Castle)
- Subdivision Approval (Planning Board, Town of North Castle)
- Wetland Buffer Disturbance (Planning Board, Town of North Castle)

[2] The Town recently passed Local Law No. 4, adopted April 27, 2022, which changed the senior multifamily housing R-MF-SCH from a floating zone to a mapped district. As such, the district's implementation requires a legislative determination and rezoning by the Town Board on a case-by-case basis.

- Tree Removal (Planning Board, Town of North Castle)
- Municipal Separate Storm Sewer System (MS4) Approvals (Town Engineering Consultant)
- Connection to North Castle Sewer District #3 (Town of North Castle Water and Sewer Department; Westchester County)
- Driveway Permit (Town of North Castle Highway Department)
- Building Permit (Town of North Castle Building Department)
- Realty Subdivision (Westchester County Department of Health)
- Incorporation of Project Site within North Castle Water District # 8 (Town Board)
- Water Main Extension (Town of North Castle and Westchester County Department of Health)
- Sanitary Sewer Allocation (Westchester County Department of Environmental Facilities)
- State Pollution Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Construction Activity (New York State Department of Environmental Conservation [NYSDEC])
- Stormwater Pollution Prevention Plan Approval (New York City Department of Environmental Protection [NYCDEP] and the Town of North Castle)
- Sewerage Approval (Town of North Castle, NYCDEP, and Westchester County Department of Health)
- Section 14.09 Review (New York State Office of Parks, Recreation, and Historic Preservation)
- Building Permit Review, Westchester County Department of Public Works/Department of Transportation (§239-f of General Municipal Law)

In addition to the above approvals, pursuant to §277.61 of the Westchester County Administrative Code, the Revised Proposed Zoning must be referred to the Westchester County Planning Board prior to final action by the Town Board and the site plan must be referred at least 30 days prior to final action by the Planning Board.

Lastly, several "Interested Agencies" are participating in review of the Proposed Action under SEQRA, including:

- Town of North Castle Conservation Board;
- Town of North Castle Open Space Committee;
- Town of North Castle Parks and Recreation Department;
- New York State Office of the Attorney General – Charles Silver, Ph.D, Watershed Inspector General Scientist, Environmental Protection Bureau;
- New York State Department of Transportation
- Armonk Fire Department;
- North Castle Police Department;
- Byram Hills School District; and,
- Westchester County Planning Board.

1.C. PROJECT SITE DESCRIPTION

1.C.1. EXISTING IMPROVEMENTS

The Project Site is located at 113 King Street in the Town of North Castle, Westchester County, New York, and is generally bounded by Cooney Hill Road to the north, King Street to the east, and undeveloped forested areas bordering the Kensico Reservoir (owned by the City of New York under the jurisdiction of the NYCDEP) to the west and south. The Project Site is approximately 38.8 acres in size and consists of the following four tax parcels and associated addresses (see **Figure 1-1**):

- **118.02-1-1 (113 King Street):** Approximately 36 acres generally located on the west side of King Street between American Lane and Cooney Hill Road;
- **113.04-1-13 (formerly 3 Weber Place):** Approximately 1 acre on the south side of Cooney Hill Road (northwest corner of the Project Site);
- **113.04-1-14 (formerly 1 Weber Place):** Approximately 1 acre on the south side of Cooney Hill Road (northwest corner of the Project Site); and
- **113.04-1-20 (formerly 3 Cooney Hill Road[3])**: Approximately 1 acre at the northeast corner of the Project Site, south of Cooney Hill Road and approximately 200 feet west of King Street.

As shown in **Figure 1-1**, 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; a second vacant, three-story, approximately 161,000-sf office building immediately north of the 100,000-sf building; approximately 328 surface parking spaces (among two surface lots); a three-story parking structure containing approximately 316 parking spaces; a circa 1820s farmhouse and a modern accessory shed/barn (used for storage and maintenance purposes); a water feature/stormwater pond; and landscaping. The northern portion of the Project Site contains upland fields, landscaping, and private outdoor amenities for the uses described above, including paved tennis courts, a volleyball court, and walking paths.

1.C.2. FRONTAGE AND ACCESS

The Project Site has approximately 2,200 feet of frontage along King Street and approximately 900 feet of frontage along Cooney Hill Road. Existing vehicular and pedestrian access is provided through the signalized driveway intersection with King Street/NYS Route 120. Two curb cuts are currently provided into the Project Site from Cooney Hill Road.

1.C.3. SITE TOPOGRAPHY

The topography of the currently developed (southern) portion of the Project Site ranges from a low of approximately 390 feet above mean sea level at the King Street entrance, to a high of approximately 430 feet along northerly portion. This currently developed portion of the Project Site generally slopes up from King Street to the northwest.

[3] Tax parcel 113.04-1-20 was acquired by the Applicant subsequent to the DEIS and is incorporated into the Project Site in this FEIS.

Project Site Location, Tax Parcels, and Existing Conditions

The Cooney Hill area (northern extent) of the Project Site ranges in elevation from a high of approximately 470 feet above mean sea level at the Cooney Hill Road/King Street intersection, and generally slopes in a southwesterly direction to a low of approximately 390 feet.

The majority of slopes within the Preferred Alternative's limits of disturbance fall within the 0–15 percent category, and approximately 2,007 sf (0.16 percent) of the Preferred Alternative's overall limits of disturbance meet the Town Code's definition of steep slopes. These Town-regulated slopes within of the Preferred Alternative's limits of disturbance are found along the King Street frontage of the Project Site.

Several bedrock outcrop (Precambrian-age gneiss) areas exist in the northwest portion of the Project Site, west of the former location of the Weber Place roadbed.

1.C.4. ON-SITE WETLANDS

As documented in the DEIS, one wetland segment of approximately 0.247 acres is located at the western corner of the Project Site, abutting the east/west-oriented Site boundary to the south of the former Weber Place. The wetland on the Project Site is regulated by the U.S. Army Corps of Engineers (USACE) and the Town of North Castle by way of Chapter 137 of the Town Code. This wetland was delineated on July 10, 2018 in accordance with the Town of North Castle Town Code and the USACE Wetland Delineation Manual and Northeast Supplement. The Town of North Castle regulates a 100-foot wetland buffer resulting in approximately 1.81 acres of Town-regulated buffer on the Project Site. The total wetland and buffer area on the Project Site is 2.06 acres (5.4 percent of the Site).

1.C.5. CONSERVATION EASEMENT

As described in the DEIS, and pursuant to an agreement between the Site's previous owners (MBIA), the Natural Resources Defense council (NRDC), and Riverkeeper, Inc., a conservation easement (the "Conservation Easement") between MBIA as grantor and the Westchester Land Trust, Inc. (WLT) as grantee was executed on January 11, 2006. A portion of the conservation easement area includes an irrevocable 50-foot-deep, approximately 1.95-acre strip of property immediately adjacent to the DEP's property. The balance of the conservation easement area (approximately 6 acres) granted to WLT is revocable under two conditions: (i) MBIA has not constructed the proposed office building and the associated parking structure (i.e., the Currently Approved Development Plan, described below, that allows for expansion of the current office use to approximately 499,000 square feet plus the construction of a five-story approximately 1,000 car garage); and (ii) MBIA sells the Cooney Hill lots to a third party for a stand-alone development. The conditions allowing revocation have been satisfied and, as such, the Applicant may revoke that portion of the Conservation Easement.

The Preferred Alternative proposes development in a portion of the approximately 6-acre revocable section of the Conservation Easement Areas that are revocable, which is permitted. A portion of a proposed stormwater management basin would be located in the 1.95-acre irrevocable area, similar in location to the basin included in the Currently Approved Plan and SWPPP. Stormwater improvements are expressly permitted in the irrevocable Conservation Easement Areas as set forth in the WLT Conservation Easement.

1.D. SURROUNDING USES, FACILITIES, AND ZONING

Land uses in the vicinity of the Project Site consist of corporate office and conference centers and New York City water supply lands adjacent to the Kensico Reservoir (under jurisdiction of DEP) (see **Figure 1-2**). The Project Site is located approximately 500 feet west of the border between New York and Connecticut (Town of Greenwich, Connecticut) and benefits from convenient access to the local and regional roadway network, including access to NYS Route 22, NYS Route 128, and I-684.

The zoning districts within a ½-mile vicinity of the Project Site (see **Figure 1-3**) consist of a mix of DOB-20A, Single-Family Residence (R-2A), and Office Business (OB) zoning districts.

Notable corporate office park/conference facilities proximate to the Project Site include Swiss Re America, Citigroup Armonk Conference Center, IBM World Headquarters, and the Greenwich American Center. Immediately west of the Project Site, within NYC watershed land, is Shaft 17, a DEP-owned facility that controls water flow into the Kensico Reservoir. Shaft 17 is accessed from Cooney Hill Road. The Armonk Hamlet is located approximately 2 miles northeast of the Project Site and is the Town's primary central business district.

As depicted in **Figure 1-4**, the Project Site is located within the Westchester County Airport 60 L_{dn} Noise Contour Critical Environmental Area (CEA) as defined by NYSDEC.

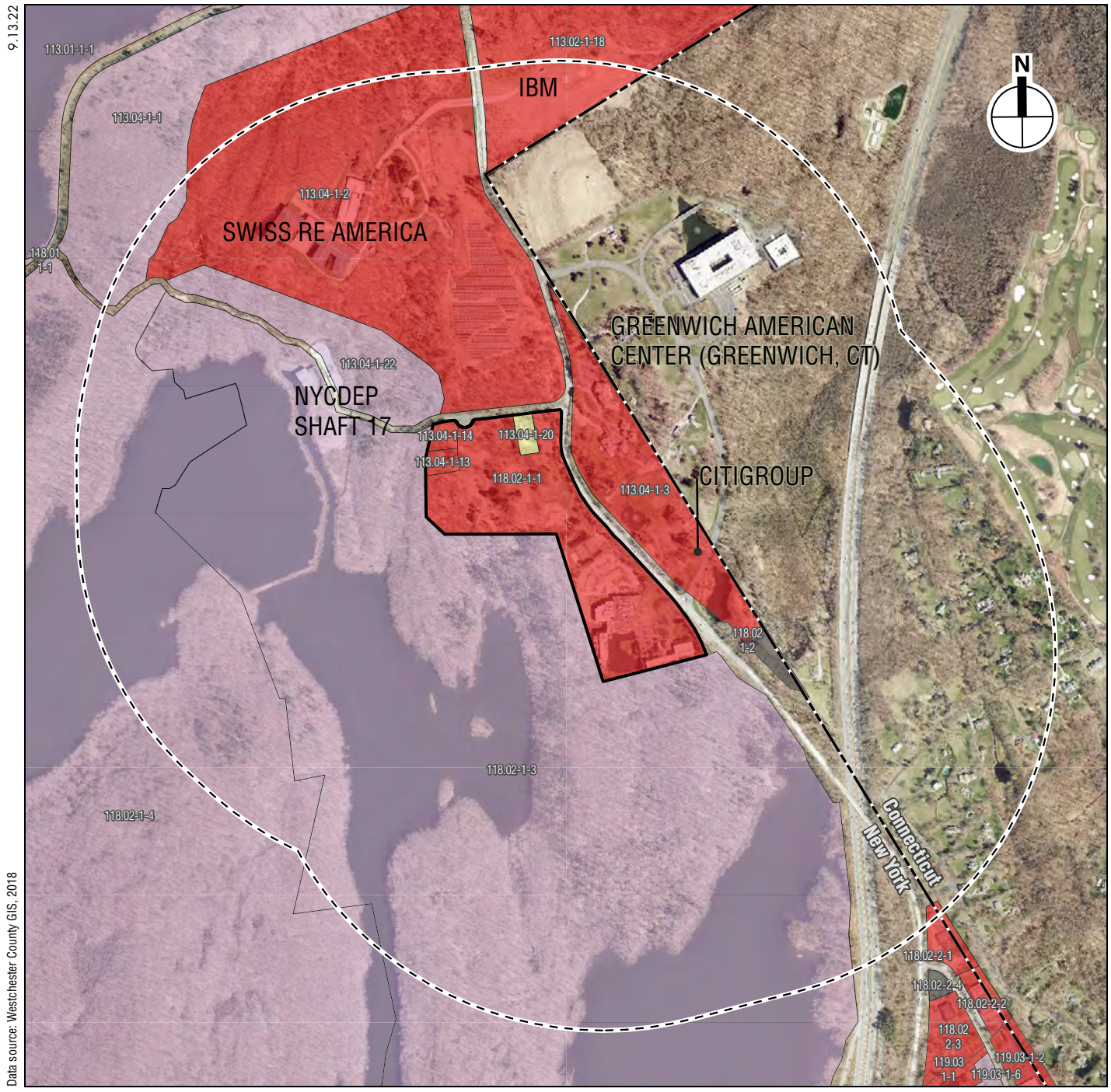
1.E. DETAILED DESCRIPTION OF PREFERRED ALTERNATIVE

As discussed above, consistent with SEQRA regulations at §617.9, and in response to comments from the Lead Agency, Interested and Involved Agencies, and the public, the Applicant has developed the Residential Housing Alternative for achieving the purpose and need described in the DEIS that avoids, reduces and further mitigates the potential adverse impacts associated with the DEIS Project. The Applicant has also amended its original petition to request that the Town Board consider mapping the Senior Housing Portion of the Site within the Town's existing R-MF-SCH Zoning District, and the Townhouse Portion of the Site within the Town's existing R-MF-A Zoning District.

1.E.1. BUILDINGS AND USES

The Preferred Alternative proposes redevelopment of the Project Site as follows (see **Figure 1-5** and **Table 1-1**):

- Conversion of the approximately 100,000-sf office building in the southwest corner of the Project Site to a multifamily residential building with approximately 50, 2-bedroom units. The 3-story, approximately 37.5-foot-tall building with rooftop mechanicals would remain in its current location on the Project Site. The building would contain a residential lobby and amenity space. Parking for the multifamily building would be accommodated in a new, approximately 53-space surface parking lot and a new, 2-story, approximately 60-space parking structure north of the building. The parking structure is anticipated to be connected to the multifamily building with an enclosed pedestrian bridge/walkway.
- The multifamily units would be age-restricted to those 55 years of age and older, as required by the Town's R-MF-SCH Zoning District and permitted by the U.S. Fair Housing Act. Attached as **Appendix C** is representative language that the Applicant plans to utilize in a rental agreement governing use of the Site.



Project Site

Study Area (Half-mile radius)

State Line

118.02-1-3 *Tax Parcel Boundary*

Land Use

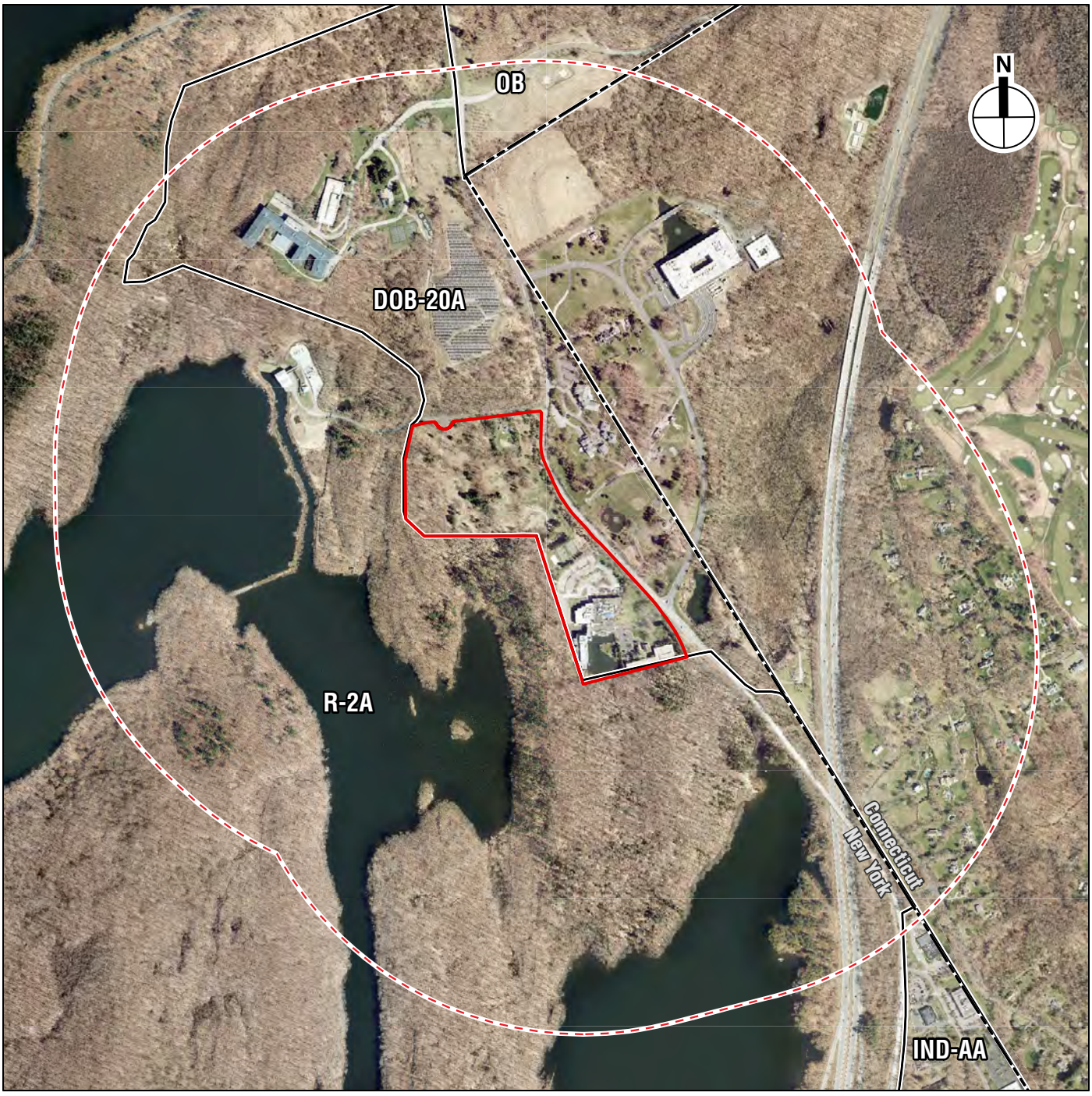
Commercial

Public Services

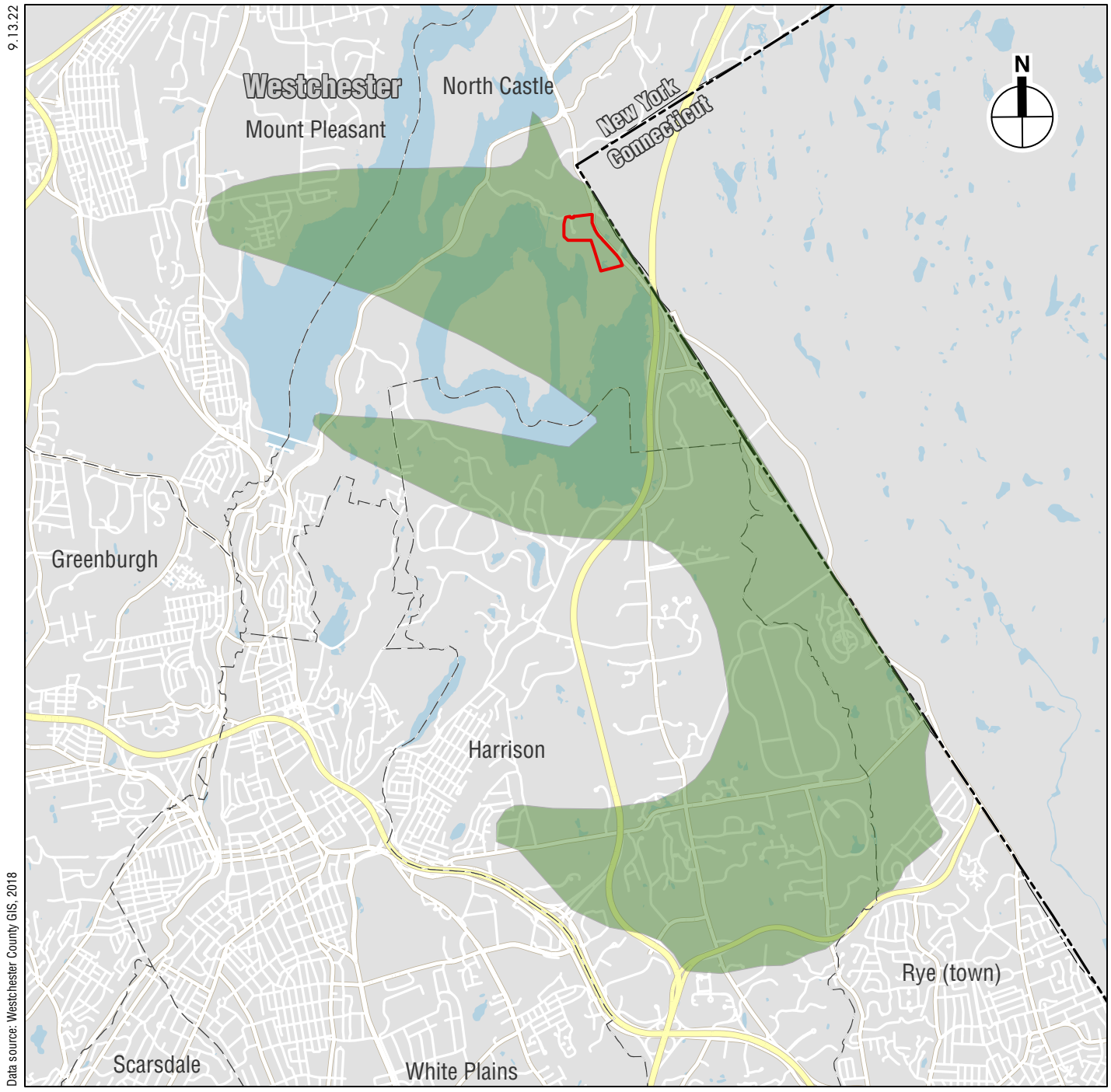
Residential

Vacant Land

Existing Land Use - Project Site and 1/2 Mile



Existing Zoning - Project Site and 1/2 Mile



Westchester County Airport CEA

Source: JMC 2023

Preferred Alternative Site Plan

- Construction of approximately 125, 2-story townhouses, throughout the Project Site. Three separate models of townhouse are envisioned, each with three bedrooms and a two-car garage. The townhouses would be constructed in attached groups of two, three, or four units and would range in size from approximately 2,800 gsf to 3,600 gsf, which includes the approximately 360 gsf to 410 gsf two-car garage. The total aggregate gross floor area of the 125 townhouses would be approximately 377,228 gsf.
- Demolition of the Site's existing 29-foot tall, two-story, approximately 316-space parking garage and the 36-foot tall, three-story, approximately 161,000 square foot northern office building.

In order to facilitate the Residential Housing Alternative, as well as allow for the proposed townhouses to be owned as fee-simple parcels, the Applicant proposes to subdivide the Project Site (see **Figure 1-5a**). The Senior Housing Portion of the Site is proposed to become a separate tax parcel that benefits from access easements to King Street and Cooney Hill Road over the newly created private roads within the subdivision. The Townhouse Portion of the Site is proposed to be subdivided into separate tax lots for each townhouse, as well as one or more commonly owned lots on which the Site's roads, open spaces, and infrastructure (e.g., stormwater management, etc.) would be located.

Figure 1-6 provides conceptual floor plans for the proposed townhouses. Conceptual architectural designs for the townhouses proposed in the northern portion of the Site are shown on **Figure 1-7**. The architecture of the proposed multifamily building has not yet been finalized; however, the Applicant does not anticipate significant changes to the existing southern office building's façade as part of the repurposing.

Accessory uses and amenities for the Preferred Alternative are subject to change and future site plan approvals, but may include:

- Clubhouse and outdoor swimming pool; and,
- Landscaped outdoor recreation spaces, including mulched walking trails.

Table 1-1
Preferred Alternative
Gross Floor Area and Building Footprint Summary

Building ID	Existing Total Floor Area (gsf)	Proposed Total Floor Area (gsf)	Existing/Proposed Building Footprints (gsf)	Dwelling Units
Demolition of Existing Parking Garage	Approx. 101,400			
Demolition of Northern Office Building	Approx. 161,000	-		
Existing Southern Office Building (to become multifamily residential)	Approx. 100,000	Approx. 100,000	25,468	50
Proposed Townhouses	N/A	377,228	275,127	125
Proposed 2-Story Parking Garage	N/A	-	9,240	N/A
Proposed 2-story Parking Garage Pedestrian Bridge	N/A	2,259	2,259	N/A
Proposed Clubhouse	N/A	2,153	2,153	N/A
Total	389,400	**481,640**	**314,247**	**175 units**

Note: gsf = gross square feet
Source: JMC

Source: JMC 2023

Preferred Alternative - Proposed Zoning

1.31.23

Source: Toll Brothers 2022

NOTE: This conceptual floorplan shows a master-down layout, but it will be optional

Conceptual Floor Plans - Townhouses - Dover

1.31.23

Source: Toll Brothers 2022

NOTE: This conceptual floorplan shows a master-down layout, but it will be optional

Conceptual Floor Plans - Townhouses - Virtue

1.31.23

Source: Toll Brothers 2022

NOTE: This conceptual floorplan shows a master-down layout, but it will be optional

Conceptual Floor Plans - Townhouses - Hopkinton

Source: Toll Brothers 2022

Conceptual Architectural Designs - Townhouses

1.E.2. ZONING CONFORMANCE

The Revised Proposed Zoning (i.e., mapping the Senior Housing Portion of the Site within the R-MF-SCH District and the Townhouse Portion of the Site within the R-MF-A District) would allow the Applicant to develop a partially age-restricted (55+) residential community, without requiring the extensive text changes to the Zoning Code's DOB-20A District as contemplated by the DEIS Zoning.[4]

The Preferred Alternative will conform to the design considerations required in multifamily residence districts pursuant to §355-24G of the Town's Zoning Code (see **Tables 1-2 and 1-2a**). Each individual fee simple townhouse lot in the Townhouse Portion of the Site would also meet all applicable setback and other requirements for Attached dwellings in R-MF-A Residence Districts, per §355-21 of the Town's Zoning Code.

Visual Privacy will be preserved for residents through new and existing landscaping throughout the Project Site and the landscaped buffer along King Street, as well as the preservation of existing trees, vegetation, and physical features of the Project Site (§355-24G(1)).

Audio privacy will be maintained through the use of solid party walls to limit sound transmission between adjoining dwelling units (§355-24G(2)).

Appropriate scale will be preserved throughout the Project Site by limiting the height of the townhouses to two-stories and keeping the height of the proposed multifamily building (repurposed southern office building) the same as the existing condition (as opposed to the DEIS Project which would have constructed a five-story multifamily building and the Currently Approved Development Plan which includes a five-story parking garage in excess of 300,000 sf) (§355-24G(3)).

Finally, no unenclosed porch or deck will encroach into minimum require yards (§355-24G(4)).

[4] The application of the R-MF-SCH and R-MF-A Zoning Districts is a Town Board legislative act, and the Lead Agency will determine whether the proposed zoning map and text amendments are acceptable.

Table 1-2
Dimensional Regulations – Existing and Proposed Zoning: Senior Housing Portion

Dimensional Regulations	Existing DOB-20A Zoning	Existing Condition	R-MF-SCH Zoning	Compliance of Preferred Alternative
Area				
Minimum Lot Area	20 acres	38.8 acres	--[1]	4.48 acres
Minimum Frontage	500 feet	2,215 feet	--[1]	117 feet
Minimum Depth	500 feet	857 feet (avg)	--[1]	265 feet
Minimum Front Yard Setbacks	150 feet	61 feet	--[1]	185 feet
Minimum Rear Yard Setbacks	300 feet / 10 feet	14 feet	--[1]	14 feet
Minimum Side Yard Setbacks	300 feet	4 feet	--[1]	46 feet
Maximum Building Coverage	10 percent	7.0 percent	--[1]	19.3 percent
Maximum Building Height	As in § 355-30J(3)(c)	37.5 feet (3-story office building)	--[1, 2]	3 stories 37.5 feet (existing)
Floor Area Ratio	0.15	0.16	0.15 to 0.4	0.70[3]
Residential Unit Size (per §355-27)				
Bedrooms	N/A	N/A	1-2	2
Minimum Floor Area	N/A	N/A	min. 800sf / 1BR min. 1000sf / 2BR	1,139 sf / 2BR
Affordably Furthering Fair Housing Units (§355-27(B)(5)	N/A	N/A	10%	10%
Parking	As in § 355-30J	473	110 spaces	113 total (2.3 per unit)

Notes:
[1] Determined by Town Board at Time of Zoning Approval.
[2] Pursuant to Town Code §355-24(G)(3) "Appropriate scale should be preserved through limiting building height to, in general, no more than two stories of living quarters."
[3] The Applicant is seeking a zoning text amendment to the R-MF-SCH Residence District Regulations (Town Code §355-27(B)(2)), which would preserve the Town Board's discretion in establishing R-MF-SCH sites, and would grant the Town Board the authority to establish the dimensional and design requirements, at the time of rezoning, when converting existing office space to senior multifamily residential use (as is the case here)..
Sources: Airport Campus I-V LLC, JMC Engineering

Table 1-2a
Dimensional Regulations – Existing and Proposed Zoning: Townhouse Portion

Dimensional Regulations	Existing DOB-20A Zoning	Existing Condition	R-MF-A Zoning	Compliance of Preferred Alternative
Area				
Minimum Lot Area	20 acres	38.8 acres	5 acres	34.30 acres
Minimum Frontage	500 feet	2,215 feet	25 feet	2,215 feet
Minimum Depth	500 feet	857 feet (avg)	250 feet	857 feet
Minimum Front Yard Setbacks	150 feet	61 feet	10 feet	64 feet
Minimum Rear Yard Setbacks	300 feet / 10 feet	14 feet	25 feet	25 feet
Minimum Side Yard Setbacks	300 feet	4 feet	10 feet	32 feet
Maximum Building Coverage	10%	7.0%	20%	18.6%
Maximum Building Height	As in § 355-30J(3)(c)	37.5 feet (3-story office building)	3 stories 30 feet	2 stories 29.0 feet
Floor Area Ratio / Density	0.15 FAR	0.16 FAR	105.2 density units permitted[1]	83.33 density units[1]
Residential Unit Size (per §355-24)				
Bedrooms	N/A	N/A	-[2]	3
Affordably Furthering Fair Housing Units (§355-27(B)(5)	N/A	N/A	10%	10%
Parking	As in § 355-30J	473	250	Townhouses: 272 total (2.2 per unit)[3]

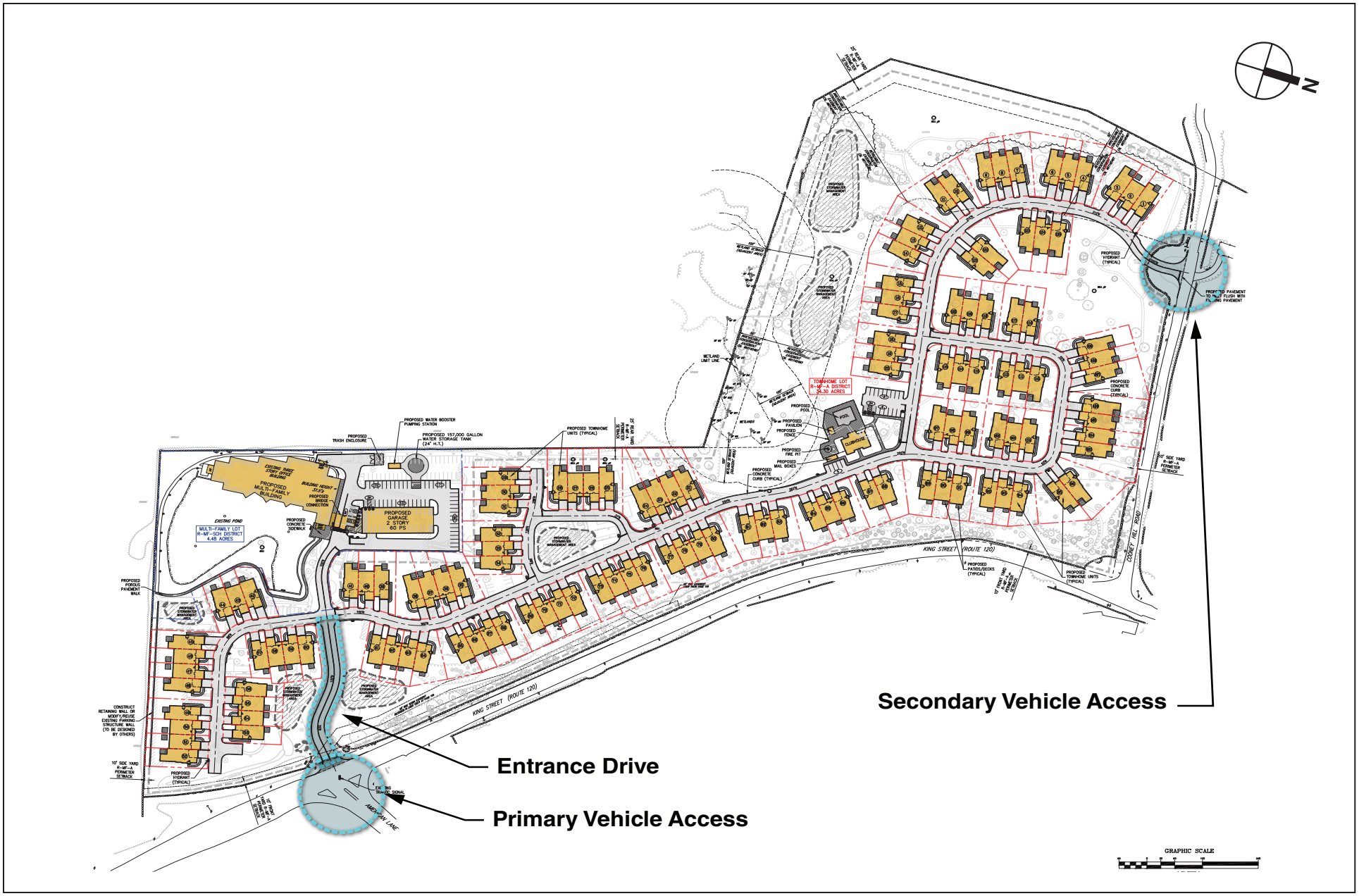
Notes:
[1] See FEIS Chapter 2, Section 2.B.1.b(ii), for the calculation of density units permitted and proposed on the Townhouse Portion of the Site.
[2] Pursuant to §355.24(C), the "Planning Board shall be responsible for determining the number of bedrooms in each dwelling unit, in connection with its review of site development plans."
[3] Each townhouse would have space available to park four cars—two garage spaces, plus enough space in each driveway for two additional parked cars. It is understood that only spaces that could be continuously accessible can be counted towards zoning compliance and, therefore, each townhouse would have two "parking spaces" as required by the Town. The 272 spaces are inclusive of the 250 driveway spaces for the townhomes, plus the 22 guest parking spaces near the proposed clubhouse.
Sources: Airport Campus I-V LLC, JMC Engineering

1.E.3. SITE ACCESS AND CIRCULATION

The Preferred Alternative includes two primary, vehicular access points to the Project Site, and the internal roadways have been designed to efficiently provide for passenger, emergency, sanitation, and delivery vehicle access (see **Figure 1-8**). Primary vehicular access to the Project Site would remain at the existing signalized driveway on King Street at American Lane. A secondary vehicular access to the Project Site would be provided from Cooney Hill Road in the approximate location of the former Weber Drive.

Circulation within the Project Site would include the main east-west oriented two-way entrance driveway from King Street providing direct access to the multifamily building and parking garage. A north-south oriented two-way drive would provide access to townhouses to the north and south of the King Street entrance drive, connecting to Cooney Hill Road.

Parking for residents of the multifamily residential building would be provided by way of a surface lot including approximately 53 parking spaces, as well as a 2-story parking garage with approximately 60 parking spaces. Each townhouse would have two off-street



Source: JMC 2023

Preferred Alternative - Site Access and Circulation

parking spaces within an enclosed garage. Each townhouse driveway could also accommodate another two vehicles. In addition, there will be approximately 22 guest parking spaces within the townhouse area, near the proposed clubhouse.

1.E.4. SIGNAGE

Existing signage on the Project Site consists of ornamental address identification signage flanking the signalized main entrance to the Site from King Street, which reads "113 King Street." The Preferred Alternative would modify these signs but likely retain the locations. Entrance signage would also be provided at the Cooney Hill Road entrance. Internal wayfinding and branding signage is also likely to be installed. Detailed signage plans would be developed and subject to review by the Town as part of future site plan approvals.

1.E.5. LIGHTING, OPEN SPACE, AND LANDSCAPING

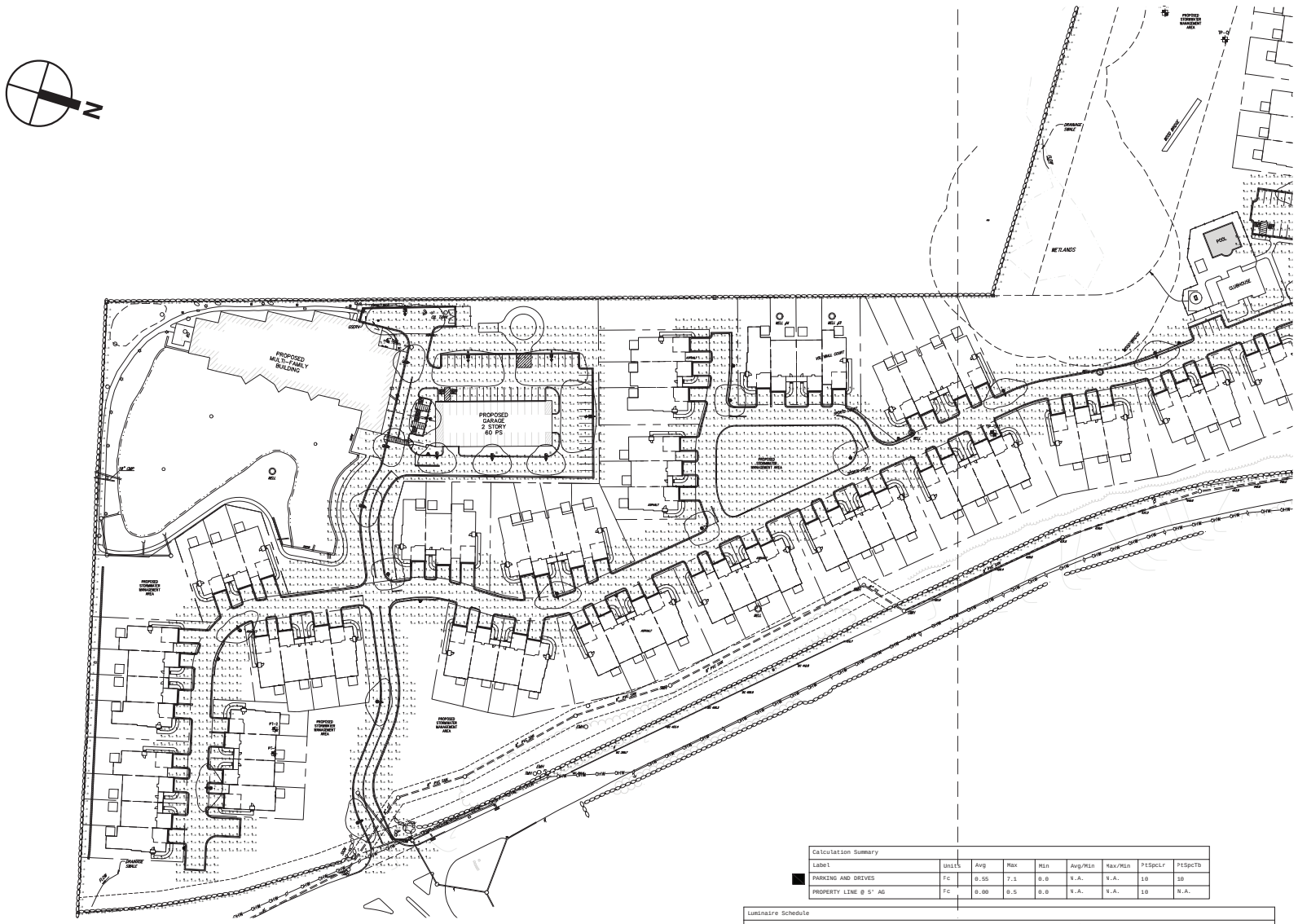
The Project Site currently has exterior lighting on its driveways, walkways, and parking areas. Similar to the existing condition, the Preferred Alternative would incorporate Site lighting along proposed driveways, parking areas, and certain mulched walking paths. The lighting design would be compliant 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 have not been finalized; however, **Figures 1-9a and 1-9b** include preliminary information on the approximate quantity, wattage, and height of fixtures to be considered for each lighting zone on the Project Site.

Regarding open space, as shown in **Figure 1-10**, following construction of the Preferred Alternative approximately 65.4 percent of the Project Site's total area (which equates to approximately 25.36 acres) would consist of either undisturbed (wetland area, steep slopes, forest, conservation easement area) or landscaped open space. This is approximately 2.45 acres less than were proposed with the DEIS Project (i.e., 28 acres).

The plans included as **Figures 1-11a and 1-11b** depict the preliminary landscaping plan for the Preferred Alternative, including the location, size, and quantity of proposed trees, shrubs, and ground cover. As noted on the plans, approximately 898 new trees (a mix of deciduous and evergreen) would be planted on the Project Site. This is approximately 447 more trees than were proposed to be planted with the DEIS Project (i.e., 451). Methods of installation would conform to the American Nursery and Landscape Association, American Standard for Nursery Stock (latest edition). All areas of the Project Site not occupied by buildings or pavement and not specified as being planted with trees, shrubs, or manicured lawn would remain in its current natural state. According to the Applicant, the integrated pest management plan (IPM) currently in place for the Project Site's existing office uses would be expected to remain in place with the Preferred Alternative.

1.E.6. GRADING, LIMITS OF DISTURBANCE, AND TREE REMOVAL

Grading would be limited to the proposed limits of disturbance on the Project Site, i.e., those areas where new buildings, internal circulation driveways/parking lots, and stormwater management facilities are proposed. The existing grades associated with the existing southern office building / water feature and identified wetland area will remain undisturbed. In total, the Preferred Alternative would involve approximately 28 acres of



Calculation Summary								
Label	Units	Avg	Max	Min	Avg/Min	Max/Min	PtSpcLr	PtSpcTb
PARKING AND DRIVES	Fc	0.55	7.1	0.0	N.A.	N.A.	10	10
PROPERTY LINE @ 5' AG	Fc	0.00	0.5	0.0	N.A.	N.A.	10	N.A.

Luminaire Schedule

WLS17145 AIRPORT CAMPUS NORTH CASTLE, NY PM: HOLLY PLEASE EMAIL US FOR PRICING AT HOLLY@WLSLIGHTING.COM

Symbol	Qty	Label	Lum. Lumens	LLF	Description	Lum. Watts
	8	A	5084	0.950	WLS-LXL-PT-SW-LED-05L-40-SLW 12' POLE	39.2
	7	B	5054	0.950	WLS-LXL-PT-FT-LED-05L-40-SLW 12' POLE	39.2
	14	C	5046	0.980	WLS-LXL-PT-2-LED-05L-40-SLW 12' POLE	39.2
	3	D	12044	0.980	WLS-CLXM-LED-18L-SIL-FT-40-70CRI-IL-SLW 20' MOUNTING HEIGHT	148.5
	1	E	13765	0.950	WLS-CLXM-LED-18L-SIL-3-40-70CRI-IL-SLW 20' MOUNTING HEIGHT	148.5

Source: WLS Lighting 2023

Preferred Alternative - Lighting Plans

Source: WLS Lighting 2023

Preferred Alternative - Lighting Plans

Source: JMC 2023

Preferred Alternative - Open Space Plan

Source: JMC 2023

Preferred Alternative - Preliminary Landscaping Plan

AIRPORT CAMPUS FEIS

Figure 1-11a

Source: JMC 2023

Preferred Alternative - Preliminary Landscaping Plan

AIRPORT CAMPUS FEIS

Figure 1-11b

disturbance (approximately 72 percent of the Project Site's total acreage) (see **Figure 1-12**). This is approximately 10.5 acres more than were estimated to be disturbed by the DEIS Project (i.e., 17.5 acres), including the approximately 3 acres of disturbance required to demolish the existing parking structure and existing northern office building.

The most recent tree protection/removal plans and tree survey that have been prepared by the Applicant's Engineer in accordance with Chapter 308 of the Town Code indicate that there are approximately 1,091 existing trees regulated by the Town with a diameter at breast height (DBH) of 8 inches or greater within the area of the site for which a tree survey was conducted. Of the 1,091 trees regulated by Chapter 308 of the Town Code, the Applicant proposes to remove approximately 744 in connection with construction of the Preferred Alternative (see **Figure 1-13**). Additional details on the Project Site's vegetation, including the measures to mitigate the proposed tree removal, can be found in Chapter 2, "Environmental Analyses."

1.E.7. STORMWATER MANAGEMENT AND EROSION CONTROL

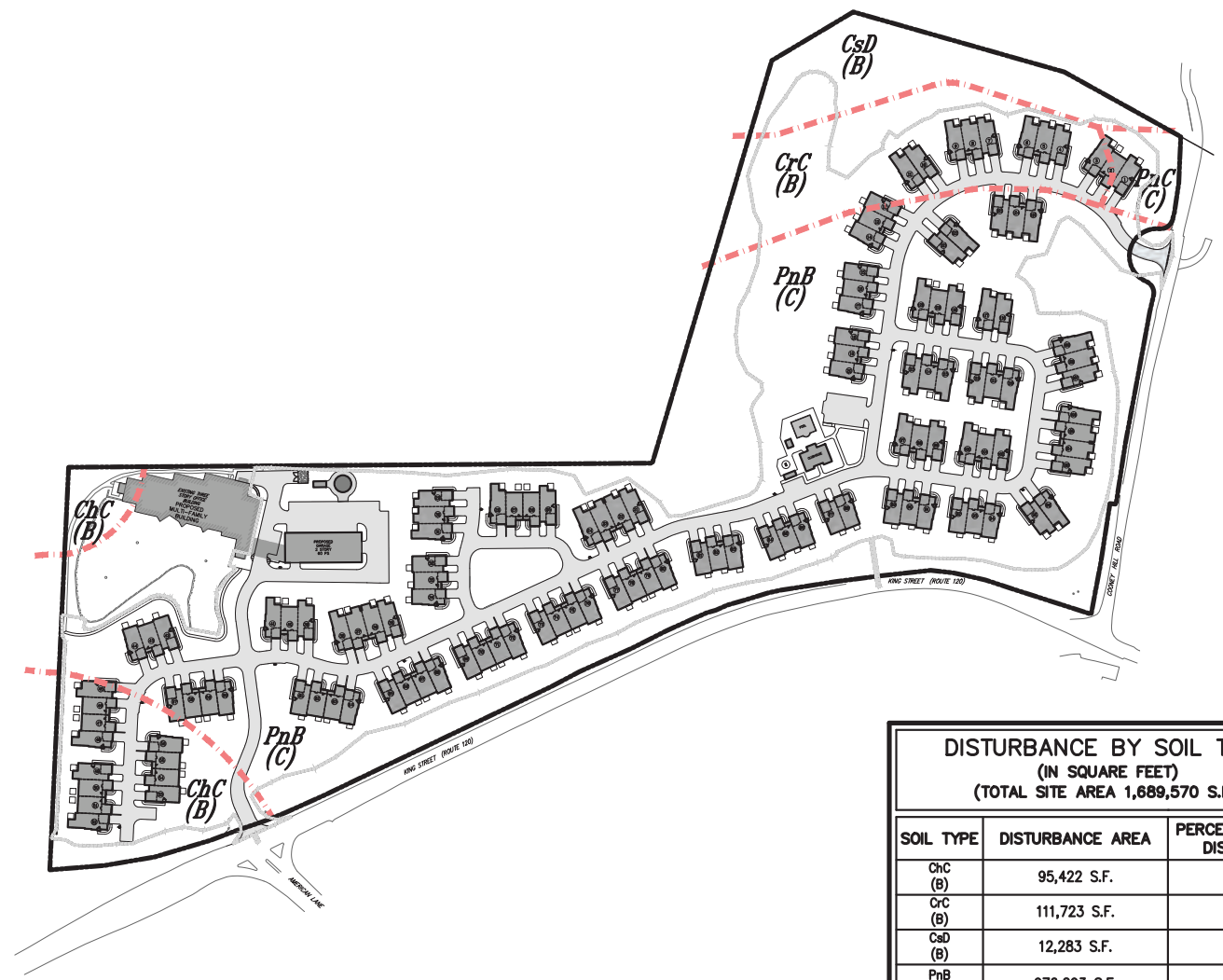
The Preferred Alternative includes a Stormwater Pollution Prevention Plan (SWPPP) and an Erosion and Sediment Control Plan (ESCP) (see **Appendix D**) to avoid and/or mitigate impacts associated with the disturbance of on-Site soils during construction.

Eight stormwater management practices are proposed for the Preferred Alternative: Two infiltration basins, one subsurface infiltration system, three bioretention areas and two detention areas. The Preferred Alternative's SWPPP has been designed to ensure that the quantity and quality of stormwater runoff during and after development are not substantially altered from pre-development conditions. As a result of its implementation, and as discussed more thoroughly in Chapter 2, "Environmental Analyses," it is expected that there will be no significant adverse impact on downstream properties and watercourses, including the adjacent New York City watershed lands, the Kensico Reservoir, and its floodplain and related wetlands. In fact, the Preferred Alternative would reduce both the rate and volume of stormwater runoff from the Project Site from the existing condition.

The Applicant's engineer has also developed an Erosion and Sediment Control Plan (ESCP) that depicts the measures that would be implemented to control erosion during construction and reduce the potential for sediment to leave the Site. These measures 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 Preferred Alternative.

1.E.8. ON- AND OFF-SITE UTILITIES

Concurrent with this FEIS, the Applicant has petitioned the Town of North Castle to include the Project Site within the North Castle Water District #8. As a component of the Preferred Alternative, the Applicant would extend the public water system from its currently proposed northern terminus of New King Street to the Project Site adequately sized to supply the Project Site as well as further extension to the Town (see **Figure 1-14**). On the Project Site, the Applicant would construct a 157,000-gallon water storage tank, to provide both domestic and fire water, as required by the Fire Code. The tank would be



DISTURBANCE BY SOIL TYPE (IN SQUARE FEET) (TOTAL SITE AREA 1,689,570 S.F.)		
SOIL TYPE	DISTURBANCE AREA	PERCENT OF SITE DISTURBED
ChC (B)	95,422 S.F.	5.6%
CrC (B)	111,723 S.F.	6.6%
CsD (B)	12,283 S.F.	0.7%
PnB (C)	976,293 S.F.	57.8%
PnC (C)	13,757 S.F.	0.8%
TOTAL	1,209,478 S.F.	71.6%

Source: JMC 2023

Preferred Alternative - Disturbance by Soil Type

Source: JMC 2023

Preferred Alternative - Tree Protection Plans

AIRPORT CAMPUS FEIS

Figure 1-13a

Source: JMC 2023

Preferred Alternative - Tree Protection Plans

Figure 1-13b

1.31.23

TREE TABLE - PART A

1,091 TREES DESIGNATED HAVING A DIAMETER AT DBH OF 8" OR GREATER

TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE	TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE	TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE	TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE
1	CHERRY	12"	POOR	REMOVE	98	SPRUCE	8"	FAIR	REMOVE	200	MAPLE	8"	GOOD	REMOVE	300	BIRCHERRY	10"	POOR	REMOVE
2	SPRUCE	14"	FAIR	REMOVE	99	SPRUCE	8"	POOR	REMOVE	201	ASH	10"	GOOD	REMOVE	301	PINE	28"	FAIR	REMOVE
3	SPRUCE	14"	FAIR	REMOVE	100	MAPLE	10"	GOOD	REMAIN	202	ASH	8"	GOOD	REMOVE	302	SPRUCE	12"	GOOD	REMOVE
4	SPRUCE	14"	FAIR	REMOVE	101	HICKORY	8"	GOOD	REMAIN	203	OAK	14"	FAIR	REMOVE	303	MAPLE	8"	GOOD	REMAIN
5	MAPLE	24"	GOOD	REMOVE	102	MAPPLELE	10"	GOOD	REMAIN	204	MAPLE	14"	GOOD	REMOVE	304	SPRUCE	12"	POOR	REMAIN
6	SPRUCE	14"	FAIR	REMOVE	103	MAPLE	44"	GOOD	REMOVE	205	SPRUCE	8"	GOOD	REMOVE	305	SPRUCE	8"	GOOD	REMOVE
7	CHERRY	12"	FAIR	REMOVE	104	MAPLE	10"	GOOD	REMAIN	206	PINE	14"	GOOD	REMOVE	306	PINE	10"	POOR	REMOVE
8	MAPLE	16"	GOOD	REMOVE	105	MAPLE	10"	GOOD	REMAIN	207	MAPLE	8"	GOOD	REMOVE	307	SPRUCE	14"	POOR	REMOVE
9	MAPLE	38"	GOOD	REMAIN	106	MAPLE	8"	GOOD	REMAIN	208	PINE	12"	FAIR	REMOVE	308	SPRUCE	8"	GOOD	REMOVE
10	SPRUCE	14"	FAIR	REMOVE	107	BIRCHERRY	16" TR	GOOD	REMOVE	209	MAPLE	10"	GOOD	REMAIN	309	SPRUCE	12"	GOOD	REMOVE
11	MAPLE	10"	GOOD	REMAIN	108	ASH	8"	FAIR	REMAIN	210	PINE	14"	FAIR	REMOVE	310	PINE	18"	FAIR	REMOVE
12	SPRUCE	14"	FAIR	REMOVE	110	MAGNOLIA	14"	GOOD	REMOVE	211	PINE	10"	FAIR	REMOVE	311	ASH	10"	FAIR	REMOVE
13	ASH	8"	GOOD	REMAIN	111	MAPLE	10"	GOOD	REMAIN	212	SPRUCE	8"	GOOD	REMOVE	312	CEDAR	10"	GOOD	REMOVE
14	MAPLE	8"	GOOD	REMOVE	112	MAPLE	10"	GOOD	REMAIN	213	SPRUCE	8"	FAIR	REMAIN	313	MAPLE	22"	GOOD	REMOVE
15	MAPLE	8"	GOOD	REMAIN	113	PINE	12"	GOOD	REMAIN	214	CHERRY	9"	FAIR	REMAIN	314	SPRUCE	14"	GOOD	REMOVE
16	ASH	14"	GOOD	REMAIN	114	MAPLE	8"	GOOD	REMAIN	215	OAK	14"	FAIR	REMOVE	315	PINE	26"	GOOD	REMOVE
17	SPRUCE	14"	FAIR	REMOVE	115	MAPLE	16"	GOOD	REMAIN	216	MAPLE	16"	FAIR	REMOVE	316	CEDAR	10"	FAIR	REMOVE
18	ASH	10"	GOOD	REMAIN	116	MAPLE	8"	GOOD	REMAIN	217	MAPLE	10"	FAIR	REMOVE	317	MAPLE	30"	POOR	REMOVE
19	ASH	14"	GOOD	REMAIN	117	PINE	14" 8"	GOOD	REMOVE	218	SPRUCE	12"	GOOD	REMOVE	318	PINE	24"	FAIR	REMAIN
20	ASH	10"	GOOD	REMAIN	118	SPRUCE	14"	POOR	REMOVE	219	MAPLE	8"	GOOD	REMAIN	319	PINE	14"	FAIR	REMOVE
21	ASH	10"	GOOD	REMAIN	119	PINE	14"	FAIR	REMOVE	220	PEAR	10"	GOOD	REMOVE	320	CEDAR	12"	FAIR	REMOVE
22	MAPLE	8"	GOOD	REMAIN	120	MAPLE	10"	GOOD	REMAIN	221	SPRUCE	8"	GOOD	REMOVE	321	SPRUCE	12"	GOOD	REMOVE
23	MAPLE	8"	GOOD	REMAIN	121	BIRCHERRY	12" MU	GOOD	REMOVE	222	SPRUCE	8"	FAIR	REMOVE	322	OAK	12"	GOOD	REMOVE
24	MAPLE	8"	GOOD	REMOVE	122	MAPLE	10"	GOOD	REMAIN	223	MAPLE	9" TW	GOOD	REMOVE	323	DECIDUOUS	10"	POOR	REMOVE
25	MAPLE	8"	GOOD	REMAIN	123	MAPLE	8"	FAIR	REMAIN	224	MAPLE	8"	GOOD	REMAIN	324	CEDAR	10"	FAIR	REMOVE
26	MAPLE	26"	GOOD	REMAIN	124	MAPLE	12" 8"	FAIR	REMAIN	225	SPRUCE	8"	FAIR	REMOVE	325	MAPLE	18"	GOOD	REMOVE
27	MAPLE	8"	GOOD	REMAIN	125	OAK	20"	FAIR	REMOVE	226	MAPLE	10"	GOOD	REMAIN	326	PINE	14"	FAIR	REMAIN
28	MAPLE	10"	GOOD	REMAIN	126	SPRUCE	18" TW	POOR	REMOVE	227	PINE	8"	FAIR	REMAIN	327	PINE	28"	GOOD	REMOVE
29	MAPLE	10" 6"	GOOD	REMAIN	127	MAPLE	8"	GOOD	REMAIN	228	LOCUST	12"	GOOD	REMOVE	328	CEDAR	10"	FAIR	REMOVE
30	ASH	12"	GOOD	REMAIN	129	MAPLE	12"	GOOD	REMAIN	229	PINE	10"	GOOD	REMOVE	329	ASH	12"	FAIR	REMOVE
31	MAPLE	12"	GOOD	REMAIN	130	MAPLE	8"	GOOD	REMAIN	230	PINE	10"	FAIR	REMOVE	330	CEDAR	10"	FAIR	REMOVE
32	SPRUCE	14"	FAIR	REMOVE	132	MAPLE	8"	GOOD	REMAIN	231	PINE	10"	FAIR	REMOVE	331	MAPLE	20"	GOOD	REMOVE
33	ASH	8"	GOOD	REMAIN	134	MAPLE	10"	GOOD	REMAIN	232	MAPLE	10"	GOOD	REMAIN	332	CEDAR	10"	FAIR	REMOVE
34	ASH	8"	GOOD	REMAIN	135	PINE	14"	GOOD	REMOVE	233	MAPLE	10"	GOOD	REMOVE	333	PINE	14"	FAIR	REMAIN
35	MAPLE	8"	GOOD	REMAIN	136	MAPLE	8"	GOOD	REMAIN	234	PINE	10"	POOR	REMOVE	334	DECIDUOUS	12"	GOOD	REMOVE
36	ASH	8"	FAIR	REMAIN	137	PINE	10"	POOR	REMOVE	235	PINE	10"	FAIR	REMOVE	335	CHERRY	10"	GOOD	REMOVE
37	CHERRY	12"	GOOD	REMAIN	138	MAPLE	10"	GOOD	REMAIN	236	MAPLE	12" TR	FAIR	REMAIN	336	MAPLE	14"	FAIR	REMOVE
38	CHERRY	8"	POOR	REMAIN	139	SPRUCE	14"	FAIR	REMOVE	237	SPRUCE	12"	GOOD	REMAIN	337	MAPLE	10"	GOOD	REMOVE
39	MAPLE	8"	POOR	REMAIN	140	SPRUCE	14"	FAIR	REMOVE	238	SPRUCE	12"	GOOD	REMAIN	338	SPRUCE	10"	GOOD	REMOVE
40	ASH	12" TW	FAIR	REMAIN	141	OAK	10"	GOOD	REMOVE	239	SPRUCE	8"	FAIR	REMAIN	339	MAPLE	14"	GOOD	REMOVE
41	MAPLE	10"	GOOD	REMAIN	142	OAK	10"	FAIR	REMOVE	240	SPRUCE	8"	GOOD	REMOVE	340	CEDAR	8" TW	FAIR	REMOVE
42	CHERRY	8"	POOR	REMAIN	143	MAPLE	12"	GOOD	REMAIN	242	LOCUST	14"	GOOD	REMOVE	341	PEAR	22"	GOOD	REMOVE
43	MAPLE	34"	GOOD	REMAIN	144	HICKORY	10"	GOOD	REMAIN	243	SPRUCE	8"	FAIR	REMAIN	342	CEDAR	10" TW	FAIR	REMOVE
44	ASH	8"	GOOD	REMAIN	145	OAK	18"	GOOD	REMOVE	244	MAPLE	8"	FAIR	REMOVE	343	PINE	36"	GOOD	REMOVE
45	MAPLE	8"	GOOD	REMAIN	146	OAK	10"	GOOD	REMOVE	245	SPRUCE	12"	GOOD	REMAIN	344	APPLE	8"	GOOD	REMOVE
46	MAPLE	44"	FAIR	REMOVE	147	ASH	16"	FAIR	REMOVE	246	MAPLE	8"	FAIR	REMAIN	345	OAK	8"	FAIR	REMOVE
47	MAPLE	36"	GOOD	REMOVE	148	MAPLE	12"	GOOD	REMAIN	247	SPRUCE	8"	FAIR	REMAIN	346	CEDAR	10"	GOOD	REMOVE
48	MAPLE	20"	FAIR	REMOVE	149	BIRCHERRY	8"	GOOD	REMOVE	248	SPRUCE	8"	GOOD	REMOVE	347	OAK	34"	GOOD	REMAIN
49	MAPLE	8"	GOOD	REMAIN	150	OAK	12"	GOOD	REMOVE	249	MAPLE	12"	FAIR	REMAIN	348	MAGNOLIA	8"	FAIR	REMOVE
50	MAPLE	34"	GOOD	REMAIN	151	PEAR	16"	FAIR	REMOVE	250	MAPLE	12" 8" 6"	FAIR	REMAIN	349	MAGNOLIA	12"	FAIR	REMOVE
51	MAPLE	8"	GOOD	REMAIN	152	OAK	12"	GOOD	REMOVE	251	MAPLE	10"	FAIR	REMAIN	350	SPRUCE	10"	FAIR	REMOVE
52	MAPLE	16"	GOOD	REMAIN	154	MAPLE	10"	GOOD	REMAIN	252	SPRUCE	8"	GOOD	REMOVE	351	CEDAR	12" TW	GOOD	REMOVE
53	MAPLE	8"	GOOD	REMAIN	155	OAK	8"	GOOD	REMOVE	253	MAPLE	8"	GOOD	REMAIN	352	CEDAR	8"	FAIR	REMOVE
54	OAK	30"	GOOD	REMAIN	156	ASH	10"	GOOD	REMAIN	254	OAK	36"	GOOD	REMAIN	353	MAPLE	24"	POOR	REMOVE
55	MAPLE	4"	GOOD	REMOVE	157	PINE	10"	GOOD	REMAIN	255	SPRUCE	8"	GOOD	REMOVE	354	SPRUCE	16"	GOOD	REMOVE
56	MAPLE	12"	GOOD	REMAIN	158	OAK	8"	GOOD	REMOVE	256	MAPLE	14"	FAIR	REMOVE	355	CEDAR	8"	FAIR	REMOVE
57	MAPLE	48"	GOOD	REMOVE	159	SPRUCE	14"	GOOD	REMOVE	257	MAPLE	12" 8" 6"	FAIR	REMAIN	356	APPLE	8"	FAIR	REMOVE
58	MAPLE	26"	FAIR	REMAIN	160	LOCUST	6"	GOOD	REMOVE	258	LOCUST	12"	GOOD	REMOVE	357	CEDAR	10"	GOOD	REMOVE
59	MAPLE	44"	POOR	REMOVE	161	PINE	8"	POOR	REMOVE	259	ASH	18"	GOOD	REMOVE	358	SPRUCE	10"	GOOD	REMOVE
60	MAPLE	8"	GOOD	REMAIN	162	PINE	8"	FAIR	REMOVE	260	MAPLE	8"	GOOD	REMOVE	359	DECIDUOUS	16"	GOOD	REMOVE
61	OAK	28"	GOOD	REMAIN	163	SPRUCE	10"	GOOD	REMAIN	261	SPRUCE	8"	FAIR	REMAIN	360	CEDAR	14"	FAIR	REMOVE
62	MAPLE	28"	GOOD	REMAIN	164	PINE	8"	FAIR	REMOVE	263	OAK	12"	GOOD	REMOVE	361	MAPLE	16"	GOOD	REMOVE
63	CHERRY	8"	FAIR	REMAIN	166	SPRUCE	8"	FAIR	REMAIN	264	SPRUCE	8"	GOOD	REMOVE	362	OAK	40"	GOOD	REMAIN
64	MAPLE	12"	GOOD	REMAIN	167	OAK	14"	GOOD	REMOVE	265	PINE	12"	FAIR	REMOVE	363	CEDAR	12"	FAIR	REMOVE
65	CHERRY	10"	FAIR	REMAIN	168	MAPLE	10"	GOOD	REMAIN	266	ASH	10"	GOOD	REMOVE	364	MAPLE	18"	GOOD	REMOVE
66	MAPLE	8"	GOOD	REMAIN	169	PEAR	21"	FAIR	REMOVE	268	SPRUCE	8"	FAIR	REMAIN	366	CEDAR	10"	FAIR	REMOVE
67	MAPLE	22"	FAIR	REMOVE	170	SPRUCE	8"	GOOD	REMOVE	269	SPRUCE	8"	GOOD	REMOVE	367	HM	18"	POOR	REMOVE
68	CHERRY	10"	GOOD	REMAIN	171	OAK	14"	FAIR	REMOVE	270	SPRUCE	8"	FAIR	REMOVE	368	CEDAR	14"	FAIR	REMOVE
69	MAPLE	12"	GOOD	REMOVE	172	OAK	20"	GOOD	REMOVE	271	SPRUCE	12"	POOR	REMAIN	369	APPLE	8"	FAIR	REMOVE
70	MAPLE	8"	GOOD	REMAIN	173	OAK	14"	GOOD	REMOVE	272	DOGWOOD	10"	POOR	REMOVE	370	APPLE	8"	GOOD	REMOVE
71	MAPLE	20" 12"	FAIR	REMAIN	174	MAPLE	12"	GOOD	REMOVE	273	PINE	20"	FAIR	REMOVE	371	SPRUCE	14"	GOOD	REMOVE
72	MAPLE	12"	GOOD	REMAIN	175	MAPLE	14"	GOOD	REMOVE	274	OAK	10"	GOOD	REMOVE	372	SYCAMORE	16"	FAIR	REMOVE
73	MAPLE	10"	GOOD	REMAIN	176	SPRUCE	8"	GOOD	REMOVE	275	SPRUCE	14"	POOR	REMAIN	373	CEDAR	12"	FAIR	REMOVE
74	ASH	24"	FAIR	REMAIN	177	SPRUCE	8"	FAIR	REMOVE	276	SPRUCE	8"	FAIR	REMOVE	374	HEMLOCK	8"	POOR	REMOVE
75	MAPLE	8"	GOOD	REMAIN	178	MAPLE	10"	GOOD	REMOVE	277	SM	24"	GOOD	REMAIN	375	MAPLE	12"	GOOD	REMOVE
76	MAPLE	12"	GOOD	REMOVE	179	SPRUCE	8"	FAIR	REMOVE	278	SPRUCE	16"	GOOD	REMAIN	376	HEMLOCK	8"	POOR	REMOVE
77	MAPLE	12"	GOOD	REMAIN	180	MAPLE	8"	GOOD	REMAIN	279	PINE	16"	FAIR	REMOVE	377	MAPLE	12"	POOR	REMOVE
78	MAPLE	10"	GOOD	REMAIN	181	SPRUCE	14"	GOOD	REMOVE	280	CEDAR	12"	GOOD	REMAIN	378	SPRUCE	14"	FAIR	REMOVE
79	MAPLE	8" 6"	GOOD	REMAIN	182	SPRUCE	14"	FAIR	REMOVE	281	MAPLE	16"	GOOD	REMOVE	380	MAPLE	12"	GOOD	REMAIN
80	SPRUCE	12"	FAIR	REMOVE	183	SPRUCE	12"	GOOD	REMOVE	282	PINE	10"	FAIR	REMAIN	381	BIRCHERRY	14"	GOOD	REMAIN
81	MAPLE	12"	GOOD	REMAIN	184	SPRUCE	14"	FAIR	REMOVE	283	SPRUCE	14"	POOR	REMAIN	382	BIRCHERRY	14"	GOOD	REMAIN
82	SPRUCE	12"	FAIR	REMOVE	185	SPRUCE	8"	FAIR	REMOVE	284	OAK	14"	GOOD	REMAIN	383	PINE	28"	FAIR	REMOVE
83	MAPLE	12"	GOOD	REMAIN	186	SPRUCE	8"	FAIR	REMOVE	285	SPRUCE	8"	GOOD	REMOVE	384	SPRUCE	20"	GOOD	REMOVE
84	MAPLE	12"	GOOD	REMOVE	187	SPRUCE	8"	FAIR	REMOVE	286	BIRCHERRY	12"	GOOD	REMAIN	385	APPLE	10"	GOOD	REMOVE
85	SPRUCE	14"	GOOD	REMOVE	188	SPRUCE	8"	FAIR	REMOVE	287	BIRCHERRY	8"	POOR	REMAIN	386	OAK	30"	GOOD	REMOVE
86	ASH	22"	POOR	REMAIN	189	MAPLE	10"	GOOD	REMOVE	288	SPRUCE	10"	POOR	REMAIN	387	HEMLOCK	8" TW	FAIR	REMOVE
87	MAPLE	12"	GOOD	REMAIN	190	MAPLE	10"	GOOD	REMAIN	289	MAPLE	12"	GOOD	REMAIN	388	OAK	12"	FAIR	REMOVE
88	DECIDUOUS	12"	FAIR	REMOVE	191	SPRUCE	8"	GOOD	REMOVE	290	PINE	12"	FAIR	REMOVE	389	APPLE	12" TR	POOR	REMOVE
89	SPRUCE	10"	FAIR	REMOVE	192	MAPLE	12"	GOOD	REMOVE	291	PINE	8"	FAIR	REMOVE	390	SPRUCE	14"	FAIR	REMOVE
90	MAPLE	8"	FAIR	REMAIN	193	SPRUCE	8"	GOOD	REMOVE	293	SPRUCE	12" TW	GOOD	REMAIN	391	MAPLE	34"	GOOD	REMOVE
91	MAPLE	8"	FAIR	REMAIN	194	SPRUCE	8"	FAIR	REMOVE	294	PINE	12"	FAIR	REMOVE	392	APPLE	10"	GOOD	REMOVE
92	BIRCHERRY	14" TR	GOOD	REMOVE	195	SPRUCE	8"	FAIR	REMOVE	295	PINE	10"	FAIR	REMOVE	393	APPLE	12"	GOOD	REMOVE
93	SPRUCE	8"	FAIR	REMOVE	196	PEAR	8"	GOOD	REMOVE	296	CEDAR	24" TW	FAIR	REMOVE	394	CHERRY	10"	POOR	REMOVE
94	MAPLE	12"	POOR	REMOVE	197	SPRUCE	8"	FAIR	REMOVE	297	ASH	16"	GOOD	REMOVE	395	ASH	16"	FAIR	REMOVE
95	PINE	10"	GOOD	REMOVE	198	SPRUCE	8"	GOOD	REMOVE	298	MAPLE	10"	GOOD	REMOVE	396	CHERRY	10"	POOR	REMOVE
96	PINE	8"	GOOD	REMOVE	199	SPRUCE	12"	FAIR	REMOVE	299	PINE	10"	FAIR	REMOVE	397	OAK	22"	FAIR	REMOVE
97	MAPLE	16"	GOOD	REMOVE											398	MAPLE	14"	FAIR	REMOVE
															399	OAK	28"	GOOD	REMOVE

Source: JMC 2023

1.31.23

TREE TABLE - PART B

1,091 TREES DESIGNATED HAVING A DIAMETER AT DBH OF 8" OR GREATER

TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE	TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE	TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE	TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE
400	SPRUCE	12"	POOR	REMOVE	500	CHERRY	20"	POOR	REMOVE	600	CHERRY	14"	POOR	REMOVE	700	APPLE	12"	DEAD	REMOVE
401	CHERRY	22"	POOR	REMOVE	501	DECIDUOUS	16"	FAIR	REMAIN	602	ASH	18"	POOR	REMOVE	702	ASH	14"	POOR	REMOVE
402	MAPLE	14"	GOOD	REMOVE	502	TREE OF HEAVEN	18"	FAIR	REMOVE	603	CHERRY	12"	POOR	REMOVE	703	SASSAFRAS	18"	FAIR	REMAIN
403	MAPLE	24"	FAIR	REMOVE	503	MAPLE	18"	GOOD	REMOVE	604	CHERRY	12"	DEAD	REMOVE	704	ASH	10"	FAIR	REMAIN
404	OAK	16"	FAIR	REMOVE	504	ASH	16"	FAIR	REMOVE	605	TREE OF HEAVEN	24" TW	FAIR	REMAIN	705	APPLE	28"	POOR	REMOVE
405	MAPLE	12"	GOOD	REMOVE	505	SYCAMORE	16"	GOOD	REMOVE	606	CHERRY	14"	POOR	REMOVE	707	PINE	48"	GOOD	REMOVE
406	MAPLE	22"	FAIR	REMOVE	506	MAPLE	16"	FAIR	REMAIN	607	MAPLE	16"	DEAD	REMOVE	709	MAPLE	50"	GOOD	REMOVE
407	CHERRY	10"	POOR	REMOVE	507	BIRCHERRY	8"	POOR	REMOVE	608	CHERRY	14"	POOR	REMOVE	710	MAPLE	18"	FAIR	REMOVE
408	SPRUCE	14"	FAIR	REMOVE	508	CHERRY	8"	GOOD	REMOVE	609	TREE OF HEAVEN	8" MU	FAIR	REMOVE	712	CHERRY	18"	FAIR	REMAIN
409	SPRUCE	10"	POOR	REMOVE	509	MAPLE	16"	GOOD	REMAIN	610	OAK	38"	GOOD	REMOVE	713	CHERRY	18"	FAIR	REMAIN
410	OAK	22"	GOOD	REMOVE	510	ASH	40"	POOR	REMAIN	611	ASH	12" TW	DEAD	REMOVE	715	MAPLE	48"	GOOD	REMAIN
411	OAK	24"	FAIR	REMOVE	511	CHERRY	10"	DEAD	REMOVE	612	ASH	20"	POOR	REMOVE	716	SASSAFRAS	18"	FAIR	REMAIN
412	CHERRY	18"	FAIR	REMOVE	512	APPLE	12"	DEAD	REMOVE	614	LOCUST	20"	POOR	REMOVE	717	ASH	18"	POOR	REMOVE
413	OAK	20"	GOOD	REMAIN	513	CHERRY	10"	FAIR	REMOVE	616	PINE	10"	DEAD	REMOVE	718	MAPLE	10"	FAIR	REMOVE
414	SPRUCE	10"	POOR	REMOVE	514	APPLE	16"	DEAD	REMOVE	617	WILLOW	60"	POOR	REMAIN	719	MAPLE	10" TW	FAIR	REMOVE
415	SPRUCE	12"	FAIR	REMOVE	515	LOCUST	14"	POOR	REMOVE	618	OAK	12"	FAIR	REMOVE	720	MAPLE	12" TW	FAIR	REMOVE
416	DECIDUOUS	16"	GOOD	REMAIN	516	CHERRY	16"	FAIR	REMOVE	619	CHERRY	8"	POOR	REMOVE	721	BIRCHERRY	14" TR	FAIR	REMAIN
417	DECIDUOUS	16"	GOOD	REMAIN	517	ASH	14"	POOR	REMOVE	620	CHESNUT	18" 6"	GOOD	REMOVE	722	TREE OF HEAVEN	16"	GOOD	REMAIN
419	SPRUCE	20"	FAIR	REMOVE	518	LOCUST	12"	DEAD	REMOVE	621	PINE	20"	GOOD	REMOVE	723	OAK	18"	FAIR	REMOVE
420	LINDEN	16"	GOOD	REMAIN	519	SPRUCE	24"	FAIR	REMAIN	622	PINE	10"	POOR	REMOVE	724	SASSAFRAS	18"	FAIR	REMAIN
421	SPRUCE	8"	FAIR	REMAIN	520	CHERRY	14"	DEAD	REMOVE	623	PINE	24"	FAIR	REMOVE	725	APPLE	16"	POOR	REMOVE
422	HEMLOCK	8"	FAIR	REMOVE	521	CHERRY	12"	FAIR	REMOVE	624	CHESNUT	32"	GOOD	REMOVE	726	OAK	20"	FAIR	REMOVE
423	APPLE	12"	GOOD	REMOVE	523	MAPLE	22" TW	FAIR	REMOVE	625	PINE	18"	FAIR	REMOVE	728	MAPLE	20"	FAIR	REMOVE
424	SPRUCE	10"	POOR	REMOVE	524	ASH	16"	POOR	REMOVE	626	SPRUCE	14"	POOR	REMOVE	729	CHERRY	8"	DEAD	REMOVE
425	OAK	8"	GOOD	REMOVE	525	CHERRY	10"	FAIR	REMOVE	627	CHESNUT	20"	FAIR	REMAIN	730	FIR	16"	POOR	REMOVE
426	SPRUCE	12"	FAIR	REMOVE	527	CHERRY	10"	FAIR	REMOVE	628	PINE	16"	FAIR	REMOVE	731	OAK	28"	FAIR	REMOVE
427	SPRUCE	8"	FAIR	REMAIN	528	CEDAR	10"	GOOD	REMOVE	629	OAK	26"	GOOD	REMOVE	732	MAPLE	32"	GOOD	REMOVE
428	APPLE	8"	FAIR	REMAIN	529	CEDAR	10" 8"	GOOD	REMOVE	630	APPLE	18" TR	POOR	REMOVE	733	CHERRY	16" TW	FAIR	REMOVE
429	OAK	12"	GOOD	REMOVE	530	MAPLE	28"	GOOD	REMOVE	631	OAK	22"	FAIR	REMOVE	735	SPRUCE	16"	GOOD	REMAIN
430	APPLE	8"	POOR	REMOVE	531	PINE	18"	POOR	REMOVE	632	OAK	20"	FAIR	REMOVE	736	MAGNOLIAB	16"	GOOD	REMOVE
431	SPRUCE	10"	GOOD	REMAIN	532	MAPLE	20"	FAIR	REMAIN	633	PINE	22"	POOR	REMOVE	737	SPRUCE	16"	GOOD	REMAIN
432	SPRUCE	12"	POOR	REMOVE	533	ASH	12"	FAIR	REMOVE	634	CHERRY	18"	FAIR	REMOVE	739	WALNUT	12"	GOOD	REMOVE
433	SPRUCE	12"	FAIR	REMAIN	535	PINE	16"	FAIR	REMOVE	635	MAPLE	16"	FAIR	REMOVE	740	HEMLOCK	12" 10"	GOOD	REMOVE
434	SPRUCE	14"	FAIR	REMAIN	536	CHERRY	12"	POOR	REMOVE	636	OAK	16"	GOOD	REMOVE	741	MAPLE	8" TR	POOR	REMOVE
435	OAK	22"	FAIR	REMOVE	537	CHERRY	10"	POOR	REMOVE	637	CHERRY	12"	FAIR	REMOVE	742	HEMLOCK	14"	GOOD	REMOVE
436	MAPLE	26"	GOOD	REMAIN	538	MAPLE	48"	POOR	REMOVE	638	PINE	18"	POOR	REMOVE	743	APPLE	24"	POOR	REMOVE
437	SPRUCE	12"	POOR	REMOVE	539	MAPLE	26"	FAIR	REMOVE	639	ASH	12"	POOR	REMOVE	744	PINE	22"	GOOD	REMOVE
438	BIRCHERRY	12" MU	FAIR	REMOVE	540	CHERRY	12"	POOR	REMOVE	641	ASH	24"	POOR	REMOVE	745	PINE	22"	GOOD	REMOVE
439	SPRUCE	12"	POOR	REMOVE	541	CHERRY	12"	FAIR	REMOVE	642	OAK	28"	FAIR	REMOVE	746	BIRCHERRY	22"	GOOD	REMOVE
440	BIRCHERRY	12" MU	FAIR	REMOVE	544	CHERRY	8"	FAIR	REMOVE	643	OAK	30"	FAIR	REMOVE	748	MAPLE	24" 8"	FAIR	REMOVE
441	BIRCHERRY	18" TR	FAIR	REMOVE	545	LOCUST	22"	POOR	REMOVE	644	ASH	12"	POOR	REMOVE	752	BIRCHERRY	10" 4"	GOOD	REMAIN
442	SPRUCE	10"	POOR	REMOVE	546	MAPLE	18"	FAIR	REMOVE	645	ASH	12"	POOR	REMOVE	753	SASSAFRAS	10"	GOOD	REMAIN
443	SPRUCE	10"	POOR	REMOVE	547	ASH	10" TW	POOR	REMOVE	646	PINE	16" MU	POOR	REMOVE	754	MAPLE	22" 14"	GOOD	REMAIN
444	MAPLE	14"	GOOD	REMOVE	548	PINE	12"	POOR	REMOVE	647	APPLE	20"	DEAD	REMOVE	755	SASSAFRAS	8"	GOOD	REMAIN
445	SPRUCE	8"	POOR	REMOVE	549	ASH	14"	POOR	REMOVE	648	PINE	16"	GOOD	REMOVE	756	OAK	28"	GOOD	REMAIN
446	HEMLOCK	8"	FAIR	REMOVE	550	BIRCHERRY	8"	GOOD	REMOVE	649	OAK	24"	FAIR	REMOVE	757	MAPLE	10"	GOOD	REMAIN
447	LOCUST	10"	FAIR	REMOVE	551	CHERRY	8"	DEAD	REMOVE	650	ASH	10"	POOR	REMOVE	758	DECIDUOUS	8"	POOR	REMOVE
448	CEDAR	10"	FAIR	REMOVE	552	SYCAMORE	8"	GOOD	REMAIN	651	ASH	8"	POOR	REMOVE	759	HICKORY	16"	GOOD	REMOVE
449	HEMLOCK	10"	POOR	REMOVE	553	PINE	16"	FAIR	REMOVE	652	OAK	16" TW	POOR	REMOVE	760	CHERRY	8"	POOR	REMOVE
451	HEMLOCK	12"	FAIR	REMOVE	554	CHERRY	18"	POOR	REMOVE	653	OAK	26"	GOOD	REMOVE	761	CHERRY	8"	POOR	REMAIN
452	SPRUCE	20"	POOR	REMOVE	555	APPLE	18"	DEAD	REMOVE	654	SPRUCE	24"	FAIR	REMOVE	762	MAPLE	8"	GOOD	REMAIN
454	CEDAR	10"	FAIR	REMOVE	556	WALNUT	16"	POOR	REMAIN	655	MAPLE	24"	FAIR	REMAIN	763	MAPLE	10" 6"	POOR	REMOVE
455	MAPLE	18"	FAIR	REMOVE	557	MAPLE	20"	FAIR	REMOVE	656	PINE	30" MU	FAIR	REMOVE	764	MAPLE	12"	GOOD	REMAIN
456	LOCUST	12"	DEAD	REMOVE	558	ASH	12"	DEAD	REMOVE	657	SPRUCE	10" MU	FAIR	REMAIN	765	MAPLE	8"	GOOD	REMAIN
457	CHERRY	20"	GOOD	REMOVE	560	LOCUST	20"	FAIR	REMOVE	658	PINE	22"	FAIR	REMOVE	766	ASH	22"	GOOD	REMOVE
458	MAPLE	10" MU	POOR	REMOVE	561	DOGWOOD	8"	FAIR	REMAIN	659	MAPLE	8"	FAIR	REMAIN	767	MAPLE	12"	GOOD	REMOVE
460	CEDAR	20"	POOR	REMOVE	562	CHERRY	10"	FAIR	REMOVE	660	SPRUCE	28"	FAIR	REMOVE	768	MAPLE	10"	GOOD	REMOVE
461	CHERRY	16"	FAIR	REMOVE	563	PINE	16"	DEAD	REMOVE	661	CHERRY	22"	POOR	REMOVE	770	HICKORY	26"	GOOD	REMOVE
465	MAPLE	8"	FAIR	REMOVE	564	ASH	10"	FAIR	REMAIN	662	CHERRY	14"	POOR	REMOVE	771	CHERRY	8"	POOR	REMOVE
466	MAPLE	18"	GOOD	REMOVE	565	LOCUST	18"	FAIR	REMOVE	663	PINE	20"	FAIR	REMOVE	772	LOCUST	10"	POOR	REMOVE
467	MAPLE	12"	FAIR	REMOVE	566	CHERRY	10"	FAIR	REMOVE	664	ASH	12"	POOR	REMAIN	773	BIRCHERRY	10"	POOR	REMOVE
470	OAK	24"	FAIR	REMOVE	567	LOCUST	18"	FAIR	REMOVE	665	MAPLE	14"	GOOD	REMAIN	774	SPRUCE	10"	FAIR	REMOVE
471	MAPLE	12"	GOOD	REMAIN	568	MAPLE	22" TW	FAIR	REMAIN	667	PINE	18"	FAIR	REMOVE	775	MAPLE	10"	FAIR	REMOVE
472	PINE	16"	FAIR	REMOVE	569	PINE	16"	POOR	REMOVE	668	SPRUCE	18"	GOOD	REMOVE	776	MAPLE	8"	FAIR	REMOVE
473	PINE	24"	FAIR	REMOVE	570	PINE	14"	POOR	REMOVE	669	BIRCHERRY	12"	FAIR	REMAIN	777	SPRUCE	10"	POOR	REMOVE
474	MAPLE	16"	FAIR	REMOVE	571	SPRUCE	18"	GOOD	REMAIN	671	MAPLE	10"	FAIR	REMAIN	778	SPRUCE	10"	POOR	REMOVE
475	OAK	14"	FAIR	REMOVE	572	LOCUST	14"	FAIR	REMOVE	672	PINE	20"	FAIR	REMOVE	779	DECIDUOUS	10"	DEAD	REMAIN
476	PINE	24"	FAIR	REMOVE	573	MAPLE	12"	FAIR	REMOVE	673	ASH	8"	FAIR	REMAIN	780	PINE	14"	DEAD	REMOVE
477	PINE	16"	FAIR	REMOVE	574	TREE OF HEAVEN	14"	FAIR	REMOVE	674	ASH	10"	POOR	REMAIN	781	HICKORY	14"	POOR	REMOVE
478	MAPLE	30"	POOR	REMOVE	575	CHERRY	10"	FAIR	REMOVE	675	MAPLE	50"	FAIR	REMAIN	782	OAK	38"	GOOD	REMOVE
479	PINE	16"	FAIR	REMOVE	576	CHERRY	14"	FAIR	REMOVE	676	HICKORY	10"	GOOD	REMAIN	783	DECIDUOUS	18"	DEAD	REMOVE
480	PINE	8"	DEAD	REMAIN	577	MAPLE	18"	FAIR	REMOVE	677	APPLE	12"	GOOD	REMOVE	784	DECIDUOUS	12"	POOR	REMOVE
481	MAPLE	10"	POOR	REMAIN	578	CHERRY	14"	POOR	REMOVE	678	MAPLE	24"	GOOD	REMOVE	785	MAPLE	10"	FAIR	REMOVE
482	MAPLE	10"	GOOD	REMAIN	579	CHERRY	16"	FAIR	REMOVE	679	MAPLE	12"	GOOD	REMAIN	786	MAPLE	10"	FAIR	REMOVE
483	PINE	28"	FAIR	REMOVE	580	HEMLOCK	8"	FAIR	REMOVE	680	ASH	10"	FAIR	REMAIN	787	DECIDUOUS	14"	POOR	REMOVE
484	MAPLE	12"	POOR	REMAIN	581	PINE	16"	DEAD	REMOVE	681	ASH	10"	FAIR	REMAIN	788	DECIDUOUS	14"	FAIR	REMAIN
485	MAPLE	18"	GOOD	REMAIN	582	ASH	20"	POOR	REMOVE	682	PINE	18"	GOOD	REMOVE	789	DECIDUOUS	22"	POOR	REMAIN
486	PINE	28"	FAIR	REMOVE	583	LOCUST	30"	FAIR	REMOVE	683	DECIDUOUS	8"	FAIR	REMAIN	790	OAK	24"	GOOD	REMAIN
487	PINE	8"	DEAD	REMOVE	584	ASH	16"	FAIR	REMOVE	684	ASH	8"	POOR	REMAIN	791	OAK	20"	GOOD	REMAIN
488	PINE	16"	FAIR	REMOVE	585	LOCUST	14"	FAIR	REMOVE	685	TREE OF HEAVEN	16"	GOOD	REMAIN	792	OAK	20"	FAIR	REMAIN
489	LOCUST	26"	POOR	REMAIN	586	BIRCHERRY	12"	POOR	REMOVE	690	MAPLE	10"	FAIR	REMAIN	793	DECIDUOUS	12"	DEAD	REMOVE
490	PINE	16"	FAIR	REMOVE	587	LOCUST	10"	FAIR	REMOVE	691	CEDAR	16"	FAIR	REMOVE	794	DECIDUOUS	8"	POOR	REMOVE
491	ASH	14"	POOR	REMOVE	588	BIRCHERRY	26"	POOR	REMOVE	692	PINE	16"	FAIR	REMOVE	795	DECIDUOUS	10"	POOR	REMOVE
492	CHERRY	12"	POOR	REMOVE	589	TREE OF HEAVEN	20"	GOOD	REMOVE	693	CEDAR	14" MU	FAIR	REMAIN	796	DECIDUOUS	10"	DEAD	REMOVE
493	ASH	12"	POOR	REMOVE	591	PINE	16"	POOR	REMOVE	697	ASH	16"	DEAD	REMOVE	797	DECIDUOUS	12" 10"	POOR	REMOVE
494	CHERRY	10"	POOR	REMOVE	592	MAPLE	30"	GOOD	REMOVE	698	WILLOW	50"	POOR	REMOVE	798	DECIDUOUS	10"	POOR	REMOVE
495	CHERRY	10"	POOR	REMOVE	593	CHERRY	14"	POOR	REMOVE	699	BIRCHERRY	16"	POOR	REMOVE	799	OAK	12"	GOOD	REMOVE
496	CHERRY	8"	FAIR	REMOVE	594	OAK	28"	FAIR	REMOVE										
497	LOCUST	14"	POOR	REMOVE	595	CHERRY	12"	POOR	REMOVE										
498	ELM	16"	GOOD	REMAIN	596	CHERRY	8"	GOOD	REMOVE										
499	MAPLE	10" TW	GOOD	REMAIN	598	ASH	18"	POOR	REMOVE										
					599	WALNUT	16"	FAIR	REMAIN										

Source: JMC 2023

1.31.23

TREE TABLE - PART C

1,091 TREES DESIGNATED HAVING A DIAMETER AT DBH OF 8" OR GREATER

TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE	TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE	TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE	TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE
802	SPRUCE	18''	GOOD	REMOVE	900	MAPLE	12''	GOOD	REMOVE	997	OAK	28''	GOOD	REMOVE	1093	PINE	14''	GOOD	REMOVE
803	MAPLE	8''	GOOD	REMOVE	901	PINE	8''	GOOD	REMOVE	998	HICKORY	12''	GOOD	REMOVE	1094	PINE	14''	GOOD	REMOVE
804	MAPLE	10''	GOOD	REMOVE	902	MAPLE	12''	GOOD	REMOVE	999	OAK	16''	GOOD	REMOVE	1095	PINE	12''	GOOD	REMOVE
805	CEDAR	14''	GOOD	REMOVE	903	SPRUCE	8''	GOOD	REMOVE	1000	HEMLOCK	8''	GOOD	REMOVE	1096	PINE	18''	GOOD	REMOVE
806	PINE	10''	GOOD	REMOVE	904	MAPLE	8''	GOOD	REMOVE	1001	HEMLOCK	10''	GOOD	REMOVE	1097	SPRUCE	8''	GOOD	REMOVE
807	MAPLE	8''	GOOD	REMOVE	905	SPRUCE	8''	GOOD	REMOVE	1002	OAK	28''	GOOD	REMOVE	1098	SPRUCE	8''	GOOD	REMOVE
808	OAK	36''	GOOD	REMOVE	906	SPRUCE	14''	GOOD	REMOVE	1003	OAK	26'' 24''	GOOD	REMOVE	1099	SPRUCE	16''	GOOD	REMOVE
809	OAK	28''	GOOD	REMOVE	907	SPRUCE	10''	GOOD	REMOVE	1004	BIRCHERRY	14''	GOOD	REMAIN	1100	SPRUCE	12''	GOOD	REMAIN
810	PINE	28''	GOOD	REMOVE	908	SPRUCE	8''	GOOD	REMOVE	1005	OAK	26''	GOOD	REMAIN	1101	SPRUCE	12''	GOOD	REMOVE
811	MAPLE	26''	GOOD	REMOVE	909	MAPLE	16'' 24''	GOOD	REMOVE	1006	OAK	12''	GOOD	REMAIN	1102	SPRUCE	12''	GOOD	REMAIN
812	TU	30''	GOOD	REMOVE	910	MAPLE	8'' 12''	GOOD	REMOVE	1007	OAK	26''	GOOD	REMAIN	1103	OAK	12''	GOOD	REMAIN
813	SASSAFRAS	8''	GOOD	REMOVE	911	MAPLE	8''	GOOD	REMOVE	1008	BIRCHERRY	8''	GOOD	REMAIN	1104	SPRUCE	12''	GOOD	REMOVE
814	MAPLE	28''	GOOD	REMOVE	912	PINE	12''	GOOD	REMOVE	1009	MAPLE	16''	GOOD	REMAIN	1105	SPRUCE	8''	GOOD	REMOVE
815	DOGWOOD	8''	GOOD	REMOVE	913	PINE	8''	GOOD	REMOVE	1010	BIRCHERRY	8''	GOOD	REMAIN	1106	SPRUCE	12''	GOOD	REMAIN
816	HEMLOCK	28''	GOOD	REMOVE	914	PINE	12''	GOOD	REMOVE	1011	BIRCHERRY	16''	GOOD	REMOVE	1107	SPRUCE	10''	GOOD	REMAIN
817	HEMLOCK	16''	GOOD	REMOVE	915	TREE OF HEAVEN	16''	GOOD	REMOVE	1012	HICKORY	8''	GOOD	REMAIN	1108	SPRUCE	8''	GOOD	REMOVE
818	HEMLOCK	16''	GOOD	REMOVE	916	PINE	10''	GOOD	REMOVE	1013	OAK	30''	GOOD	REMAIN	1109	SPRUCE	12''	GOOD	REMAIN
819	HO	10''	GOOD	REMOVE	917	PINE	8''	GOOD	REMOVE	1014	OAK	24''	GOOD	REMOVE	1110	MAPLE	10''	GOOD	REMAIN
820	HEMLOCK	18''	GOOD	REMOVE	918	PINE	8''	GOOD	REMOVE	1015	OAK	22''	GOOD	REMOVE	1111	SPRUCE	12''	GOOD	REMAIN
821	HEMLOCK	14''	GOOD	REMOVE	919	PINE	8''	GOOD	REMOVE	1016	CHERRY	8''	FAIR	REMOVE	1112	FIR	10''	GOOD	REMAIN
822	HEMLOCK	18''	GOOD	REMOVE	920	SPRUCE	8''	GOOD	REMOVE	1017	OAK	16''	GOOD	REMOVE	1113	FIR	10''	GOOD	REMOVE
823	OAK	26''	GOOD	REMOVE	921	SPRUCE	10''	GOOD	REMOVE	1018	MAPLE	8''	GOOD	REMOVE	1114	SPRUCE	8''	GOOD	REMAIN
824	HEMLOCK	10''	GOOD	REMOVE	922	SPRUCE	8''	GOOD	REMOVE	1019	MAPLE	8''	GOOD	REMAIN	1115	PINE	8''	GOOD	REMAIN
825	OAK	30''	GOOD	REMOVE	923	SPRUCE	12''	GOOD	REMOVE	1020	MAPLE	8'' MU	GOOD	REMAIN	1116	SPRUCE	12''	GOOD	REMAIN
826	OAK	30''	GOOD	REMOVE	924	SPRUCE	8''	GOOD	REMOVE	1021	MAPLE	14''	GOOD	REMAIN	1117	FIR	12''	GOOD	REMAIN
827	OAK	36''	GOOD	REMOVE	925	SPRUCE	12''	GOOD	REMOVE	1022	MAPLE	8''	GOOD	REMAIN	1118	SPRUCE	8''	GOOD	REMAIN
828	OAK	34''	GOOD	REMOVE	926	SPRUCE	12''	GOOD	REMOVE	1023	OAK	34''	GOOD	REMAIN	1119	SPRUCE	8''	GOOD	REMAIN
829	HEMLOCK	8''	GOOD	REMOVE	927	PINE	14''	GOOD	REMOVE	1024	CHERRY	8''	FAIR	REMOVE	1120	SPRUCE	8''	GOOD	REMAIN
830	OAK	28''	GOOD	REMOVE	928	PINE	8''	GOOD	REMOVE	1025	BIRCHERRY	18''	GOOD	REMAIN	1121	OAK	16''	GOOD	REMAIN
831	HO	8''	GOOD	REMOVE	929	PINE	12''	GOOD	REMOVE	1026	OAK	22''	GOOD	REMOVE	1122	OAK	16''	GOOD	REMOVE
832	OAK	24''	GOOD	REMOVE	930	PINE	12''	GOOD	REMOVE	1027	OAK	18''	GOOD	REMOVE	1123	PINE	12''	GOOD	REMAIN
833	OAK	20''	GOOD	REMOVE	931	PINE	10''	GOOD	REMOVE	1028	MAPLE	12''	GOOD	REMOVE	1124	PINE	12''	GOOD	REMOVE
834	MAPLE	8''	GOOD	REMOVE	932	TREE OF HEAVEN	10'' 12''	FAIR	REMOVE	1029	OAK	34''	GOOD	REMOVE	1125	PINE	10''	GOOD	REMOVE
835	OAK	32''	GOOD	REMOVE	933	TREE OF HEAVEN	8'' 18''	FAIR	REMOVE	1030	MAPLE	12''	GOOD	REMOVE	1126	PINE	10''	GOOD	REMAIN
836	DOGWOOD	8''	GOOD	REMOVE	934	TREE OF HEAVEN	8''	FAIR	REMOVE	1031	MAPLE	12''	GOOD	REMOVE	1127	PINE	8''	GOOD	REMAIN
837	OAK	36''	GOOD	REMOVE	935	TREE OF HEAVEN	16''	FAIR	REMOVE	1032	MAPLE	14''	GOOD	REMOVE	1128	PINE	10''	GOOD	REMAIN
838	OAK	22''	GOOD	REMAIN	936	TREE OF HEAVEN	12''	FAIR	REMAIN	1033	HICKORY	10''	GOOD	REMOVE	1129	PINE	12''	GOOD	REMAIN
839	MAPLE	8''	GOOD	REMAIN	937	MAPLE	8''	GOOD	REMAIN	1034	BIRCHERRY	10''	GOOD	REMAIN	1130	PINE	12''	GOOD	REMAIN
840	MAPLE	12''	GOOD	REMOVE	938	MAPLE	8''	GOOD	REMAIN	1035	HICKORY	24''	GOOD	REMAIN	1131	PINE	14''	GOOD	REMAIN
841	MAPLE	10''	GOOD	REMOVE	939	OAK	14''	GOOD	REMAIN	1036	MAPLE	8''	GOOD	REMOVE	1132	DOGWOOD	8''	GOOD	REMAIN
842	CHERRY	8''	FAIR	REMOVE	940	OAK	28''	GOOD	REMAIN	1037	OAK	24''	GOOD	REMOVE	1133	SASSAFRAS	8'' MU	GOOD	REMAIN
843	CHERRY	8''	FAIR	REMOVE	941	MAPLE	8''	GOOD	REMAIN	1038	OAK	28''	GOOD	REMOVE	1134	DOGWOOD	8''	GOOD	REMAIN
844	DOGWOOD	12''	GOOD	REMOVE	942	OAK	28''	GOOD	REMAIN	1039	BEECH	8''	GOOD	REMAIN	1135	OAK	18''	GOOD	REMAIN
845	MAPLE	10''	GOOD	REMOVE	943	MAPLE	26''	GOOD	REMAIN	1040	BIRCHERRY	24''	GOOD	REMAIN	1136	PINE	8''	GOOD	REMAIN
846	HEMLOCK	20''	GOOD	REMOVE	944	OAK	38''	GOOD	REMOVE	1041	OAK	30''	GOOD	REMAIN	1137	PINE	10''	GOOD	REMAIN
847	MAPLE	16''	GOOD	REMAIN	945	OAK	20''	GOOD	REMOVE	1042	MAPLE	8''	GOOD	REMAIN	1138	HEMLOCK	8''	GOOD	REMAIN
848	MAGNOLIA	16''	GOOD	REMOVE	946	MAPLE	24''	GOOD	REMOVE	1043	MAPLE	14''	GOOD	REMOVE	1139	SPRUCE	10''	GOOD	REMAIN
849	HEMLOCK	20''	GOOD	REMAIN	947	MAPLE	8''	GOOD	REMOVE	1044	MAPLE	8 TW	GOOD	REMAIN	1140	SPRUCE	8''	GOOD	REMAIN
850	LOCUST	20''	POOR	REMOVE	948	HICKORY	22''	GOOD	REMOVE	1045	MAPLE	8''	GOOD	REMAIN	1141	SPRUCE	10''	GOOD	REMAIN
851	MAPLE	14''	GOOD	REMAIN	949	BIRCH	8''	GOOD	REMOVE	1046	FIR	12''	GOOD	REMAIN	1142	SPRUCE	8''	GOOD	REMAIN
852	MAPLE	26''	GOOD	REMOVE	950	OAK	36''	GOOD	REMOVE	1047	MAGNOLIA	14'' MU	GOOD	REMOVE	1143	SPRUCE	8''	GOOD	REMAIN
853	HO	8''	FAIR	REMOVE	951	OAK	24''	GOOD	REMOVE	1048	PINE	14''	GOOD	REMOVE	1144	SPRUCE	12''	GOOD	REMAIN
854	MAPLE	16''	GOOD	REMAIN	952	OAK	20''	GOOD	REMOVE	1049	PINE	16''	GOOD	REMOVE	1145	SPRUCE	8''	GOOD	REMAIN
856	MAPLE	16''	GOOD	REMOVE	953	MAPLE	8''	GOOD	REMOVE	1050	PINE	8''	GOOD	REMOVE	1146	SPRUCE	8''	GOOD	REMAIN
857	DECIDUOUS	12''	GOOD	REMOVE	954	MAPLE	8''	GOOD	REMAIN	1051	PINE	8''	GOOD	REMAIN	1147	SPRUCE	10''	GOOD	REMAIN
858	DECIDUOUS	10''	GOOD	REMOVE	955	OAK	20''	GOOD	REMOVE	1052	PINE	8''	GOOD	REMAIN	1148	SPRUCE	8''	GOOD	REMAIN
859	TREE OF HEAVEN	8''	FAIR	REMOVE	956	MAPLE	8''	GOOD	REMOVE	1053	SPRUCE	12''	GOOD	REMAIN	1149	SPRUCE	10''	GOOD	REMAIN
860	TREE OF HEAVEN	14''	FAIR	REMOVE	957	OAK	34''	GOOD	REMOVE	1054	SPRUCE	8''	GOOD	REMAIN	1150	SPRUCE	12''	GOOD	REMAIN
861	MAPLE	8''	GOOD	REMOVE	958	MAPLE	8''	GOOD	REMOVE	1055	SPRUCE	8''	GOOD	REMAIN	1151	SPRUCE	8''	GOOD	REMOVE
862	ASH	10''	POOR	REMOVE	960	MAPLE	8''	GOOD	REMOVE	1056	SPRUCE	8''	GOOD	REMAIN					
863	SYCAMORE	36''	GOOD	REMOVE	961	BIRCH	10''	GOOD	REMOVE	1057	MAPLE	14''	GOOD	REMAIN					
864	MAPLE	12''	GOOD	REMOVE	962	OAK	34''	GOOD	REMOVE	1058	SPRUCE	10''	GOOD	REMAIN					
865	LOCUST	28''	GOOD	REMOVE	963	BIRCH	14''	GOOD	REMAIN	1059	SPRUCE	8''	GOOD	REMAIN					
866	LOCUST	24''	GOOD	REMOVE	964	MAPLE	8''	GOOD	REMAIN	1060	MAPLE	14''	GOOD	REMAIN					
867	TREE OF HEAVEN	12''	FAIR	REMOVE	965	BIRCH	8''	GOOD	REMOVE	1061	SPRUCE	16''	GOOD	REMAIN					
868	MAPLE	16''	GOOD	REMOVE	966	MAPLE	8''	GOOD	REMOVE	1062	SPRUCE	16''	GOOD	REMAIN					
869	CHERRY	20''	FAIR	REMOVE	967	MAPLE	8''	GOOD	REMOVE	1063	SPRUCE	12''	GOOD	REMAIN					
870	MAPLE	24''	GOOD	REMOVE	968	OAK	20''	GOOD	REMAIN	1064	SPRUCE	12''	GOOD	REMOVE					
871	CHERRY	16''	FAIR	REMOVE	969	OAK	28''	GOOD	REMAIN	1065	SPRUCE	10''	GOOD	REMAIN					
872	MAPLE	26''	GOOD	REMOVE	970	HICKORY	8''	GOOD	REMAIN	1066	SPRUCE	12''	GOOD	REMOVE					
873	MAPLE	14''	GOOD	REMOVE	971	MAPLE	12''	GOOD	REMAIN	1067	SPRUCE	16''	GOOD	REMAIN					
874	ASH	12''	FAIR	REMOVE	972	OAK	16''	GOOD	REMAIN	1068	MAPLE	8''	GOOD	REMOVE					
875	MAPLE	22''	GOOD	REMOVE	973	OAK	22''	GOOD	REMAIN	1069	LOCUST	8'' TW	GOOD	REMAIN					
876	CHERRY	16''	FAIR	REMOVE	974	BIRCH	8''	GOOD	REMAIN	1070	SPRUCE	12''	GOOD	REMAIN					
877	MULBERRY	8''	GOOD	REMOVE	975	MAPLE	8''	GOOD	REMAIN	1071	SPRUCE	12''	GOOD	REMAIN					
878	MAPLE	16''	GOOD	REMOVE	976	DOGWOOD	8''	GOOD	REMOVE	1072	SPRUCE	14''	GOOD	REMAIN					
879	MAPLE	16''	GOOD	REMOVE	977	HICKORY	8''	GOOD	REMAIN	1073	MAPLE	14''	GOOD	REMAIN					
880	ASH	18''	FAIR	REMOVE	978	CH	8''	FAIR	REMAIN	1074	PINE	14''	GOOD	REMOVE					
881	ASH	14''	FAIR	REMOVE	979	CD	8''	GOOD	REMAIN	1075	PINE	16''	GOOD	REMOVE					
883	SPRUCE	8''	GOOD	REMOVE	980	MAPLE	12''	GOOD	REMOVE	1076	CEDAR	10'' TW	GOOD	REMOVE					
884	SPRUCE	8''	GOOD	REMOVE	981	MAPLE	16''	GOOD	REMAIN	1077	PINE	8''	GOOD	REMOVE					
885	SPRUCE	8''	GOOD	REMOVE	982	MAPLE	8''	GOOD	REMAIN	1078	PINE	16''	GOOD	REMOVE					
886	SPRUCE	8''	GOOD	REMOVE	983	BIRCH	14''	GOOD	REMAIN	1079	MAPLE	12''	GOOD	REMOVE					
887	PINE	12''	GOOD	REMOVE	984	MAPLE	24''	GOOD	REMAIN	1080	SPRUCE	8''	GOOD	REMOVE					
888	PINE	8''	GOOD	REMOVE	985	OAK	12''	GOOD	REMAIN	1081	SPRUCE	8''	GOOD	REMOVE					
889	SYCAMORE	10''	GOOD	REMOVE	986	TREE OF HEAVEN	8''	FAIR	REMOVE	1082	SPRUCE	8''	GOOD	REMOVE					
890	SYCAMORE	8''	GOOD	REMOVE	987	BEECH	10''	GOOD	REMOVE	1083	SPRUCE	8''	GOOD	REMOVE					
891	SYCAMORE	10''	GOOD	REMOVE	988	MAPLE	18''	GOOD	REMOVE	1084	SPRUCE	10''	GOOD	REMOVE					
892	PINE	10''	GOOD	REMOVE	989	MAPLE	8''	GOOD	REMOVE	1085	SPRUCE	12''	GOOD	REMOVE					
893	PINE	8''	GOOD	REMOVE	990	MAPLE	8''	GOOD	REMOVE	1086	MAPLE	12''	GOOD	REMOVE					
894	PINE	12''	GOOD	REMOVE	991	OAK	28''	GOOD	REMOVE	1087	MAPLE	12''	GOOD	REMOVE					
895	LOCUST	14''	GOOD	REMOVE	992	OAK	30''	GOOD	REMOVE	1088	PINE	22''	GOOD	REMOVE					
896	PINE	8''	GOOD	REMOVE	993	MAPLE	10''	GOOD	REMOVE	1089	HEMLOCK	14''	GOOD	REMOVE					
897	PINE	8''	GOOD	REMOVE	994	HICKORY	12''	GOOD	REMAIN	1090	HEMLOCK	8''	GOOD	REMOVE					
898	PINE	8''	GOOD	REMOVE	995	HICKORY	28''	GOOD	REMOVE	1091	HEMLOCK	12''	GOOD	REMOVE					
899	PINE	8''	GOOD	REMOVE	996	OAK	24''	GOOD	REMOVE	1092	OAK	14''	GOOD	REMOVE					

Source: JMC 2023

Source: JMC 2023

Preferred Alternative - Preliminary Utilities Plan

Source: JMC 2023

Preferred Alternative - Preliminary Utilities Plan

placed behind the proposed parking structure near the converted multifamily building on the Site. In addition, the Applicant would construct a water booster pump station adjacent to the water storage tank in order to provide adequate water pressure and flow to the Project. As such, the Project Site would be served with municipal water that has the capacity to meet the anticipated demand of the Preferred Alternative. The Applicant would only propose to utilize existing on-site groundwater supply to meet the domestic demand of the Site, as part of a community water system, as an alternative should municipal water not be available. One or more of the existing on-Site wells may be utilized for irrigation purposes, in addition to using the existing pond for that purpose, to the extent feasible and permitted by the County.

As described in the DEIS, no modifications to either the Town or County sewer collection system piping would be required to serve the anticipated demand of the Preferred Alternative, which has a lower daily demand than the DEIS Project. As described in the DEIS, the public sewer system's existing Pump Stations 2 and 3 require minor modifications to correct an existing condition (irrespective of re-development of the Project Site), as further explained in Section 2.9, "Utilities."

1.E.9. OTHER OFF-SITE IMPROVEMENTS

But for the water line extension and pump station modifications described above, the Preferred Alternative, like the DEIS Project, does not require other off-site utility improvements.

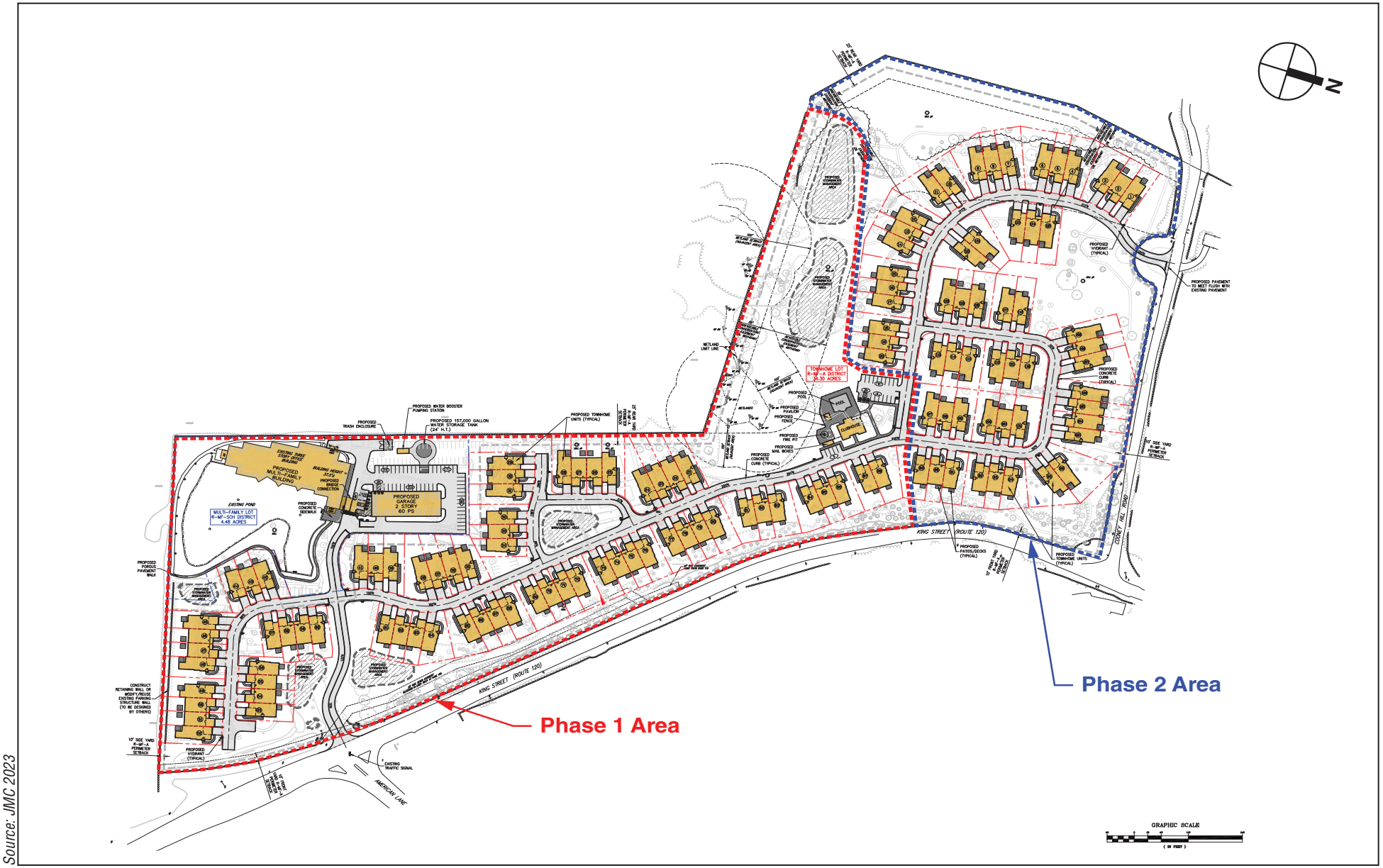
1.E.10. CONSTRUCTION PHASING

The construction program for the Preferred Alternative is anticipated to occur in two major phases, as described below (see **Figure 1-15**). 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.

1.E.10.a. Phase 1

Phase 1 of construction for the Preferred Alternative involves the conversion of the existing southern office building to an approximately 50-unit multifamily building and the construction of a 2-story parking garage, the southernmost 68 townhouses, the clubhouse/amenity area and related infrastructure improvements. This phase would also likely include demolition of the Site's existing 29-foot tall, two-story, approximately 316-space parking garage and the 36-foot tall, three-story, approximately 161,000 square foot northern office building. This phase would also include the construction of four temporary stormwater sediment basins for erosion and sediment control purposes. The temporary basins would be converted to permanent stormwater management practices at the end of this phase. This phase is estimated to last 24 months.

Since the majority of work associated with the office building conversion consists of interior and exterior building renovations, any necessary site work



Source: JMC 2023

Preferred Alternative - Conceptual Construction Phasing

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 last approximately 8 to 12 months, with the building façade upgrades occurring during the final 4 to 6 months of the interior renovation timeframe.

It is anticipated that the construction process for the 68 townhouses would begin with clearing, grading and road construction lasting up to 12 months, and construction of the residential units lasting 12 months.

It is anticipated that approximately 75 construction workers would be on-Site for Phase 1 of construction.

1.E.10.b. Phase 2

Phase 2 of construction for the Preferred Alternative would involve the construction of 57 townhouses on the northern portion of the Project Site, along with the access road 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 townhouses 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 24 months.

It is anticipated that the construction process for this phase would begin with clearing, grading and road construction lasting up to 12 months and construction of the residential units lasting 12 months.

It is anticipated that approximately 50 construction workers would be on-Site for Phase 2 of construction.

1.E.11. SITE LIMITATIONS AND CONSTRAINTS

As was the case with the DEIS Project, the Preferred Alternative has been designed to complement the currently developed portion of the Project Site while avoiding certain site limitations and constraints, including development in the aforementioned Conservation Easement area and the Town-regulated wetland buffer. The Town of North Castle also regulates steep slopes. Chapter 355 of the Town Code defines a steep slope as "a natural geographical area, whether on one or more lots, which has a slope equal to 25 percent or greater over a horizontal area measuring at least 25 feet in all directions." Approximately 2,007 sf (0.16 percent) of the Preferred Alternative's overall limits of disturbance meet the Town Code's definition of steep slopes. These Town-regulated slopes within of the Preferred Alternative's limits of disturbance are found along the King Street frontage of the Project Site and were created as the result of constructing the existing berm that screens the Project Site's existing improvements.

1.E.12. DESCRIPTION OF THE PROPOSED ZONING

To redevelop the Project Site as proposed, the Applicant has petitioned the Town Board to map the Senior Housing Portion of the Site within the Town's existing R-MF-SCH Zoning District. The Zoning District was established by the Town "for the purpose of furthering the goals of the North Castle Comprehensive Plan by providing a multifamily

residence district specifically designed for, and limited in occupancy to, senior citizens."[5] Further, the Zoning District provides the Town Board the opportunity to make a legislative determination "on a case-by case basis after consideration of the specific site, the specific development plan and the specific housing program."[6] The conformance of the Senior Housing Portion of the Preferred Alternative with the Revised Proposed Zoning is presented in **Table 1-2**, above, and discussed in more detail in Section 2.B.1 of this FEIS.

The Applicant has also petitioned the Town Board to map the Townhouse Portion of the Site within the Town's existing R-MF-A Zoning District. The Zoning District was established by the Town "in order to further and promote the goals and purposes of the Multifamily R-MF Zone[7] and to promote the goals of the Town [Comprehensive Plan] by providing a multifamily residential density at the upper end of the density range as set forth in [the Comprehensive Plan]."[8] The conformance of the Townhouse Portion of the Preferred Alternative with the Revised Proposed Zoning is presented in **Table 1-2a**, above, and discussed in more detail in Section 2.B.1 of this FEIS.

Finally, the Applicant has petitioned the Town Board for a zoning text amendment to the R-MF-SCH Residence District Regulations (Town Code §355-27), which would grant the Town Board discretion to approve conversion of existing office space to multifamily residential use (as is the case here) as part of remapping a site. If the Project Site were mapped entirely R-MF-A or entirely R-MF-SCH, the Project Site would be compliant with the maximum density allowed by each district. However, given the unique shape of the Project Site and the location of the existing office building, the proposed subdivision line results in the Townhouse Portion of the Site being larger than it needs to be to accommodate the proposed 125 townhomes and the lot area of the Senior Housing Portion being smaller than would allow conformance with the FAR envelope of the R-MF-SCH zoning. Specifically, as mapped, the planned R-MF-A portion of the Site could theoretically accommodate 157 townhouse units, though we only propose 125 units, and the R-MF-SCH portion of the Site would have an FAR of 0.70. The proposed zoning text amendment would give the Board the discretion to acknowledge these unique site constraints for the R-MF-SCH site density to accommodate reuse of the existing office building which is an environmental policy preference in New York State.

1.F. CURRENTLY APPROVED DEVELOPMENT PLAN

On October 8, 2003, the Town Board adopted a SEQRA Findings Statement and approved the necessary zoning amendments, including an amended Preliminary Development Concept Plan (PDCP), to permit an additional 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 allow for an increase of office space on the Project Site from approximately 261,000 sf of office and related amenity

[5] Section 355-27(A) of the North Castle Zoning Code.

[6] Ibid.

[7] The intent of the R-MF Multifamily District is "to increase the supply of dwelling units for smaller families or individuals." See Section 355-24 of the North Castle Zoning Code.

[8] Section 355-25(A) of the North Castle Zoning Code.

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 five-story parking structure in excess of 300,000 sf containing approximately 1,000 parking spaces.

A site plan delineating the currently approved development plan is shown in **Figure 1-16**. While the most recent approvals for the additional expansion have been granted extensions by the Town and remain in full force and effect today, no new structures contemplated by those approvals have been built. In addition, subsequent site plan and Stormwater Pollution Prevention Plan (SWPPP) approvals 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 site plan and SWPPP approvals currently in place with the Town, which have not been constructed, allow for a parking expansion of 94 spaces (for a total of 137 spaces), with associated curbing, utility, and stormwater management improvements.

1.G. STATEMENT OF PURPOSE AND NEED

As described by the Applicant, the downturn in the economy precluded MBIA from undertaking the approved office expansion. Ultimately, MBIA moved out of its corporate headquarters and sold the property to the Applicant. 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. The purpose of the Proposed Action is to provide a solution to these challenges with respect to the Project Site, consistent with the Town's recently updated Comprehensive Plan and in a way that minimizes the impacts and maximizes the benefits to the Town.

The Town of North Castle recently completed the process of updating and revising its 1996 Comprehensive Plan. The new Comprehensive Plan was adopted on April 25, 2018. As part of that process, 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 uses. Specific references from the Comprehensive Plan that are applicable to the Project Site and the Preferred Alternative are described in the following paragraphs.

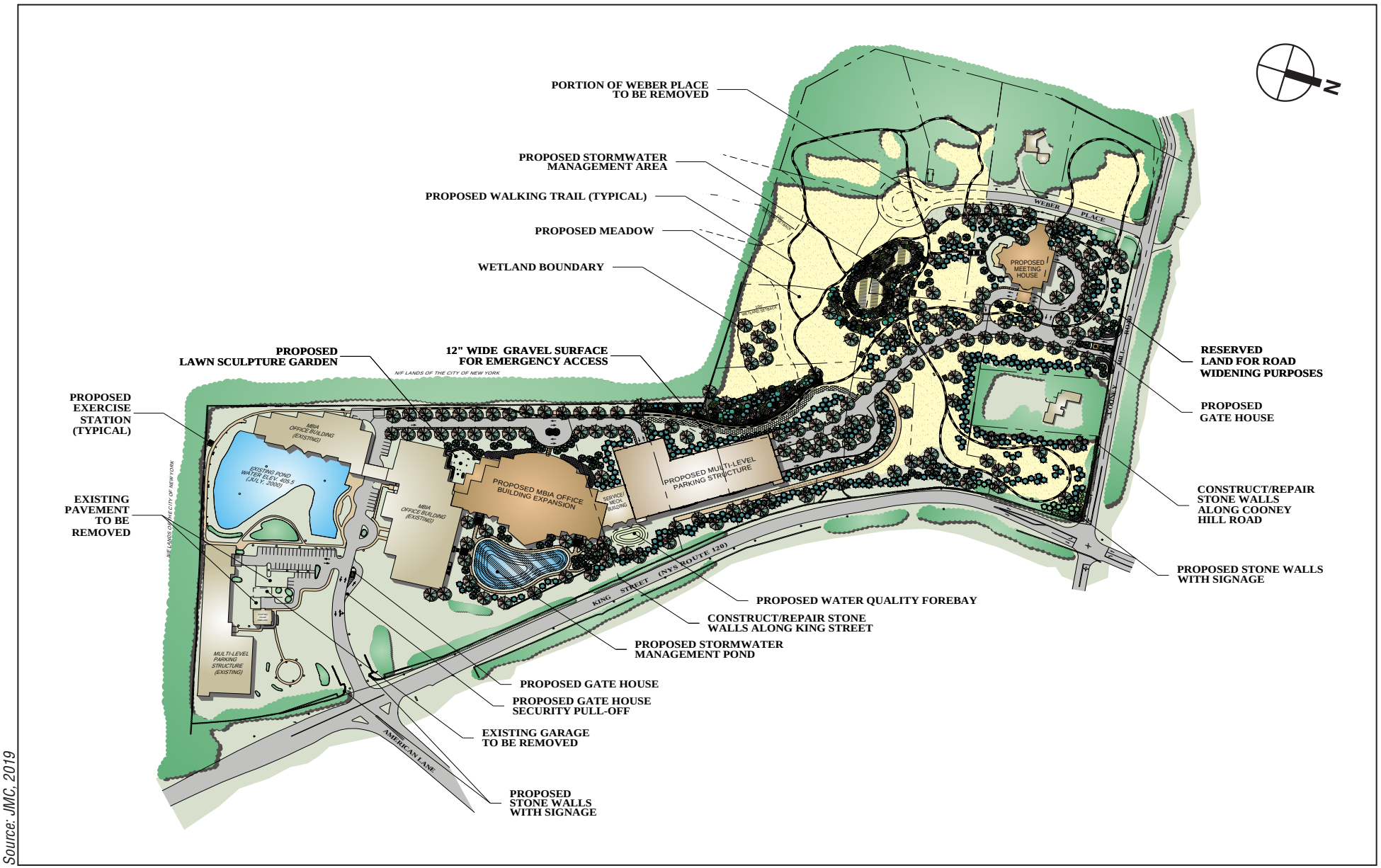
The Comprehensive Plan recognizes that the needs of its citizens change over time. Section 3.3 of the Comprehensive Plan (page 21) observes that:

> *"In recent years, the Town has seen its senior and older workforce population (aged 50-64) increase in number, while the young adult population (ages 18-24) and prime labor force age population (34-49) has declined. The high cost of housing and inadequate supply of varied housing types for rent or sale will likely make it difficult for people to age in place while young households decrease in number."*

Recognizing this issue, the Comprehensive Plan notes that the Town Board took affirmative steps to address it:

> *"[T]he Town Board created the floating R-MF-SCH Multifamily Senior Citizen Housing District."*

Section 4.4 of the Comprehensive Plan (page 34) recommends that the Town should "undertake a comprehensive analysis of the office and commercial zones, with the goal of streamlining and



Source: JMC, 2019

Project Site - Currently Approved Development Plan

clarifying their regulations so that they function effectively in a contemporary context." Additionally, this Section specifically mentions the Project Site as an appropriate site for the introduction of residential uses. It also mentions the IBM property, which was recently rezoned for senior housing:

> *"For the PLI, OB-H and DOB-20A zones, in particular (business park, portion of IBM property, Swiss Re and former MBIA campus), the Town should explore allowing for an introduction of residential uses, at a scale comparable to surrounding land use patterns."*

Section 8.6 of the Comprehensive Plan (page 99) notes the following opportunity related to the promotion of infill development to facilitate a variety of housing options:

> *"While North Castle today is mostly defined by its attractive low-density residential neighborhoods, offering a greater variety of housing types could help the Town to retain Baby Boomers in retirement and attract younger people who wish to stay but cannot afford a single-family home. An efficient approach to greater variety of housing would prioritize attractive multifamily options in locations that maximize access to the community assets that make the Town so attractive, with a focus on targeted infill development in appropriate locations."*

Section 8.6 of the Comprehensive Plan (page 99) goes on to further recognize the potential for infill development to add needed housing for the Town's aging population:

> *"The growth in older age groups of the population over the coming decades suggests encouraging siting and design of new and infill development of smaller, lower maintenance units for seniors near services, enabling more of the population to age in place and stay connected to the community physically and socially."*

Section 8.7 of the Comprehensive Plan (page 100) sets forth a series of specific growth, development and housing recommendations. This Section suggests that the Town "should encourage residential development that is compatible in scale, density, and character with its neighborhood and natural environment." The same section of the Comprehensive Plan also suggests that the Town "[e]xplore opportunities to provide housing for the Town's senior population." Notably, this Section specifically targets office parks such as the Project Site as an appropriate opportunity for the introduction of an infill mixed-use development:

> *"Explore options to rezone business and office parks in order to create opportunities for infill mixed use residential development where office uses have become, or could become, obsolete. These locations could include the business park, the former MBIA site, Old Route 22, and Mariani Gardens, areas where affordable housing for smaller households will minimize traffic and parking impacts. Additional residential uses in these areas can also help to support Armonk businesses."*

With regard to marketability and economic benefits of the Preferred Alternative, there is a strong market demand for residential uses in the Town and the region, especially for "seniors interested in downsizing locally" as observed in the Comprehensive Plan (p. 150). As such, rezoning the Project Site as two zoning districts—a senior multifamily housing district, R-MF-SCH (for the multifamily building), and a multifamily housing district, R-MF-A (for the townhomes)—would increase the economic viability of the Project Site. ✷

2.A. INTRODUCTION

In accordance with the requirements of the State Environmental Quality Review Act ("SEQRA"), this Chapter analyzes the potential environmental impacts associated with the Revised Proposed Zoning and Residential Housing Alternative described in Chapter 1, "Project Description" (collectively, the "Preferred Alternative"). Based on the analyses below, it is the Applicant's opinion that the Preferred Alternative would not result in any new significant adverse impacts that were not already analyzed in the DEIS. Rather, the Preferred Alternative would further avoid and mitigate potential adverse environmental impacts when compared to the DEIS Project.

2.B. POTENTIAL IMPACTS OF THE PREFERRED ALTERNATIVE

2.B.1. LAND USE, ZONING, AND PUBLIC POLICY

This section analyzes the consistency of the Preferred Alternative with the land uses and zoning surrounding the Project Site, as well as the consistency of the Preferred Alternative with applicable public policies.

2.B.1.a. Potential Impacts – Land Use

Town Board approval of the Revised Proposed Zoning would allow the Project Site to be redeveloped for residential use, as opposed to its existing use as an office campus. Specifically, the Preferred Alternative would adaptively repurpose the southernmost of the two existing three-story office buildings on the Project Site as a multifamily residential building with approximately 50 two-bedroom, age-restricted units. Parking for the multifamily building would be accommodated in a new, 51-space surface parking lot and a new, 2-story, 60-space parking structure north of the building. The parking structure is anticipated to be connected to the multifamily building with an enclosed pedestrian walkway. Additional residential uses would be introduced to the north and east of the repurposed office building in the form of approximately 125 attached, two-story, three-bedroom, townhouses.

The remaining three-story, approximately 161,000-square-foot (sf) office building and three-story, approximately 101,400 sf, 316-space parking garage in the southern portion of the Project Site would be demolished. With the Preferred Alternative, the existing circa 1820's farmhouse would not remain in its current location. Given the "significant loss of integrity, most notably

the setting, design, feeling and association,"[1] the Applicant would coordinate with the Town on whether further mitigation was appropriate for the farmhouse's removal or other community needs.

As discussed below, and as was the case with the DEIS Project, the Preferred Alternative would result in some physical changes to portions of the Project Site and the introduction of residential uses consistent with the land use plans governing the area, including the Town's Comprehensive Plan. Additionally, the new townhomes would be designed in a manner that is architecturally consistent with other residential townhouse development in the Town.

As was the case with the DEIS Project, the Preferred Alternative would not introduce land uses that are inconsistent with the land uses surrounding the Project Site. The Preferred Alternative would activate an area of the Town that was historically a mix of office and single-family residential uses which, over the last 15–20 years, has seen limited interest from corporate office tenants and has been lacking a traditional neighborhood identity. The Project Site's prior residential subdivision south of Cooney Hill Road was acquired and removed to facilitate MBIA's expansion plan which was never constructed (as discussed in Chapter 3, "Land Use, Zoning, and Public Policy," of the DEIS). Currently, the character of the neighborhood around the Project Site 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, Westchester County Airport, I-684, Greenwich, Connecticut, and the hamlet of Armonk.

The Preferred Alternative, in the Applicant's opinion, is compatible with the Westchester County Airport considering that the Site is predominately located within the airport's 60 Day-Night Average Sound Level (DNL) noise contour. No land use impacts are anticipated. As stated in the DEIS, the existing noise levels from the airport in the vicinity of the Project Site do not reach a level requiring a degree of window-wall attenuation above what can be achieved through standard multifamily residential construction practices. As was the case with the DEIS Project, the reintroduction of residential uses to the Project Site would not represent a unique condition when compared to historic and existing land uses surrounding the airport which have included prior residential uses of a portion of the Project Site. For example, the Preferred Alternative's proposed residential density of 4.5 units/acre is comparable to the Cider Mill attached townhouse/single-family development located approximately two miles to the northeast. 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) and the Bellfaire and Kingfield developments (Rye Brook, New York).

[1] August 7, 2019 letter from the New York State Historic Preservation Office (SHPO) determining that the farmhouse was not eligible for listing on the National Register of Historic Places. See DEIS Appendix J-2.

The Preferred Alternative, in contrast to the DEIS Project, does not require changes to the allowable building heights on the Project Site. The Preferred Alternative would repurpose one existing office building (while removing the other, approximately 161,000-sf office building) and introduce townhouses that are two-stories in height. The two-story buildings are lower in height than the Site's existing buildings and lower than the multifamily building proposed in the DEIS. As such, the Preferred Alternative would not result in a significant change in the visual character of the area. Additional details regarding the visibility of the Preferred Alternative as well as mitigation measures to reduce the potential for visual and community character impacts are discussed in Section 2.B.9, herein.

2.B.1.b. Potential Impacts – Zoning

To redevelop the Project Site as a residential community, the Applicant has amended its Zoning Petition to request that the Town Board map the Senior Housing Portion of the Project within the Town's Multifamily-Senior Citizen Housing (R-MF-SCH) Zoning District and the Townhouse Portion of the Project Site within the Town's Residential Multifamily (R-MF-A) Zoning District. As described in FEIS Chapter 1, "Project Description," the Applicant is no longer requesting amendments to the DOB-20A zoning district, which would have affected sites other than the Project Site. The Revised Proposed Zoning is limited solely to the Project Site and would not have the potential to result in other potential development on neighboring properties.[2]

2.B.1.b.(i) Senior Housing Portion of the Project Site

As stated in the Town's Zoning Code, the R-MF-SCH district was "established for the purpose of furthering the goals of the North Castle Comprehensive Plan by providing a multifamily resident district specifically designed for, and limited in occupancy to, senior citizens" (§355-27(A)). As stated in FEIS Chapter 1, "Project Description," the multifamily units would be age-restricted to those 55 years of age and older, as required by the R-MF-SCH district and permitted by the U.S. Fair Housing Act. Attached as **Appendix C** is representative language that the Applicant plans to utilize in a rental agreement governing use of the multifamily units.

The R-MF-SCH zoning district provides the Town Board the opportunity to make a legislative determination "on a case-by case basis after consideration of the specific site, the specific development plan and the specific housing program."[3] Save for limited dimensional regulations set out in the Town's Zoning Code, most dimensional standards applicable

[2] As part of its Zoning Petition (see **Appendix B**), the Applicant is seeking a minor zoning text amendment to the R-MF-SCH Residence District Regulations (Town Code §355-27(B)(2)). The text amendment would preserve the Town Board's discretion in establishing R-MF-SCH sites, and would grant the Town Board the authority to establish the dimensional and design requirements, at the time of rezoning, when converting existing office space to senior multifamily residential use (as is the case here).

[3] Ibid.

to development in the R-MF-SCH District are to be determined by the Town Board at the time of re-zoning. Pursuant to § 355-27(B)(2):

"The determination of maximum permitted FAR, as well as other dimensional standards for each individual zone, shall be based upon the Town Board's consideration of the character of the neighborhood in which the zone will be located; the zone's relationship to adjoining zones, properties and land uses; the zone's topography; the zone's proximity to shopping and transportation services; and other such factors which said Board may determine to be appropriate."

Table 2-1 identifies the existing dimensional regulations of the DOB-20A Zoning District, and the regulations that would apply to the Senior Housing Portion of the Project Site under the proposed R-MF-SCH Zoning District.

Table 2-1

Dimensional Regulations – Existing and Proposed Zoning: Senior Housing Portion

Dimensional Regulations	Existing DOB-20A Zoning	Existing Condition	R-MF-SCH Zoning	Compliance of Preferred Alternative
Area				
Minimum Lot Area	20 acres	38.8 acres	--[1]	4.48 acres
Minimum Frontage	500 feet	2,215 feet	--[14]	117 feet
Minimum Depth	500 feet	857 feet (avg)	--[1]	265 feet
Minimum Front Yard Setbacks	150 feet	61 feet	--[1]	185 feet
Minimum Rear Yard Setbacks	300 feet / 10 feet	14 feet	--[1]	14 feet
Minimum Side Yard Setbacks	300 feet	4 feet	--[1]	46 feet
Maximum Building Coverage	10 percent	7.0 percent	--[1]	19.3 percent
Maximum Building Height	As in § 355-30J(3)(c)	37.5 feet (3-story office building)	--[1, 2]	3 stories 37.5 feet (existing)
Floor Area Ratio	0.15	0.16	0.15 to 0.4	0.70[3]
Residential Unit Size (per §355-27)				
Bedrooms	N/A	N/A	1-2	2
Minimum Floor Area	N/A	N/A	min. 800sf / 1BR min. 1000sf / 2BR	1,139 sf / 2BR
Affordably Furthering Fair Housing Units (§355-27(B)(5)	N/A	N/A	10%	10%
Parking	As in § 355-30J	473	110 spaces	Multifamily: 113 total (2.3 per unit)

Notes:
[1] Determined by Town Board at Time of Zoning Approval.
[2] Pursuant to Town Code §355-24(G)(3) "Appropriate scale should be preserved through limiting building height to, in general, no more than two stories of living quarters."
[3] The Applicant is seeking a zoning text amendment to the R-MF-SCH Residence District Regulations (Town Code §355-27(B)(2)), which would preserve the Town Board's discretion in establishing R-MF-SCH sites, and would grant the Town Board the authority to establish the dimensional and design requirements, at the time of rezoning, when converting existing office space to senior multifamily residential use (as is the case here).
Sources: Airport Campus I-V LLC, JMC Engineering

The Applicant has also petitioned the Town Board for a zoning text amendment to the R-MF-SCH Residence District Regulations (Town Code §355-27), which would grant the Town Board discretion and not apply FAR in regulating the conversion of existing office space to senior

multifamily residential use (as is the case here). If the Project Site were mapped entirely R-MF-A or entirely R-MF-SCH, the Project Site would be compliant with the maximum density allowed by each district. However, given the unique shape of the Project Site and the location of the existing office building, the lot area of the Senior Housing Portion would be smaller than would allow conformance with the typically "greenfield" FAR envelope for R-MF-SCH zoning sites. Specifically, as mapped, the planned R-MF-A portion of the Site could theoretically accommodate 157 townhouse units, though we only propose 125 units, and the R-MF-SCH portion of the Site would have an FAR of 0.70. The proposed zoning text amendment would give the Board the discretion to acknowledge these unique site constraints and accommodate reuse of the existing office building as a R-MF-SCH site and the balance of the Project Site with R-MF-A townhomes.

2.B.1.b.(ii) Townhouse Portion of the Project Site

As stated in the Town's Zoning Code, the R-MF-A Zoning District was established by the Town "in order to further and promote the goals and purposes of the Multifamily R-MF Zone and to promote the goals of the Town [Comprehensive Plan] by providing a multifamily residential density at the upper end of the density range as set forth in [the Comprehensive Plan]" (§355-25(A)). The intent of the R-MF Multifamily Zone is "to increase the supply of dwelling units for smaller families or individuals" (§355-24(A)).

Table 2-2 identifies the existing dimensional regulations of the DOB-20A Zoning District, and the regulations that would apply to the Townhouse Portion of the Site under the proposed R-MF-A Zoning District. Each individual fee simple townhouse lot in the Townhouse Portion of the Site would also meet all applicable setback and other requirements for Attached dwellings in R-MF-A Residence Districts, per §355-21 of the Town's Zoning Code.

Table 2-2

Dimensional Regulations – Existing and Proposed Zoning (Townhouse Portion)

Dimensional Regulations	Existing DOB-20A Zoning	Existing Condition	R-MF-A Zoning	Compliance of Preferred Alternative
Area				
Minimum Lot Area	20 acres	38.8 acres	5 acres	34.30 acres
Minimum Frontage	500 feet	2,215 feet	25 feet	2,215 feet
Minimum Depth	500 feet	857 feet (avg)	250 feet	857 feet
Minimum Front Yard Setbacks	150 feet	61 feet	10 feet	64 feet
Minimum Rear Yard Setbacks	300 feet / 10 feet	14 feet	25 feet	25 feet
Minimum Side Yard Setbacks	300 feet	4 feet	10 feet	32 feet
Maximum Building Coverage	10 percent	7.0 percent	20%	18.6%
Maximum Building Height	As in § 355-30J(3)(c)	37.5 feet (3-story office building)	3 stories 30 feet	2 stories 29.0 feet
Floor Area Ratio / Density	0.15	0.16	105.2 density units permitted	83.33 density units
Residential Unit Size (per §355-24)				
Bedrooms	N/A	N/A	-[1]	3
Affordably Furthering Fair Housing Units (§355-27(B)(5)	N/A	N/A	10%	10%
Parking	As in § 355-30J	473	250	Townhouses: 272 total (2.2 per unit)[2]

Notes:

[1] Pursuant to §355.24(C), the "Planning Board shall be responsible for determining the number of bedrooms in each dwelling unit, in connection with its review of site development plans."

2 Each townhouse will have space available to park four cars – two garage spaces, plus enough space in each driveway for two additional parked cars. It is understood that the only spaces that could be continuously accessible would be counted toward zoning compliance and, therefore, each townhouse would have two "parking spaces" as required by the Town. The 272 spaces are inclusive of the 250 driveway spaces for the townhomes, plus the 22 guest parking spaces near the proposed clubhouse.

Sources: Airport Campus I-V LLC, JMC Engineering

The Preferred Alternative's Townhouse Portion would comply with the density limits set out under §355-25(B)(1) of the Zoning Code, as described below. Pursuant to §355-25(B)(1), "the average gross density shall not exceed one density unit, as defined in §355-4 of this chapter, per 14,000 square feet of land area as defined in Subsection B(2) of §355-24." Pursuant to §355-4, a "Density Unit" is equal to "One and one-half dwelling units containing three bedrooms each in permitted dwellings other than one-family detached units." In the R-MF-A District, the lot area used when calculating the number of permitted Density Units is Net Lot Area (§355-24(B)(2)).

In order to calculate Net Lot Area (pursuant to its definition in §355-4), seventy-five percent of the area of steep slopes, as well as wetlands & waterbodies (both as defined under the Town Code), are subtracted from the gross lot area.

As shown in **Table 2-3**, the "net lot area" of the Townhouse Portion of the Site is 1,494,147 sf. As such, the Townhouse Portion of the Project Site is theoretically permitted to have 105.2 density units, or 157 townhouses. As stated throughout this FEIS, the Applicant is only proposing 125 townhouses to be constructed in the Townhouse Portion of the Site.

Table 2-3
Density Calculation for Townhouse Portion of Preferred Alternative

Component	Calculation	Code Reference
Gross Lot Area	1,494,147 sf	n/a
Wetlands, Water Bodies & Watercourses Takeoff	10,682 sf * 75% = 8,011 sf	§355-4 (Net Lot Area)
Steep Slopes Takeoff	17,638 sf * 75% = 13,228 sf	§355-4 (Net Lot Area)
Net Lot Area	1,472,907 sf	n/a
Density Units Permitted	1,472,907 sf / 14,000 sf = 105.2	§355-25(B)(1)
Density Units Proposed	125 townhouses / 1.5 = 83.3	§355-4 (Density Unit)

Note: sf = square feet
Sources: JMC Engineering, Town of North Castle Zoning Code §§355-4, 355-24, 355-25

2.B.1.b.(iii) Other Zoning Requirements

Both components of the Preferred Alternative (i.e., the age-restricted multifamily units, as well as the townhomes) will conform to the design considerations required in multifamily residence districts pursuant to §355-24G of the Town's Zoning Code.

Visual Privacy will be preserved for residents through extensive landscaping throughout the Project Site, as well as the preservation of existing trees, vegetation, and physical features of the Project Site (§355-24G(1)).

Audio privacy will be maintained through the use of solid party walls to limit sound transmission between adjoining dwelling units (§355-24G(2)).

Appropriate scale will be preserved throughout the Project Site by limiting the height of the townhouses to two-stories and keeping the height of the proposed multifamily building (repurposed southern office building) the same as the existing condition (as opposed to the DEIS Project which would have constructed a five-story multifamily building and the Currently Approved Development Plan which includes a five-story parking garage in excess of 300,000 sf) (§355-24G(3)).

Finally, no unenclosed porch or deck will encroach into minimum require yards (§355-24G(4)).

In the Applicant's opinion, the Preferred Alternative would not result in any significant adverse land use impacts, and no mitigation measures are required.

2.B.1.c. Potential Impacts – Public Policy

As discussed below, the Preferred Alternative is consistent with relevant public policies, and would not result in any significant adverse impacts.

2.B.1.c.(i) Consistency with Town of North Castle Comprehensive Plan (2018)

The Town of North Castle updated and revised its 1996 Comprehensive Plan, adopting a new Comprehensive Plan on April 25, 2018. As part of that process, 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 infill development including, but not limited to, residential uses. Specific references from the Comprehensive Plan that are applicable to the Project Site and the Preferred Alternative are described in the following paragraphs.

The Comprehensive Plan recognizes that the needs of its citizens change over time. Section 3.3 of the Comprehensive Plan (page 21) observes that:

"In recent years, the Town has seen its senior and older workforce population (aged 50-64) increase in number, while the young adult population (ages 18-24) and prime labor force age population (34-49) has declined. The high cost of housing and inadequate supply of varied housing types for rent or sale will likely make it difficult for people to age in place while young households decrease in number."

Recognizing this issue, the Comprehensive Plan notes that the Town Board took affirmative steps to address it:

"[T]he Town Board created the floating R-MF-SCH Multifamily-Senior Citizen Housing District."

Section 4.4 of the Comprehensive Plan (page 34) recommends that the Town should "undertake a comprehensive analysis of the office and commercial zones, with the goal of streamlining and clarifying their regulations so that they function effectively in a contemporary context." Additionally, this Section specifically mentions the Project Site as an appropriate site for the introduction of residential uses. It also mentions the IBM property, which was recently rezoned for senior housing:

"For the PLI, OB-H, and DOB-20A zones, in particular (business park, portion of IBM property, Swiss Re and former MBIA campus), the Town should explore allowing for an introduction of residential uses, at a scale comparable to surrounding land use patterns."

Section 8.6 of the Comprehensive Plan (page 99) notes the following opportunity related to the promotion of infill development to facilitate a variety of housing options. The Cider Mill neighborhood approximately two miles northeast of the Project Site is an example of a development containing a mix of housing types (townhouses and single family homes) with a residential density comparable with that proposed by the Preferred Alternative (4.5 units/acre).

"While North Castle today is mostly defined by its attractive low-density residential neighborhoods, offering a greater variety of housing types could help the Town to retain Baby Boomers in retirement and attract younger people who wish to stay but cannot afford a single-family home. An efficient approach to greater variety of housing would prioritize attractive multifamily options in locations that maximize access to the community assets that make the Town so attractive, with a focus on targeted infill development in appropriate locations."

Section 8.6 of the Comprehensive Plan (page 99) goes on to further recognize the potential for infill development to add needed housing for the Town's aging population:

"The growth in older age groups of the population over the coming decades suggests encouraging siting and design of new and infill development of smaller, lower maintenance units for seniors near services, enabling more of the population to age in place and stay connected to the community physically and socially."

Section 8.7 of the Comprehensive Plan (page 100) sets forth a series of specific growth, development, and housing recommendations. This Section suggests that the Town "should encourage residential development that is compatible in scale, density, and character with its neighborhood and natural environment." The same section of the Comprehensive Plan also suggests that the Town "[e]xplore opportunities to provide housing for the Town's senior population." Notably, this Section specifically targets office parks such as the Project Site as an appropriate opportunity for the introduction of an infill mixed-use development:

"Explore options to rezone business and office parks in order to create opportunities for infill mixed use residential development where office uses have become, or could become, obsolete. These locations could include the business park, the former MBIA site, Old Route 22 and Mariani Gardens, areas where affordable housing for smaller households will minimize traffic and parking impacts. Additional residential uses in these areas can also help to support Armonk businesses."

With regard to marketability and economic benefits of the Preferred Alternative, there is a strong market demand for residential uses in the Town and the region, especially for "seniors interested in downsizing locally" as observed in the Comprehensive Plan (p. 150). As such, rezoning the Project Site to permit such housing is likely to increase the economic viability of the Project Site, and further the goals of the Town's Comprehensive Plan.

2.B.1.c.(ii) Consistency with Westchester County Master Plans

Within the County's 1996 regional plan entitled "Patterns for Westchester: The Land and The People ("Patterns")," the King Street/Route 120 corridor in the vicinity of the Project Site is depicted within a "Medium Density Suburban" recommended land use category, with a residential density range of two to seven dwelling units per acre and FAR range between 0.05 and 0.2. This area includes the Project Site.

The Applicant's Preferred Alternative proposes a total of approximately 175 dwelling units (50 apartments and 125 townhouses). Based on the Project Site's total area of approximately 38.8 acres, the proposed gross residential density would be approximately 4.5 dwelling units per acre.

"Patterns" is still an adopted plan of the Westchester County Planning Board. However, the "Assumptions and Policies" section has since been replaced by the context and policy document that emerged from the "Westchester 2025" planning efforts, known as "2025 Context for County and Municipal Planning and Policies to Guide County Planning." This policy document was adopted by the Westchester County Planning Board on May 6, 2008 (amended January 5, 2010) and recommends 15 policies to county municipalities as guidance for their own decision-making. Of these 15 policies, seven of them

have applicability to the Preferred Alternative. The seven applicable policies (and the Preferred Alternative's consistency with each) are summarized as follows:

- **Enhance transportation corridors** – King Street/NYS Route 120 is an important transportation corridor that generally runs north/south between Rye and Chappaqua. The Project Site's King Street frontage is marked with a stone wall, ornamental lawn and landscaping, and berms which provide an aesthetically pleasing parkway-like setting for motorists and a visual screening from development on the Project Site, a condition which would remain as part of the Preferred Alternative.
- **Nurture economic climate / track and respond to trends** – While these two policies are separated in the County's plan, they are both applicable to the Preferred Alternative in similar ways. 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 infill development, including a diverse housing stock, including housing targeted for the aging population. This is evident from the Applicant's unsuccessful attempts to market the Project Site for continued office use. The Preferred Alternative represents the Applicant's attempt to respond to this trend.
- **Preserve natural resources** – As described in detail in FEIS Chapter 1 and DEIS Chapter 3, "Land Use, Zoning, and Public Policy," there is a conservation easement and a delineated wetland on the Project Site, and both would remain undeveloped with the Preferred Alternative. Grading will be limited to the proposed limits of disturbance on the Project Site, and no mass grading of the Project Site would occur. Implementation of the Town and DEP-approved SWPPP would protect the Project Site and neighboring New York City water supply lands and the Kensico Reservoir from any impacts during both construction and operation of the Preferred Alternative.
- **Support development and preservation of permanently affordable housing** – As noted in Section 355-24(I)(1) of the Town Code, "within all residential developments of 10 or more units created by subdivision or site plan approval, no less than 10 percent of the total number of units shall be created as affordable affirmatively further fair housing (AFFH) units." It is expected that when site plan approvals are sought for the Project Site in the future, the Preferred Alternative would comply with these requirements.
- **Provide recreational opportunities to serve residents –** The Preferred Alternative provides for open space and recreational opportunities to on-site residents including mulched walking trails, a community clubhouse, and a swimming pool.
- **Promote sustainable technology** – It is anticipated that when site plan approvals are sought for the Project Site in the future, the Preferred Alternative would incorporate sustainable building practices and green technologies, to the extent practicable. Development of the townhouse portion of the Preferred Alternative would be constructed to exceed the

requirements of the 2020 International Energy Conservation Code of New York State.

Additionally, by comment letter dated September 28, 2021 (see **Appendix A**), the Westchester County Planning Board ("WCPB") provided written comments on the DEIS and feedback on the DEIS Project. The WCPB comments received on the DEIS Project centered on several themes:

- Concerns about the new construction of the DEIS Project's multifamily building (5-stories, 149 units) within a lower density area of the Town.
- Concerns that the DEIS Project did not provide pedestrian connections between the new buildings and King Street/Cooney Hill Road.
- Concerns that airport-related noise could be an issue for future residents of the site.
- New development should consider the inclusion of green building technology and parking spaces equipped with charging stations for electric vehicles.

The WCPB further recommended against residential uses including the high density residential apartment building in the original proposal.

The Preferred Alternative (and its reduced scope of development compared to the DEIS Project) responds to the comments provided by the WCPB in several ways, including addressing why the Applicant believes that the Project Site is suitable for residential development. Each WCPB comment is addressed in detail within Chapter 3, "Responses to Comments on the DEIS."

2.B.1.c.(iii) Consistency with New York State Climate Leadership and Community Protection Act (2019)

In July 2019, New York State passed the Climate Leadership and Community Protection Act ("Climate Act"). The purpose of the Climate Act is to adopt measures to put New York State on a path towards the statewide reduction of greenhouse gas ("GHG") emissions by eighty-five percent by the year 2050. The remaining fifteen percent of emissions will be offset by various means, to reach net-zero emissions. The Climate Act created a Climate Action Council, which has recently developed an initial framework[4] for how the state will reduce GHG emissions, reach net-zero emissions, and increase renewable energy usage. Some of the "key strategies" to achieve emissions limits as identified by the Climate Action Council include greater inclusion of energy efficiency measures in new construction, transportation electrification (including vehicles), and reduction in vehicle miles traveled ("VMT").

The design of the Preferred Alternative aligns with the strategies of the Climate Act, which was not in place at the time the Currently Approved Development Plan was proposed. The Preferred Alternative will include green technologies, as discussed above, including energy efficient appliances, and charging stations for electric vehicles. The reduced scale of development envisioned by the Preferred Alternative (an approximately 50-unit

[4] https://climate.ny.gov/Our-Climate-Act/Draft-Scoping-Plan

multifamily building that would be age-restricted, and approximately 125 two-story townhouses) as compared to the DEIS Project (a 149-unit multifamily building, a 125-room hotel, 100,000 sf of office space, and 22 townhouses), will result in reduced VMTs and energy consumption (during both construction and operation), and greener development.

It is the Applicant's preference to re-use the Project Site's existing natural gas allocation for Preferred Alternative's heating and hot water systems. To the extent this is not feasible, these systems would utilize either propane or electric-fired equipment.

In summary, the Preferred Alternative aligns with the goals of the Climate Act and incorporates some of the key strategies identified by the Climate Action Council.

2.B.1.c.(iv) Master Planning at the Westchester County Airport

The last full master plan for the Westchester County Airport was completed in 1987. A Master Plan Update was completed in 2017[5], and as of 2022, Westchester County is undertaking the development of another update. The current update is anticipated to analyze the airport's regional economic impacts, noise and environmental impacts, identify measures to reduce noise, and review potential wetland and water quality issues. The current update does not anticipate physical expansion of the airport or an increase in the volume of flights.

While the contribution of aircraft overflights to the noise levels varies day-to-day due to flight conditions, as discussed in detail in DEIS Chapter 16, "Noise," noise levels at the Project Site would be appropriate for residential use. Additionally, construction methods used to build the Preferred Alternative are expected to provide at least 20 dBA of window/wall attenuation to further reduce interior noise levels. And, as discussed above, the reintroduction of residential uses to the Project Site would not represent a unique condition when compared to historic and existing land uses surrounding the airport.

In conclusion, it is the Applicant's opinion that the Preferred Alternative is consistent with the State, County, and local planning efforts and public policy guidance discussed throughout this section. No significant adverse impacts related to public policy are anticipated, and no mitigation measures are required.

2.B.2. GEOLOGY AND SOILS

This section addresses the potential impacts of the Preferred Alternative on geology and soils. Potential impacts to these resources are based on the potential for the Preferred Alternative to cause soil erosion or to impact geologic resources or groundwater resources as a result of cut-and-fill activities during construction. This section also identifies proposed mitigation measures to minimize the potential for impacts. Subject to the implementation of such measures, it is the Applicant's opinion that the Preferred Alternative would

[5] https://airport.westchestergov.com/general-information/news-and-public-notices

mitigate potential adverse environmental impacts in a manner similar to the DEIS Project, and no significant adverse impacts are anticipated.

2.B.2.a. Potential Impacts on Geology

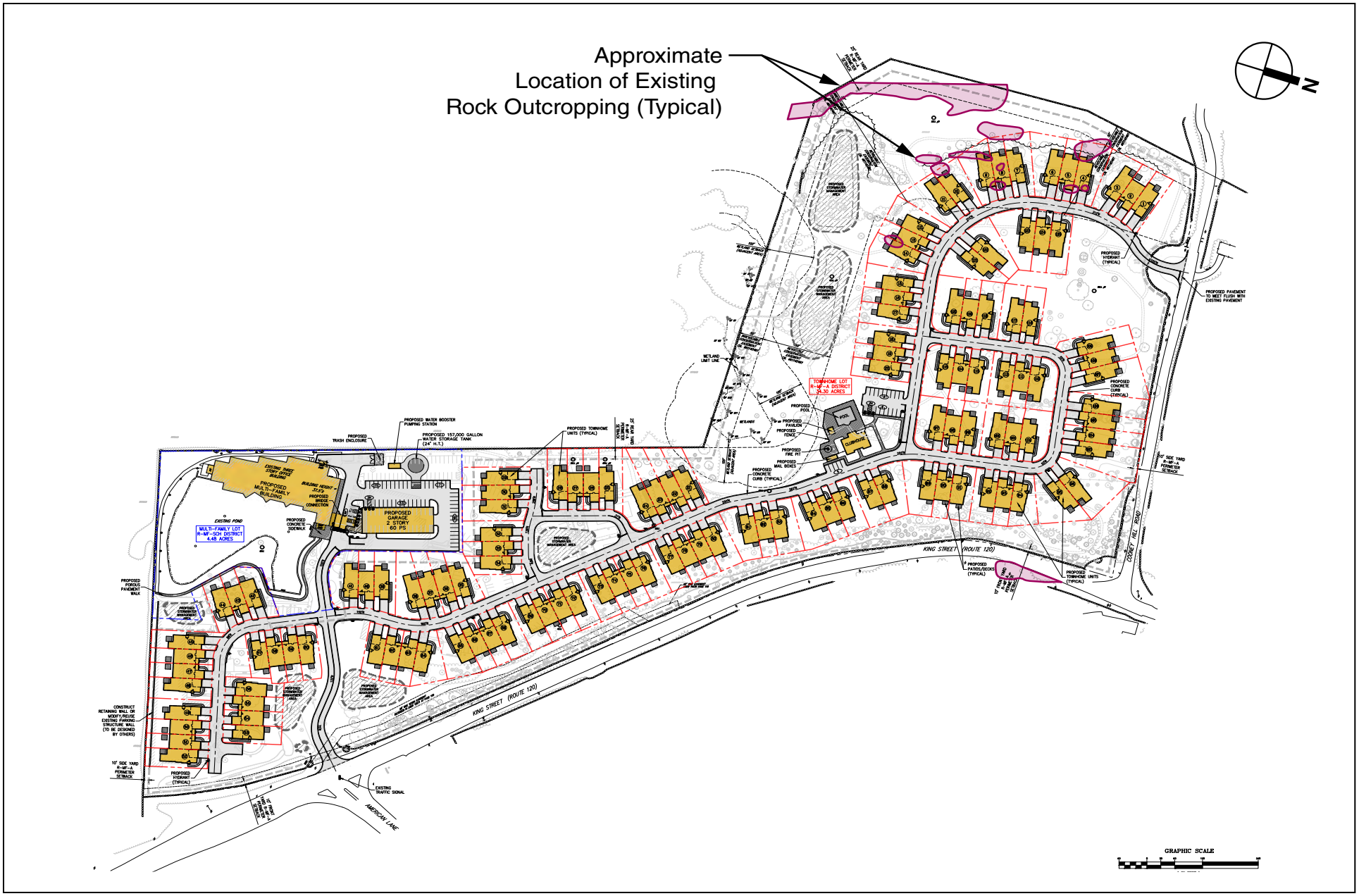
The majority of surface rock outcrop features identified on the Project Site are outside of the Preferred Alternative's limits of disturbance and would not be impacted by construction of the Preferred Alternative. As shown in **Figure 2-1** construction of some townhouses in the northwesternmost portion of the Project Site would have the potential to impact existing rock outcroppings.

Based on the preliminary evaluation by the Applicant's Engineer, construction of the Preferred Alternative may require limited rock removal by blasting or hammering activities in the northwestern portion of the proposed townhouse development area, which may have an isolated area extending up to 8 feet into bedrock. In addition, there will be limited rock removal for some of the townhouse basements in the northern portion of the Site, which may have an isolated area extending up to 16 feet into bedrock. 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 Engineer.

Should blasting be performed during the construction of the Preferred Alternative, it 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 blasting activities would be protective of public health and safety to the maximum extent practicable. Specific measures to be taken in the event of blasting are discussed below under Section 2.15 ("Construction").

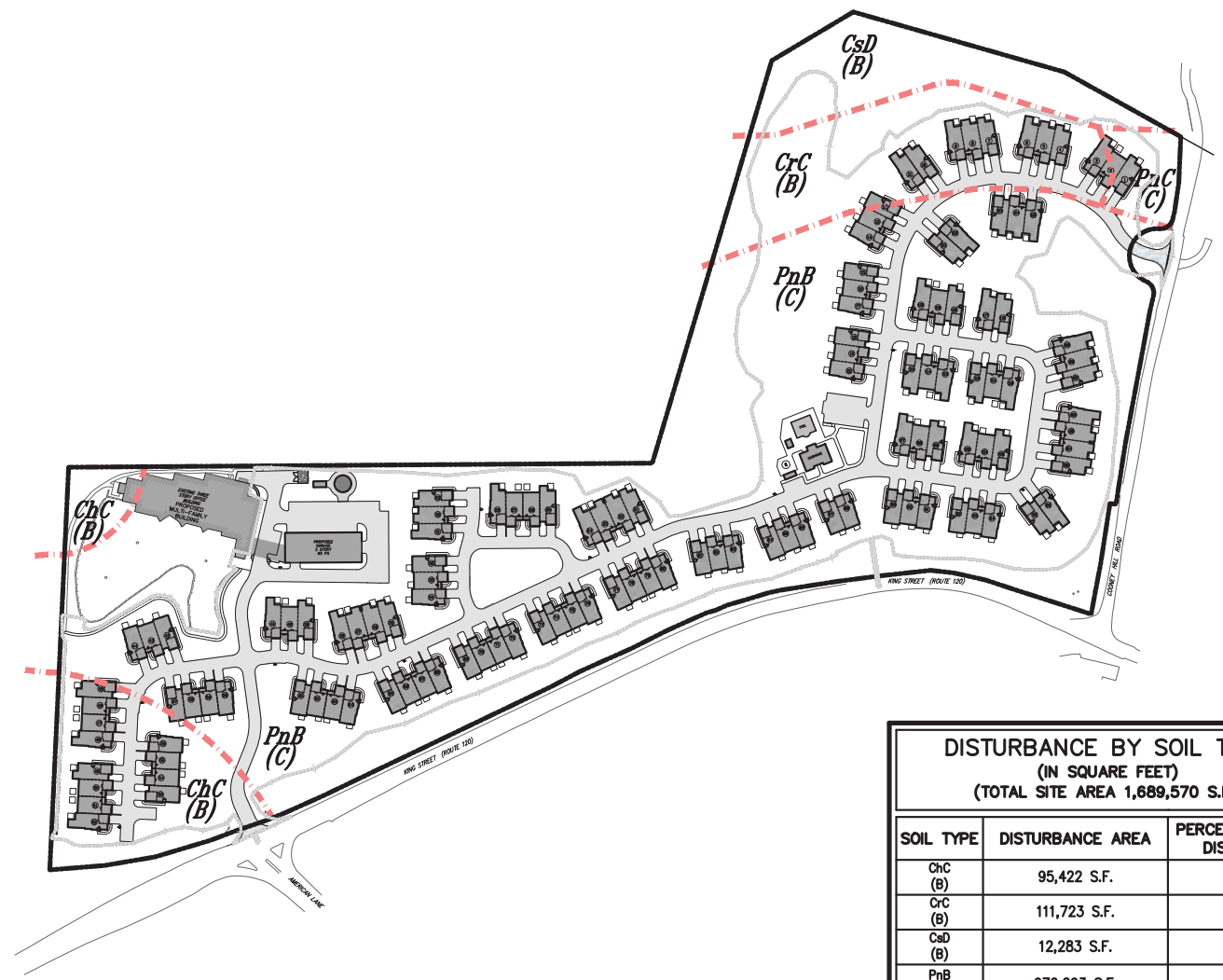
2.B.2.b. Potential Impacts to Soils

With the Preferred Alternative, approximately 72.0 percent (28.0 acres or 1,209,478 sf) of the Project Site would be affected by site development activities, building construction and infrastructure installation. Site disturbance for the DEIS Project (which excluded a recently acquired tax lot) was calculated to be 46.3 percent (17.5 acres or 760,701 sf). Total site disturbance for the Preferred Alternative is approximately 10.5 acres more than were estimated to be disturbed by the DEIS Project, including the approximately 3 acres of disturbance required to demolish the existing 316-space parking structure and the 161,000-sf existing northern office building. **Table 2-4** summarizes the Preferred Alternative's disturbance by soil unit area. Although there would be an increase in the area of disturbance from the Preferred Alternative as compared to the DEIS Project, the density and intensity of development associated with the Preferred Alternative would be lower than the DEIS Project and the Currently Approved Plan. Most disturbance (approximately 57.8 percent) would occur within the PnB – Paxton Fine Sandy Loam soil unit (approximately 976,277 sf or 22.41 acres) (see **Figure 2-2**). According to the "Soil Survey of Putnam and Westchester Counties, New York" prepared by the Soil Conservation Service/U.S.



Source: JMC 2023

Unique Geological Features



DISTURBANCE BY SOIL TYPE
(IN SQUARE FEET)
(TOTAL SITE AREA 1,689,570 S.F.)

SOIL TYPE	DISTURBANCE AREA	PERCENT OF SITE DISTURBED
ChC (B)	95,422 S.F.	5.6%
CrC (B)	111,723 S.F.	6.6%
CsD (B)	12,283 S.F.	0.7%
PnB (C)	976,293 S.F.	57.8%
PnC (C)	13,757 S.F.	0.8%
TOTAL	1,209,478 S.F.	71.6%

Source: JMC 2023

Preferred Alternative - Disturbance by Soil Type

Department of Agriculture (1994), many areas with PnB soils are used for community development purposes. The main limitation on sites for dwellings with basements is seasonal wetness, which can be overcome by installing drains around footings, sealing foundations, and grading to divert surface water away from the buildings. The main limitations for the construction of roadways and other paved surfaces are wetness and frost action. Constructing roadways on raised fill of coarse-grained materials helps to overcome these limitations. The Applicant's Engineer has developed a preliminary grading plan for the Preferred Alternative which incorporates these design controls (see **Figure 2-3**).

Table 2-4
Proposed Disturbance by Soil Type

Soil Type	Proposed Disturbance (sf/acres)	Percent of Site Disturbed
ChC	95,422 sf 2.19 acres	5.6
CrC	111,723 sf 2.56 acres	6.6
CsD	12,283 sf 0.28 acres	0.7
PnB	976,293 sf 22.41 acres	57.8
PnC	13,757 sf 0.32 acres	0.8
Total	**1,209,478 sf 27.77 acres**	**71.6**

Sources: JMC Engineering; "Soil Survey of Putnam and Westchester Counties, New York," prepared by the Soil Conservation Service/U.S. Department of Agriculture, issued September 1994; Geotechnical Engineering Report prepared by Carlin-Simpson and Associates, January 29, 2020.

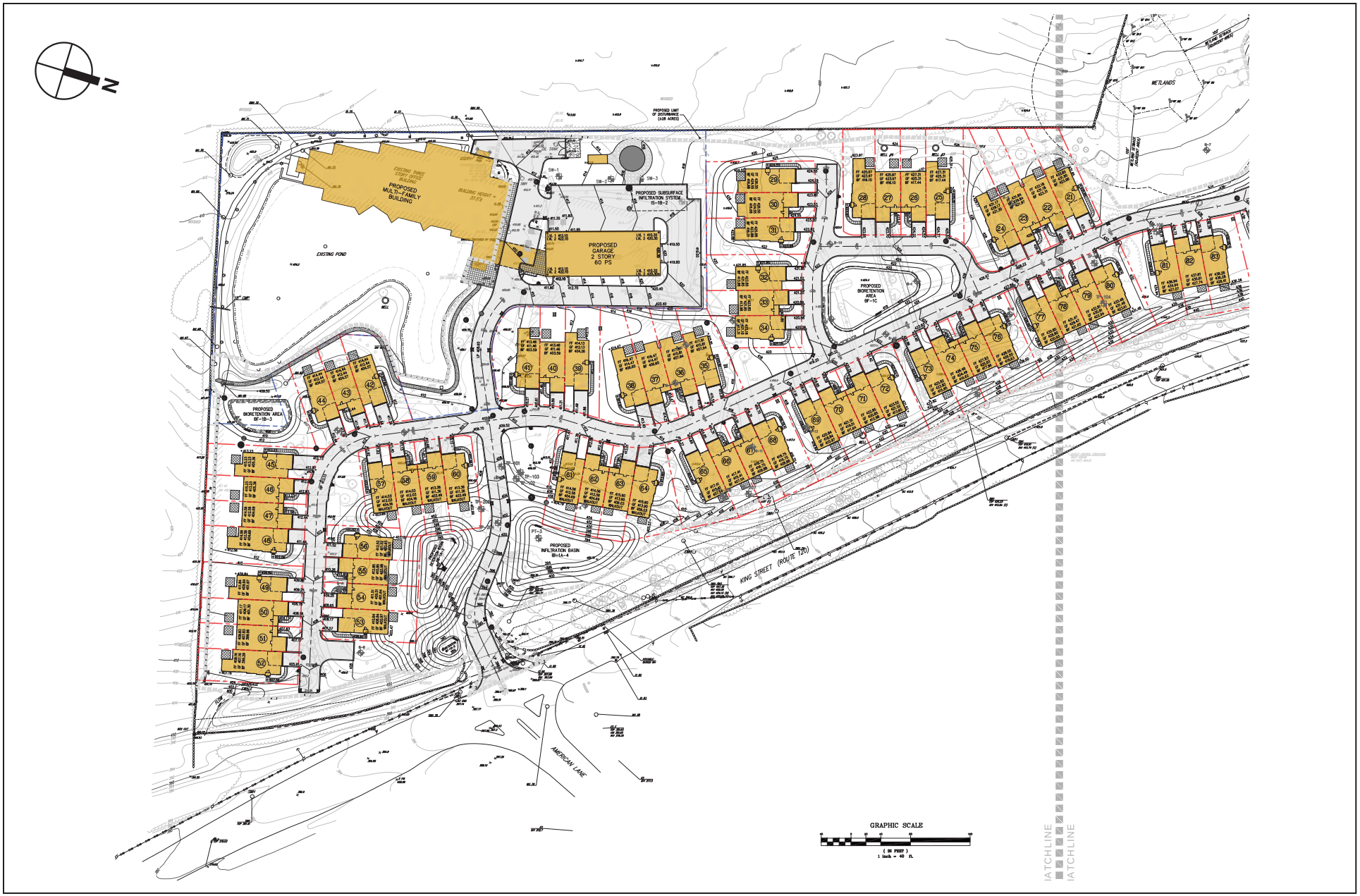
Based on the topography of the Project Site, and in order to create generally level development pads and perimeter berms in select locations, the Preferred Alternative would result in a net cut of approximately 12,306 cubic yards of material. Preliminary earthwork calculations have been provided by the Applicant's Engineer and are summarized in **Table 2-5** below. A map depicting a preliminary cut and fill analysis can be found in **Figure 2-4**.

Table 2-5
Preliminary Cut-and-Fill Analysis

Total Cut Volume (cubic yards)	Total Fill Volume (cubic yards)[1]	Net Cut-and-Fill (cubic yards)[2]
109,853	99,598	12,306

Notes:
[1] Assumes 10 percent compaction factor and 1-foot thickness for proposed building floor slabs and subbase.
[2] Includes 20 percent expansion factor for cut to be exported.
Source: JMC Engineering

As documented in **Table 2-5**, approximately 90.7 percent of the material to be excavated would be re-used on the Project Site as fill, and the balance of the excavated material would be exported. As recommended by the

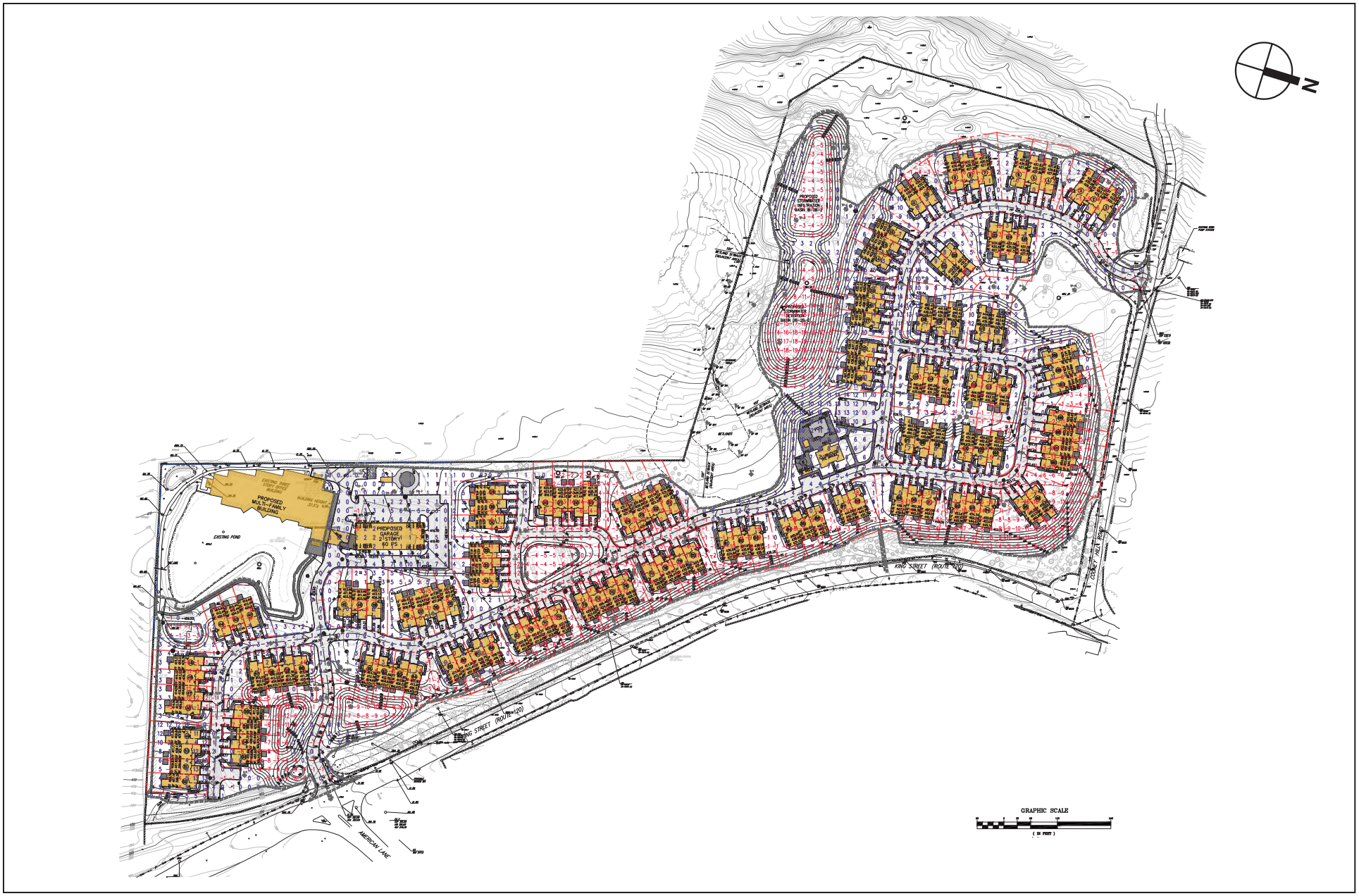


Source: JMC 2023

Preferred Alternative - Preliminary Grading Plan

Source: JMC 2023

Preferred Alternative - Preliminary Grading Plan



Source: JMC 2023

Preferred Alternative - Preliminary Cut and Fill

Applicant's Geotechnical Engineer, a 20 percent expansion factor was applied to the total cut volume to be exported off-site. The total amount of excavated material to be exported under the Preferred Alternative (12,306 cubic yards) would be less than under the DEIS Project (13,324 cubic yards), and therefore fewer truck trips (assuming haul trucks with a 20 cubic yard capacity) would be required to export the material off site (615 truck trips compared to 666 with the DEIS Project). These trips would be spread over several months during the construction period such that the number of truck trips during a single day would be a small fraction of the total number of trips.

A temporary on-site rock crushing process may be established during construction. The need for, location, and schedule of operation of potential rock crushing activities would be determined during Site Plan review and approval. If rock crushing is established, the appropriate permit would be obtained from the Westchester County Department of Health and any crushing activities would be located at least 200 feet from any property line. Any rock crushing activities would only occur during permitted hours of construction as required by Chapter 210 of the North Castle Town Code.

Preliminary soil testing was conducted as part of the Preliminary Geotechnical Engineering Report. This testing revealed acceptable permeability rates. These parameters have been incorporated into the applicable calculations in the Preferred Alternative's Stormwater Pollution Prevention Plan (SWPPP).

2.B.2.c. Mitigation Measures for the Preferred Alternative

The Preferred Alternative is not anticipated to have a significant adverse impact on geology or soils. According to the Preliminary Geotechnical Engineering Report (see DEIS, Appendix C-1), the Project Site's geology and soils are suitable for development of the Preferred Alternative. As described below, measures developed to address potential impacts on geology and soils as part of construction are similar to those outlined for the DEIS Project.

A construction phasing plan has been developed and is discussed in Section 2.B.15, "Construction Impacts." Proper sequencing of construction activities will serve to mitigate various impacts. The Preferred Alternative includes a SWPPP and an Erosion and Sediment Control Plan (ESCP) (see **Appendix D**) to avoid and/or mitigate impacts associated with the disturbance of on-Site soils during construction. The layout and configuration of the Preferred Alternative has been designed to take advantage of the Project Site's topography and contours, thereby minimizing the potential for erosion hazards.

The Applicant shall be responsible for maintaining the temporary sediment and erosion control measures throughout construction. This maintenance will include, but not be limited to, the following:

- For dust control purposes, all exposed graded areas would be moistened with water at least twice a day in those areas where soil is exposed and cannot be planted with a temporary cover due to construction operations or the season (December through March).

- Inspection of erosion and sediment control measures shall be performed at the end of each construction day and immediately following each rainfall event. Required repairs shall be immediately executed by the contractor.
- Sediment deposits shall be removed when they reach approximately one-third the height of the silt fence. Such sediment shall be properly disposed of in fill areas on the site, as directed by the Applicant's field representative. Fill shall be protected following disposal with mulch, temporary and/or permanent vegetation and be completely circumscribed on the downhill side by silt fence.
- Exposed areas parallel to the slope would be raked during earthwork operations.
- In areas where soil disturbance activity has temporarily or permanently ceased, the application of soil stabilization measures would be initiated by the end of the next business day and completed within seven days.
- Following final grading, the disturbed area would be stabilized with a permanent surface treatment (i.e., turf grass, pavement, or sidewalk). During rough grading, areas which are not to be disturbed for fourteen or more days shall be stabilized with the temporary seed mixture, as defined on the final approved Site Plans. Exposed soil areas that will not receive a permanent surface treatment will be seeded.

The ESCP would also include maintenance requirements, contingency and emergency measures, notification procedures in the event of failure of sediment and erosion control measures, and timing of removal. These measures, which would be finalized based on the final Site Plan, would at a minimum include the following:

- The Applicant shall have a qualified professional conduct an assessment of the Site prior to the commencement of construction and certify that the appropriate erosion and sediment controls, as shown on the final ESCP approved as part of the Site Plan, have been adequately installed to ensure overall preparedness of the Site for the commencement of construction. The Applicant shall have a qualified professional conduct a site inspection twice every seven calendar days separated by a minimum of two (2) full calendar days.
- Prior to the commencement of construction activity, the Applicant would identify the contractor(s) and subcontractor(s) that will be responsible for installing, constructing, repairing, replacing, inspecting, and maintaining the erosion and sediment control practices included in the final SWPPP approved as part of the Site Plan; and the contractor(s) and subcontractor(s) that will be responsible for constructing the post-construction stormwater management practices included in the SWPPP. The Applicant shall have the contractors and subcontractors identify at least one person from their company that will be responsible for implementation of the SWPPP. This person shall be known as the "trained contractor." The Applicant shall ensure that at least one trained contractor is on site on a daily basis when soil disturbance activities are being performed.

- Within one business day of the completion of an inspection, the qualified inspector shall notify the Applicant and appropriate contractor or subcontract of corrective actions that need to be taken. The contractor or subcontractor shall begin implementing the corrective actions within one business day of this notification and shall complete the corrective actions in a reasonable time frame.

The Applicant would utilize Best Management Practices for rock crushing operations, if implemented, including wet suppression to avoid and minimize impacts associated with airborne dust to the maximum extent practicable. As mentioned above, any crushing activities would be located at least 200 feet from any property line. To further mitigate adverse impacts, rock and other material stockpiles will be covered with tarps and properly maintained in a wet condition. The rock crusher will be operated in accordance with the applicable permits and will be kept full to avoid air gaps and help mitigate dust impacts.

In addition, if blasting is determined to be necessary during the construction of the Preferred Alternative, it 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") and would be subject to a site-specific blasting protocol.

These mitigation measures, an ESCP, rock crushing protocol, and blasting protocol, would be detailed in a Construction Management Plan (CMP) that would be reviewed and 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 above measures represent the best available technologies and practices to minimize potential impacts to the Project Site's soils or geological features to the maximum extent practicable. Subject to the implementation of these mitigation measures, and in the Applicant's opinion, no significant adverse impacts are anticipated.

2.B.3. TOPOGRAPHY AND SLOPES

This section addresses the potential impacts of the Preferred Alternative on topography and slope conditions. The analysis of potential impacts is based on the potential for the Preferred Alternative to cause soil erosion or to impact geologic resources or groundwater resources as a result of cut-and-fill activities during construction. This section also identifies proposed mitigation measures to minimize the potential for impacts. As discussed below, the Project Site's topography is suitable for development of the Preferred Alternative, and no significant adverse impacts are anticipated.

2.B.3.a. Limits of Disturbance of the Preferred Alternative

A slope analysis of the overall Project Site has been prepared by the Applicant's Engineer. The total area of each slope category for the entirety of the Project Site, as well as the proposed limits of disturbance for the Preferred Alternative, are displayed in **Table 2-6** below.

Unlike the steep slopes regulated by the Town, this analysis includes all areas of slopes, regardless of their dimensions. As shown in **Table 2-6** and **Figure**

2-5, similar to the DEIS Project, the majority of slopes within the Preferred Alternative's limits of disturbance fall within the 0–15 percent category.

Table 2-6
Slopes Analysis

Slope Category	Total Project Site Area (sf/acres)	Percent of Site Area	Total Limit of Disturbance Area (sf/acres)	Percent of Disturbed Area
0–15 percent	1,466,503 sf 33.67 acres	86.81%	1,115,745 sf 25.61 acres	91.16%
15–25 percent	139,797 sf 3.21 acres	8.27%	78,141 sf 1.79 acres	6.38%
25–35 percent	50,429 sf 1.16 acres	2.98%	20,296 sf 0.47 acres	1.66%
35 percent and above	32,841 sf 0.75 acres	1.94%	9,792 sf 0.22 acres	0.80%
Source: JMC Engineering				

The Town of North Castle also regulates steep slopes. Chapter 355 of the Town Code defines a steep slope as "A natural geographical area, whether on one or more lots, which has a slope equal to 25 percent or greater over a horizontal area measuring at least 25 feet in all directions." A map depicting the areas of the Project Site which meet the Town's definition of a steep slope is included as **Figure 2-6**. The total area of the Project Site which meets the Town's definition of a steep slope is approximately 17,638 sf (1.04 percent of the Site).

2.B.3.b. Potential Impacts of the Preferred Alternative

Using the same methodology as in the DEIS, the Applicant's engineer has calculated that based on the topography of the Project Site, and in order to create generally level development pads for the townhouses, the Preferred Alternative would result in a net cut of approximately 12,306 cubic yards of material. Approximately 90.7 percent of the material to be excavated would be reused on the Project Site as fill, and the balance of the excavated material would be exported. Utilizing haul trucks with a 20 cubic yard capacity, approximately 615 truck trips would be required to remove the excess material from the Site, which would then be exported in accordance with all applicable regulations to appropriate locations. These trips would be spread over several months during the construction period such that the number of truck trips during any single day would be a small fraction of the total number of trips. The number of truck trips would be less than those required for construction of the DEIS Project (i.e., 666 truck trips).

Section 355-18 of the Town Code requires that disturbance to steep slopes associated with approval of a site plan be approved by the Planning Board. As discussed in the DEIS, the majority of the Project Site's Town-regulated steep slopes are found along the southern and western extents of the northern (Cooney Hill) portion of the Project Site, within the existing Conservation Easement areas, which slopes would remain undeveloped with the Preferred Alternative. Approximately 2,007 sf (0.16 percent) of the Preferred Alternative's overall limits of disturbance meet the Town Code's definition of steep slopes. These Town-regulated slopes within of the Preferred

SLOPES ANALYSIS TABLE							
CATEGORY	MINIMUM SLOPE	MAXIMUM SLOPE	PROJECT SITE AREA	PERCENT OF SITE AREA	DISTURBANCE AREA	PERCENT OF DISTURBED AREA	COLOR
1	0.00%	15.00%	1,466,503 S.F.	86.81%	1,115,745 S.F.	91.16%	
2	15.00%	25.00%	139,797 S.F.	8.27%	78,141 S.F.	6.38%	
3	25.00%	35.00%	50,429 S.F.	2.98%	20,296 S.F.	1.66%	
4	35.00%	VERTICAL	32,841 S.F.	1.94%	9,792 S.F.	0.80%	

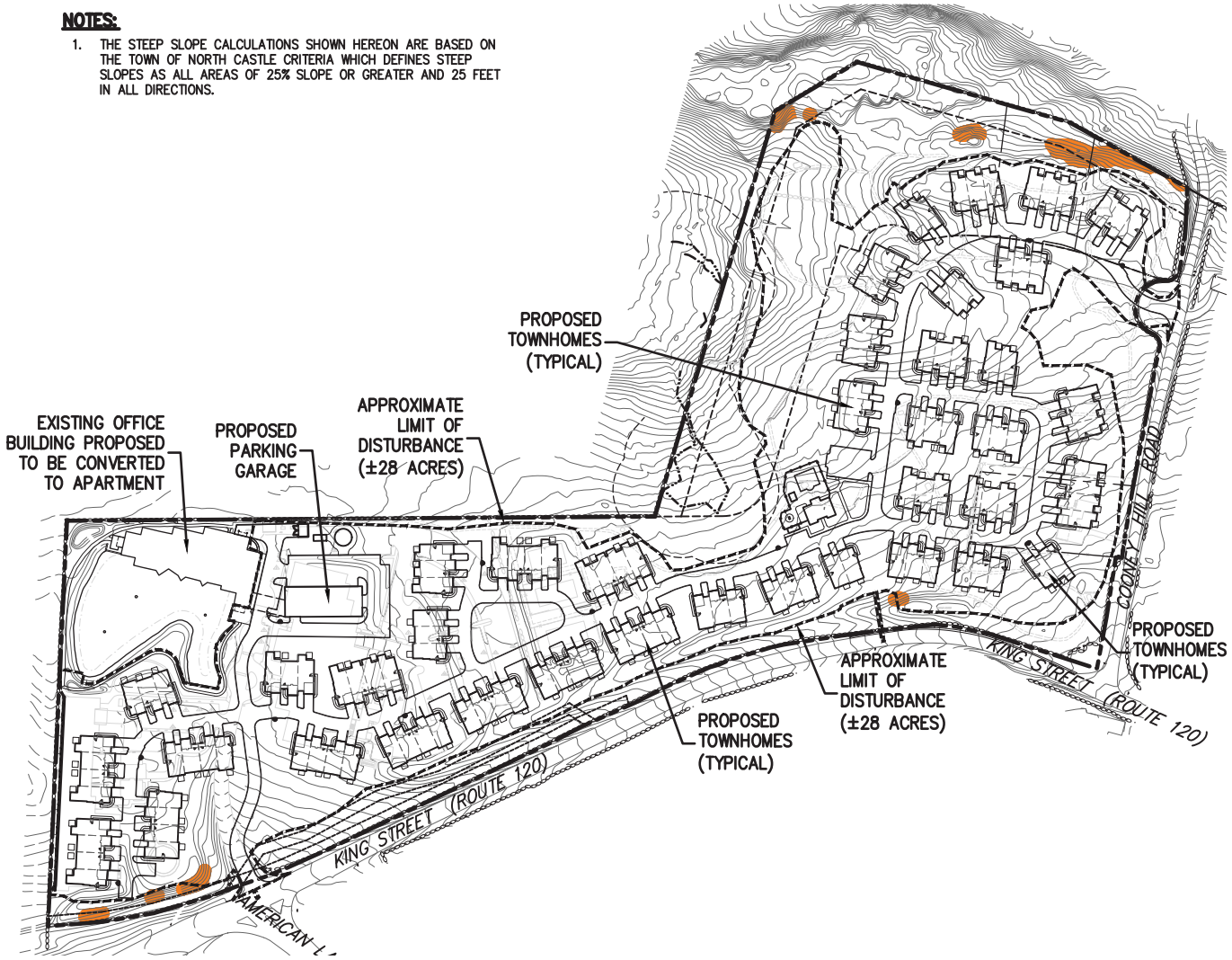
Source: JMC 2023

Project Site Slopes Analysis

SLOPES ANALYSIS TABLE							
CATEGORY	MINIMUM SLOPE	MAXIMUM SLOPE	PROJECT SITE AREA	PERCENT OF SITE AREA	DISTURBANCE AREA	PERCENT OF DISTURBED AREA	COLOR
1	0.00%	25.00%	1,671,932 S.F.	98.96%	1,221,967 S.F.	99.84%	
2	25.00%	VERTICAL	17,638 S.F.	1.04%	2,007 S.F.	0.16%	

NOTES:

1. THE STEEP SLOPE CALCULATIONS SHOWN HEREON ARE BASED ON THE TOWN OF NORTH CASTLE CRITERIA WHICH DEFINES STEEP SLOPES AS ALL AREAS OF 25% SLOPE OR GREATER AND 25 FEET IN ALL DIRECTIONS.



Source: JMC 2023

Project Site Steep Slopes (Town of North Castle)

Alternative's limits of disturbance are found along the King Street frontage of the Project Site and were created as the result of constructing the existing berm that screens the Project Site's existing improvements. The Preferred Alternative will result in minor disturbance to these areas, but the disturbance would be mitigated with additional plantings and in the Applicant's opinion is, therefore, not considered significant. As noted above, the Planning Board has authority to approve disturbance to Town-regulated steep slopes through the site plan review process.

Based on the foregoing analyses, the Preferred Alternative is not anticipated to have significant long-term post-development adverse impact due to changes in surface coverage and topography. As shown in the above table, the majority of slopes within the Preferred Alternative's limits of disturbance fall within the 0–15 percent category. The layout and configuration of the Preferred Alternative has been designed to take advantage of the Project Site's topography and contours, thereby minimizing the potential for erosion hazards, sedimentation, and slope failure. Following construction of the Preferred Alternative, potential adverse impacts across the entire site related to soil coverage and topography would be avoided and minimized through the implementation of the ESCP and SWPPP.

2.B.3.c. Mitigation Measures for the Preferred Alternative

In the Applicant's opinion, the Preferred Alternative is not anticipated to have a significant adverse impact on topography. Similar to the DEIS Project, the Preferred Alternative includes an ESCP and SWPPP to avoid and/or mitigate impacts associated with the disturbance of the Project Site's topography and on-Site soils during both construction and operation. The Preferred Alternative's grading plan incorporates appropriate design controls for disturbed slopes in excess of 15 percent, including the installation of retaining walls (as needed) and proposed revegetation and landscaping. Overall, the layout and configuration of the Preferred Alternative has been designed to take advantage of the Project Site's topography and contours, thereby minimizing the potential for erosion hazards. The above measures represent the best available technologies and practices that will ensure that any impacts to the Project Site's topographical features are minimized to the maximum extent practicable. Through the implementation of these measures, no significant adverse impacts are anticipated.

2.B.4. VEGETATION AND WILDLIFE

This section addresses the potential impacts of the Preferred Alternative on vegetation and wildlife. It also identifies proposed mitigation measures to further minimize the potential for impacts. As discussed below, similar to the DEIS Project, the Preferred Alternative would not have an adverse impact on rare, threatened, or endangered species, or species of special concern, nor would it have an adverse impact on significant natural communities.

2.B.4.a. Potential Impacts on Vegetation

Table 2-7 below identifies the three habitat cover types documented for the Project Site.

Table 2-7
Project Site – Habitat Cover Types

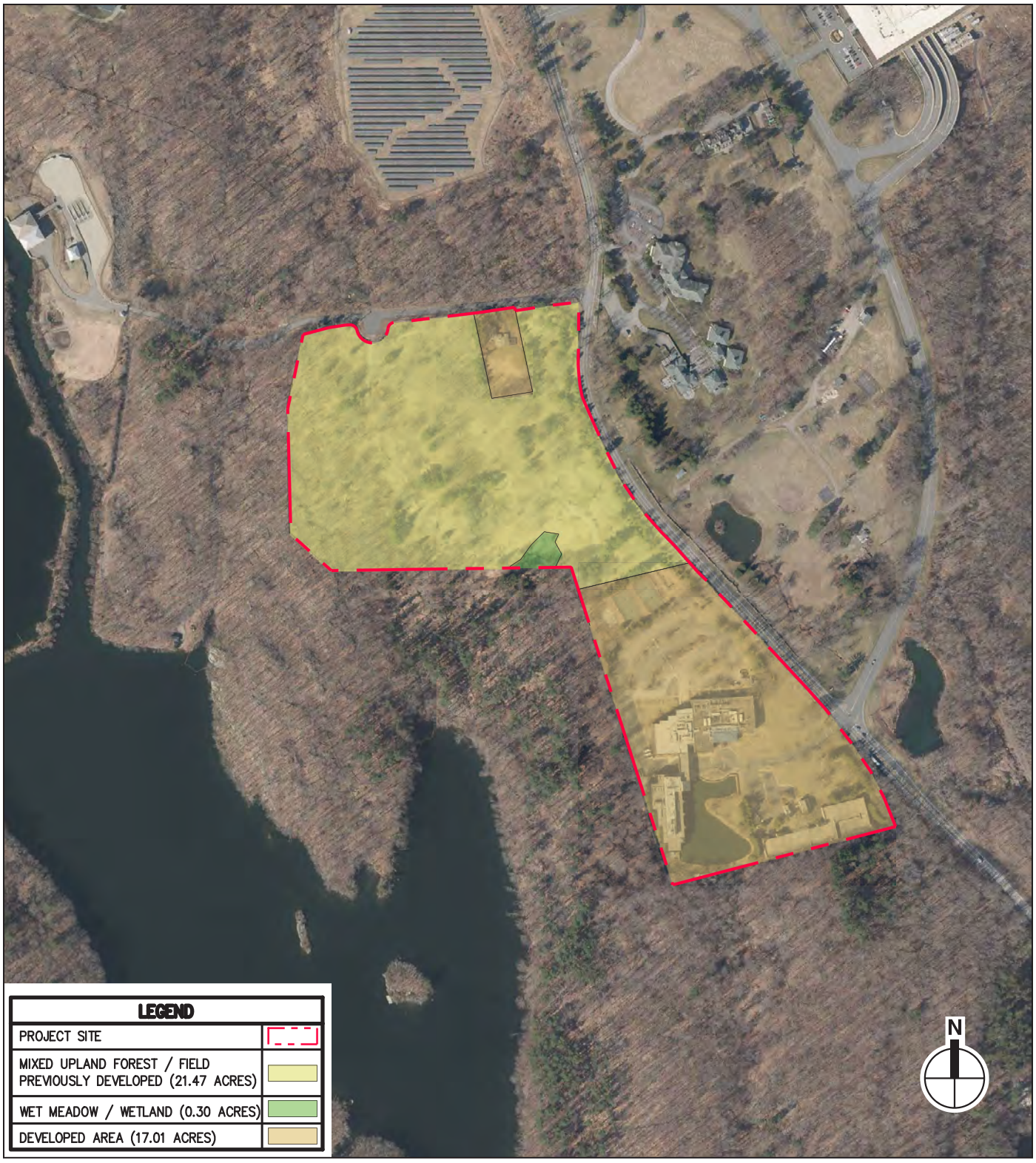
Habitat Cover Type	Acres Identified
Mixed Upland Forest/Field Previously Developed	21.47
Developed Area	17.01
Wet Meadow/Wetland	0.30
Source: JMC Engineering	

During construction of the Preferred Alternative, there would be a temporary loss of habitat for species that use mixed upland forest/field as the dominant habitat. Based on the Preferred Alternative's limits of disturbance, proposed new construction activities will require the disturbance of approximately 14.94 acres, or 69.6 percent, of mixed upland forest/field cover type on the Project Site (see **Figure 2-7**). The majority of the disturbed forest/field cover type is located in the northern portion of the Project Site where previous disturbance has already occurred. More heavily forested areas of the Project Site, including those areas along the western perimeter of the Project Site and most of the Conservation Easement areas, will be preserved, providing protection for forest interior species. As noted in Section 2.B.5, there will be no impacts or loss to the wet meadow (aka wetland) habitat found on the Project Site.

In addition to the introduction of native landscaping as part of future construction, the Applicant is proposing to preserve existing trees within the proposed limits of site disturbance, to the maximum extent practicable. A preliminary list of the trees to be preserved and removed from areas to be disturbed is included as **Figure 2-8**. The most recent tree protection/removal plans and tree survey that have been prepared by the Applicant's Engineer in accordance with Chapter 308 of the Town Code indicate that there are approximately 1,091 existing trees regulated by the Town with a diameter at beast height (DBH) of 8 inches or greater within the area of the site for which a tree survey was conducted. Of the 1,091 trees regulated by Chapter 308 of the Town Code, the Applicant proposes to remove approximately 744 in connection with construction of the Preferred Alternative. This is approximately 376 more trees that require removal than the DEIS Project.

Before trees on the Project Site are to be removed, a permit from the Town's Building Inspector would be obtained in accordance with Chapter 308 of the Town Code. According to the Applicant's preliminary landscaping plans (see **Figure 2-9**), approximately 898 new trees (deciduous and evergreen) would be planted on the Project Site (compared to 451 proposed for the DEIS Project). The majority of the existing trees on the King Street side of the existing landscaped berm will remain. Additional new trees will be planted on the back side of the berm following site construction. The existing trees found along the northern and northwestern boundaries of the Project Site would remain intact.

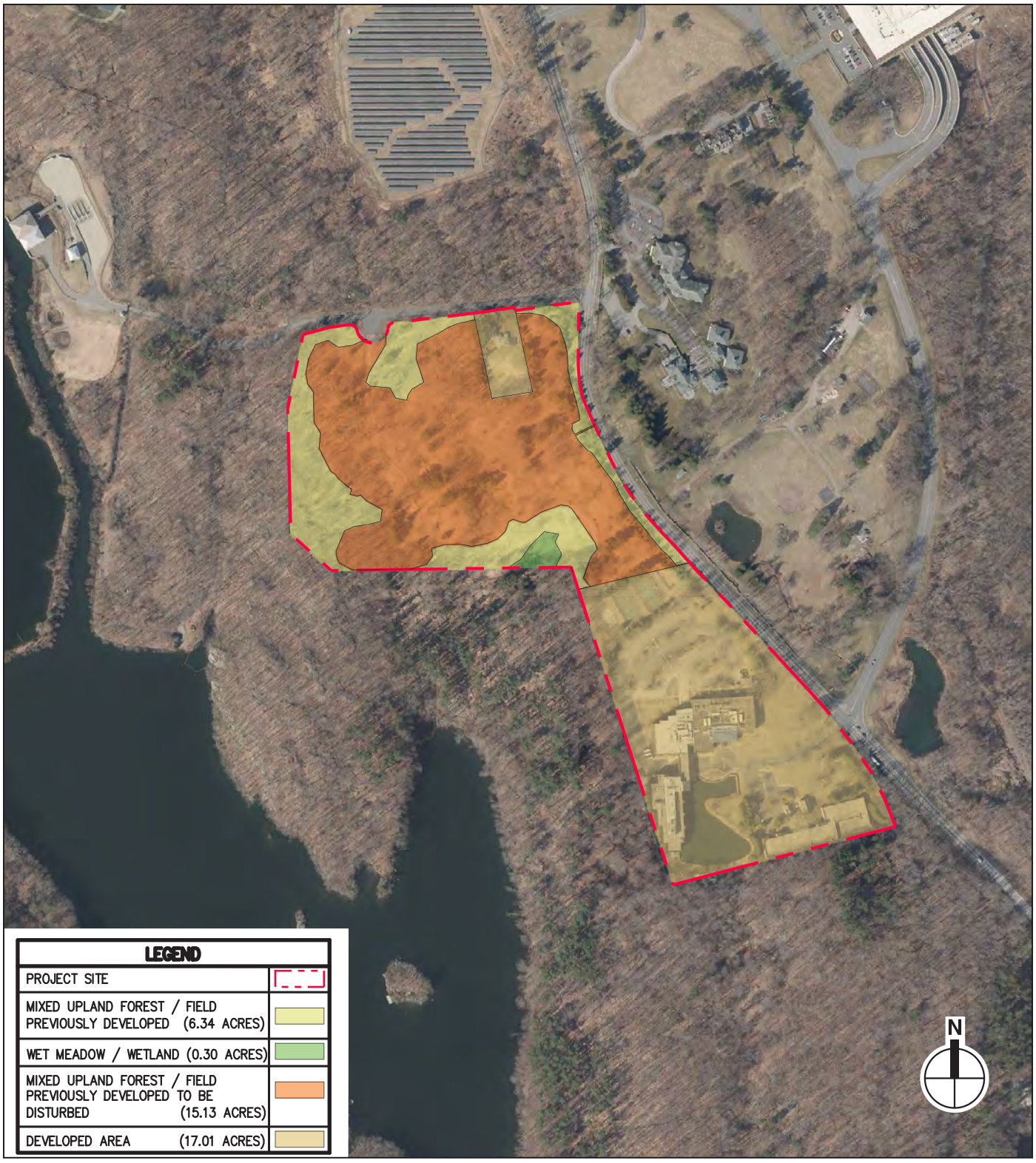
There are no unique trees on the Project Site that are regulated by the Town of North Castle. There is very low potential for erosion due to the removal of vegetation on the Project Site. As discussed in DEIS Chapter 5, "Topography and Slopes," the topography of the currently developed portion of the Project



9.12.22

Source: JMC 2022

Project Site - Habitat Cover Types - Existing



Project Site - Habitat Cover Types - Proposed

Source: JMC 2023

Preferred Alternative - Tree Protection Plans

Source: JMC 2023

Preferred Alternative - Tree Protection Plans

1.31.23

TREE TABLE - PART A

1,091 TREES DESIGNATED HAVING A DIAMETER AT DBH OF 8" OR GREATER

TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE	TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE	TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE	TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE
1	CHERRY	12"	POOR	REMOVE	98	SPRUCE	8"	FAIR	REMOVE	200	MAPLE	8"	GOOD	REMOVE	300	BIRCHERRY	10"	POOR	REMOVE
2	SPRUCE	14"	FAIR	REMOVE	99	SPRUCE	8"	POOR	REMOVE	201	ASH	10"	GOOD	REMOVE	301	PINE	28"	FAIR	REMOVE
3	SPRUCE	14"	FAIR	REMOVE	100	MAPLE	10"	GOOD	REMAIN	202	ASH	8"	GOOD	REMOVE	302	SPRUCE	12"	GOOD	REMOVE
4	SPRUCE	14"	FAIR	REMOVE	101	HICKORY	8"	GOOD	REMAIN	203	OAK	14"	FAIR	REMOVE	303	MAPLE	8"	GOOD	REMAIN
5	MAPLE	24"	GOOD	REMOVE	102	MAPPLELE	10"	GOOD	REMAIN	204	MAPLE	14"	GOOD	REMOVE	304	SPRUCE	12"	POOR	REMAIN
6	SPRUCE	14"	FAIR	REMOVE	103	MAPLE	44"	GOOD	REMOVE	205	SPRUCE	8"	GOOD	REMOVE	305	SPRUCE	8"	GOOD	REMOVE
7	CHERRY	12"	FAIR	REMOVE	104	MAPLE	10"	GOOD	REMAIN	206	PINE	14"	GOOD	REMOVE	306	PINE	10"	POOR	REMOVE
8	MAPLE	16"	GOOD	REMOVE	105	MAPLE	10"	GOOD	REMAIN	207	MAPLE	8"	GOOD	REMOVE	307	SPRUCE	14"	POOR	REMOVE
9	MAPLE	38"	GOOD	REMAIN	106	MAPLE	8"	GOOD	REMAIN	208	PINE	12"	FAIR	REMOVE	308	SPRUCE	8"	GOOD	REMOVE
10	SPRUCE	14"	FAIR	REMOVE	107	BIRCHERRY	16" TR	GOOD	REMOVE	209	MAPLE	10"	GOOD	REMAIN	309	SPRUCE	12"	GOOD	REMOVE
11	MAPLE	10"	GOOD	REMAIN	108	ASH	8"	FAIR	REMAIN	210	PINE	14"	FAIR	REMOVE	310	PINE	18"	FAIR	REMOVE
12	SPRUCE	14"	FAIR	REMOVE	110	MAGNOLIA	14"	GOOD	REMOVE	211	PINE	10"	FAIR	REMOVE	311	ASH	10"	FAIR	REMOVE
13	ASH	8"	GOOD	REMAIN	111	MAPLE	10"	GOOD	REMAIN	212	SPRUCE	8"	GOOD	REMOVE	312	CEDAR	10"	GOOD	REMOVE
14	MAPLE	8"	GOOD	REMOVE	112	MAPLE	10"	GOOD	REMAIN	213	SPRUCE	8"	FAIR	REMAIN	313	MAPLE	22"	GOOD	REMOVE
15	MAPLE	8"	GOOD	REMAIN	113	PINE	12"	GOOD	REMAIN	214	CHERRY	9"	FAIR	REMAIN	314	SPRUCE	14"	GOOD	REMOVE
16	ASH	14"	GOOD	REMAIN	114	MAPLE	8"	GOOD	REMAIN	215	OAK	14"	FAIR	REMOVE	315	PINE	26"	GOOD	REMOVE
17	SPRUCE	14"	FAIR	REMOVE	115	MAPLE	16"	GOOD	REMAIN	216	MAPLE	16"	FAIR	REMOVE	316	CEDAR	10"	FAIR	REMOVE
18	ASH	10"	GOOD	REMAIN	116	MAPLE	8"	GOOD	REMAIN	217	MAPLE	10"	FAIR	REMOVE	317	MAPLE	30"	POOR	REMOVE
19	ASH	14"	GOOD	REMAIN	117	PINE	14" 8"	GOOD	REMOVE	218	SPRUCE	12"	GOOD	REMOVE	318	PINE	24"	FAIR	REMAIN
20	ASH	10"	GOOD	REMAIN	118	SPRUCE	14"	POOR	REMOVE	219	MAPLE	8"	GOOD	REMAIN	319	PINE	14"	FAIR	REMOVE
21	ASH	10"	GOOD	REMAIN	119	PINE	14"	FAIR	REMOVE	220	PEAR	10"	GOOD	REMOVE	320	CEDAR	12"	FAIR	REMOVE
22	MAPLE	8"	GOOD	REMAIN	120	MAPLE	10"	GOOD	REMAIN	221	SPRUCE	8"	GOOD	REMOVE	321	SPRUCE	12"	GOOD	REMOVE
23	MAPLE	8"	GOOD	REMAIN	121	BIRCHERRY	12" MU	GOOD	REMOVE	222	SPRUCE	8"	FAIR	REMOVE	322	OAK	12"	GOOD	REMOVE
24	MAPLE	8"	GOOD	REMOVE	122	MAPLE	10"	GOOD	REMAIN	223	MAPLE	9" TW	GOOD	REMOVE	323	DECIDUOUS	10"	POOR	REMOVE
25	MAPLE	8"	GOOD	REMAIN	123	MAPLE	8"	FAIR	REMAIN	224	MAPLE	8"	GOOD	REMAIN	324	CEDAR	10"	FAIR	REMOVE
26	MAPLE	26"	GOOD	REMAIN	124	MAPLE	12" 8"	FAIR	REMAIN	225	SPRUCE	8"	FAIR	REMOVE	325	MAPLE	18"	GOOD	REMOVE
27	MAPLE	8"	GOOD	REMAIN	125	OAK	20"	FAIR	REMOVE	226	MAPLE	10"	GOOD	REMAIN	326	PINE	14"	FAIR	REMAIN
28	MAPLE	10"	GOOD	REMAIN	126	SPRUCE	18" TW	POOR	REMOVE	227	PINE	8"	FAIR	REMAIN	327	PINE	28"	GOOD	REMOVE
29	MAPLE	10" 6"	GOOD	REMAIN	127	MAPLE	8"	GOOD	REMAIN	228	LOCUST	12"	GOOD	REMOVE	328	CEDAR	10"	FAIR	REMOVE
30	ASH	12"	GOOD	REMAIN	129	MAPLE	12"	GOOD	REMAIN	229	PINE	10"	GOOD	REMOVE	329	ASH	12"	FAIR	REMOVE
31	MAPLE	12"	GOOD	REMAIN	130	MAPLE	8"	GOOD	REMAIN	230	PINE	10"	FAIR	REMOVE	330	CEDAR	10"	FAIR	REMOVE
32	SPRUCE	14"	FAIR	REMOVE	132	MAPLE	8"	GOOD	REMAIN	231	PINE	10"	FAIR	REMOVE	331	MAPLE	20"	GOOD	REMOVE
33	ASH	8"	GOOD	REMAIN	134	MAPLE	10"	GOOD	REMAIN	232	MAPLE	10"	GOOD	REMAIN	332	CEDAR	10"	FAIR	REMOVE
34	ASH	8"	GOOD	REMAIN	135	PINE	14"	GOOD	REMOVE	233	MAPLE	10"	GOOD	REMOVE	333	PINE	14"	FAIR	REMAIN
35	MAPLE	8"	GOOD	REMAIN	136	MAPLE	8"	GOOD	REMAIN	234	PINE	10"	POOR	REMOVE	334	DECIDUOUS	12"	GOOD	REMOVE
36	ASH	8"	FAIR	REMAIN	137	PINE	10"	POOR	REMOVE	235	PINE	10"	FAIR	REMOVE	335	CHERRY	10"	GOOD	REMOVE
37	CHERRY	12"	GOOD	REMAIN	138	MAPLE	10"	GOOD	REMAIN	236	MAPLE	12" TR	FAIR	REMAIN	336	MAPLE	14"	FAIR	REMOVE
38	CHERRY	8"	POOR	REMAIN	139	SPRUCE	14"	FAIR	REMOVE	237	SPRUCE	12"	GOOD	REMAIN	337	MAPLE	10"	GOOD	REMOVE
39	MAPLE	8"	POOR	REMAIN	140	SPRUCE	14"	FAIR	REMOVE	238	SPRUCE	12"	GOOD	REMAIN	338	SPRUCE	10"	GOOD	REMOVE
40	ASH	12" TW	FAIR	REMAIN	141	OAK	10"	GOOD	REMOVE	239	SPRUCE	8"	FAIR	REMAIN	339	MAPLE	14"	GOOD	REMOVE
41	MAPLE	10"	GOOD	REMAIN	142	OAK	10"	FAIR	REMOVE	240	SPRUCE	8"	GOOD	REMOVE	340	CEDAR	8" TW	FAIR	REMOVE
42	CHERRY	8"	POOR	REMAIN	143	MAPLE	12"	GOOD	REMAIN	242	LOCUST	14"	GOOD	REMOVE	341	PEAR	22"	GOOD	REMOVE
43	MAPLE	34"	GOOD	REMAIN	144	HICKORY	10"	GOOD	REMAIN	243	SPRUCE	8"	FAIR	REMAIN	342	CEDAR	10" TW	FAIR	REMOVE
44	ASH	8"	GOOD	REMAIN	145	OAK	18"	GOOD	REMOVE	244	MAPLE	8"	FAIR	REMOVE	343	PINE	36"	GOOD	REMOVE
45	MAPLE	8"	GOOD	REMAIN	146	OAK	10"	GOOD	REMOVE	245	SPRUCE	12"	GOOD	REMAIN	344	APPLE	8"	GOOD	REMOVE
46	MAPLE	44"	FAIR	REMOVE	147	ASH	16"	FAIR	REMOVE	246	MAPLE	8"	FAIR	REMAIN	345	OAK	8"	FAIR	REMOVE
47	MAPLE	36"	GOOD	REMOVE	148	MAPLE	12"	GOOD	REMAIN	247	SPRUCE	8"	FAIR	REMAIN	346	CEDAR	10"	GOOD	REMOVE
48	MAPLE	20"	FAIR	REMOVE	149	BIRCHERRY	8"	GOOD	REMOVE	248	SPRUCE	8"	GOOD	REMOVE	347	OAK	34"	GOOD	REMAIN
49	MAPLE	8"	GOOD	REMAIN	150	OAK	12"	GOOD	REMOVE	249	MAPLE	12"	FAIR	REMAIN	348	MAGNOLIA	8"	FAIR	REMOVE
50	MAPLE	34"	GOOD	REMAIN	151	PEAR	16"	FAIR	REMOVE	250	MAPLE	12" 8" 6"	FAIR	REMAIN	349	MAGNOLIA	12"	FAIR	REMOVE
51	MAPLE	8"	GOOD	REMAIN	152	OAK	12"	GOOD	REMOVE	251	MAPLE	10"	FAIR	REMAIN	350	SPRUCE	10"	FAIR	REMOVE
52	MAPLE	16"	GOOD	REMAIN	154	MAPLE	10"	GOOD	REMAIN	252	SPRUCE	8"	GOOD	REMOVE	351	CEDAR	12" TW	GOOD	REMOVE
53	MAPLE	8"	GOOD	REMAIN	155	OAK	8"	GOOD	REMOVE	253	MAPLE	8"	GOOD	REMAIN	352	CEDAR	8"	FAIR	REMOVE
54	OAK	30"	GOOD	REMAIN	156	ASH	10"	GOOD	REMAIN	254	OAK	36"	GOOD	REMAIN	353	MAPLE	24"	POOR	REMOVE
55	MAPLE	4"	GOOD	REMOVE	157	PINE	10"	GOOD	REMAIN	255	SPRUCE	8"	GOOD	REMOVE	354	SPRUCE	16"	GOOD	REMOVE
56	MAPLE	12"	GOOD	REMAIN	158	OAK	8"	GOOD	REMOVE	256	MAPLE	14"	FAIR	REMOVE	355	CEDAR	8"	FAIR	REMOVE
57	MAPLE	48"	GOOD	REMOVE	159	SPRUCE	14"	GOOD	REMOVE	257	MAPLE	12" 8" 6"	FAIR	REMAIN	356	APPLE	8"	FAIR	REMOVE
58	MAPLE	26"	FAIR	REMAIN	160	LOCUST	6"	GOOD	REMOVE	258	LOCUST	12"	GOOD	REMOVE	357	CEDAR	10"	GOOD	REMOVE
59	MAPLE	44"	POOR	REMOVE	161	PINE	8"	POOR	REMOVE	259	ASH	18"	GOOD	REMOVE	358	SPRUCE	10"	GOOD	REMOVE
60	MAPLE	8"	GOOD	REMAIN	162	PINE	8"	FAIR	REMOVE	260	MAPLE	8"	GOOD	REMOVE	359	DECIDUOUS	16"	GOOD	REMOVE
61	OAK	28"	GOOD	REMAIN	163	SPRUCE	10"	GOOD	REMAIN	261	SPRUCE	8"	FAIR	REMAIN	360	CEDAR	14"	FAIR	REMOVE
62	MAPLE	28"	GOOD	REMAIN	164	PINE	8"	FAIR	REMOVE	263	OAK	12"	GOOD	REMOVE	361	MAPLE	16"	GOOD	REMOVE
63	CHERRY	8"	FAIR	REMAIN	166	SPRUCE	8"	FAIR	REMAIN	264	SPRUCE	8"	GOOD	REMOVE	362	OAK	40"	GOOD	REMAIN
64	MAPLE	12"	GOOD	REMAIN	167	OAK	14"	GOOD	REMOVE	265	PINE	12"	FAIR	REMOVE	363	CEDAR	12"	FAIR	REMOVE
65	CHERRY	10"	FAIR	REMAIN	168	MAPLE	10"	GOOD	REMAIN	266	ASH	10"	GOOD	REMOVE	364	MAPLE	18"	GOOD	REMOVE
66	MAPLE	8"	GOOD	REMAIN	169	PEAR	21"	FAIR	REMOVE	268	SPRUCE	8"	FAIR	REMAIN	366	CEDAR	10"	FAIR	REMOVE
67	MAPLE	22"	FAIR	REMOVE	170	SPRUCE	8"	GOOD	REMOVE	269	SPRUCE	8"	GOOD	REMOVE	367	HM	18"	POOR	REMOVE
68	CHERRY	10"	GOOD	REMAIN	171	OAK	14"	FAIR	REMOVE	270	SPRUCE	8"	FAIR	REMOVE	368	CEDAR	14"	FAIR	REMOVE
69	MAPLE	12"	GOOD	REMOVE	172	OAK	20"	GOOD	REMOVE	271	SPRUCE	12"	POOR	REMAIN	369	APPLE	8"	FAIR	REMOVE
70	MAPLE	8"	GOOD	REMAIN	173	OAK	14"	GOOD	REMOVE	272	DOGWOOD	10"	POOR	REMOVE	370	APPLE	8"	GOOD	REMOVE
71	MAPLE	20" 12"	FAIR	REMAIN	174	MAPLE	12"	GOOD	REMOVE	273	PINE	20"	FAIR	REMOVE	371	SPRUCE	14"	GOOD	REMOVE
72	MAPLE	12"	GOOD	REMAIN	175	MAPLE	14"	GOOD	REMOVE	274	OAK	10"	GOOD	REMOVE	372	SYCAMORE	16"	FAIR	REMOVE
73	MAPLE	10"	GOOD	REMAIN	176	SPRUCE	8"	GOOD	REMOVE	275	SPRUCE	14"	POOR	REMAIN	373	CEDAR	12"	FAIR	REMOVE
74	ASH	24"	FAIR	REMAIN	177	SPRUCE	8"	FAIR	REMOVE	276	SPRUCE	8"	FAIR	REMOVE	374	HEMLOCK	8"	POOR	REMOVE
75	MAPLE	8"	GOOD	REMAIN	178	MAPLE	10"	GOOD	REMOVE	277	SM	24"	GOOD	REMAIN	375	MAPLE	12"	GOOD	REMOVE
76	MAPLE	12"	GOOD	REMOVE	179	SPRUCE	8"	FAIR	REMOVE	278	SPRUCE	16"	GOOD	REMAIN	376	HEMLOCK	8"	POOR	REMOVE
77	MAPLE	12"	GOOD	REMAIN	180	MAPLE	8"	GOOD	REMAIN	279	PINE	16"	FAIR	REMOVE	377	MAPLE	12"	POOR	REMOVE
78	MAPLE	10"	GOOD	REMAIN	181	SPRUCE	14"	GOOD	REMOVE	280	CEDAR	12"	GOOD	REMAIN	378	SPRUCE	14"	FAIR	REMOVE
79	MAPLE	8" 6"	GOOD	REMAIN	182	SPRUCE	14"	FAIR	REMOVE	281	MAPLE	16"	GOOD	REMOVE	380	MAPLE	12"	GOOD	REMAIN
80	SPRUCE	12"	FAIR	REMOVE	183	SPRUCE	12"	GOOD	REMOVE	282	PINE	10"	FAIR	REMAIN	381	BIRCHERRY	14"	GOOD	REMAIN
81	MAPLE	12"	GOOD	REMAIN	184	SPRUCE	14"	FAIR	REMOVE	283	SPRUCE	14"	POOR	REMAIN	382	BIRCHERRY	14"	GOOD	REMAIN
82	SPRUCE	12"	FAIR	REMOVE	185	SPRUCE	8"	FAIR	REMOVE	284	OAK	14"	GOOD	REMAIN	383	PINE	28"	FAIR	REMOVE
83	MAPLE	12"	GOOD	REMAIN	186	SPRUCE	8"	FAIR	REMOVE	285	SPRUCE	8"	GOOD	REMOVE	384	SPRUCE	20"	GOOD	REMOVE
84	MAPLE	12"	GOOD	REMOVE	187	SPRUCE	8"	FAIR	REMOVE	286	BIRCHERRY	12"	GOOD	REMAIN	385	APPLE	10"	GOOD	REMOVE
85	SPRUCE	14"	GOOD	REMOVE	188	SPRUCE	8"	FAIR	REMOVE	287	BIRCHERRY	8"	POOR	REMAIN	386	OAK	30"	GOOD	REMOVE
86	ASH	22"	POOR	REMAIN	189	MAPLE	10"	GOOD	REMOVE	288	SPRUCE	10"	POOR	REMAIN	387	HEMLOCK	8" TW	FAIR	REMOVE
87	MAPLE	12"	GOOD	REMAIN	190	MAPLE	10"	GOOD	REMAIN	289	MAPLE	12"	GOOD	REMAIN	388	OAK	12"	FAIR	REMOVE
88	DECIDUOUS	12"	FAIR	REMOVE	191	SPRUCE	8"	GOOD	REMOVE	290	PINE	12"	FAIR	REMOVE	389	APPLE	12" TR	POOR	REMOVE
89	SPRUCE	10"	FAIR	REMOVE	192	MAPLE	12"	GOOD	REMOVE	291	PINE	8"	FAIR	REMOVE	390	SPRUCE	14"	FAIR	REMOVE
90	MAPLE	8"	FAIR	REMAIN	193	SPRUCE	8"	GOOD	REMOVE	293	SPRUCE	12" TW	GOOD	REMAIN	391	MAPLE	34"	GOOD	REMOVE
91	MAPLE	8"	FAIR	REMAIN	194	SPRUCE	8"	FAIR	REMOVE	294	PINE	12"	FAIR	REMOVE	392	APPLE	10"	GOOD	REMOVE
92	BIRCHERRY	14" TR	GOOD	REMOVE	195	SPRUCE	8"	FAIR	REMOVE	295	PINE	10"	FAIR	REMOVE	393	APPLE	12"	GOOD	REMOVE
93	SPRUCE	8"	FAIR	REMOVE	196	PEAR	8"	GOOD	REMOVE	296	CEDAR	24" TW	FAIR	REMOVE	394	CHERRY	10"	POOR	REMOVE
94	MAPLE	12"	POOR	REMOVE	197	SPRUCE	8"	FAIR	REMOVE	297	ASH	16"	GOOD	REMOVE	395	ASH	16"	FAIR	REMOVE
95	PINE	10"	GOOD	REMOVE	198	SPRUCE	8"	GOOD	REMOVE	298	MAPLE	10"	GOOD	REMOVE	396	CHERRY	10"	POOR	REMOVE
96	PINE	8"	GOOD	REMOVE	199	SPRUCE	12"	FAIR	REMOVE	299	PINE	10"	FAIR	REMOVE	397	OAK	22"	FAIR	REMOVE
97	MAPLE	16"	GOOD	REMOVE											398	MAPLE	14"	FAIR	REMOVE
															399	OAK	28"	GOOD	REMOVE

Source: JMC 2023

1.31.23

TREE TABLE - PART B

1,091 TREES DESIGNATED HAVING A DIAMETER AT DBH OF 8" OR GREATER

TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE	TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE	TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE	TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE
400	SPRUCE	12"	POOR	REMOVE	500	CHERRY	20"	POOR	REMOVE	600	CHERRY	14"	POOR	REMOVE	700	APPLE	12"	DEAD	REMOVE
401	CHERRY	22"	POOR	REMOVE	501	DECIDUOUS	16"	FAIR	REMAIN	602	ASH	18"	POOR	REMOVE	702	ASH	14"	POOR	REMOVE
402	MAPLE	14"	GOOD	REMOVE	502	TREE OF HEAVEN	18"	FAIR	REMOVE	603	CHERRY	12"	POOR	REMOVE	703	SASSAFRAS	18"	FAIR	REMAIN
403	MAPLE	24"	FAIR	REMOVE	503	MAPLE	18"	GOOD	REMOVE	604	CHERRY	12"	DEAD	REMOVE	704	ASH	10"	FAIR	REMAIN
404	OAK	16"	FAIR	REMOVE	504	ASH	16"	FAIR	REMOVE	605	TREE OF HEAVEN	24" TW	FAIR	REMAIN	705	APPLE	28"	POOR	REMOVE
405	MAPLE	12"	GOOD	REMOVE	505	SYCAMORE	16"	GOOD	REMOVE	606	CHERRY	14"	POOR	REMOVE	707	PINE	48"	GOOD	REMOVE
406	MAPLE	22"	FAIR	REMOVE	506	MAPLE	16"	FAIR	REMAIN	607	MAPLE	16"	DEAD	REMOVE	709	MAPLE	50"	GOOD	REMOVE
407	CHERRY	10"	POOR	REMOVE	507	BIRCHERRY	8"	POOR	REMOVE	608	CHERRY	14"	POOR	REMOVE	710	MAPLE	18"	FAIR	REMOVE
408	SPRUCE	14"	FAIR	REMOVE	508	CHERRY	8"	GOOD	REMOVE	609	TREE OF HEAVEN	8" MU	FAIR	REMOVE	712	CHERRY	18"	FAIR	REMAIN
409	SPRUCE	10"	POOR	REMOVE	509	MAPLE	16"	GOOD	REMAIN	610	OAK	38"	GOOD	REMOVE	713	CHERRY	18"	FAIR	REMAIN
410	OAK	22"	GOOD	REMOVE	510	ASH	40"	POOR	REMAIN	611	ASH	12" TW	DEAD	REMOVE	715	MAPLE	48"	GOOD	REMAIN
411	OAK	24"	FAIR	REMOVE	511	CHERRY	10"	DEAD	REMOVE	612	ASH	20"	POOR	REMOVE	716	SASSAFRAS	18"	FAIR	REMAIN
412	CHERRY	18"	FAIR	REMOVE	512	APPLE	12"	DEAD	REMOVE	614	LOCUST	20"	POOR	REMOVE	717	ASH	18"	POOR	REMOVE
413	OAK	20"	GOOD	REMAIN	513	CHERRY	10"	FAIR	REMOVE	616	PINE	10"	DEAD	REMOVE	718	MAPLE	10"	FAIR	REMOVE
414	SPRUCE	10"	POOR	REMOVE	514	APPLE	16"	DEAD	REMOVE	617	WILLOW	60"	POOR	REMAIN	719	MAPLE	10" TW	FAIR	REMOVE
415	SPRUCE	12"	FAIR	REMOVE	515	LOCUST	14"	POOR	REMOVE	618	OAK	12"	FAIR	REMOVE	720	MAPLE	12" TW	FAIR	REMOVE
416	DECIDUOUS	16"	GOOD	REMAIN	516	CHERRY	16"	FAIR	REMOVE	619	CHERRY	8"	POOR	REMOVE	721	BIRCHERRY	14" TR	FAIR	REMAIN
417	DECIDUOUS	16"	GOOD	REMAIN	517	ASH	14"	POOR	REMOVE	620	CHESNUT	18" 6"	GOOD	REMOVE	722	TREE OF HEAVEN	16"	GOOD	REMAIN
419	SPRUCE	20"	FAIR	REMOVE	518	LOCUST	12"	DEAD	REMOVE	621	PINE	20"	GOOD	REMOVE	723	OAK	18"	FAIR	REMOVE
420	LINDEN	16"	GOOD	REMAIN	519	SPRUCE	24"	FAIR	REMAIN	622	PINE	10"	POOR	REMOVE	724	SASSAFRAS	18"	FAIR	REMAIN
421	SPRUCE	8"	FAIR	REMAIN	520	CHERRY	14"	DEAD	REMOVE	623	PINE	24"	FAIR	REMOVE	725	APPLE	16"	POOR	REMOVE
422	HEMLOCK	8"	FAIR	REMOVE	521	CHERRY	12"	FAIR	REMOVE	624	CHESNUT	32"	GOOD	REMOVE	726	OAK	20"	FAIR	REMOVE
423	APPLE	12"	GOOD	REMOVE	523	MAPLE	22" TW	FAIR	REMOVE	625	PINE	18"	FAIR	REMOVE	728	MAPLE	20"	FAIR	REMOVE
424	SPRUCE	10"	POOR	REMOVE	524	ASH	16"	POOR	REMOVE	626	SPRUCE	14"	POOR	REMOVE	729	CHERRY	8"	DEAD	REMOVE
425	OAK	8"	GOOD	REMOVE	525	CHERRY	10"	FAIR	REMOVE	627	CHESNUT	20"	FAIR	REMAIN	730	FIR	16"	POOR	REMOVE
426	SPRUCE	12"	FAIR	REMOVE	527	CHERRY	10"	FAIR	REMOVE	628	PINE	16"	FAIR	REMOVE	731	OAK	28"	FAIR	REMOVE
427	SPRUCE	8"	FAIR	REMAIN	528	CEDAR	10"	GOOD	REMOVE	629	OAK	26"	GOOD	REMOVE	732	MAPLE	32"	GOOD	REMOVE
428	APPLE	8"	FAIR	REMAIN	529	CEDAR	10" 8"	GOOD	REMOVE	630	APPLE	18" TR	POOR	REMOVE	733	CHERRY	16" TW	FAIR	REMOVE
429	OAK	12"	GOOD	REMOVE	530	MAPLE	28"	GOOD	REMOVE	631	OAK	22"	FAIR	REMOVE	735	SPRUCE	16"	GOOD	REMAIN
430	APPLE	8"	POOR	REMOVE	531	PINE	18"	POOR	REMOVE	632	OAK	20"	FAIR	REMOVE	736	MAGNOLIAB	16"	GOOD	REMOVE
431	SPRUCE	10"	GOOD	REMAIN	532	MAPLE	20"	FAIR	REMAIN	633	PINE	22"	POOR	REMOVE	737	SPRUCE	16"	GOOD	REMAIN
432	SPRUCE	12"	POOR	REMOVE	533	ASH	12"	FAIR	REMOVE	634	CHERRY	18"	FAIR	REMOVE	739	WALNUT	12"	GOOD	REMOVE
433	SPRUCE	12"	FAIR	REMAIN	535	PINE	16"	FAIR	REMOVE	635	MAPLE	16"	FAIR	REMOVE	740	HEMLOCK	12" 10"	GOOD	REMOVE
434	SPRUCE	14"	FAIR	REMAIN	536	CHERRY	12"	POOR	REMOVE	636	OAK	16"	GOOD	REMOVE	741	MAPLE	8" TR	POOR	REMOVE
435	OAK	22"	FAIR	REMOVE	537	CHERRY	10"	POOR	REMOVE	637	CHERRY	12"	FAIR	REMOVE	742	HEMLOCK	14"	GOOD	REMOVE
436	MAPLE	26"	GOOD	REMAIN	538	MAPLE	48"	POOR	REMOVE	638	PINE	18"	POOR	REMOVE	743	APPLE	24"	POOR	REMOVE
437	SPRUCE	12"	POOR	REMOVE	539	MAPLE	26"	FAIR	REMOVE	639	ASH	12"	POOR	REMOVE	744	PINE	22"	GOOD	REMOVE
438	BIRCHERRY	12" MU	FAIR	REMOVE	540	CHERRY	12"	POOR	REMOVE	641	ASH	24"	POOR	REMOVE	745	PINE	22"	GOOD	REMOVE
439	SPRUCE	12"	POOR	REMOVE	541	CHERRY	12"	FAIR	REMOVE	642	OAK	28"	FAIR	REMOVE	746	BIRCHERRY	22"	GOOD	REMOVE
440	BIRCHERRY	12" MU	FAIR	REMOVE	544	CHERRY	8"	FAIR	REMOVE	643	OAK	30"	FAIR	REMOVE	748	MAPLE	24" 8"	FAIR	REMOVE
441	BIRCHERRY	18" TR	FAIR	REMOVE	545	LOCUST	22"	POOR	REMOVE	644	ASH	12"	POOR	REMOVE	752	BIRCHERRY	10" 4"	GOOD	REMAIN
442	SPRUCE	10"	POOR	REMOVE	546	MAPLE	18"	FAIR	REMOVE	645	ASH	12"	POOR	REMOVE	753	SASSAFRAS	10"	GOOD	REMAIN
443	SPRUCE	10"	POOR	REMOVE	547	ASH	10" TW	POOR	REMOVE	646	PINE	16" MU	POOR	REMOVE	754	MAPLE	22" 14"	GOOD	REMAIN
444	MAPLE	14"	GOOD	REMOVE	548	PINE	12"	POOR	REMOVE	647	APPLE	20"	DEAD	REMOVE	755	SASSAFRAS	8"	GOOD	REMAIN
445	SPRUCE	8"	POOR	REMOVE	549	ASH	14"	POOR	REMOVE	648	PINE	16"	GOOD	REMOVE	756	OAK	28"	GOOD	REMAIN
446	HEMLOCK	8"	FAIR	REMOVE	550	BIRCHERRY	8"	GOOD	REMOVE	649	OAK	24"	FAIR	REMOVE	757	MAPLE	10"	GOOD	REMAIN
447	LOCUST	10"	FAIR	REMOVE	551	CHERRY	8"	DEAD	REMOVE	650	ASH	10"	POOR	REMOVE	758	DECIDUOUS	8"	POOR	REMOVE
448	CEDAR	10"	FAIR	REMOVE	552	SYCAMORE	8"	GOOD	REMAIN	651	ASH	8"	POOR	REMOVE	759	HICKORY	16"	GOOD	REMOVE
449	HEMLOCK	10"	POOR	REMOVE	553	PINE	16"	FAIR	REMOVE	652	OAK	16" TW	POOR	REMOVE	760	CHERRY	8"	POOR	REMOVE
451	HEMLOCK	12"	FAIR	REMOVE	554	CHERRY	18"	POOR	REMOVE	653	OAK	26"	GOOD	REMOVE	761	CHERRY	8"	POOR	REMAIN
452	SPRUCE	20"	POOR	REMOVE	555	APPLE	18"	DEAD	REMOVE	654	SPRUCE	24"	FAIR	REMOVE	762	MAPLE	8"	GOOD	REMAIN
454	CEDAR	10"	FAIR	REMOVE	556	WALNUT	16"	POOR	REMAIN	655	MAPLE	24"	FAIR	REMAIN	763	MAPLE	10" 6"	POOR	REMOVE
455	MAPLE	18"	FAIR	REMOVE	557	MAPLE	20"	FAIR	REMOVE	656	PINE	30" MU	FAIR	REMOVE	764	MAPLE	12"	GOOD	REMAIN
456	LOCUST	12"	DEAD	REMOVE	558	ASH	12"	DEAD	REMOVE	657	SPRUCE	10" MU	FAIR	REMAIN	765	MAPLE	8"	GOOD	REMAIN
457	CHERRY	20"	GOOD	REMOVE	560	LOCUST	20"	FAIR	REMOVE	658	PINE	22"	FAIR	REMOVE	766	ASH	22"	GOOD	REMOVE
458	MAPLE	10" MU	POOR	REMOVE	561	DOGWOOD	8"	FAIR	REMAIN	659	MAPLE	8"	FAIR	REMAIN	767	MAPLE	12"	GOOD	REMOVE
460	CEDAR	20"	POOR	REMOVE	562	CHERRY	10"	FAIR	REMOVE	660	SPRUCE	28"	FAIR	REMOVE	768	MAPLE	10"	GOOD	REMOVE
461	CHERRY	16"	FAIR	REMOVE	563	PINE	16"	DEAD	REMOVE	661	CHERRY	22"	POOR	REMOVE	770	HICKORY	26"	GOOD	REMOVE
465	MAPLE	8"	FAIR	REMOVE	564	ASH	10"	FAIR	REMAIN	662	CHERRY	14"	POOR	REMOVE	771	CHERRY	8"	POOR	REMOVE
466	MAPLE	18"	GOOD	REMOVE	565	LOCUST	18"	FAIR	REMOVE	663	PINE	20"	FAIR	REMOVE	772	LOCUST	10"	POOR	REMOVE
467	MAPLE	12"	FAIR	REMOVE	566	CHERRY	10"	FAIR	REMOVE	664	ASH	12"	POOR	REMAIN	773	BIRCHERRY	10"	POOR	REMOVE
470	OAK	24"	FAIR	REMOVE	567	LOCUST	18"	FAIR	REMOVE	665	MAPLE	14"	GOOD	REMAIN	774	SPRUCE	10"	FAIR	REMOVE
471	MAPLE	12"	GOOD	REMAIN	568	MAPLE	22" TW	FAIR	REMAIN	667	PINE	18"	FAIR	REMOVE	775	MAPLE	10"	FAIR	REMOVE
472	PINE	16"	FAIR	REMOVE	569	PINE	16"	POOR	REMOVE	668	SPRUCE	18"	GOOD	REMOVE	776	MAPLE	8"	FAIR	REMOVE
473	PINE	24"	FAIR	REMOVE	570	PINE	14"	POOR	REMOVE	669	BIRCHERRY	12"	FAIR	REMAIN	777	SPRUCE	10"	POOR	REMOVE
474	MAPLE	16"	FAIR	REMOVE	571	SPRUCE	18"	GOOD	REMAIN	671	MAPLE	10"	FAIR	REMAIN	778	SPRUCE	10"	POOR	REMOVE
475	OAK	14"	FAIR	REMOVE	572	LOCUST	14"	FAIR	REMOVE	672	PINE	20"	FAIR	REMOVE	779	DECIDUOUS	10"	DEAD	REMAIN
476	PINE	24"	FAIR	REMOVE	573	MAPLE	12"	FAIR	REMOVE	673	ASH	8"	FAIR	REMAIN	780	PINE	14"	DEAD	REMOVE
477	PINE	16"	FAIR	REMOVE	574	TREE OF HEAVEN	14"	FAIR	REMOVE	674	ASH	10"	POOR	REMAIN	781	HICKORY	14"	POOR	REMOVE
478	MAPLE	30"	POOR	REMOVE	575	CHERRY	10"	FAIR	REMOVE	675	MAPLE	50"	FAIR	REMAIN	782	OAK	38"	GOOD	REMOVE
479	PINE	16"	FAIR	REMOVE	576	CHERRY	14"	FAIR	REMOVE	676	HICKORY	10"	GOOD	REMAIN	783	DECIDUOUS	18"	DEAD	REMOVE
480	PINE	8"	DEAD	REMAIN	577	MAPLE	18"	FAIR	REMOVE	677	APPLE	12"	GOOD	REMOVE	784	DECIDUOUS	12"	POOR	REMOVE
481	MAPLE	10"	POOR	REMAIN	578	CHERRY	14"	POOR	REMOVE	678	MAPLE	24"	GOOD	REMOVE	785	MAPLE	10"	FAIR	REMOVE
482	MAPLE	10"	GOOD	REMAIN	579	CHERRY	16"	FAIR	REMOVE	679	MAPLE	12"	GOOD	REMAIN	786	MAPLE	10"	FAIR	REMOVE
483	PINE	28"	FAIR	REMOVE	580	HEMLOCK	8"	FAIR	REMOVE	680	ASH	10"	FAIR	REMAIN	787	DECIDUOUS	14"	POOR	REMOVE
484	MAPLE	12"	POOR	REMAIN	581	PINE	16"	DEAD	REMOVE	681	ASH	10"	FAIR	REMAIN	788	DECIDUOUS	14"	FAIR	REMAIN
485	MAPLE	18"	GOOD	REMAIN	582	ASH	20"	POOR	REMOVE	682	PINE	18"	GOOD	REMOVE	789	DECIDUOUS	22"	POOR	REMAIN
486	PINE	28"	FAIR	REMOVE	583	LOCUST	30"	FAIR	REMOVE	683	DECIDUOUS	8"	FAIR	REMAIN	790	OAK	24"	GOOD	REMAIN
487	PINE	8"	DEAD	REMOVE	584	ASH	16"	FAIR	REMOVE	684	ASH	8"	POOR	REMAIN	791	OAK	20"	GOOD	REMAIN
488	PINE	16"	FAIR	REMOVE	585	LOCUST	14"	FAIR	REMOVE	685	TREE OF HEAVEN	16"	GOOD	REMAIN	792	OAK	20"	FAIR	REMAIN
489	LOCUST	26"	POOR	REMAIN	586	BIRCHERRY	12"	POOR	REMOVE	690	MAPLE	10"	FAIR	REMAIN	793	DECIDUOUS	12"	DEAD	REMOVE
490	PINE	16"	FAIR	REMOVE	587	LOCUST	10"	FAIR	REMOVE	691	CEDAR	16"	FAIR	REMOVE	794	DECIDUOUS	8"	POOR	REMOVE
491	ASH	14"	POOR	REMOVE	588	BIRCHERRY	26"	POOR	REMOVE	692	PINE	16"	FAIR	REMOVE	795	DECIDUOUS	10"	POOR	REMOVE
492	CHERRY	12"	POOR	REMOVE	589	TREE OF HEAVEN	20"	GOOD	REMOVE	693	CEDAR	14" MU	FAIR	REMAIN	796	DECIDUOUS	10"	DEAD	REMOVE
493	ASH	12"	POOR	REMOVE	591	PINE	16"	POOR	REMOVE	697	ASH	16"	DEAD	REMOVE	797	DECIDUOUS	12" 10"	POOR	REMOVE
494	CHERRY	10"	POOR	REMOVE	592	MAPLE	30"	GOOD	REMOVE	698	WILLOW	50"	POOR	REMOVE	798	DECIDUOUS	10"	POOR	REMOVE
495	CHERRY	10"	POOR	REMOVE	593	CHERRY	14"	POOR	REMOVE	699	BIRCHERRY	16"	POOR	REMOVE	799	OAK	12"	GOOD	REMOVE
496	CHERRY	8"	FAIR	REMOVE	594	OAK	28"	FAIR	REMOVE										
497	LOCUST	14"	POOR	REMOVE	595	CHERRY	12"	POOR	REMOVE										
498	ELM	16"	GOOD	REMAIN	596	CHERRY	8"	GOOD	REMOVE										
499	MAPLE	10" TW	GOOD	REMAIN	598	ASH	18"	POOR	REMOVE										
					599	WALNUT	16"	FAIR	REMAIN										

Source: JMC 2023

1.31.23

TREE TABLE - PART C

1,091 TREES DESIGNATED HAVING A DIAMETER AT DBH OF 8" OR GREATER

TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE	TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE	TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE	TREE NO.	COMMON NAME	DIAM.	COND.	REMAIN OR REMOVE
802	SPRUCE	18''	GOOD	REMOVE	900	MAPLE	12''	GOOD	REMOVE	997	OAK	28''	GOOD	REMOVE	1093	PINE	14''	GOOD	REMOVE
803	MAPLE	8''	GOOD	REMOVE	901	PINE	8''	GOOD	REMOVE	998	HICKORY	12''	GOOD	REMOVE	1094	PINE	14''	GOOD	REMOVE
804	MAPLE	10''	GOOD	REMOVE	902	MAPLE	12''	GOOD	REMOVE	999	OAK	16''	GOOD	REMOVE	1095	PINE	12''	GOOD	REMOVE
805	CEDAR	14''	GOOD	REMOVE	903	SPRUCE	8''	GOOD	REMOVE	1000	HEMLOCK	8''	GOOD	REMOVE	1096	PINE	18''	GOOD	REMOVE
806	PINE	10''	GOOD	REMOVE	904	MAPLE	8''	GOOD	REMOVE	1001	HEMLOCK	10''	GOOD	REMOVE	1097	SPRUCE	8''	GOOD	REMOVE
807	MAPLE	8''	GOOD	REMOVE	905	SPRUCE	8''	GOOD	REMOVE	1002	OAK	28''	GOOD	REMOVE	1098	SPRUCE	8''	GOOD	REMOVE
808	OAK	36''	GOOD	REMOVE	906	SPRUCE	14''	GOOD	REMOVE	1003	OAK	26'' 24''	GOOD	REMOVE	1099	SPRUCE	16''	GOOD	REMOVE
809	OAK	28''	GOOD	REMOVE	907	SPRUCE	10''	GOOD	REMOVE	1004	BIRCHERRY	14''	GOOD	REMAIN	1100	SPRUCE	12''	GOOD	REMAIN
810	PINE	28''	GOOD	REMOVE	908	SPRUCE	8''	GOOD	REMOVE	1005	OAK	26''	GOOD	REMAIN	1101	SPRUCE	12''	GOOD	REMOVE
811	MAPLE	26''	GOOD	REMOVE	909	MAPLE	16'' 24''	GOOD	REMOVE	1006	OAK	12''	GOOD	REMAIN	1102	SPRUCE	12''	GOOD	REMAIN
812	TU	30''	GOOD	REMOVE	910	MAPLE	8'' 12''	GOOD	REMOVE	1007	OAK	26''	GOOD	REMAIN	1103	OAK	12''	GOOD	REMAIN
813	SASSAFRAS	8''	GOOD	REMOVE	911	MAPLE	8''	GOOD	REMOVE	1008	BIRCHERRY	8''	GOOD	REMAIN	1104	SPRUCE	12''	GOOD	REMOVE
814	MAPLE	28''	GOOD	REMOVE	912	PINE	12''	GOOD	REMOVE	1009	MAPLE	16''	GOOD	REMAIN	1105	SPRUCE	8''	GOOD	REMOVE
815	DOGWOOD	8''	GOOD	REMOVE	913	PINE	8''	GOOD	REMOVE	1010	BIRCHERRY	8''	GOOD	REMAIN	1106	SPRUCE	12''	GOOD	REMAIN
816	HEMLOCK	28''	GOOD	REMOVE	914	PINE	12''	GOOD	REMOVE	1011	BIRCHERRY	16''	GOOD	REMOVE	1107	SPRUCE	10''	GOOD	REMAIN
817	HEMLOCK	16''	GOOD	REMOVE	915	TREE OF HEAVEN	16''	GOOD	REMOVE	1012	HICKORY	8''	GOOD	REMAIN	1108	SPRUCE	8''	GOOD	REMOVE
818	HEMLOCK	16''	GOOD	REMOVE	916	PINE	10''	GOOD	REMOVE	1013	OAK	30''	GOOD	REMAIN	1109	SPRUCE	12''	GOOD	REMAIN
819	HO	10''	GOOD	REMOVE	917	PINE	8''	GOOD	REMOVE	1014	OAK	24''	GOOD	REMOVE	1110	MAPLE	10''	GOOD	REMAIN
820	HEMLOCK	18''	GOOD	REMOVE	918	PINE	8''	GOOD	REMOVE	1015	OAK	22''	GOOD	REMOVE	1111	SPRUCE	12''	GOOD	REMAIN
821	HEMLOCK	14''	GOOD	REMOVE	919	PINE	8''	GOOD	REMOVE	1016	CHERRY	8''	FAIR	REMOVE	1112	FIR	10''	GOOD	REMAIN
822	HEMLOCK	18''	GOOD	REMOVE	920	SPRUCE	8''	GOOD	REMOVE	1017	OAK	16''	GOOD	REMOVE	1113	FIR	10''	GOOD	REMOVE
823	OAK	26''	GOOD	REMOVE	921	SPRUCE	10''	GOOD	REMOVE	1018	MAPLE	8''	GOOD	REMOVE	1114	SPRUCE	8''	GOOD	REMAIN
824	HEMLOCK	10''	GOOD	REMOVE	922	SPRUCE	8''	GOOD	REMOVE	1019	MAPLE	8''	GOOD	REMAIN	1115	PINE	8''	GOOD	REMAIN
825	OAK	30''	GOOD	REMOVE	923	SPRUCE	12''	GOOD	REMOVE	1020	MAPLE	8'' MU	GOOD	REMAIN	1116	SPRUCE	12''	GOOD	REMAIN
826	OAK	30''	GOOD	REMOVE	924	SPRUCE	8''	GOOD	REMOVE	1021	MAPLE	14''	GOOD	REMAIN	1117	FIR	12''	GOOD	REMAIN
827	OAK	36''	GOOD	REMOVE	925	SPRUCE	12''	GOOD	REMOVE	1022	MAPLE	8''	GOOD	REMAIN	1118	SPRUCE	8''	GOOD	REMAIN
828	OAK	34''	GOOD	REMOVE	926	SPRUCE	12''	GOOD	REMOVE	1023	OAK	34''	GOOD	REMAIN	1119	SPRUCE	8''	GOOD	REMAIN
829	HEMLOCK	8''	GOOD	REMOVE	927	PINE	14''	GOOD	REMOVE	1024	CHERRY	8''	FAIR	REMOVE	1120	SPRUCE	8''	GOOD	REMAIN
830	OAK	28''	GOOD	REMOVE	928	PINE	8''	GOOD	REMOVE	1025	BIRCHERRY	18''	GOOD	REMAIN	1121	OAK	16''	GOOD	REMAIN
831	HO	8''	GOOD	REMOVE	929	PINE	12''	GOOD	REMOVE	1026	OAK	22''	GOOD	REMOVE	1122	OAK	16''	GOOD	REMOVE
832	OAK	24''	GOOD	REMOVE	930	PINE	12''	GOOD	REMOVE	1027	OAK	18''	GOOD	REMOVE	1123	PINE	12''	GOOD	REMAIN
833	OAK	20''	GOOD	REMOVE	931	PINE	10''	GOOD	REMOVE	1028	MAPLE	12''	GOOD	REMOVE	1124	PINE	12''	GOOD	REMOVE
834	MAPLE	8''	GOOD	REMOVE	932	TREE OF HEAVEN	10'' 12''	FAIR	REMOVE	1029	OAK	34''	GOOD	REMOVE	1125	PINE	10''	GOOD	REMOVE
835	OAK	32''	GOOD	REMOVE	933	TREE OF HEAVEN	8'' 18''	FAIR	REMOVE	1030	MAPLE	12''	GOOD	REMOVE	1126	PINE	10''	GOOD	REMAIN
836	DOGWOOD	8''	GOOD	REMOVE	934	TREE OF HEAVEN	8''	FAIR	REMOVE	1031	MAPLE	12''	GOOD	REMOVE	1127	PINE	8''	GOOD	REMAIN
837	OAK	36''	GOOD	REMOVE	935	TREE OF HEAVEN	16''	FAIR	REMOVE	1032	MAPLE	14''	GOOD	REMOVE	1128	PINE	10''	GOOD	REMAIN
838	OAK	22''	GOOD	REMAIN	936	TREE OF HEAVEN	12''	FAIR	REMAIN	1033	HICKORY	10''	GOOD	REMOVE	1129	PINE	12''	GOOD	REMAIN
839	MAPLE	8''	GOOD	REMAIN	937	MAPLE	8''	GOOD	REMAIN	1034	BIRCHERRY	10''	GOOD	REMAIN	1130	PINE	12''	GOOD	REMAIN
840	MAPLE	12''	GOOD	REMOVE	938	MAPLE	8''	GOOD	REMAIN	1035	HICKORY	24''	GOOD	REMAIN	1131	PINE	14''	GOOD	REMAIN
841	MAPLE	10''	GOOD	REMOVE	939	OAK	14''	GOOD	REMAIN	1036	MAPLE	8''	GOOD	REMOVE	1132	DOGWOOD	8''	GOOD	REMAIN
842	CHERRY	8''	FAIR	REMOVE	940	OAK	28''	GOOD	REMAIN	1037	OAK	24''	GOOD	REMOVE	1133	SASSAFRAS	8'' MU	GOOD	REMAIN
843	CHERRY	8''	FAIR	REMOVE	941	MAPLE	8''	GOOD	REMAIN	1038	OAK	28''	GOOD	REMOVE	1134	DOGWOOD	8''	GOOD	REMAIN
844	DOGWOOD	12''	GOOD	REMOVE	942	OAK	28''	GOOD	REMAIN	1039	BEECH	8''	GOOD	REMAIN	1135	OAK	18''	GOOD	REMAIN
845	MAPLE	10''	GOOD	REMOVE	943	MAPLE	26''	GOOD	REMAIN	1040	BIRCHERRY	24''	GOOD	REMAIN	1136	PINE	8''	GOOD	REMAIN
846	HEMLOCK	20''	GOOD	REMOVE	944	OAK	38''	GOOD	REMOVE	1041	OAK	30''	GOOD	REMAIN	1137	PINE	10''	GOOD	REMAIN
847	MAPLE	16''	GOOD	REMAIN	945	OAK	20''	GOOD	REMOVE	1042	MAPLE	8''	GOOD	REMAIN	1138	HEMLOCK	8''	GOOD	REMAIN
848	MAGNOLIA	16''	GOOD	REMOVE	946	MAPLE	24''	GOOD	REMOVE	1043	MAPLE	14''	GOOD	REMOVE	1139	SPRUCE	10''	GOOD	REMAIN
849	HEMLOCK	20''	GOOD	REMAIN	947	MAPLE	8''	GOOD	REMOVE	1044	MAPLE	8 TW	GOOD	REMAIN	1140	SPRUCE	8''	GOOD	REMAIN
850	LOCUST	20''	POOR	REMOVE	948	HICKORY	22''	GOOD	REMOVE	1045	MAPLE	8''	GOOD	REMAIN	1141	SPRUCE	10''	GOOD	REMAIN
851	MAPLE	14''	GOOD	REMAIN	949	BIRCH	8''	GOOD	REMOVE	1046	FIR	12''	GOOD	REMAIN	1142	SPRUCE	8''	GOOD	REMAIN
852	MAPLE	26''	GOOD	REMOVE	950	OAK	36''	GOOD	REMOVE	1047	MAGNOLIA	14'' MU	GOOD	REMOVE	1143	SPRUCE	8''	GOOD	REMAIN
853	HO	8''	FAIR	REMOVE	951	OAK	24''	GOOD	REMOVE	1048	PINE	14''	GOOD	REMOVE	1144	SPRUCE	12''	GOOD	REMAIN
854	MAPLE	16''	GOOD	REMAIN	952	OAK	20''	GOOD	REMOVE	1049	PINE	16''	GOOD	REMOVE	1145	SPRUCE	8''	GOOD	REMAIN
856	MAPLE	16''	GOOD	REMOVE	953	MAPLE	8''	GOOD	REMOVE	1050	PINE	8''	GOOD	REMOVE	1146	SPRUCE	8''	GOOD	REMAIN
857	DECIDUOUS	12''	GOOD	REMOVE	954	MAPLE	8''	GOOD	REMAIN	1051	PINE	8''	GOOD	REMAIN	1147	SPRUCE	10''	GOOD	REMAIN
858	DECIDUOUS	10''	GOOD	REMOVE	955	OAK	20''	GOOD	REMOVE	1052	PINE	8''	GOOD	REMAIN	1148	SPRUCE	8''	GOOD	REMAIN
859	TREE OF HEAVEN	8''	FAIR	REMOVE	956	MAPLE	8''	GOOD	REMOVE	1053	SPRUCE	12''	GOOD	REMAIN	1149	SPRUCE	10''	GOOD	REMAIN
860	TREE OF HEAVEN	14''	FAIR	REMOVE	957	OAK	34''	GOOD	REMOVE	1054	SPRUCE	8''	GOOD	REMAIN	1150	SPRUCE	12''	GOOD	REMAIN
861	MAPLE	8''	GOOD	REMOVE	958	MAPLE	8''	GOOD	REMOVE	1055	SPRUCE	8''	GOOD	REMAIN	1151	SPRUCE	8''	GOOD	REMOVE
862	ASH	10''	POOR	REMOVE	960	MAPLE	8''	GOOD	REMOVE	1056	SPRUCE	8''	GOOD	REMAIN					
863	SYCAMORE	36''	GOOD	REMOVE	961	BIRCH	10''	GOOD	REMOVE	1057	MAPLE	14''	GOOD	REMAIN					
864	MAPLE	12''	GOOD	REMOVE	962	OAK	34''	GOOD	REMOVE	1058	SPRUCE	10''	GOOD	REMAIN					
865	LOCUST	28''	GOOD	REMOVE	963	BIRCH	14''	GOOD	REMAIN	1059	SPRUCE	8''	GOOD	REMAIN					
866	LOCUST	24''	GOOD	REMOVE	964	MAPLE	8''	GOOD	REMAIN	1060	MAPLE	14''	GOOD	REMAIN					
867	TREE OF HEAVEN	12''	FAIR	REMOVE	965	BIRCH	8''	GOOD	REMOVE	1061	SPRUCE	16''	GOOD	REMAIN					
868	MAPLE	16''	GOOD	REMOVE	966	MAPLE	8''	GOOD	REMOVE	1062	SPRUCE	16''	GOOD	REMAIN					
869	CHERRY	20''	FAIR	REMOVE	967	MAPLE	8''	GOOD	REMOVE	1063	SPRUCE	12''	GOOD	REMAIN					
870	MAPLE	24''	GOOD	REMOVE	968	OAK	20''	GOOD	REMAIN	1064	SPRUCE	12''	GOOD	REMOVE					
871	CHERRY	16''	FAIR	REMOVE	969	OAK	28''	GOOD	REMAIN	1065	SPRUCE	10''	GOOD	REMAIN					
872	MAPLE	26''	GOOD	REMOVE	970	HICKORY	8''	GOOD	REMAIN	1066	SPRUCE	12''	GOOD	REMOVE					
873	MAPLE	14''	GOOD	REMOVE	971	MAPLE	12''	GOOD	REMAIN	1067	SPRUCE	16''	GOOD	REMAIN					
874	ASH	12''	FAIR	REMOVE	972	OAK	16''	GOOD	REMAIN	1068	MAPLE	8''	GOOD	REMOVE					
875	MAPLE	22''	GOOD	REMOVE	973	OAK	22''	GOOD	REMAIN	1069	LOCUST	8'' TW	GOOD	REMAIN					
876	CHERRY	16''	FAIR	REMOVE	974	BIRCH	8''	GOOD	REMAIN	1070	SPRUCE	12''	GOOD	REMAIN					
877	MULBERRY	8''	GOOD	REMOVE	975	MAPLE	8''	GOOD	REMAIN	1071	SPRUCE	12''	GOOD	REMAIN					
878	MAPLE	16''	GOOD	REMOVE	976	DOGWOOD	8''	GOOD	REMOVE	1072	SPRUCE	14''	GOOD	REMAIN					
879	MAPLE	16''	GOOD	REMOVE	977	HICKORY	8''	GOOD	REMAIN	1073	MAPLE	14''	GOOD	REMAIN					
880	ASH	18''	FAIR	REMOVE	978	CH	8''	FAIR	REMAIN	1074	PINE	14''	GOOD	REMOVE					
881	ASH	14''	FAIR	REMOVE	979	CD	8''	GOOD	REMAIN	1075	PINE	16''	GOOD	REMOVE					
883	SPRUCE	8''	GOOD	REMOVE	980	MAPLE	12''	GOOD	REMOVE	1076	CEDAR	10'' TW	GOOD	REMOVE					
884	SPRUCE	8''	GOOD	REMOVE	981	MAPLE	16''	GOOD	REMAIN	1077	PINE	8''	GOOD	REMOVE					
885	SPRUCE	8''	GOOD	REMOVE	982	MAPLE	8''	GOOD	REMAIN	1078	PINE	16''	GOOD	REMOVE					
886	SPRUCE	8''	GOOD	REMOVE	983	BIRCH	14''	GOOD	REMAIN	1079	MAPLE	12''	GOOD	REMOVE					
887	PINE	12''	GOOD	REMOVE	984	MAPLE	24''	GOOD	REMAIN	1080	SPRUCE	8''	GOOD	REMOVE					
888	PINE	8''	GOOD	REMOVE	985	OAK	12''	GOOD	REMAIN	1081	SPRUCE	8''	GOOD	REMOVE					
889	SYCAMORE	10''	GOOD	REMOVE	986	TREE OF HEAVEN	8''	FAIR	REMOVE	1082	SPRUCE	8''	GOOD	REMOVE					
890	SYCAMORE	8''	GOOD	REMOVE	987	BEECH	10''	GOOD	REMOVE	1083	SPRUCE	8''	GOOD	REMOVE					
891	SYCAMORE	10''	GOOD	REMOVE	988	MAPLE	18''	GOOD	REMOVE	1084	SPRUCE	10''	GOOD	REMOVE					
892	PINE	10''	GOOD	REMOVE	989	MAPLE	8''	GOOD	REMOVE	1085	SPRUCE	12''	GOOD	REMOVE					
893	PINE	8''	GOOD	REMOVE	990	MAPLE	8''	GOOD	REMOVE	1086	MAPLE	12''	GOOD	REMOVE					
894	PINE	12''	GOOD	REMOVE	991	OAK	28''	GOOD	REMOVE	1087	MAPLE	12''	GOOD	REMOVE					
895	LOCUST	14''	GOOD	REMOVE	992	OAK	30''	GOOD	REMOVE	1088	PINE	22''	GOOD	REMOVE					
896	PINE	8''	GOOD	REMOVE	993	MAPLE	10''	GOOD	REMOVE	1089	HEMLOCK	14''	GOOD	REMOVE					
897	PINE	8''	GOOD	REMOVE	994	HICKORY	12''	GOOD	REMAIN	1090	HEMLOCK	8''	GOOD	REMOVE					
898	PINE	8''	GOOD	REMOVE	995	HICKORY	28''	GOOD	REMOVE	1091	HEMLOCK	12''	GOOD	REMOVE					
899	PINE	8''	GOOD	REMOVE	996	OAK	24''	GOOD	REMOVE	1092	OAK	14''	GOOD	REMOVE					

Source: JMC 2023

1.31.23

Source: JMC 2023

Preferred Alternative - Preliminary Landscaping Plan

AIRPORT CAMPUS FEIS

Figure 2-9a

Source: JMC 2023

Preferred Alternative - Preliminary Landscaping Plan

AIRPORT CAMPUS FEIS

Figure 2-9b

Site ranges from a low of approximately 390 feet above mean sea level at the King Street entrance to a high of approximately 430 feet along the northerly portion. The majority of the Project Site is fairly level with a gradual slope. The Project Site has been previously developed with commercial office buildings, single-family residential dwellings, and landscaped areas. The single-family residential subdivision was removed from the northern portion of the Project Site several years ago (with the exception of the 3 Cooney Hill Road property, which was recently purchased by the Applicant), and the area that contained landscaping and lawns was allowed to revert to scrub/shrub and mixed forest, creating an upland field-like environment with interspersed upland forest vegetation. Due to previous disturbance on the Project Site, as well the nature of topography in the area, the likelihood of erosion from removal of vegetation is minimal. The steepest slopes on the Project Site are located on the western portions, which begin to slope downward toward the reservoir. No future disturbance is proposed in these areas, a portion of which is within the conservation easement. To ensure minimal impacts related to storm water runoff and erosion both on- and off-site, including the reservoir, erosion and sediment controls have been incorporated into the SWPPP.

2.B.4.b. Potential Impacts on Wildlife

2.B.4.b.(i) Threatened and Endangered Species

The proposed work area on the Project Site is more than 0.5 miles from the known bald eagle nest location described in DEIS Chapter 6, "Vegetation and Wildlife." Bald eagle nesting season in New York occurs from January 1 to September 30.

The construction activity that generally creates the highest levels of construction period noise is excavation/grading activities. Based on the preliminary evaluation by the Applicant's Engineer, construction of the Preferred Alternative may require limited rock removal by blasting or hammering activities in the northwestern portion of the proposed townhouse development area, which may have an isolated area extending up to 8 feet into bedrock. In addition, there will be limited rock removal for some of the townhouse basements in the northern portion of the Site, which may have an isolated area extending up to 16 feet into bedrock. 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 Engineer.

There is no other potential rock removal or rock crushing anticipated as part of construction. If blasting is required, it would occur more than 0.5 miles from the known nesting site and would be performed in accordance with a blasting protocol prepared pursuant to Town Code requirements. However, as per the Northeast Bald Eagle Project Screening Form[6] (completed and attached as **Appendix E**), the Applicant meets all the requested guidelines since the areas of potential blasting are more than 0.5 miles from the known bald eagle nest and no other mitigation is required.

[6] https://www.fws.gov/media/northeast-bald-eagle-project-screening-form

Following construction activities, the structures on the Project Site, in addition to the wooded buffer that already exists between the Project Site and the reservoir, would serve to adequately buffer operational noise from the Preferred Alternative. Operational noise would predominately consist of noise related to vehicular traffic and building mechanical systems and would not rise to a level of a significant adverse impact.

With regard to the Indiana bat and northern long-eared bat, as described in DEIS Chapter 6, "Vegetation and Wildlife," neither of these species and associated hibernacula were observed on the Project Site during fieldwork. As a precautionary measure, the Applicant could further conduct tree-clearing activities between October 1 and March 31, to the maximum extent practicable, to avoid any potential impacts to bats during construction. In addition, as recommended by the USFWS, the Applicant will ensure that no artificial dyes, coloring, insecticide, or algaecide such as copper sulfate, will be placed in stormwater control structures on the site.

2.B.4.b.(ii) Habitat Displacement/Fragmentation and Migration Patterns

Direct impacts to wildlife biodiversity from the Preferred Alternative will primarily be limited displacement and some direct loss, especially to species that spend a large percentage of their life cycle underground. Most species found on the Project Site are typically found in suburban settings, especially in North Castle and may have already adapted to proximal human habitation. These species will remain on the developed portion of the site, though possibly in fewer numbers.

Habitat fragmentation is defined as the separation and isolation of habitats and wildlife populations by placing impenetrable barriers between habitats that prevent mixing formerly connected or adjacent wildlife populations creating "habitat islands." The northern portion of the Project Site contains open canopy mixed forest/field areas resulting from previous disturbance, which would be cleared to facilitate the Preferred Alternative. The densely forested areas within the Project Site's conservation easement would be preserved, leaving protection for forest interior species. The clearing of the mixed forest/field habitat on the Project Site is not anticipated to alter site biodiversity since the forest area is already fragmented from previous site disturbance.

The Preferred Alternative will not significantly affect large mammal or migratory bird species movements since these species are highly mobile and not typically confined to small corridors. The Preferred Alternative will disturb approximately 28 acres of the Project Site, with the largest impact associated with the previously disturbed mixed forest/upland field habitat in the northern portion (14.94 acres). The regulated wetland on the Project Site will be left intact and is considered the most likely migratory corridors for wildlife species on the site, especially the more sensitive species of amphibians and reptiles. The prime migratory corridors and wildlife destinations for breeding found in the regulated wetland will remain.

2.B.4.b.(iii) Impacts of Chemical Use on Site

Fertilizer and pesticide use, when applied in accordance with the manufacturer's guidelines, is not anticipated to have an impact on wildlife beyond that of the Project Site's existing conditions. According to the Applicant, the integrated pest management plan (IPM) currently in place for the Project Site's existing office uses would be expected to remain in the future with the Preferred Alternative. Only reputable professionals, licensed and certified by the NYSDEC for the storage and application of these chemicals, will be contracted for landscaping services.

2.B.4.c. Mitigation Measures for the Preferred Alternative

Similar to the DEIS Project, the following mitigation measures are proposed to minimize the potential for impacts to vegetation and wildlife in connection with the Preferred Alternative:

- Proposed site disturbance would occur in areas of the Project Site that have been previously disturbed for office, surface parking, and single-family residential uses;
- The Applicant will minimize impacts by establishing undisturbed, naturally vegetated zones demarcated in the field by orange construction fencing and by clearing only necessary areas within the limit of disturbance area or within building envelopes;
- The Applicant's schematic landscaping plan includes retaining and revegetating areas within the development with native plant species. The landscaping plans propose trees and other plantings along the perimeter of the development, parking lots, mulched walking paths, and undisturbed wetland area, to buffer any potential noise emanating from normal use of the site. A total of 898 new trees are proposed to be planted throughout the site;
- Select trees would be removed only within the proposed limits of site disturbance. Prior to removal of the approximately 744 trees identified for removal in the Applicant's tree survey, a permit from the Town's Building Inspector would be obtained in accordance with Chapter 308 of the Town Code. No unique trees were observed on the Project Site;
- While no Indiana bats or northern long-eared bats were observed on the Project Site during fieldwork, to avoid the potential for any direct impacts to these bats potentially utilizing the site, to the maximum extent practicable, tree clearing activities would be limited to the October 1 to March 31 time period; unless the Applicant receives approval during Site Plan review from NYSDEC and the Planning Board that tree clearing can occur outside this time period;
- Any required blasting during construction would occur more than 0.5 miles from the known Bald Eagle nesting site described in DEIS Chapter 6, "Vegetation and Wildlife."

- A Town-approved SWPPP would be implemented to mitigate erosion potential into the regulated on-site wetland area;
- Minimization of fertilizer, pesticide, herbicide, fungicide and other chemical concentrations through avoidance and containment, respectively; and
- Once final grading and proposed clearing/grading limit lines have been established for the Preferred Alternative, these boundaries would be surveyed and accurately demarcated in the field prior to any tree clearing or site disturbance of any kind. The clearing/grading limit lines would be identified by metes and bounds and documented on the final plans.

2.B.5. WETLANDS

This section addresses the potential impacts of the Preferred Alternative on the Project Site's existing surface water and wetland features. It then identifies proposed mitigation measures to minimize the potential for impacts. As discussed below, the Preferred Alternative would have no direct impacts to the on-site delineated wetland.

2.B.5.a. Potential Impacts of the Preferred Alternative

As described in DEIS Chapter 7, "Wetlands," the Project Site contains 0.25 acres of delineated wetland area that is located at the western corner of the Project Site, abutting the east/west-oriented site boundary to the south of the former Weber Place. The wetland on the Project Site described above is regulated by the U.S. Army Corps of Engineers (USACE) and the Town of North Castle via Chapter 137 of the Town Code. The Preferred Alternative would have no direct impacts to the on-site delineated wetland. As depicted in **Figure 2-10**, the closest components of the Preferred Alternative to the wetland are the clubhouse/pool for the townhouse portion of the Preferred Alternative, a cluster of four attached townhouses, and the two stormwater infiltration basins proposed in the northwestern portion of the Project Site. The new construction will necessitate some limited grading within the Town-regulated 100-foot wetland buffer, which will impact approximately 0.18 acres (7,696 sf) of the 100-foot Town regulated buffer, a slightly smaller disturbance to the buffer when compared to the DEIS Project (0.19 acres). Disturbance within the 100-foot buffer area described above would generally occur in previously disturbed areas. Unlike the DEIS Project, which included a portion of an impervious emergency access drive within the 100-foot wetland buffer, the Preferred Alternative does not propose any new impervious areas within the 100-foot wetland buffer following grading and construction activities. Similar to the DEIS Project, the proposed construction activities have the potential for increased sedimentation during the construction period. Erosion and sediment controls would be put in place to minimize/avoid sedimentation impacts to the wetland.

According to the Applicant, the integrated pest management plan (IPM) currently in place for the Project Site's existing office uses would be expected to remain after construction of the Preferred Alternative. Fertilizer, pesticides, and other lawn care or landscaping products must be handled, stored, and applied in strict conformance with the manufacturer's guidelines. Only

Source: JMC 2023

Project Site Delineated Wetlands and Buffers

reputable professionals, licensed and certified by the NYSDEC for the storage and application of these chemicals, will be used for landscaping services.

Pollutant loading has been analyzed as part of the SWPPP, and the SWPPP pollutant loading analysis model accounts for pollutants sourcing from fertilizer usage on areas such as managed turf/lawn. Regarding the limited pesticide usage anticipated for limited areas of the Project Site, the proposed biofiltration of the on-site stormwater management ponds would serve to mitigate any potential impacts.

According to DEIS Chapter 7, "Wetlands," and the Wetlands Report appended to the DEIS, the northern portion of the Project Site appears to drain to the delineated on-site wetland, where drainage enters a swale in the wetland and discharges west of the Project Site toward the Kensico Reservoir (Weber's Cove). Off-site drainage swales also appear to collect overland runoff from precipitation that falls on the Project Site, which also drains to Weber's Cove. No alteration to this existing drainage pattern is proposed under the Preferred Alternative. Drainage introduced by new impervious surfaces on the Project Site will be handled through permanent on-site stormwater retention ponds in accordance with the SWPPP. The wetland area is not anticipated to be impacted by the construction of these retention ponds or their function throughout the life of the project. The Preferred Alternative's development in any regulated on-site wetland buffer areas will require approval from the Planning Board of the Town of North Castle.

2.B.5.b. Mitigation Measures for the Preferred Alternative

Similar to the DEIS Project, the following mitigation measures are proposed to minimize the potential for impacts to the wetland buffer area from the Preferred Alternative:

- The Preferred Alternative's impact on the on-site wetland buffer area identified above will require a permit from the Planning Board of the Town of North Castle. Mitigation measures may be required following the Town Engineer's review. Such measures could include, but are not limited to, remediating activities that limit environmental damage, wetlands construction, mitigation plantings, wetland maintenance, establishment of no-mow zones, removal of invasive species, and wetland buffer enhancement;
- Implementation of a Town-approved SWPPP will mitigate erosion potential into the regulated area;
- The addition of native plantings between developed areas and the wetland, will increase the functional capacity of the buffer and better protect the wetland over current conditions;
- Aside from limited grading in connection with the installation of a proposed stormwater infiltration basin, the Preferred Alternative does not include development within the Site's irrevocable conservation easement adjacent to the DEP property; and
- The Applicant would prohibit the use of any chemicals (fertilizers, pesticides, herbicides, fungicides, etc.) within the Project Site's identified wetland/watercourse proper and within 100 feet of this

wetland/watercourse. In addition, no chemicals would be applied within 100 feet of any existing or proposed stormwater management pond or basin which permanently or periodically retains/detains stormwater.

2.B.6. STORMWATER MANAGEMENT

This section addresses the potential impacts of the Preferred Alternative on stormwater and identifies proposed mitigation measures to minimize the potential for impacts.

2.B.6.a. Potential Impacts of the Preferred Alternative

2.B.6.a.(i) Impervious Area

The Preferred Alternative would construct several new improvements, including new townhouses, and associated site infrastructure, including roads, surface parking areas, a parking structure, and clubhouse/pool area. The Applicant has developed a SWPPP for the Preferred Alternative (the "2023 SWPPP" – see **Appendix D**). To calculate the amount of new impervious land coverage that would result, it is important to briefly outline the Project Site's previous project and stormwater approvals history. As described in DEIS Chapter 2, "Project Description" and DEIS Chapter 8, "Stormwater," the Project Site has received two separate but related SWPPP and site plan approvals from the Town since 2005, both of which remain in full effect. The first approval was granted for the Project Site's currently approved development plan (MBIA office expansion). Subsequent site plan and SWPPP approvals 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.

As shown in **Table 2-8**, the currently approved site plans and SWPPPs allow for 10.51 acres of impervious surface on the Project Site. The Preferred Alternative would result in 13.42 acres of impervious surface on the Project Site. As such, the Preferred Alternative would only result in a nominal increase in impervious surface when compared to the currently approved site plans.

Table 2-8
Gross Land Coverage Comparison

Project Site Condition	Total Gross Impervious Land Coverage (acres)
Currently Approved Development Plan (MBIA Expansion)	9.93*
Currently Approved Southern Surface Parking Lot Expansion	0.58*
Total Currently Approved Impervious Areas	**10.51**
Preferred Alternative	**13.42**

Notes:
Total Project Site area = 38.8 acres.
Total gross land coverage includes buildings (including parking structures), roads, parking lots, sidewalks, and patios.
* Separate SWPPP and site plan approvals are currently in place with the Town of North Castle for the MBIA expansion and parking lot expansion.
Source: JMC Engineering

2.B.6.a.(ii) Stormwater Permits Required

The 2023 SWPPP has been designed to ensure that the quantity and quality of stormwater runoff during and after development are not substantially altered from pre-development conditions. As a result of its implementation, and as discussed more thoroughly below, it is expected that there will be no significant adverse impact on downstream properties and watercourses, including the adjacent New York City watershed lands, the Kensico Reservoir, and its floodplain and related wetlands.

The following permits/approvals related to stormwater management would be required in connection with the Preferred Alternative:

- State Pollution Discharge Elimination System (SPDES) General Permit from NYSDEC;
- Water Withdrawal Permit from NYSDEC; and
- SWPPP approval from NYCDEP and the Town of North Castle.

2.B.6.a.(iii) Runoff Rates and Volumes

The 2023 SWPPP for the project is designed to control the rate of runoff from the project area and thus eliminate any adverse downstream impacts. Stormwater management practices will reduce the peak rates of runoff from the developed Site to a rate of flow as not to exceed that which presently runs off the project area in its present condition. Eight stormwater management practices are proposed: two infiltration basins, one subsurface infiltration system, three bioretention areas and two detention areas. The existing wet pond will continue to be utilized for stormwater management. Existing peak rates of runoff to the four design points/lines for each storm are shown in **Table 2-9**. Proposed peak rates of runoff are shown in **Table 2-10**. The percent reductions in peak rates of runoff from proposed to existing conditions are shown in **Table 2-11**.

Table 2-9
Summary of Existing Peak Rates of Runoff

Storm Recurrence Interval	DP-1	DL-2	DL-3	DP-4
1 year	5.82	9.92	0.67	0.11
2 year	8.69	15.86	1.42	0.29
5 year	13.51	26.36	2.92	0.65
10 year	18.18	36.58	4.48	1.05
25 year	26.42	55.08	7.44	1.82
50 year	33.70	71.85	10.22	2.55
100 year	45.05	93.30	13.87	3.51

Note: All flows are in cubic feet per second
Source: JMC Engineering

Table 2-10
Summary of Proposed Peak Rates of Runoff

Storm Recurrence Interval	DP-1	DL-2	DL-3	DP-4
1 year	4.61	2.08	0.30	0.07
2 year	6.85	3.42	0.70	0.21
5 year	10.61	5.98	1.54	0.46
10 year	14.79	8.49	2.45	0.74
25 year	22.17	13.53	4.20	1.28
50 year	28.49	29.26	5.86	1.79
100 year	38.65	49.23	8.06	2.47

Note: All flows are in cubic feet per second
Source: JMC Engineering

Table 2-11
Percent Reduction in Peak Rates of Runoff

Storm Recurrence Interval	DP-1	DL-2	DL-3	DP-4
1 year	20.8%	79.0%	55.2%	36.4%
2 year	21.2%	78.4%	50.7%	27.6%
5 year	21.5%	77.3%	47.3%	29.2%
10 year	18.6%	76.8%	45.3%	29.5%
25 year	16.1%	75.4%	43.5%	29.7%
50 year	15.5%	59.3%	42.7%	29.8%
100 year	14.2%	47.2%	41.9%	29.6%

Source: JMC Engineering

Existing peak volumes of runoff to the four design points/lines for each storm are shown in **Table 2-12**. Proposed peak volumes of runoff to the four design points/lines for each storm are shown in **Table 2-13**. The percent reductions in peak runoff volumes from proposed to existing conditions are shown in **Table 2-14**.

Table 2-12
Summary of Existing Peak Runoff Volumes

Storm Recurrence Interval	DP-1	DL-2	DL-3	DP-4
1 year	68,146	45,735	4,515	785
2 year	102,295	69,455	7,757	1,435
5 year	161,991	111,065	13,852	2,697
10 year	222,515	151,834	20,130	4,026
25 year	339,710	226,854	32,167	6,623
50 year	450,922	296,058	43,632	9,132
100 year	604,131	386,088	58,885	12,504

Note: All volumes are in cubic feet
Source: JMC Engineering

Table 2-13
Summary of Proposed Peak Runoff Volumes

Storm Recurrence Interval	DP-1	DL-2	DL-3	DP-4
1 year	31,312	12,869	2,328	553
2 year	58,837	28,686	4,162	1,010
5 year	100,778	65,784	7,684	1,898
10 year	162,054	94,671	11,366	2,833
25 year	289,152	163,408	18,512	4,661
50 year	407,414	229,135	25,383	6,426
100 year	569,767	314,549	34,587	8,799

Note: All volumes are in cubic feet
Source: JMC Engineering

Table 2-14
Percent Reductions in Peak Runoff Volumes

Storm Recurrence Interval	DP-1	DL-2	DL-3	DP-4
1 year	54.1%	71.9%	48.4%	29.6%
2 year	42.5%	58.7%	46.3%	29.6%
5 year	37.8%	40.8%	44.5%	29.6%
10 year	27.2%	37.6%	43.5%	29.6%
25 year	14.9%	28.0%	42.5%	29.6%
50 year	9.6%	22.6%	41.8%	29.6%
100 year	5.7%	18.5%	41.3%	29.6%

Source: JMC Engineering

2.B.6.a.(iv) Pollutant Loading Analysis

A stormwater pollutant loading analysis was performed for each drainage area under existing and proposed conditions. The pollutants analyzed were total phosphorus (TP) and fecal coliform (FC). Pollutant loading rates and removal efficiencies from the East of Hudson Watershed Corporation publication "Stormwater Retrofit Project Design Manual Project Years 6-10" were utilized to calculate the estimated loads of P in kilograms (kg) per year. Pollutant loading rates from Table 2.6 of the publication "Fundamentals of Urban Runoff Management" dated August 1994 were utilized to calculate the estimated number of FC per year. Removal efficiencies from Figure 15 of "Reducing the Impacts of Stormwater Runoff from New Development" were utilized in the FC pollutant loading calculations. The estimated annual load from each of the existing drainage areas is shown in **Table 2-15**. The estimated annual load from each of the proposed drainage areas is shown in **Table 2-16**. The estimated percent change in annual stormwater pollutant loading is shown in **Table 2-17**.

Table 2-15
Stormwater Pollutant Summary - Existing Conditions

Drainage Area Existing Conditions	Pollutant	
	TP (kg/yr.)	FC (no./yr.)
DP-1	10.82	2.2 E+11
DL-2	2.26	6.0 E+11
DL-3	0.35	7.4 E+10
DP-4	0.11	2.8 E+10
Source: JMC Engineering		

Table 2-16
Stormwater Pollutant Summary - Proposed Conditions

Drainage Area Proposed Conditions	Pollutant	
	TP (kg/yr.)	FC (no./yr.)
DP-1	9.41	2.3 E+11
DL-2	7.01	2.5 E+11
DL-3	0.23	4.2 E+10
DP-4	0.11	2.8 E+10
Source: JMC Engineering		

Table 2-17
Percent Change in Annual Stormwater Pollutant Loading

	Pollutant	
	TP	FC
DP-1	-13.0%	+4.5%
DL-2	+210.2%	-58.3%
DL-3	-34.3%	-43.2%
DP-4	0%	0%
Source: JMC Engineering		

2.B.6.a.(v) Potential Construction Period Stormwater Impacts

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 mitigation 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 November 2016, and Chapter 267, "Stormwater Management," of the Town Code. The permit requires that projects disturbing more than 1 acre of land develop a 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.

2.B.6.b. Mitigation Measures for the Preferred Alternative

As presented in detail in the 2023 SWPPP, the Preferred Alternative utilizes a variety of practices to enhance stormwater quality and reduce peak rates of runoff associated with the Preferred Alternative. With the implementation of the 2023 SWPPP and proposed stormwater management facilities described above, runoff rates would be reduced in all the analyzed storms from the existing condition.

The integrated pest management plan currently in place for the Project Site's existing office uses would be expected to remain with the Preferred Alternative. Through the SWPPP, any increases in pollutant concentrations resulting from the use of fertilizers, pesticides, herbicides, fungicides, and other chemicals are not considered significant and would be appropriately handled on-site. Furthermore, the Applicant would prohibit the use of any chemicals (fertilizers, pesticides, herbicides, fungicides, etc.) within the Project Site's identified wetland watercourse proper and within 100 feet of this wetland/watercourse. In addition, no chemicals would be applied within 100 feet of any existing or proposed stormwater management pond or basin which permanently or periodically retains/detains stormwater.

To the extent feasible and practicable, enhanced treatment and green infrastructure practices would be employed at the Project Site in conjunction with the SWPPP.

The Applicant agrees to pay the customary Engineering Inspection Fee to cover the cost of the Town's Consulting Engineer's inspections. It should be noted that since the Preferred Alternative is within the New York City East of Hudson Watershed, NYCDEP approval of the SWPPP will be required, and as such, erosion and sediment control inspections will be required twice per week. This will further ensure that potential erosion and sediment control issues are identified and addressed in a timely manner.

A construction bond will be posted by the Applicant to cover the cost of all stormwater infrastructure improvements including but not limited to drainage structures, water quality structures, piping, and stormwater management areas. The Applicant will be party to a maintenance agreement which will cover post construction stormwater management practices in perpetuity.

Implementation of the above measures would provide water quantity and quality enhancements that exceed the regulatory requirements, and therefore stormwater runoff from the Preferred Alternative is not anticipated to have a significant adverse impact to the Project Site or downstream areas.

2.B.7. UTILITIES

This section addresses the potential impacts of the Preferred Alternative on water supply and sanitary wastewater. It also identifies proposed mitigation measures to further minimize the potential for impacts.

2.B.7.a. Potential Impacts on Water Supply

The Preferred Alternative is anticipated to generate approximately 53,810 gallons per day (gpd) of water demand (including potable water and sanitary wastewater) (see **Table 2-18**), approximately 27,710 gpd more than what

would be generated by the full occupancy of the Project Site's existing office buildings (26,100 gpd), and approximately 4,790 gpd less than the 58,600 gpd that was calculated for the DEIS Project. In addition, the water demand of the Preferred Alternative would be approximately 17,090 gpd less than the Currently Approved Plan's water demand of 70,900 gpd. Water for on-Site irrigation would continue to be sourced from the existing on-site pond and, if permitted by the County, from one or more of the existing on-site wells. It is conservatively estimated that 65,000 gpd would be used to irrigate the existing and proposed lawn and landscaped areas.

Table 2-18
Total Daily Water Usage

Use	Patrons	Units	Bedrooms	Usage Rate (gpd/unit)	Usage (gpd)
Office Conversion to Multifamily	n/a	50	2	220	11,000
Townhouses	n/a	125	3	330	41,250
Pool	156	n/a	n/a	10	1,560
					53,810

Notes: GPD = gallons per day; Projected flow rates are based upon expected hydraulic loading rates, assuming 100 percent occupancy, provided in "New York State Design Standards for Intermediate Sized Wastewater Treatment Systems," 2014.
Sources: JMC Engineering

The Applicant will petition the Town of North Castle to include the Project Site within the North Castle Water District #8. As a component of the Preferred Alternative, the municipal water system would be extended from its currently proposed northern terminus of New King Street to the Project Site, adequately sized to supply the Project Site as well as further extension to the Town. On the Project Site, the Applicant would construct a 157,000-gallon storage water storage tank, to provide both domestic and fire water, as required by the Fire Code. The tank would be placed behind the proposed parking structure near the converted apartment building on the Site. In addition, the Applicant would construct a water booster pump station adjacent to the water storage tank in order to provide adequate water pressure and flow to the Project. As such, the Project Site would be served with municipal water that has the capacity to meet the anticipated demand of the Preferred Alternative. If municipal water was unavailable, the Applicant would utilize the existing on-site groundwater supply as part of creating a community water system to meet the domestic demand of the Site.

The water distribution system for the Preferred Alternative would require approval from the Westchester County Department of Health. The Applicant would seek this approval during the site plan and building permit stages of approvals. On-Site soil disturbance would be required to install the distribution lines.

The existing on-site pond and one or more of the existing on-Site wells may still be utilized for irrigation purposes, to the extent feasible and permitted by the County. The preliminary utility plan for the Preferred Alternative is provided in **Figure 2-11**.

No significant adverse impacts related to water supply are anticipated as a result of the Preferred Alternative. As shown above, the demand for water (in

Source: JMC 2023

Preferred Alternative - Preliminary Utilities Plan

Source: JMC 2023

Preferred Alternative - Preliminary Utilities Plan

gpd) is estimated to be less than the demand calculated for the DEIS Project. Adequate water capacity for fire protection would be provided based on the final site plan and final building designs. These features will likely include water storage and potentially booster pumps and would be subject to the review and approval of the Town as part of a final site plan approval.

2.B.7.b. Potential Impacts on Sanitary Sewer

Sanitary sewage would connect to the existing 8-inch public sewer main on the Project Site, which drains to the southwest. The design of the water and sewer systems would be subject to the review and approval of the Town of North Castle Engineering Department and WCDH, and the New York City Department of Environmental Protection (NYCDEP) for the proposed sanitary system improvements.

The Preferred Alternative would connect into the existing sanitary sewer mains located within King Street, as does the existing site development. No easements or agreements with adjacent properties would be needed to connect into the system. Some soil disturbance would be required to install the Preferred Alternative's sanitary sewer lines. No impacts are anticipated related to the construction of the proposed sanitary sewer infrastructure within the Project Site, including connections to the existing sanitary sewer mains. No significant adverse impacts related to sanitary sewers are anticipated as a result of the Preferred Alternative. As shown above, the Preferred Alternative's wastewater generation (in gpd) is estimated to be less than what was calculated for the DEIS Project.

2.B.7.c. Mitigation Measures for the Preferred Alternative

The Preferred Alternative will connect to the North Castle Water District. As such, the Project Site would be served with municipal water that has the capacity to meet the anticipated demand of the Preferred Alternative. If municipal water was unavailable, the Applicant would utilize the existing on-site groundwater supply as part of creating a community water system to meet the domestic demand of the Site

As described in the DEIS, no modifications to either the Town or County collection system piping will be required to serve the anticipated demand of the Preferred Alternative, which has a lower demand than the DEIS Project. However, as described in the DEIS, the public sewer system's existing Pump Stations 2 and 3 require minor modifications to correct an existing condition (irrespective of the re-development of the Project Site).

2.B.8. TRAFFIC AND TRANSPORTATION

This section summarizes the potential traffic and transportation impacts of the Preferred Alternative and its potential effects on vehicular safety and circulation conditions of the Study Area. It then identifies proposed mitigation measures to minimize the potential for impacts.

2.B.8.a. Potential Impacts of Preferred Alternative

2.B.8.a.(i) Trip Generation and Updated Traffic Study

The Preferred Alternative would generate significantly less traffic when compared to the DEIS Project as well as a scenario of the Project Site's existing office buildings being re-occupied with office uses.

As shown in **Table 2-20** below, the Preferred Alternative would generate a total of 82 trips (20 entering trips and 62 exiting trips) during the Weekday Peak AM Hour, a total of 46 trips (23 entering trips and 23 exiting trips) during the Weekday Peak Midday Hour, and a total of 99 trips (62 entering trips and 37 existing trips) during the Weekday Peak PM Hour. In order to be conservative, it should be noted that no credit (reduction in peak hour trips) has been taken to account for the age-restricted multifamily housing proposed. Trip generation estimates (provided below) were based on the Institute of Transportation Engineers (ITE) land use code 220 (multifamily housing).

As shown in **Tables 2-19 and 2-20**, the Preferred Alternative would generate significantly less traffic than both the DEIS No-Build Condition (with the re-occupancy of the two existing office buildings) and the DEIS Build Condition for the DEIS Project.

When compared to the re-occupancy of the two existing office buildings, the Preferred Alternative would result in 221 fewer total trips during the Weekday Peak AM Hour, 106 fewer total trips during the Weekday Peak Midday Hour, and 201 fewer total trips during the Weekday Peak PM Hour.

When compared to the DEIS Project, the Preferred Alternative would result in 171 fewer total trips during the Weekday Peak AM Hour, 90 fewer total trips during the Weekday Peak Midday Hour, and 186 fewer total trips during the Weekday Peak PM Hour.

Table 2-19
Site Generated Traffic Volume Comparison – DEIS Project

	Re-Occupancy of On-Site Office Buildings for Office Use			DEIS Project		
Peak Hour	**Entry Volume**	**Exit Volume**	**Total Volume**	**Entry Volume**	**Exit Volume**	**Total Volume**
Weekday Peak AM	261	42	**303**	153	100	**253**
Weekday Peak Midday	76	76	**152**	68	68	**136**
Weekday Peak PM	47	253	**300**	117	168	**285**
Source: Colliers Engineering & Design (previously Maser Consulting)						

Table 2-20
Site Generated Traffic Volume Comparison – Preferred Alternative

Peak Hour	Re-Occupancy of On-Site Office Buildings for Office Use			Preferred Alternative		
	Entry Volume	Exit Volume	Total Volume	Entry Volume	Exit Volume	Total Volume
Weekday Peak AM	261	42	**303**	20	62	**82**
Weekday Peak Midday	76	76	**152**	23	23	**46**
Weekday Peak PM	47	253	**300**	62	37	**99**
Source: Colliers Engineering & Design (previously Maser Consulting)						

Appendix F contains an updated traffic evaluation for the Preferred Alternative completed by Colliers Engineering & Design (the Applicant's traffic engineer) which provides trip generation, arrival/departure distributions for the proposed apartments and townhouses, and the resulting traffic volumes and levels of service analyses for several study area intersections.

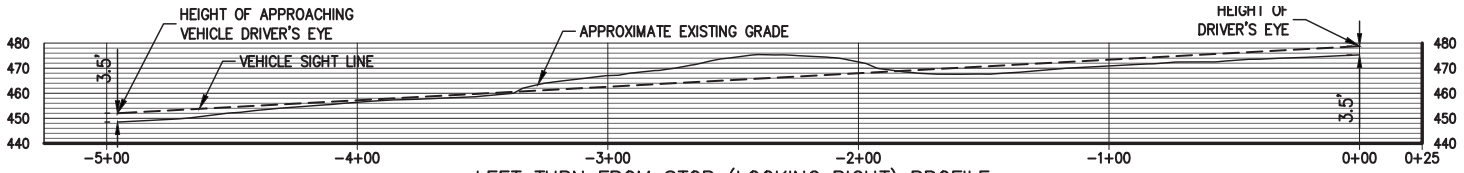
Based on the results of the updated Synchro analysis, improved Levels of Service and fewer delays will be experienced from what was previously analyzed for the DEIS Project

2.B.8.a.(ii) Sight Distance Analysis – Cooney Hill Road / NYS Route 120 (King Street)

An updated travel speed study of vehicles traveling along NYS Route 120 (King Street) in both directions was conducted by Colliers Engineering & Design using an Automatic Traffic Recorder (ATR) from Tuesday August 23, 2022 to Friday August 26, 2022. An ATR was placed approximately 350 feet north of Cooney Hill Road and a second ATR was placed approximately 350 feet south of Cooney Hill Road at mile marker 120 8701 2079. At both locations the 85th percentile speed observed was 46 mph, 44 mph, and 45 mph for the southbound direction, northbound direction, and combined directions, respectively. The posted speed limit along NYS Route 120 is 45 mph. Based on the travel speed survey, as well as the posted speed limit along the roadway the design speed of 45 mph was selected for the sight distance analysis.

Using the selected design speed described above, the desired stopping sight distances were calculated based on methodologies from the latest edition of American Association of State Highway and Transportation Official's (AASHTO) "A Policy on Geometric Design of Highways and Streets." The stopping sight distance calculations account for the existing roadway grades along NYS Route 120.

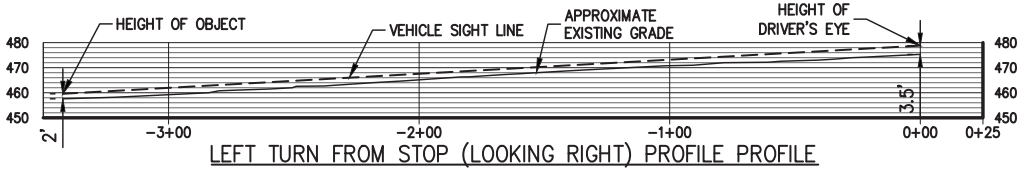
At the Cooney Hill Road approach onto NYS Route 120, the required stopping sight distance for vehicles turning left (looking right) is 340 feet while the desirable intersection sight distance is 500 feet. **Figure 2-12a** depicts the required stopping sight distance, desirable intersection sight distance, and approximate available sight distance based on field measurements, as well as the driver's sight lines for the studied sight distance locations. The available sight distance (looking right) is restricted to 400 feet



LEFT TURN FROM STOP (LOOKING RIGHT) PROFILE

SCALE 1"=50' HORIZ. & 1"=50' VERT.

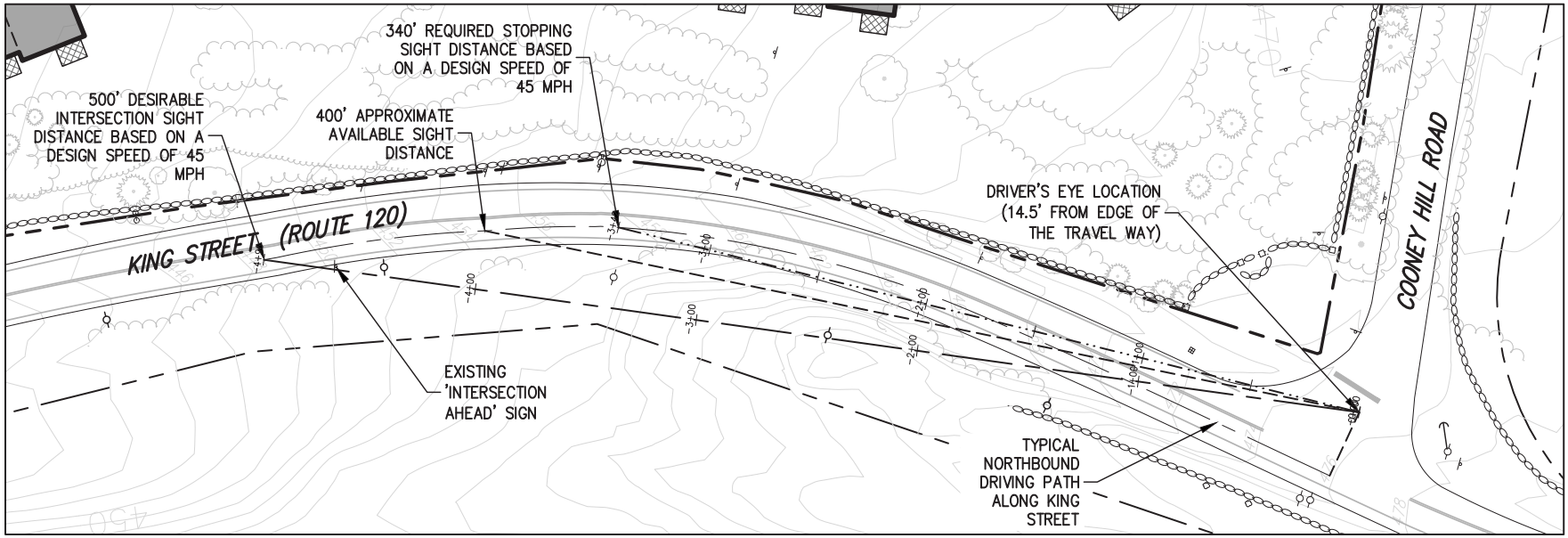
500' DESIRABLE INTERSECTION SIGHT DISTANCE BASED ON A DESIGN SPEED OF 45 MPH



LEFT TURN FROM STOP (LOOKING RIGHT) PROFILE PROFILE

SCALE 1"=50' HORIZ. & 1"=50' VERT.

340' REQUIRED STOPPING SIGHT DISTANCE BASED ON A DESIGN SPEED OF 45 MPH



Source: JMC 2022

Sight Distance Analysis - Cooney Hill Road / King Street

by an existing rock slope on the east side of NYS Route 120. Profile views have been provided along the sight lines for the intersection and stopping sight distances.

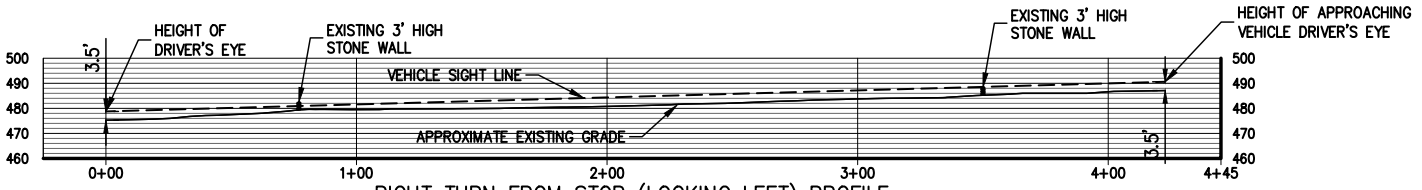
At the Cooney Hill Road approach onto NYS Route 120, the required stopping sight distance for vehicles turning right (looking left) is 380 feet while the desirable intersection sight distance is 430 feet. An advisory speed of 35 mph is posted below a 'curve ahead' sign for the southbound traveling vehicles approximately 650 feet north of Cooney Hill Road. Based on the advisory speed of 35 mph the required stopping sight distance for vehicles turning right (looking left) is 260 feet. The available sight distance (looking left) is restricted to 255 feet by an existing 3-foot-high stone decorative wall along the west side of NYS Route 120. A profile view has been provided along the sight line for the intersection sight distance. **Figure 2-12b** depicts the above noted sight distances.

An additional sight distance analysis has been prepared for the vehicles turning right (looking left) from the Cooney Hill Road approach onto NYS Route 120 with a modified driver's eye location to 10 feet from the edge of the major-road traveled way. Per AASHTO guidelines, the driver's eye location is approximately 14.5 feet from the edge of the major-road traveled way. This distance is a cumulative distance of drivers stopping with the front of their vehicle 6.5 feet from the edge of the major-road traveled way and the measurement of U.S. passenger cars are nearly always 8 feet from the front of the vehicle to the driver's eye. The additional analysis to 10 feet anticipates vehicles moving closer to the edge of the major-road traveled way prior to completing their turning maneuver after coming to a stop behind the existing stop line. The 10 feet distance includes the 8 feet from the front of the vehicle to the driver's eye location as well as 2 feet from the front of the vehicle to edge of the major-road traveled way. Based on the reduced distance the approximate available sight distance is 270 feet. A profile view has been provided along the sight line for the stopping sight distance at the 35 mph advisory speed (see **Figure 2-12c**).

The anticipated additional project related traffic exiting the Cooney Hill Road making the left turn from Cooney Hill Road to NYS Route 120 is conservatively anticipated to be 7 vehicles during the Peak AM Hour, 5 vehicles during the Midday Peak Hour, 4 vehicles during the Peak PM Hour with the right turn exiting movement anticipated to be 4 vehicles during the Peak AM Hour, 1 vehicle during the Midday Peak Hour, 3 vehicles during the Peak PM Hour. The resulting Levels of Service of the Cooney Hill Road exiting approach is projected to operate at an LOS "D" during the AM Peak Hour, LOS "B" during the Midday Peak Hour, LOS "D" during the PM Peak Hour.

2.B.8.b. Mitigation Measures for the Preferred Alternative

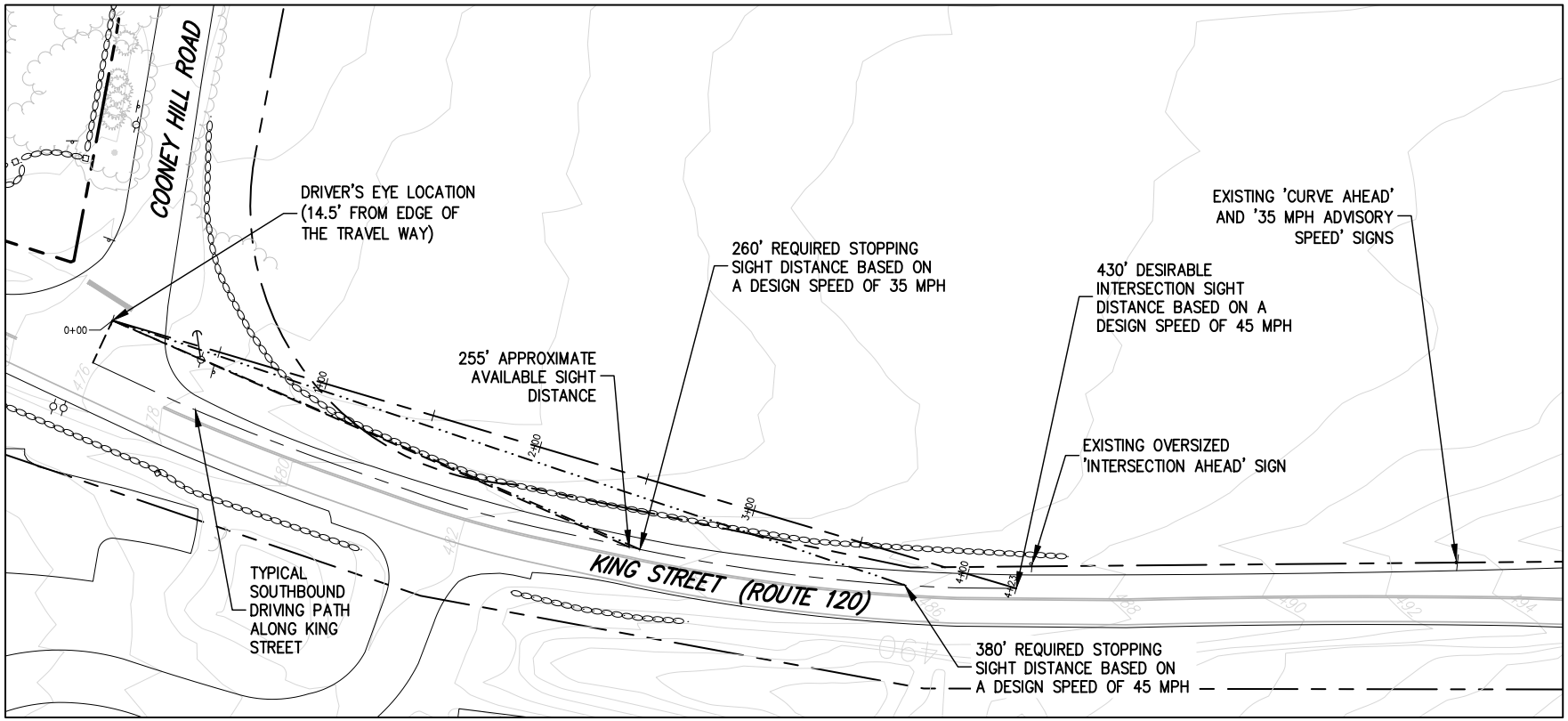
The Preferred Alternative, when compared to the DEIS Project, the scenario of the Project Site's existing office buildings being reoccupied for office uses, and the Currently Approved Development Plan, would not have a significant adverse impact on the area roadways. Therefore, no additional mitigation measures are required.



RIGHT TURN FROM STOP (LOOKING LEFT) PROFILE

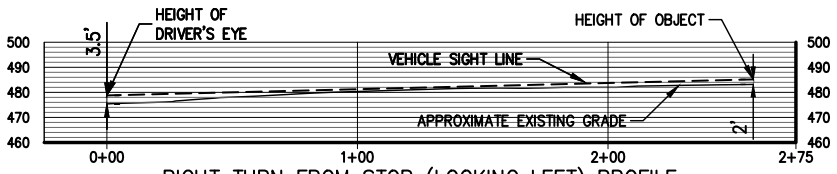
SCALE 1"=50' HORIZ. & 1"=50' VERT.

430' DESIRABLE INTERSECTION SIGHT DISTANCE BASED ON A DESIGN SPEED OF 45 MPH



Source: JMC 2022

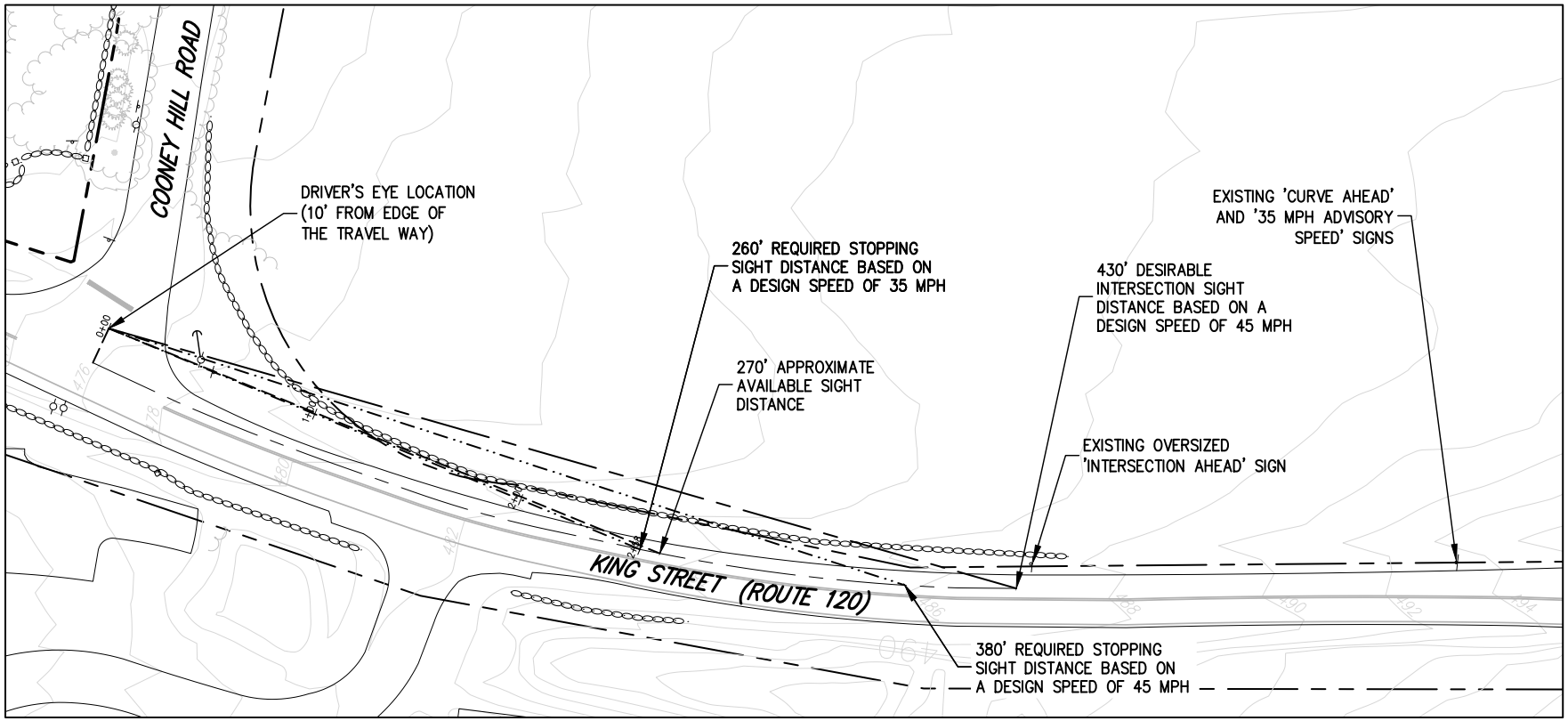
Sight Distance Analysis - Cooney Hill Road / King Street



RIGHT TURN FROM STOP (LOOKING LEFT) PROFILE

SCALE 1"=50' HORIZ. & 1"=50' VERT.

260' REQUIRED STOPPING SIGHT DISTANCE BASED ON A DESIGN SPEED OF 35 MPH



Source: JMC 2022

Sight Distance Analysis - Cooney Hill Road / King Street

2.B.9. VISUAL RESOURCES AND COMMUNITY CHARACTER

This section addresses the potential impacts of the Preferred Alternative on the character of the community surrounding the Project Site and the potential for the Preferred Alternative to create a significant adverse visual impact. It then identifies measures included as part of the Preferred Alternative to minimize the potential for impacts. Based on the following analysis, the Preferred Alternative would not result in significant adverse impacts to visual resources.

2.B.9.a. Potential Visibility Impacts of the Preferred Alternative

Conceptual renderings of the proposed townhouses are included in **Figure 2-13**.

The Preferred Alternative would not result in an adverse impact to visual resources or community character. Furthermore, the scale of the new structures proposed to be built under the Preferred Alternative would be notably less than those proposed with the DEIS Project. For example, rather than proposing a new five-story multifamily building near the center of the site at a height of approximately 78 feet above average grade, an existing office building would be repurposed for multifamily use instead. In addition, the townhouses proposed as part of the DEIS Project were analyzed at a height of 32 feet above average grade. The average height of the townhouses (above average grade) has been reduced to meet the 30-foot height requirement of the R-MF-A zoning (estimated to be 29.0 feet above average grade).

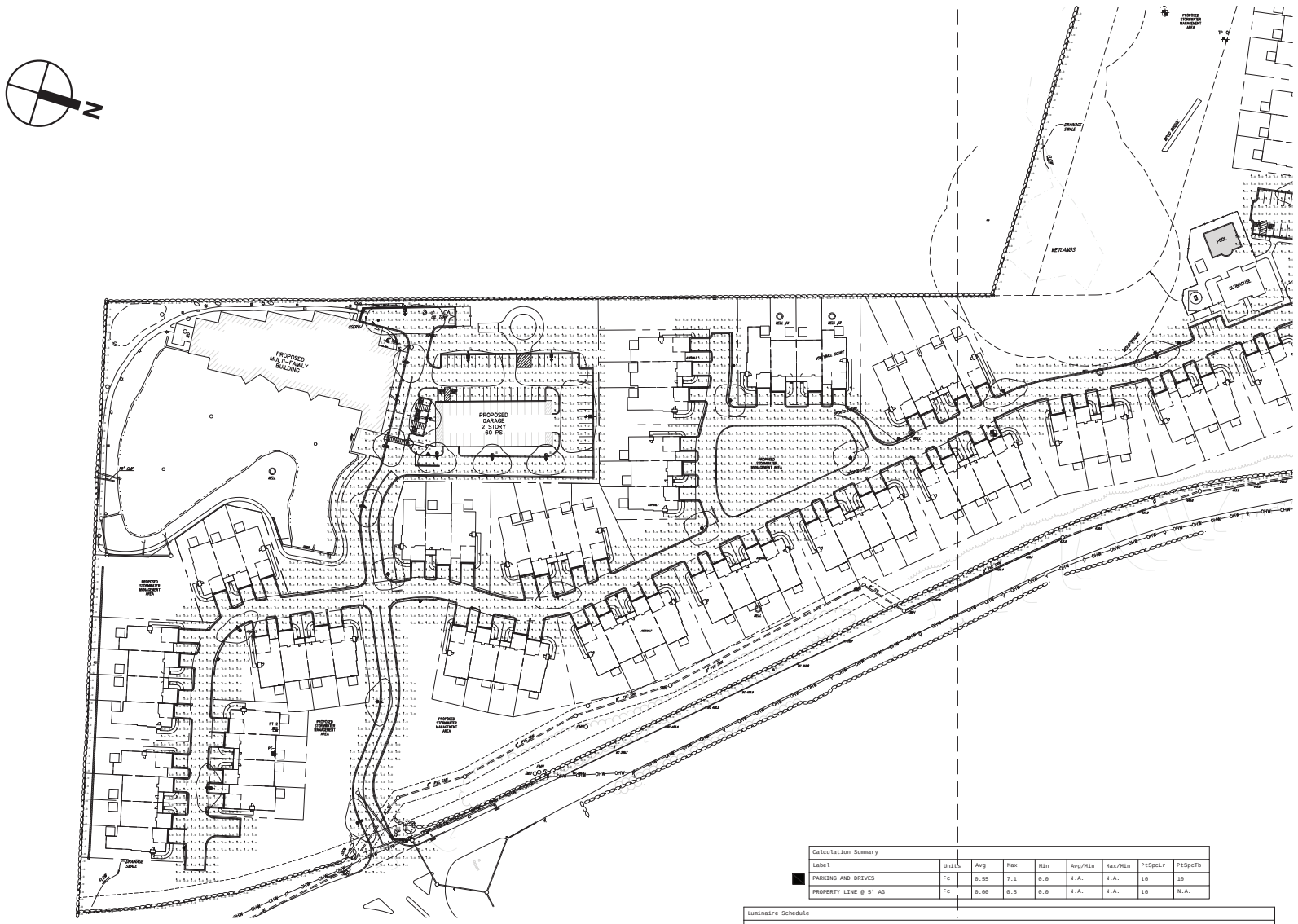
The Preferred Alternative, inclusive of the building designs (e.g., articulation, façade materials, height, roof line), siting locations, and the grading/landscaping proposed would not significantly impact the visual character of the Project Site. The Preferred Alternative would result in less visual impact than both the DEIS Project, as noted above, and the Currently Approved Development Plan, which included a five-story, 1,000-space parking garage in excess of 300,000 sf. The appearance of the new townhouses proposed would be consistent with other recent townhouse developments in North Castle and would be constructed within height limits established by zoning. The Preferred Alternative would also return the Site to active use, which is consistent with the goals of the Town's Comprehensive Plan, while re-purposing an existing office building (and associated pond/water feature) that are already sited at a considerable distance from King Street.

2.B.9.b. Potential Impacts from Proposed Lighting Plan

The Project Site currently has exterior lighting on its driveways, walkways, and parking areas. Similar to the existing condition and the DEIS Project, the Preferred Alternative would incorporate Site lighting along proposed driveways, parking areas, and certain mulched 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 Preferred Alternative will be finalized at the site plan stage and the lighting plan provided in **Figure 2-14** includes preliminary information on the approximate quantity, wattage, and height of fixtures to be considered for each lighting zone on the Project Site.

Source: Toll Brothers 2022

Conceptual Architectural Designs - Townhouses



Calculation Summary								
Label	Units	Avg	Max	Min	Avg/Min	Max/Min	PtSpcLr	PtSpcTb
PARKING AND DRIVES	Fc	0.55	7.1	0.0	N.A.	N.A.	10	10
PROPERTY LINE @ 5' AG	Fc	0.00	0.5	0.0	N.A.	N.A.	10	N.A.

Luminaire Schedule						
WLS17145 AIRPORT CAMPUS NORTH CASTLE, NY PM: HOLLY PLEASE EMAIL US FOR PRICING AT HOLLY@WLSLIGHTING.COM						
Symbol	Qty	Label	Lum. Lumens	LLF	Description	Lum. Watts
	8	A	5084	0.950	WLS-LXL-PT-SW-LED-05L-40-SLW 12' POLE	39.2
	7	B	5054	0.950	WLS-LXL-PT-FT-LED-05L-40-SLW 12' POLE	39.2
	14	C	5046	0.980	WLS-LXL-PT-2-LED-05L-40-SLW 12' POLE	39.2
	3	D	12044	0.980	WLS-CLXM-LED-18L-SIL-FT-40-70CRI-IL-SLW 20' MOUNTING HEIGHT	148.5
	1	E	13765	0.950	WLS-CLXM-LED-18L-SIL-3-40-70CRI-IL-SLW 20' MOUNTING HEIGHT	148.5

Source: WLS Lighting 2023

Preferred Alternative - Lighting Plans

Source: WLS Lighting 2023

Preferred Alternative - Lighting Plans

In addition to the Project Site's existing lighting program supporting the existing office building to remain, the lighting plan for the Preferred Alternative consists of two additional lighting zones, one in the area of the proposed parking garage and associated surface parking for the multifamily senior housing building, and another for the townhouses. In these new lighting zones, the average lighting level at the ground surface would be approximately 0.55-foot candles (fc).

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.

2.B.9.c. Mitigation Measures for the Preferred Alternative

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

- The multifamily building is repurposing an existing building that is significantly shorter than the multifamily building proposed as part of the DEIS Project;
- The multifamily building and townhouses 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 townhouses 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;
- The minimum front yard setback of 64 feet for the townhouses, when considered together with the existing and enhanced berm and landscaping along King Street (to be preserved/enhanced), serves to mitigate potential visual impacts along the traveled way; and
- Demolition and removal of approximately 262,400 sf of existing buildings (i.e., the northern office building and the 316-space parking garage).

While the amount of building area on the Project Site would increase with the Preferred Alternative, that increase is significantly mitigated through the removal of existing on-site buildings. In addition, 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. The proposed enhancement of the existing perimeter screening along King Street and Cooney Hill Road is an important visual and community benefit of the Preferred Alternative.

In the Applicant's opinion, the character of the surrounding community would not be adversely affected by other potential impacts of the Preferred Alternative. The Preferred Alternative 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, no significant adverse impacts related to visual resources or community character are anticipated, and no additional mitigation measures are required.

2.B.10. COMMUNITY FACILITIES AND SERVICES

This section addresses the potential impacts of the Preferred Alternative on community facilities and services, including public schools, police protection services, fire protection services, and emergency medical services (EMS). As discussed below, it is the Applicant's opinion that the Preferred Alternative would not have a significant adverse impact on the provision of community services or on community facilities, as the Preferred Alternative's intensity of use is less than that proposed under the DEIS Project (which included a multifamily building, hotel, townhomes and offices).

2.B.10.a. Potential Impacts on Public Schools

The Preferred Alternative's residential uses would consist of an approximately 50-unit multifamily building, which would be age-restricted (55+), and approximately 125 townhouses. As such, the Preferred Alternative would include public school-age children ("PSAC").[7] The Preferred Alternative will also yield new property tax revenues, a large portion of which the Byram Hills Central School District ("BHCSD" or "District") would receive. As demonstrated below, the additional cost associated with PSAC from the Preferred Alternative would be more than offset by the additional property tax revenues generated for the school district (see Section 2.B.11). As discussed below, this conclusion is supported by the school district, which noted in correspondence to the Town Board that, "the estimated taxes of approximately two million dollars annually toward school taxes should cover variable costs" (see **Appendix I**). It is also noted that enrollment in the school district declined from a peak of 2,818 students in the 2007–2008 school year to 2,333 students in the 2022–2023 school year, indicating sufficient physical capacity within the District to serve the Preferred Alternative.

2.B.10.a.(i) Estimated Number of Public School-Age Children

To estimate the number of PSAC that could be anticipated to live in the Preferred Alternative, this FEIS utilizes a "multiplier" approach. As defined in the DEIS, a multiplier approach estimates the number of PSAC per housing unit based on US Census data and is specific to housing type, size, and value. The most recently updated, and widely utilized, multiplier study was prepared by Rutgers University's Center for Urban Policy

[7] Age-restricted housing is permitted by the US Fair Housing Act, which allows a project to lawfully refuse to rent or sell dwellings to families with minor children. Research on age-restricted residential communities in the region indicates that these communities do not contribute children to the local school district.

Research (CUPR) in 2018 and analyzed recently constructed housing within the entire state of New Jersey. CUPR concluded that newly constructed townhomes with three bedrooms that had sale prices above the median for that product type, had an average of 0.403 school age children ("SAC") per unit. Using this multiplier, the Preferred Alternative could be anticipated to have 51 school age children living in the proposed 125 townhomes (see **Table 2-21**). Spread out over 12 grades, that is 4.25 students per grade. It should also be noted that this analysis calculated the potential number of *all* school age children (as compared to only *public* school age children). This is a more conservative estimate, in that it assumes all school age children residing at the Preferred Alternative would attend the Town's public schools.

Table 2-21
Anticipated Number of School Age Children (SAC)

Type of Unit	Number of Townhome Units	Multiplier	Number SAC
3-BR Single-Family Attached above median housing value (New Jersey 2018)	125	0.403	50.375

Note: BR = Bedroom
Sources: 2018 Rutgers Updated New Jersey Demographic Multipliers (Table II.A-5) All School-Age Children, Single-Family Attached (Own/Rent), 3 BR

2.B.10.a.(ii)School District Budget and Programmatic Cost

The total BHCSD 2022–2023 budget is $96,939,314.[8] For the 2022–2023 school year, the District expects to receive approximately $4,125,619 in state aid, which is approximately 4.3 percent of the 2022–2023 estimated revenue. Approximately 88.8 percent of the 2022–2023 estimated revenue is raised from the Tax Levy, and approximately 2.7 percent is raised from Payment in Lieu of Taxes (PILOT) payments (see **Table 2-22**).

Table 2-22
2022–2023 Byram Hills Central School District Budget Detail

	Source/Use	Budget	Percentage of Total
Expenses	Administrative	$11,301,722	11.7%
	Program (Instructional)	$70,117,974	72.3%
	Capital	$15,519,617	16.0%
	Total Expense	**$96,939,314**	**--**
Revenue	Tax Levy	$86,044,094	88.8%
	State Aid	$4,125,619	4.3%
	Reserve/Fund Balance	$3,252,277	3.4%
	Payment in Lieu of Taxes (PILOT)	$2,528,029	2.7%
	Miscellaneous	$965,000	1.0%
	Total Revenue	**$96,939,314**	**--**

Source: BHCSD 2022–2023 Budget Statement

[8] Byram Hills Central School District 2022–2023 Budget Statement: https://www.byramhills.org/uploaded/BOE/2022-23_Budget/OFFICIAL%20BUDGET%20STATEMENT%202022-23.pdf

The District groups their expenditures into three parts: administrative, program, and capital. For the 2022–2023 budget, the District allocated $70,117,974, or 72.3 percent, for its program budget, which includes instructional, programmatic, transportation, athletics, health services costs, and employee benefits for non-administrative employees. Based on the 2022–2023 projected school year enrollment of 2,333 students,[9] this equates to a per student programmatic cost of approximately $30,055, of which $27,500 (or 91.5 percent) would be funded by property tax and PILOT payments.

Applying the per pupil programmatic cost (net of state aid and other revenues) of $27,500[10] to the new students projected (51 from the Rutgers multiplier method) results in a potential annual additional cost to the District of $1,402,500. These potential costs would be wholly covered by the estimated $2.25 million in annual tax revenue that the District would receive annually from the Preferred Alternative (see Section 2.B.11.a.(iii), below). Accordingly, it is the Applicant's opinion that the Preferred Alternative would not have a significant adverse impact on the District.

Given that the additional cost of the Preferred Alternative to the BHCSD is directly related to the number of students that live in the project and attend the public schools, if more than 51 PSAC live in the project, the cost to the District could be greater than projected. (Similarly, if the number of students were lower than projected, the cost to the District would be lower.) In correspondence dated December 16, 2022, from the school district to the North Castle Town Board, the Superintendent indicated that it was her opinion that there would likely be more than 51 students living in the Preferred Alternative and attending BHCSD. However, the district also noted that, "the estimated taxes of approximately 2 million dollars annually toward school taxes should cover variable costs" (see **Appendix I**). Therefore, even if more than 51 students live within the Preferred Alternative, it is the opinion of the BHCSD that the tax revenue generated would be sufficient to cover the costs associated with those students.

2.B.10.b. Potential Impacts on Police, Fire, and EMS

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).

POLICE SERVICES

As discussed in DEIS Chapter 12, "Community Facilities and Services," the NCPD operates at an efficient level with the Town's existing population. As

[9] *See* page 30 of the *Byram Hills Central School District 2022–2023 Budget Statement* – https://www.byramhills.org/uploaded/BOE/2022-23_Budget/OFFICIAL%20BUDGET%20STATEMENT%202022-23.pdf.

[10] It is noted that this "average" cost is likely more than the incremental, or, "marginal" cost of additional students.

shown in the **Table 2-23** below, the 50 multifamily units and 125 townhouses would have a population of approximately 389 residents, which is equal to approximately 3 percent of the Town's 2020 population of 12,408.[11] The anticipated residential population of the Preferred Alternative (389 residents) is comparable to that of the DEIS Project's residential population (375 residents), but significantly less than the DEIS Project's overall population, which included guests at the hotel as well as employees at an approximately 100,000 sf office building.

Table 2-23
Preferred Alternative – Resident Population Projections

Residence Type	Number of Units	Multiplier	Projected Population
2-Bedroom Apartment (age-restricted)	50	1.20	60
3-Bedroom Townhouse	125	2.63	329
Total			**389**

Sources: *New Jersey Demographic Multipliers, The Profile of Occupants of Residential and Nonresidential Development*, Rutgers University, Center for Urban Policy Research, 2006.

The volume of calls from the Preferred Alternative would not be significantly higher than the volume of calls if the Project Site were to be fully re-occupied with office uses.

To quantify the proportional increase in the potential demand for police services, the standards found in the Urban Land Institute's (ULI) Development Assessment Handbook were used.[12] The standards correspond to increases in the residential population of new developments. The projected quantities of police personnel, equipment, and facilities attributable to the Preferred Alternative's population (conservatively not taking into account the existing demand of the Site) is presented in **Table 2-24**. These quantities are less than those projected for the DEIS project, owing to the reduced intensity of the Preferred Alternative.

Table 2-24
Preferred Alternative – Projected Police Service Level

Police Service	Multiplier	Estimated Population	Projected Service Level
Personnel	2/1,000 population	389	0.78 police personnel
Vehicles	0.6/1,000 population	389	0.23 vehicles
Facilities	200 sf/1,000 population	389	77.8 sf of facility space

Sources: Model Factors for Social Impact Analysis (Police), Development Impact Assessment Handbook, ULI, 1994.

FIRE AND EMS SERVICES

As detailed in DEIS Chapter 12, "Community Facilities and Services," the AFD stated that they respond to approximately 1,100 medical and fire calls annually throughout Armonk, Banksville, and surrounding communities (see

[11] U.S. Census Bureau, Decennial Census 2020.

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

DEIS Appendix H, November 2019 AFD correspondence). The AFD also provided a detailed estimate of the number of annual fire and EMS calls that the AFD believed it would expect from each component of the DEIS Project, based on then-current and similar developments and call volumes over the preceding two years (see **Table 2-25**).

Table 2-25
DEIS 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
149-unit Multifamily Building (including fitness center/pool)	32	14	46
22 Townhouses	6	3	9
Total Net New (DEIS Project)*	**38**	**17**	**55**
Existing Annual Calls**	**--**	**--**	**1,100**
Net New – Percent of Total	**--**	**--**	**5%**

Notes:
* Estimated calls for Preferred Alternative's multifamily and townhouse uses are categorized as net new calls. The southern office building, and hotel calls were not considered net new.
****** 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

Based on **Table 2-25** above, for the DEIS Project the AFD anticipated 6 fire calls and 3 EMS calls for 22 townhouses, and 32 fire calls and 14 EMS calls for the 149-unit multifamily building. Those same ratios were applied to the Preferred Alternative's programming, and the results are presented below in **Table 2-26**.

Table 2-26
Preferred Alternative – Estimated Annual Fire and EMS Calls

Project Component	Estimated Fire Calls	Estimated EMS Calls	Total Calls
Southern Office Building (Existing to be converted)	(5)	(10)	(15)
Northern Office Building (Existing to be removed)**	(8)	(16)	(24)
50-unit Multifamily Building	11	5	16
125 two-story Townhouses	34	17	51
Total Net New Calls	**32**	**(4)**	**28**
Total District-Wide Annual Calls*	**--**	**--**	**1,100**
Net New – Percent of Total	**--**	**--**	**2.5%**

Notes:
***** AFD responds to approximately 1,100 medical and fire alarms annually, but a specific breakdown of fire vs. EMS was not provided.
** Increased proportionally based on AFD-provided estimate for southern office building.
Source: AKRF, based on Armonk Fire Department, 2019

Based on the above, the Preferred Alternative could result in 28 net new calls annually, representing a 2.5 percent increase over the existing condition and nearly a 50 percent decrease in net new annual calls when compared to the DEIS Project.

2.B.10.c. Mitigation Measures for the Preferred Alternative

The Preferred Alternative will have less of an impact on the Town's police, fire and EMS services than would the DEIS Project. The Preferred Alternative will introduce housing at a similar scale to its presence in other areas of the Town, and on a site that had been previously developed with residential use. In addition, two three-story structures (office building and parking structure) are being removed from the site and two-story townhouses are being constructed.

To the extent the Preferred Alternative results in any *de minimis* increase in emergency service calls to the Project Site (as compared to the calls made to the now vacant office campus, or the calls made when the office campus was at full occupancy), the Preferred Alternative will generate $541,705 per year in tax revenue for the Town and $60,403 for the Fire District (see Section 2.B.11.a.(iii) of this FEIS). That tax revenue could be utilized to offset any *de minimis* impacts of the Preferred Alternative on the Town's emergency service resources.

2.B.11. FISCAL AND ECONOMIC IMPACTS

The section considers the potential impacts of the Preferred Alternative on fiscal conditions of the affected property taxing jurisdictions. The fiscal conditions analyzed in this section include the estimated tax revenues of the Preferred Alternative as compared to the estimated municipal costs of the Preferred Alternative. As discussed below, the Preferred Alternative would not have a significant adverse impact on the fiscal conditions of the Town of North Castle or the Byram Hills Central School District and would instead serve as a net positive revenue source. (Note that this section does not analyze the positive construction-period benefits (employment, building permit fees, etc.) nor the indirect benefits of increased resident spending power. Instead, if focuses on direct fiscal impacts to the Town.)

2.B.11.a. Fiscal Revenue Analysis

2.B.11.a.(i) Existing Tax Revenue

The Project Site has a current assessed value of $1,158,800, which is based on the prior (MBIA) owner-occupied status of the Site. In 2022, the Project Site generated approximately $1,253,450 in total property taxes for the Town of North Castle, the Byram Hills Central School District, Westchester County, and various local taxing districts (see **Table 2-27**). The Project Site generated approximately $200,664 for the Town and $833,492 for the School District. The existing office buildings on the Project Site are currently vacant and have been for approximately the past eight years. Despite this, the Project Site has not been reassessed and, therefore, the assessed value and property tax revenue generated by the Site would likely decrease in the future absent the Preferred Alternative.

Table 2-27
Project Site Existing Property Tax Revenues

Taxing Jurisdictions	Taxable Assessed Value of Units	Tax Rate per $1000 of Assessed Value (Mill Rate)	Estimated Amount Raised by Taxation
Westchester County	$1,158,800	$128.35	$148,727
Town Tax (Including Police)	$1,158,800	$173.17	$200,664
Ambulance District #2 (ALS)	$1,153,500	$2.45	$2,821
Blind Brook Sewer District	$1,158,800	$22.07	$25,570
Fire District #2	$1,158,800	$19.31	$22,375
Sewer District #3	42*	$471.45	$19,801
Byram Hills Central School District	$1,158,800	$719.27	$833,492
TOTAL			**$1,253,450**

Notes: Sums may not total due to rounding.
***** Sewer District #3 is a unit-based tax that is not calculated using assessed value and mill rates.
Source: 2022 Town of North Castle Tax Bill; 2022–2023 Byram Hills Central School District Tax Bill

2.B.11.a.(ii)Inputs and Assumptions

The Preferred Alternative includes approximately 50 multifamily age-restricted units and approximately 125 townhouses, with 10 percent of all units set aside for households with incomes at or below 80 percent of the Area Median Income (AMI) for the townhouses (owner-occupied) and at or below 60 percent of AMI for the rental multifamily units.

The market and assessed values of the Preferred Alternative were estimated for the townhouses using a market value comparison approach, and information from the Applicant. The multifamily units were valued using an income-based approach. The estimated real market value was valued at $17.35 million for the entire multifamily building, and $1.25 million for each townhouse. The affordable multifamily units would have a rent based on an AMI of 60 percent, and the affordable townhouse units would have an estimated real market value of $300,000 based on an AMI of 80 percent, using the "Westchester County 2022 Income and Rent Guidelines, Area Media Income (AMI), Sales and Rent Limits."[13]

2.B.11.a.(iii) Preferred Alternative – Tax Revenue

Based on the tax rates and assessed values above, the Preferred Alternative would generate approximately $3.33 million in annual property tax revenue to the various taxing jurisdictions (see **Table 2-28** below). This includes approximately $541,705 for the Town of North Castle and $2.25 million for the District. This is an increase of approximately $1.80 million per year for these two districts from the current condition of the Project Site, which is based on a fully owner-occupied assessment of the Project Site.

[13] Assumes a 2-person household for a 2-bedroom unit paying no more than 30 percent of household income on housing costs including rent and utilities (for the multifamily building), and mortgage, maintenance fees, and insurance (for the townhouses). Westchester County 2022 Income & Rent Limits Program Guidelines (westchestergov.com). Affordable sales prices and rents would be set at the time of sale or lease in coordination with Westchester County and in accordance with the income and rent guidelines in that year.

Table 2-28
Preferred Alternative Tax Revenues

Taxing Jurisdictions	Taxable Assessed Value of Units	Tax Rate per $1000 of Assessed Value (Mill Rate)	Approximate Amount Raised by Taxation
Westchester County	$3,128,250	$128.35	$401,498
Town Tax (Including Police)	$3,128,250	$173.17	$541,705
Ambulance District #2 (ALS)	$3,128,250	$2.45	$7,652
Blind Brook Sewer District	$3,128,250	$22.07	$69,029
Fire District #2	$3,128,250	$19.31	$60,403
Byram Hills Central School District	$3,128,250	$719.27	$2,250,063
TOTAL			**$3,330,350**

Notes: Sums may not total due to rounding.
***** Sewer District #3 is a unit-based tax that is not calculated using assessed value and mill rates, and thus was not included in this table.
Source: 2022 Town of North Castle Tax Bill; 2022–2023 Byram Hills Central School District Tax Bill

In addition to the revenue generated by property taxes, the Preferred Alternative would create revenue through various Town of North Castle building permit fees and other taxes including the mortgage recording tax. Though these additional sources of revenue are not to be incurred on an annual basis, they provide a notable amount of revenue to the Town upon completion of the Preferred Alternative. The Town of North Castle recreation fees amount to $3,000 per unit for a multifamily or residential development and $1,000 per affordable unit, totaling $489,000 for the Preferred Alternative.[14]

Upon sale of a dwelling unit, a mortgage recording tax is paid to Westchester County on behalf of New York State. The mortgage recording tax totals $1.30 per $100 of mortgage debt, and $0.50 is reinstated to the Town. Upon full build out, the Preferred Alternative's townhome units would generate approximately $768,560 from the mortgage recording tax. Of this total approximately $295,600 would be paid to the Town and $147,800 to Westchester County.[15] Assuming some turnover in residents over the years, a smaller portion of tax revenue would be generated for the Town upon each sale of property, as occurs with the current housing stock.

2.B.11.b. Fiscal Cost Analysis

The Preferred Alternative would generate additional demand for services provided by the Town of North Castle, such as emergency services, building department services, library services, etc. In addition to the added demand for Town services, the townhomes under the Preferred Alternative would

[14] Recreation fees are subject to a finding by the Planning Board that suitable on-site recreation areas and amenities are not practical for the Project Site. (TC Chapter 225) Certain on-site recreation amenities are proposed by the Applicant. The Town of North Castle may collect recreation fees that amount to $3,000 per unit for a multifamily or residential development and $1,000 per affordable unit upon the requisite finding.

[15] Assumes 50 percent of market-rate townhome buyers and all affordable townhome buyers would mortgage their unit at an 80 percent loan-to-value ratio. Multifamily units are conservatively excluded from this estimate.

generate demand to the Byram Hills Central School District.[16] It can reasonably be assumed that these increases in demand would result in increased costs to provide those services. This section provides an estimate of the increase in municipal expenditures that could be anticipated as a result of the Preferred Alternative.

2.B.11.b.(i) Existing Town Budget

The fiscal impact analysis uses the Town of North Castle 2022 Budget to project the direct costs of the Preferred Alternative to the Town. The Town of North Castle 2022 Budget totaled $38 million, with approximately $24 million in property tax levies.

2.B.11.b.(ii)Methodologies and Assumptions

The municipal costs of the Preferred Alternative are estimated through an analysis of the Town Budget using a combination of industry-standard methods, including Proportional Valuation, Per Capita, and Marginal Costing. First, a marginal costing methodology was applied to the Town budget to eliminate fixed-fee items from consideration. Marginal costing acknowledges that not all costs in the budget would increase with new development, such as salary and wages for certain positions such as Town Board members, or certain costs that wouldn't be affected by the Project, like highways. The methodology seeks to determine the incremental cost of a new development to the Town. Next, the Proportional Valuation Method was applied, which employs a two-step process to assign a share of municipal costs to commercial and industrial uses. First, a share of total municipal cost is given to all non-residential (i.e., commercial or industrial) uses. The remaining share of total municipal cost is assigned to residential uses and is the basis for a per capita estimate of incremental Town costs for new residents.

2.B.11.b.(iii) Marginal Costing

The Town of North Castle 2022 budget amounted to $38 million, including the General, Highway, and Library funds, and other taxing districts, such as fire protection and sewer districts. For the purposes of this analysis, only General and Library Funds were assessed. The Highway Fund was excluded from the cost estimate as the Preferred Alternative would not result in the creation of new public roads nor would it cause a measurable increase in the wear or usage of existing highway infrastructure; in fact, it would result in a decrease in traffic from the condition if the existing office buildings were occupied, or if the Currently Approved Plan were constructed. The Library Fund was included in its entirety. Marginal costing was then applied to the General Fund to isolate the costs within the budget that would not increase with new development, such as certain wage and salary costs. For example, the Preferred Alternative would not result in the need for hiring of new Town staff, such as an additional Town Clerk or Town Supervisor or Town Attorney. The budgets for Police, senior programs, and recreation programs

[16] An analysis of the potential impacts to the Byram Hills Central School District is provided in Section 2.B.10.a.

were included in their entirety. Based on this exercise, approximately 72 percent of the Town General Fund was considered to have the potential of being impacted by new development. In total, the amount of the budget raised by taxes for the General Fund and the Library Fund that has the potential of being impacted by new development totals $10.18 million.

2.B.11.b.(iv) Proportional Valuation and Per Capita Cost

To determine the incremental cost of new residents, the proportional valuation method was used to assign a share of the affected budgets ($10.18 million as determined above) to residential uses (see **Appendix G**). Based on this analysis, which considers the relative valuation of commercial and residential properties, as well as the number of such properties, 81 percent, or $8.19 million, of the affected budget can be attributed to residential uses in the Town. Using the per capita method and dividing that cost by the existing residential population of the Town of North Castle of 12,408, the per capita municipal cost for residents is estimated to be $660 per resident.

2.B.11.b.(v) Preferred Alternative – Costs

The Preferred Alternative consists of age-restricted multifamily housing units, and townhouses that are not age-restricted. As such, an average household size of 1.2 persons per household was assumed for multifamily units and an average of 2.63 persons per household was assumed for townhouse units.[17] The Preferred Alternative is anticipated to increase the Town of North Castle total population by an estimated 389 new residents. Given this, and a per capita cost of approximately $660, the estimated annual municipal cost of the Preferred Alternative is $256,740. As shown in **Table 2-29**, the total cost to the Town would be lower than the property tax revenue that is estimated to be generated by the Preferred Alternative.

Table 2-29
Preferred Alternative Projected Town Costs and Revenues

Jurisdiction	Costs	Revenue	Net
Town of North Castle	$256,740	$541,705	$284,965
Source: AKRF, Inc.			

2.B.11.c. Conclusions

Based on the above analysis, the Preferred Alternative would have a beneficial fiscal impact on the Town. As detailed above, even when considering the tax revenue generated by the current, overvalued, assessment, the Preferred Alternative would increase the tax revenue generated by the Site. In addition, the Preferred Alternative would stabilize the tax revenue generated by the Site by introducing a stable, in-demand, consistent tax-generating use. Finally, the Preferred Alternative would more than cover the potential increase in Town costs associated with the development, consistent with the low-impact nature of the use proposed.

[17] *The Profile of Occupants of Residential and Nonresidential Development*, Rutgers University, Center for Urban Policy Research, 2006. Data from 2003 American Housing Survey of all Northeast States.

2.B.12. HISTORIC, ARCHAEOLOGICAL, AND CULTURAL RESOURCES

The section considers the potential impacts of the Preferred Alternative on cultural resources, including architectural and archaeological resources, on the Project Site and in the surrounding area.

2.B.12.a. Potential Impacts on Historic Architectural Resources

The Project Site contains a farmhouse that was constructed in the early- to mid-19th century, but as detailed in DEIS Chapter 14, "Historic Resources," the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP) determined that the farmhouse is not eligible for listing on the State or National Register (S/NR) of Historic Places due to significant loss of integrity. 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 (see DEIS Chapter 14, "Historic Resources"), the Preferred Alternative would have no adverse impacts on historic architectural resources. With the Preferred Alternative, the farmhouse would not remain in its current location. Given the "significant loss of integrity, most notably the setting, design, feeling and association,"[18] the Applicant would coordinate with the Town on whether further mitigation was appropriate for the farmhouse's removal or other community needs.

Similar to the DEIS Project, 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 Preferred Alternative. 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.

2.B.12.b. Potential Impacts on Archaeological Resources

As discussed in DEIS Chapter 14, "Historic Resources," the Phase 1A Study recommended Phase 1B archaeological testing in the northern portion of the Project Site. See DEIS 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.

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 existing farmhouse. However, the

[18] August 7, 2019 letter from the New York State Historic Preservation Office (SHPO) determining that the farmhouse was not eligible for listing on the National Register of Historic Places. See DEIS Appendix J-2.

DEIS noted that if project plans change, specifically if more substantial disturbance is proposed (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 also be needed in this area, in consultation with OPRHP.

The Applicant will continue consultation with OPRHP as the Preferred Alternative advances towards site plan approval with the Town. With the completion of the Phase 1B Archaeological Investigation and any subsequent archaeological investigations that may become necessary and continued consultation and coordination with OPRHP during all phases of archaeological work, the Preferred Alternative, similar to the DEIS Project, would not result in an adverse impact to archaeological resources.

2.B.12.c. Mitigation Measures for the Preferred Alternative

As the Preferred Alternative would have no adverse impact on historic architectural resources, no mitigation measures would be required. Under the Preferred Alternative, the farmhouse would not remain in its current location. Given the "significant loss of integrity, most notably the setting, design, feeling and association,"[19] the Applicant would coordinate with the Town on whether further mitigation was appropriate for the farmhouse's removal or other community needs. As a result, Phase 1B testing around the farmhouse may be needed in connection with any relocation, and such testing would be coordinated with OPRHP once the Applicant is prepared to seek site plan approval from the Town and the project design and limits of disturbance are finalized.

With the completion of the Phase 1B Archaeological Investigation and any subsequent archaeological investigations that may become necessary, and continued consultation and coordination with OPRHP during all phases of archaeological work, the Preferred Alternative will not result in impacts on archaeological resources.

2.B.13. AIR QUALITY

This section analyzes the potential for the Preferred Alternative to impact ambient air quality from stationary sources (e.g., fossil fuel-fired equipment) and from mobile sources (i.e., project-generated traffic). As discussed below, the Preferred Alternative would not have a significant adverse impact on air quality.

2.B.13.a. Mobile sources

As described above, the Preferred Alternative would not result in an increase in traffic compared to the DEIS Project. Additionally, the Preferred Alternative would result in a decrease in on-site parking as compared to the DEIS due to the decreased project generated traffic. Therefore, the Preferred Alternative would not result in any significant adverse mobile source air quality impacts at intersections in the traffic study area not previously identified and addressed in the DEIS.

[19] August 7, 2019 letter from the New York State Historic Preservation Office (SHPO) determining that the farmhouse was not eligible for listing on the National Register of Historic Places. See DEIS Appendix J-2.

2.B.13.b. Stationary sources

The DEIS Project included the new construction of a five-story, approximately 149-unit multifamily building and approximately 22 three-story townhouses, and conservatively assumed that all new construction would utilize distillate fuel oil-fired HVAC systems to provide space heating, air conditioning, and domestic hot water. However, the proposed new construction under the Preferred Alternative would include approximately 125 two-story, three-bedroom townhouses. The new construction of dwelling units under the Preferred Alternative (125 units) would be a reduction when compared to the new construction proposed under the DEIS Project (171 units). Similar to the DEIS Project, the southernmost office building would be repurposed, but for residential use (50 apartments) rather than office use. As noted in DEIS Chapter 15, "Air Quality," impacts from the existing office buildings on the Project Site, which were previously proposed to be re-used as office and hotel uses under the DEIS Project, were excluded from the DEIS stationary source air quality analysis as their emissions would not be new sources; rather, they would be a continuation of existing sources. For similar reasons, the re-use of the southernmost office building can be excluded from analysis in the FEIS. Consequently, new sources of on-site emissions associated with the HVAC systems for the Preferred Alternative would be decreased when compared to the DEIS Project, and emissions would be more dispersed when leaving the site. Therefore, concentrations are anticipated to be less than those predicted for the DEIS Project.

Additionally, the nearest off-site sensitive receptor considered in the DEIS was an existing residence located along Cooney Hill Road (3 Cooney Hill Road). However, this parcel was acquired by the Applicant subsequent to publication of the DEIS and is incorporated into the Preferred Alternative. Therefore, this parcel is no longer considered a sensitive off-site receptor for the purpose of the stationary source analysis. Under the Preferred Alternative, the nearest off-site sensitive receptor is located beyond 1,000 feet from the Project Site.

Overall, since the fossil fuel emissions associated with the Preferred Alternative would be less intensive and the distance to the nearest sensitive receptor would be much greater, pollutant concentrations would be below those predicted in for the DEIS Project. Consequently, the Preferred Alternative would not result in potential significant adverse air quality impacts from stationary sources or mobile sources. Therefore, the Preferred Alternative would not have significant adverse air quality impacts, and no mitigation measures are required.

2.B.14. NOISE

This section considers the potential for the Preferred Alternative to result in significant adverse noise impacts by summarizing the results of the noise analysis completed for the DEIS and its applicability to the Preferred Alternative. As discussed below, the Preferred Alternative would not result in any significant adverse noise impacts. Noise associated with the Preferred Alternative would be in compliance with the Town of North Castle's restrictions on noise, and noise levels at the buildings included in the Preferred Alternative would be considered acceptable for residential use according to NYSDEC guidance.

2.B.14.a. Mobile Sources

Since the Preferred Alternative would involve a reduced mix of uses and less overall development than the DEIS Project, it would be expected to result in traffic volumes less than or comparable to those analyzed in for the DEIS Project. Consequently, as with the

DEIS Project, traffic resulting from the Preferred Alternative would be small compared to existing volumes such that those changes would not appreciably affect noise levels at nearby noise receptors.

2.B.14.b. Stationary Sources

Additionally, as with the DEIS Project, it is assumed that the building mechanical systems (i.e., HVAC systems) associated with the Preferred Alternative would be appropriately screened and designed to meet all applicable noise regulations and avoid producing noise levels that would result in any significant increase in ambient noise levels at nearby noise receptors. Consequently, the Preferred Alternative would not result in a significant adverse noise impact.

2.B.14.c. Maximum Predicted Noise Levels

As discussed in the DEIS, maximum measured and predicted noise levels from all sources (including aircraft as established using the most recently published noise contours for the nearby Westchester County Airport) 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 residential uses in the Preferred Alternative would include setbacks from King Street of at least 64 feet. Furthermore, the proposed residential buildings would utilize standard façade construction practices, resulting in at least 20 dBA of building façade attenuation such than 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 for the Preferred Alternative would not constitute a significant adverse impact, and no mitigation measures are required.

2.B.15. CONSTRUCTION IMPACTS

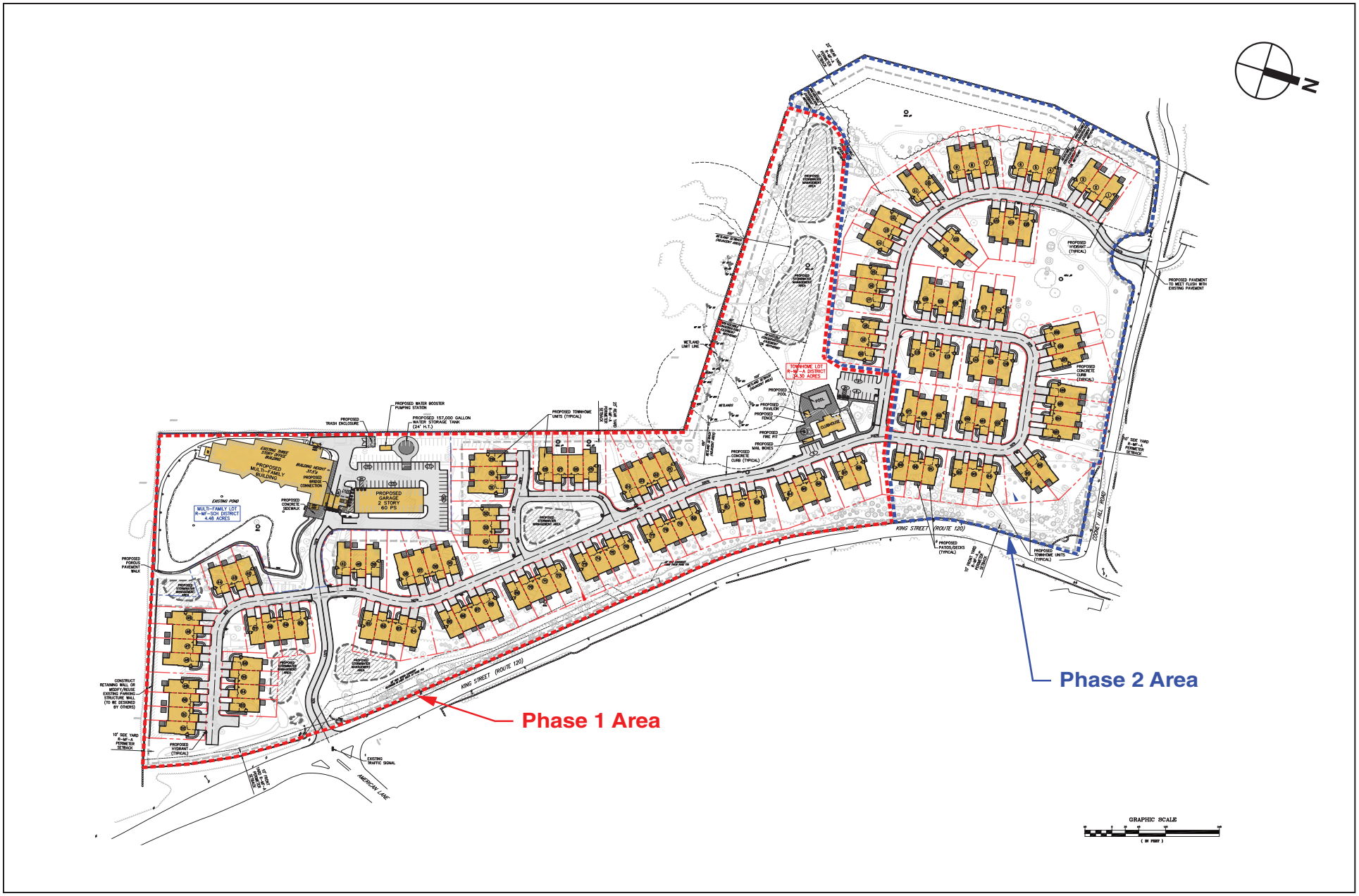
This section addresses the potential impacts of construction of the Preferred Alternative to the Project Site and surrounding areas. It then identifies proposed mitigation measures to minimize the potential for impacts.

2.B.15.a. Phasing Summary

The construction program for the Preferred Alternative is anticipated to occur in two major phases, as described below (**see Figure 2-15**). 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.

2.B.15.a.(i) Phase 1

Phase 1 of construction for the Preferred Alternative involves the conversion of the existing southern office building to an approximately 50-unit multifamily building and the construction of a 2-story parking garage, the southernmost 68 townhouses, the clubhouse/amenity area and related infrastructure improvements. This phase would also likely include demolition of the Site's existing 29-foot tall, three-story, approximately 316-space parking garage and the 36-foot tall, three-story, approximately 161,000-sf northern office building. This phase would also include the construction of



Source: JMC 2023

Preferred Alternative - Conceptual Construction Phasing

four temporary stormwater sediment basins for erosion and sediment control purposes. The temporary basins would be converted to permanent stormwater management practices at the end of this phase. This phase is estimated to last 24 months.

Since the majority of work associated with the office building conversion 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 last approximately 8 to 12 months, with the building façade upgrades occurring during the final 4 to 6 months of the interior renovation timeframe.

It is anticipated that the construction process for the 68 townhouses would begin with clearing, grading and road construction lasting up to 12 months, and construction of the residential units lasting 12 months.

2.B.15.a.(ii) Phase 2

Phase 2 of construction for the Preferred Alternative would involve the construction of 57 townhouses on the northern portion of the Project Site, along with the access road 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 townhouses 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 24 months.

It is anticipated that the construction process for this phase would begin with clearing, grading and road construction lasting up to 12 months and construction of the residential units lasting 12 months.

2.B.15.b. Construction Workers

Construction of the Preferred Alternative 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.

It is anticipated that approximately 75 construction workers would be on-Site for Phase 1 of construction, and approximately 50 construction workers would be on-Site for Phase 2. Over the life of the project, it is estimated that a total of approximately 125 construction workers would be utilized (compared to 155 to 220 for the DEIS Project).

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 50 (compared to approximately 75 for the DEIS Project).

2.B.15.c. 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 and other site areas within the Preferred Alternative's limit of disturbance.

2.B.15.d. Potential Construction Impacts – Preferred Alternative

2.B.15.d.(i) Construction Period Traffic

Construction of the Preferred Alternative 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 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 50 (compared to approximately 75 for the DEIS Project).

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.

While the overall number of delivery trucks would be reduced from the DEIS Project, it is anticipated that a similar maximum number of trucks per day (i.e., 10) would occur with the Preferred Alternative. Regarding earthwork operations, as noted above under "Geology and Soils," it is anticipated that some 12,306 cubic yards of soil will need to be exported from the site (less than the 13,324 cubic yards estimated for the DEIS Project). This would require approximately 615 20-yard trucks (compared to 666 with the DEIS Project). Similar to the DEIS Project, assuming 20 trucks a day, this would result in about 31days of trucking, or 6.2 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 Preferred Alternative during the weekday peak AM, weekday peak midday, and weekday peak PM hour. Therefore, the traffic analysis included for the operation of the Preferred Alternative would more than account for the temporary construction period traffic volume.

2.B.15.d.(ii) Construction Period Erosion and Sediment Control

Similar to the DEIS Project, in order to avoid and mitigate the potential for adverse erosion and sediment impacts, the Applicant's engineer developed an

ESCP (see **Appendix D**) 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 above under "Geology and Soils" 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 Preferred Alternative.

2.B.15.d.(iii) 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 Preferred Alternative would be similar to those identified for the DEIS Project and 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 Preferred Alternative 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 Preferred Alternative and would be included in the Construction Management Plan (CMP) which would be reviewed and approved by the Town during Site Plan approvals.

Vehicle emissions from construction vehicles and equipment have the potential to result in elevated levels of nitrogen oxides (NOx), particulate matter (PM), and CO. The greatest potential for impact is typically associated with heavy duty equipment that is used for short durations. For the Preferred Alternative, the period of greatest potential for emissions would likely occur during the excavation and foundation tasks of the townhouses. During construction of the townhouses, 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. Repurposing of the southern office building for residential use would not include excavation or foundation tasks. 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. As was proposed for the DEIS Project, 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.

2.B.15.d.(iv) Construction Period Noise

Construction of the Preferred Alternative would generate noise and vibration from construction equipment, construction vehicles, and delivery vehicles traveling to and from the Project Site. As discussed in the DEIS, 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 (see DEIS Table 17-1).

As discussed in the DEIS, 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.

It should be noted that for the DEIS Project, the nearest off-site sensitive receptor considered was an existing residence located along Cooney Hill Road (3 Cooney Hill Road). However, this parcel was acquired by the Applicant subsequent to publication of the DEIS and is now incorporated into the Preferred Alternative. Therefore, this parcel is no longer considered a sensitive off-site receptor in terms of proximity to construction noise. With the acquisition of the 3 Cooney Hill Road parcel, the nearest off-site sensitive receptor from the Preferred Alternative is now located beyond 1,000 feet from the Project Site.

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 over 1,000 feet away from the nearest off-site sensitive

receptor, it is the Applicant's belief that the potential noise generated by construction of the Preferred Alternative would not create a significant adverse noise impact to off-Site receptors.

2.B.15.d.(v) Construction Period Blasting

Based on the preliminary evaluation by the Applicant's Engineer, construction of the Preferred Alternative may require limited rock removal by blasting or hammering activities in the northwestern portion of the proposed townhouse development area, which may have an isolated area extending up to 8 feet into bedrock. In addition, there will be limited rock removal for some of the townhouses in the northern portion of the Site, which may have an isolated area extending up to 16 feet into bedrock. 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 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 Preferred Alternative 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.

2.B.15.d.(vi) Construction Period Hazardous Materials

The findings of a Phase I Environmental Site Assessment for the Project Site are included in DEIS Chapter 17, "Construction."

Under the Preferred Alternative, development on the Project Site would involve renovation of one of the existing office building as well as excavation for the proposed construction of the townhouses.

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. Standard measures, including building surveys and adherence to applicable Occupational Safety and Health Administration (OSHA) regulations prior to and during demolition and 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.

Construction of the proposed townhouses would involve demolition of paved surfaces (tennis courts and parking), excavation, and grading. As discussed in detail in DEIS Chapter 17, "Construction," the Phase I ESA for the Project Site identified a recognized environmental condition (REC) in connection with missing information on residential fuel oil tank removal/regulatory

closure as it relates to the former residential subdivision in the northern area of the Project Site. 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 townhouses, the potential exists for exposure to hazardous materials as a result of unexpected discoveries. The Preferred Alternative, however, would incorporate standard and appropriate controls, as described in the DEIS, to avoid the potential for adverse impacts to construction workers and community members.

2.B.15.e. Mitigation Measures for the Preferred Alternative

Similar to the DEIS Project, adverse impacts from the construction of the Preferred Alternative 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 SWPPP and ESCP, as well as the measures identified in the DEIS to avoid impacts related to traffic, air quality, noise, blasting (if necessary), and hazardous materials. With these measures in place, similar to the DEIS Project, potential impacts from construction of the Preferred Alternative would be mitigated to the maximum extent practicable.

2.B.16. UNAVOIDABLE ADVERSE IMPACTS

The Preferred Alternative is likely to result in physical changes to, and new construction and uses within, the Project Site. These changes will result in impacts to various environmental resources, as described throughout the DEIS and this FEIS, however these potential impacts would not be significant. The design of the Preferred Alternative avoids certain impacts that would have occurred with the DEIS Project or the Currently Approved Plan, and mitigates other potential impacts to levels that are not considered significant. The Preferred Alternative proposes less intense development and a less intense mix of land uses on the Project Site when compared to the DEIS Project.

2.B.17. OTHER REQUIRED ANALYSES

This section considers the potential impacts of the Preferred Alternative on (i) the commitment of resources, (ii) the use and conservation of energy, (iii) growth inducing aspects of new development, and (iv) cumulative impacts.

2.B.17.a. Irreversible and Irretrievable Commitment of Resources

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

The land that makes up the Project Site is the most basic resource irretrievably committed. Should the Preferred Alternative be constructed, one existing office building on the Project Site would be reoccupied for residential 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 Preferred Alternative is not considered a significant or an adverse impact.

The actual building materials used in the construction of the Preferred Alternative (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 Preferred Alternative 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.

2.B.17.b. Impacts on the Use and Conservation of Energy

Electricity and gas service to the Project Site is provided by Con Edison. Electric and gas service is 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 Preferred Alternative would require electricity and gas to power building systems. Con Edison would continue to provide electric service to the Project Site, which would be fed through underground service originating from King Street. This existing service would be tapped by the uses on the Project Site through a series of pad-mounted utility transformers. It is anticipated that the existing electric service will accommodate the Preferred Alternative. At the time of site plan approval, confirmation of adequate electrical service from Con Edison will be required.

The Preferred Alternative would be expected to be connected to the existing natural gas service along King Street. It is anticipated that the existing natural gas service would accommodate the Preferred Alternative. At the time of site plan approval, confirmation of adequate electrical service from Con Edison will be required.

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

The townhouse component of the Preferred Alternative would be constructed to exceed the requirements of the 2020 International Energy Conservation Code of New York State.

2.B.17.c. Growth Inducing Aspects of the Preferred Alternative

The Preferred Alternative would not be expected to induce growth elsewhere in the Town of North Castle or surrounding region, as the Preferred Alternative is being proposed to serve a current and existing need, one that has been identified in the Town's Comprehensive Plan. 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.

While the Preferred Alternative would introduce 175 residential units (50 of which would be age-restricted), this population would not be expected to create significant new commercial development pressure in the region. The Preferred Alternative would include on-Site amenities for residents including indoor/outdoor exercise and fitness options, a swimming pool, and mulched walking paths. The off-Site spending of the Preferred Alternative's residents would therefore be expected to increase the patronage of existing regional businesses, and not create the demand for new development. In addition, the Preferred Alternative would involve removal of the Site's existing three-story, approximately 316-space parking garage and the three-story, approximately 161,000-sf northern office building.

2.B.17.d. Cumulative Impacts

As noted in Chapter 1, "Project Description," the DEIS included consideration of the potential, hypothetical, development of sites other than the Project Site that could theoretically be permitted by the DOB-20A zoning amendments previously proposed in connection with the DEIS Project. The Applicant has since requested that the Town Board defer further consideration of zoning amendments that directly affect sites other than the Project Site while it considers the Revised Proposed Zoning. Since the Preferred Alternative would only result in the redevelopment of the Project Site, an analysis of potential cumulative impacts of the Preferred Alternative has been excluded from the FEIS. ✷

A. INTRODUCTION

Consistent with SEQRA regulations at §617.9, and in response to comments from the Lead Agency, Interested and Involved Agencies, and the public, the Applicant has developed an additional alternative for achieving the purpose and need described in the DEIS that avoids, reduces, and further mitigates the potential adverse impacts associated with the original project proposed in the DEIS (the "DEIS Project").

This additional alternative is iterative of the Alternatives presented in the DEIS and, as described in Chapter 2 of this FEIS, does not result in an adverse environmental impact that was not considered in the DEIS. The new alternative consists of developing a portion of the Site with 125 townhomes and re-using the existing southern office building as a 50-unit, age-restricted (55+) multifamily housing building. Throughout this FEIS, this new alternative is referred to as the "Residential Housing Alternative" or "Preferred Alternative." The other alternatives defined and analyzed in the DEIS, including the DEIS Project, remain unchanged.

The Applicant has amended its original petition (see **Appendix B**) to request that the Town Board map the "Senior Housing Portion" of the Site within the Town's existing R-MF-SCH Zoning District, and map the "Townhouse Portion" of the Site within the Town's existing R-MF-A Zoning District (collectively, the "Revised Proposed Zoning") (see **Figure 3-1**). The Applicant is also requesting a minor zoning text amendment to the R-MF-SCH Residence District Regulations (Town Code §355-27(B)(2)). The text amendment would preserve the Town Board's discretion in establishing R-MF-SCH sites, and would grant the Town Board the authority to establish the dimensional and design requirements, at the time of rezoning, when converting existing office space to senior multifamily residential use (as is the case here).

This additional alternative, which is Applicant's Preferred Alternative, was developed in response to both evolving market needs and the comments received on the DEIS. Such comments included those that opined that the DEIS Project was too intense for the Project Site, and that the proposed 5-story multifamily building proposed in the DEIS Project was too large and would create adverse visual impacts.

In response, the Applicant developed the Residential Housing Alternative, described in more detail below, which includes:

- The construction of approximately 125, fee simple, 2-story, 3-bedroom townhomes;
- Removal of the Site's existing 29-foot tall, two-story, approximately 316-space parking garage and the 37.5-foot tall, three-story, approximately 161,000 square foot northern office building;
- Repurposing the Site's southern office building as approximately 50, two-bedroom dwelling units in a multifamily building, the occupancy of which would be age-restricted to those 55

Source: JMC 2023

Preferred Alternative - Proposed Zoning

years of age and older, as required by the Town's R-MF-SCH Zoning District, and permitted by the U.S. Fair Housing Act;

- Construction of a new, 2-story, approximately 60-space parking structure north of the multifamily building, which is anticipated to be connected to the multifamily building with an enclosed pedestrian walkway;
- Construction of site amenities, including a clubhouse, pool, and walking trails; and
- Construction of internal driveways, stormwater management features, and a site-wide landscaping program.

As described in Chapter 2, "Environmental Analyses," the Preferred Alternative is directly responsive to the substantive comments received on the DEIS Project. Specifically, the Preferred Alternative generates significantly less traffic than the DEIS Project and less traffic than would occur if the existing office buildings were reoccupied. The Preferred Alternative would remove more than 262,000 square feet of building space on the Site, including two, three-story structures, while new construction would be limited to two-stories. As such, the Preferred Alternative would have less of a visual impact than the DEIS Project and significantly less visual impact than the Currently Approved office expansion plan. Reducing the height of the construction on the Site also reduces potential impacts to the Fire Department. With respect to wetlands and stormwater, the Preferred Alternative would not include impervious surfaces within the town's wetland buffer (as was contemplated in the DEIS Project and as currently exists today) and would include stormwater management systems that reduce the rate and volume of stormwater runoff from the Site through compliance with the most recent stormwater regulations of New York State and New York City's DEP. Finally, through reducing the population of the Site (from both the DEIS Project and the condition that would occur if the two office buildings were reoccupied), the burden on Town services would be reduced. At the same time, the property taxes generated by the Project Site would not only stabilize, they would increase from the current, over-assessed, condition of the Site, and would more than cover the costs associated with the Preferred Alternative.

This chapter provides specific responses to the substantive comments from the public, Town officials, and other agencies on the Draft Environmental Impact Statement ("DEIS") and Draft Generic Environmental Impact Statement ("DGEIS"), collectively the "DGEIS," that were made verbally at the Public Hearings on the DGEIS held on July 28, 2021, September 9, 2021, and September 22, 2021, or provided to the Town of North Castle Town Board (the "Town Board"), as Lead Agency, through October 12, 2021. A list of commenters, as well as the full transcripts of the Public Hearings and the correspondence from which the comments are drawn are included as **Appendix A**. Comments having a similar subject or raising similar technical points are grouped together. In some cases, for ease of reading, an introduction to a group of similar comments is provided (see e.g., Comment 2-1). Comments consisting solely of support or opposition to the project, or support or opposition of a particular comment on the DGEIS are not included in this chapter, but those letters are included in **Appendix A**.

B. COMMENTS AND RESPONSES

Substantive comments on the DGEIS are organized by topic and presented according to the appropriate DGEIS Chapter.

CHAPTER 2: PROJECT DESCRIPTION

Comment 2-1: A comment was received questioning the "baseline" to which impacts of the Proposed Action were considered; specifically whether it is appropriate to compare the potential impacts of the Proposed Action to the potential impacts of approved, but unbuilt, improvements.

> Sometimes we hear that an applicant's baseline is what's been approved, even though it hasn't been built. Now, I've said numerous times I want our businesses, our developers, to do well. But our primary concern is what's good for the town, and we want to understand that.
>
> So, the world changes. And Eagle Ridge is an example. They were approved for a 300-room hotel. They said, "We can't build it." So, we've got to come here. And they proposed that the baseline, out of a sense of fairness, at least some people have said, should be what they were approved for and go from there.
>
> Similarly, you're saying something like that here, I believe. Not to put words in your mouth. But, you know, if the world changes for a property owner and they find that they can't go ahead and feasibly build what was approved, I would submit that it at least merits consideration that as the world evolves, as there's more buildings in town, circumstances change, so you have COVID, you know, all these crazy things that can happen, you know, things can change for the town in evaluating too. So, I wouldn't just automatically start with the base that, Hey, what was there before, it's only fair that we go there. The world changes. If it changes for one party, reasonable that you would say that it changes for the other party as well. (Berra_002)

Response 2-1: As discussed in FEIS Chapter 1, "Project Description," in response to evolving market needs as well as comments received on the DEIS, the Applicant has amended its original petition (see **Appendix B**) to request that the Town Board map the "Senior Housing Portion" of the Site within the Town's existing R-MF-SCH Zoning District, and map the "Townhouse Portion" of the Site within the Town's existing R-MF-A Zoning District. The Applicant is also requesting a zoning text amendment to the R-MF-SCH Residence District Regulations (Town Code §355-27), which would clarify FAR when converting existing office space to senior multifamily residential use (as is the case here). The Revised Proposed Zoning would facilitate a residential development plan for the Project Site, referred to as the "Residential Housing Alternative." The "Residential Housing Alternative" together with the "Revised Proposed Zoning" is now referred to as the Applicant's "Preferred Alternative" throughout this FEIS. The Preferred Alternative will repurpose the Project Site's southernmost office building with approximately 50, 2-bedroom apartments in an age-restricted (55+) multifamily building, and will construct approximately 125, 2-story, 3-bedroom townhomes.

As discussed in the DEIS, as well as FEIS Chapter 1, "Project Description," the Town Board granted special permit approval and the Planning Board granted amended site plan approval to permit the Project 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 (aka the "Previously Approved Development Plan"). These approvals 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 five-story parking structure containing approximately 1,000 parking spaces.

Pursuant to SEQRA, the Lead Agency must take a "hard look" when examining the potential environmental impacts of a proposed action, while also considering what can reasonably be expected to occur on a site absent the proposed action, based the existing condition of the site and any previously granted approvals. The Project Site currently contains two vacant office buildings along with site access and parking to support that use should it be continued. As appropriate, both the DEIS and FEIS disclose both the Project Site's existing improvements and the Previously Approved Development Plan. However, the analyses presented in the FEIS for the Preferred Alternative are conservative and do not utilize the Previously Approved Development Plan as a baseline for presenting potential impacts. For example, as discussed in Chapter 2, "Environmental Analyses," the Stormwater Pollution Prevention Plan (SWPPP) is no longer being treated as an amendment to the SWPPP approved for the Previously Approved Development Plan. In addition, similar to the DEIS Project, the analysis of potential traffic impacts compares the Preferred Alternative to a scenario where both existing office buildings on the Project Site are reoccupied for office uses. This approach was determined appropriate by the Town Board as documented in the DEIS Scoping Document (see DEIS Appendix A).

Comment 2-2: Comments were received expressing the opinion that the repurposing of the existing office buildings should be considered first, then single-family residential uses on the undeveloped portion of the Site; but apartment uses should not be permitted.

> Woodyard_013: Okay, look at this project in phases. Go ahead and what we talked about in the comprehensive plan steering committee. Re-purpose those buildings, one as the office building, the other one as the hotel, that's fine, you know, and then make that as a start. And then really start thinking about the other opportunities that may be available to them besides a freaking apartment building.

> Woodyard_013: I think you can probably make them more profitable at the end because that's what people are coming for. What you are doing is you are creating a neighborhood in the 45 houses, and you got people who will sit there and walk their dogs and you know, carpool.

Response 2-2: As discussed in FEIS Chapter 1, "Project Description," in response to evolving market needs as well as comments received on the DEIS, the Applicant has amended its original petition to request that the Town Board map the Senior Housing Portion of the Site within the Town's existing R-MF-SCH Zoning District, and map the Townhouse Portion of the Site within the Town's existing R-MF-A Zoning District. The Preferred Alternative will repurpose the Project Site's southernmost office building as approximately 50, 2-bedroom apartments in an age-restricted (55+) multifamily building, and will construct approximately 125, 2-story, 3-bedroom townhomes. The mix of uses and associated phasing presented in the DEIS is no longer proposed. As discussed in Chapter 2, "Environmental Analyses," the Applicant is contemplating two phases of construction for the Preferred Alternative's all-residential, partially age-restricted housing plan.

Comment 2-3: Comments were received requesting additional, new allowable uses in the DOB-20A district through revisions to the proposed local law. (DiGiacinto_010, Baroni_018)

> DiGiacinto_010: I would like to add to the permitted uses, and this is my favorite, a sports complex. I would love to see something that does not exist anywhere in our vicinity. I am talking about indoor ice rink, indoor pool, indoor fields, outdoor fields. I mean tennis courts, indoor, outdoor, something that will draw if you've got the people.
>
> DiGiacinto_010: I would also like to add a skilled nursing care because I believe you just have in the zoning senior housing and assisted living. [Consider a continuum of care and housing options for seniors.]
>
> Baroni_018: Regarding the proposed uses: it occurred to me that perhaps we should preface the proposed uses, and even the existing uses that are in the district as for profit uses only, that's our tax base out there and I just think it's important that no matter what you propose out there that all of those uses stay on the tax roll.

Response 2-3: As discussed in FEIS Chapter 1, "Project Description," in response to evolving market needs as well as comments received on the DEIS, the Applicant has amended its original petition to request that the Town Board map the Senior Housing Portion of the Site within the Town's existing R-MF-SCH Zoning District, and map the Townhouse Portion of the Site within the Town's existing R-MF-A Zoning District. The Applicant is no longer proposing text changes to the DOB-20A Zoning District, and no adjacent sites in the DOB-20A district would be affected by the Applicant's amended petition. The Preferred Alternative will

repurpose the Project Site's southernmost office building as approximately 50, 2-bedroom apartments in an age-restricted (55+) multifamily building, and will construct approximately 125, 2-story, 3-bedroom townhomes.

Comment 2-4: I didn't see any reference in the document to affordable housing, which also has to be complied with under the model ordinance. (Baroni_005)

Response 2-4: Similar to the DEIS Project, the Preferred Alternative would comply with Section 355-24(I)(1) of the Town Code and set aside affordable affirmatively furthering fair housing (AFFH) units. While the specific details would be refined as part of the site plan review process with the Planning Board, the code requires no less than ten (10) percent of the total units developed be AFFH units and marketed in accordance with the Westchester County Fair and Affordable Housing Affirmative Marketing Plan.

Comment 2-5: The applicant should verify that sufficient space will be available to store recyclables under the County recycling program which includes plastics numbered 1 through 7. County regulations for plastic recycling may be found at: http://environment.westchestergov.com. The Town should also be aware that Westchester County has reporting requirements for waste management for businesses with more than 100 employees. (Drummond_WCPB_020)

Response 2-5: Comment noted. The Preferred Alternative is exclusively residential and would not include any businesses with more than 100 employees. The Applicant would work with the Town to continue to advance the County's recommendations through the site plan review process. Each townhouse will include a two-car garage to store containers for solid waste and recyclables and the existing office building, to be converted to multifamily use, has adequate storage spaces for solid waste and recyclables.

Comment 2-6: We appreciate the applicant's proposed use of permeable pavement, and the extensive use of bioretention and other aboveground stormwater management techniques. We encourage the Town to work with the applicant to include as much further green or sustainable building technology into the development as possible. In addition, the Town and the applicant should give consideration towards the provision of electric vehicle parking capabilities as well as charging facilities for electric bicycles. (Drummond_WCPB_020)

Response 2-6: Comment noted. The Applicant would work with the Town on advancing these recommendations through the site plan review process. FEIS

Chapter 2, "Environmental Analysis," includes a discussion of the Preferred Alternative's consistency with the New York State Climate Leadership and Community Protection Act which was passed in 2019. Among other design considerations, the Preferred Alternative would incorporate green building technologies such as green roof areas, energy efficient appliances, LED lighting, and charging options for electric vehicles.

Comment 2-7: Comments were received seeking clarification on the maximum number of units that could be built on the Project Site and Swiss Re site under the DEIS Zoning, as described by the DGEIS component of the environmental review. Comments were also received asking if it would be possible to limit this maximum buildout through changes to the local law. (Berra_002, DiGiacinto_001)

> Berra_002: Another question in terms of the presentation, on the generic EIS: what's the maximum number of units in one way or the other that could be built on the Swiss Re? I think you said before, at least implied, that it would allow more than what was currently being proposed.
>
> DiGiancinto_001: And the project [the maximum build out of the Project Site under the DEIS Zoning], then, would be all residential?
>
> Berra_002: And is there some way, since it's a proposed change in the law, to limit it so that you wouldn't have the ability to have that many units and Swiss Re wouldn't either?
>
> Berra_002: I would be interested in seeing what that law would look like if it were going to be limited to what you are currently proposing.
>
> DiGiancinto_001: Page 13, same chapter 13, page 13-16, the final paragraph, 13E, cites in quotes, "Theoretical build out for Airport Campus and Swiss Re, 750 residential units and an 80-room hotel." This is the equivalent, in terms of the number of residential units, to more than two Windmill Farm developments, therefore I wish to see the proposed local law revised so it eliminates Section 4, which is Chapter 355 of our local law, Sections B and C and D, dealing with conversion.

Response 2-7: As discussed in FEIS Chapter 1, "Project Description," in response to evolving market needs as well as comments received on the DEIS, the Applicant has amended its original petition to request that the Town Board map the Senior Housing Portion of the Site within the Town's existing R-MF-SCH Zoning District, and map the Townhouse Portion of the Site within the Town's existing R-MF-A Zoning District. The Preferred Alternative would repurpose the Project Site's southernmost office building as approximately 50, 2-bedroom apartments in an age-restricted (55+) multifamily building, and will construct approximately 125, 2-story, 3-bedroom townhomes.

The DEIS prepared by the Applicant, and accepted by the Lead Agency, included consideration of the potential, hypothetical, development of

sites other than the Project Site (including Swiss Re) that could theoretically be permitted by the DEIS Zoning. These potential impacts were analyzed in the "generic" portion of the document, also referred to as the Draft Generic Environmental Impact Statement (DGEIS). As the Applicant has requested that the Town Board defer further consideration of zoning amendments that directly affect sites other than the Project Site while it considers the Revised Proposed Zoning, a Final Generic Environmental Impact Statement (FGEIS) is not required to, and has not, been prepared.

CHAPTER 3: LAND USE, ZONING, AND PUBLIC POLICY

Comment 3-1: Comments were received questioning whether the necessary conditions have been satisfied for the Applicant to develop within the "revocable" portion of the conservation easement.

> It says here in the bottom paragraph of the Executive Summary, Section 1.B.3 on page 1-5, when it talks about the conservation easement, it says, A portion of the conservation easement area was to be irrevocable in the form of a 50-foot deep, approximately 1.95-acre strip of property immediately adjacent to the DEP property. The balance of the conservation easement area (approximately six acres) was to be revocable if two conditions were met as follows: (i) MBIA has not constructed both the proposed office building and the associated parking structure. That seems like it's met. And (ii), MBIA sells the Cooney Hill lots to a third party for the standalone development.
>
> So what I have trouble seeing, and I don't have obviously the whole agreement in front of me, but – it might be in here. I forgot if it is. MBIA sells the Cooney Hill lot to a third party for standalone development. It doesn't seem like MBIA sold the Cooney Hill lots to a third party for a standalone development. (Berra_002)
>
> I took a lot of comfort in the fact that River Keeper and Natural Resources defense council had reached an agreement where that wouldn't be done and now, I understand the position is as it was mentioned the last time, that the Deed restriction on that part of it according to the applicant isn't really something that applies any longer and I question that, whether that really should be the case. (Berra_009)

Response 3-1: As described in the DEIS, and pursuant to an agreement between the Site's previous owners (MBIA), the Natural Resources Defense council (NRDC), and Riverkeeper, Inc., a conservation easement (the "Conservation Easement") between MBIA as grantor and the Westchester Land Trust, Inc. (WLT) as grantee was executed on January 11, 2006. A portion of the conservation easement area includes an irrevocable 50-foot-deep, approximately 1.95-acre strip of property immediately adjacent to the DEP's property. The balance of the conservation easement area (approximately 6 acres) granted to WLT is revocable under two conditions: (i) MBIA has not constructed the

proposed office building and the associated parking structure (i.e., the Currently Approved Development Plan, described below, that allows for expansion of the current office use to approximately 499,000 square feet plus the construction of a five-story approximately 1,000 car garage); and (ii) MBIA sells the Cooney Hill lots to a third party for a stand-alone development. The conditions allowing revocation have been satisfied and, as such, the Applicant may revoke that portion of the Conservation Easement Area delineated as revocable.

The Preferred Alternative proposes development in a portion of the approximately 6-acre revocable section of the Conservation Easement Areas that are revocable, which is permitted. A portion of a proposed stormwater management basin would be located in the 1.95-acre irrevocable area, similar in location to the basin included in the Currently Approved Plan and SWPPP. Stormwater improvements are expressly permitted in the irrevocable Conservation Easement Areas as set forth in the WLT Conservation Easement.

Comment 3-2: Comments were received expressing concerns about the DEIS Zoning, including the overall density that would be permitted, the height that would be permitted, the zoning mechanisms that would allow for conversion of office space, the character and scale of development that would be permitted under the DEIS Zoning, its conformity with surrounding land use patterns, and what the impacts of the zoning amendments could be on other sites within the DOB-20A. (DiGiacinto_010, Black_Krupa_CB_024, Kaufman_TNC_022, Drummond WCPB_020, Kazak_OSC)

> DiGiacinto_010: I would like to see a change to the limited maximum height to three stories inclusive of parking in building for multifamily buildings.
>
> Black_Krupa_CB_024: We are particularly concerned with the proposal's density, which we believe is greater than the site can handle environmentally.
>
> Kaufman_TNC_022: The Applicant is proposing significant changes to the DOB-20A Zoning District to permit hotel, single family homes, two-family homes, senior citizen housing and assisted living facilities in an existing office district. Specifically, the draft local law grants a 1:1 office space conversion to hotel uses and a 1:1.25 office space conversion to residential uses. In addition, the draft zoning law would provide a 25 percent and 50 percent density bonus to assisted living uses. While the 2018 Comprehensive Plan recommends changes of use in this district to permit hotel and residential uses, the plan also notes that residential uses should be at an appropriate scale. The proposed zoning changes would permit approximately 500 new residential units at the Airport Campus site and 250 units at the SwissRe site. The Town Board will need to determine whether the proposed amount of new residential development would be appropriate in the DOB-20A Zoning District. The Applicant should provide the rationale

for requesting the proposed residential density on the property. In addition, the Applicant should provide the rationale for the proposed residential and assisted living bonus densities.

Kaufman_TNC_022: The maximum permitted FAR in the DOB-20A Zoning District is 0.15. It is recommended that the maximum resulting density after the DOB-20A zoning revisions not exceed that amount. The Applicant should describe the maximum potential FAR in the DOB-20A after the zoning changes. If in excess of 0.15, the Lead Agency will need to determine whether the proposed local law should be revised.

Kaufman_TNC_022: The proposed zoning amendments are overly complex, will be difficult to administer and difficult for the Lead Agency to fully evaluate as presented. It is strongly recommended that the text be revised with an aim to simplify the DOB-20A regulations. Particular attention should be given to eliminating density bonus provisions, setbacks based upon use and height maximums based upon use, where possible.

Kaufman_TNC_022: The Applicant is proposing significant changes to the DOB-20A Zoning District to permit hotel, single family homes, two-family homes, senior citizen housing and assisted living facilities in an existing office district. In addition to permitting the conversion of existing and fully approved office space to residential uses, the draft local law also permits the construction of the following new permitted principal uses:

- Medical offices
- Hotels
- Multifamily, townhouse, single-family, and two-family dwellings
- Senior citizen housing
- Assisted living facilities

In an effort to spur occupancy of existing vacant office space, there is a clear rationale to permit other compatible uses including residential. However, the rationale for also permitting new multifamily, townhouse, single-family, two-family dwellings and senior citizen housing as new permitted principal uses is less clear. The Applicant should provide such rationale to the Lead Agency.

It seems that the permitted uses for hotel, multifamily, townhouse, single-family, and two-family & senior citizen housing should note that these uses are permitted only under the office conversion provisions of Section 355-40(X)(2)&(3) of the Town Code. Specifically, the Lead Agency should give consideration to permitting a wide array of uses that would permit the conversion of existing vacant office space but prohibit the transfer of existing unbuilt office to new residential multifamily. Unbuilt portions of the property could be rezoned back to single family residential as that was the zoning in place prior to the current DOB-20A zoning.

Kaufman_TNC_022: The proposed modifications to the DOB-20A district's dimensional regulations would increase the maximum allowable building height from 3 stories and 45 feet, to 85 feet for multifamily buildings. This increase in height would permit the construction of a multifamily building that could be as much as 40 feet taller than currently permitted office buildings. This increase in height will be discernable from locations where the building can be observed, such as from NYS Route 120.

The Applicant should provide the rationale for permitting the proposed additional height on the property. The Town Board may wish to limit the maximum permitted height of buildings in the DOB-20A Zoning District to minimize these impacts.

Kaufman_TNC_022: The existing DOB-20A zoning setbacks are the same as the OB and OB-H Zoning District and are the largest of any zoning district in the Town. The proposed action would reduce the front yard setback from 150' to 65' for multifamily buildings and 200' for townhouses (57 percent reduction in setback and 33 percent increase in setback), the side yard setback from 300' to 60' (80 percent reduction in setback) and the rear yard setback from 300' to 80' for multifamily buildings (73 percent reduction in setback). The proposed reductions in setbacks may create significant visual impacts from NYS Route 120 and surrounding properties. The Applicant should provide the rationale for permitting the proposed reductions in setback.

Kaufman_TNC_022: The existing DOB-20A zoning building coverage regulations are the same as the OB and OB-H Zoning District. The proposed action would increase the maximum permitted amount of building coverage from 10 percent to 15 percent (50 percent increase in building coverage). The proposed increase in building coverage would permit additional density on the site, as well as create additional impervious surfaces within the DOB-20A Zoning District. The Applicant should provide the rationale for permitting the proposed increase in maximum permitted building coverage.

Drummond WCPB_020: The concept of placing large amounts of new development in relatively remote locations runs contrary to the County Planning Board's long-range planning policies set forth in Westchester 2025—Context for County and Municipal Planning and Policies to Guide County Planning, adopted by the Board on May 6, 2008, amended January 5, 2010, and its recommended strategies set forth in Patterns for Westchester: The Land and the People, adopted December 5, 1995, which call for directing growth towards existing downtown centers. In this case, the applicant is contemplating a five-story, 149-unit multifamily building. Typically, higher density apartment buildings of this size are placed closer to public transit, shopping, and services so that more people can avail themselves of the shorter traveling distances. Placing multifamily buildings in low-density areas further from services would necessitate that more people would have to make longer automobile trips for all of their daily needs. The 331 parking spaces that the applicant proposes (more than two spaces per apartment unit) provides an insight into the scale of this automobile dependency.

Kazak_OSC_026: The Open Space Committee supports the introduction of other uses on the DOB-20A parcels but does not support the Applicant's current zoning proposal as the resulting density and scale is contrary to Town and County planning. We recommend that the Applicant propose a zoning change whose density and scale will result in buildings that embrace, not destroy, the special sense of place, that is Armonk.

Kazak_OSC_026: The DEIS and GEIS demonstrate that under the Applicant's proposed zoning change the maximum development potential for the project site is 500 residential units and 250 residential units on the

nearby Swiss Re property. Such density is completely out of character in our town and contradicts both Town and County Planning.

Kazak_OSC_026: Section 4.4 of the Town Comprehensive Plan states that for the DOB-20A zone, in particular Swiss Re and former MBIA campus, the Town should explore allowing for an introduction of residential uses, at a scale comparable to surrounding land use patterns. The zoning change that the Applicant proposes allows for land use that is most definitely not comparable to the surrounding land use patterns and therefore contrary to the Town Comprehensive Plan.

Drummond WCPB_020: While the County Planning Board is generally supportive of the redevelopment of vacant office campuses with non-office uses, the subject site is not suitable for residential development. While the continuation of office space on the site along with a hotel may be acceptable for this property, we recommend the Town not approve residential uses on this site.

DiGiacinto_010: If the town were to rezone 113 King Street property, the zoning amendment would apply to the 126 acres Swiss Re parcel. Please provide the same data as requested in the above number 6.

Response 3-2: As discussed in FEIS Chapter 1, "Project Description," in response to evolving market needs as well as comments received on the DEIS, the Applicant has amended its original petition to request that the Town Board map the Senior Housing Portion of the Site within the Town's existing R-MF-SCH Zoning District, and map the Townhouse Portion of the Site within the Town's existing R-MF-A Zoning District. The Applicant has requested the Town Board to defer review of any text changes to the Zoning Code's DOB-20A Zoning District. No adjacent sites in the DOB-20A district (including Swiss Re) would be affected by the Applicant's Preferred Alternative.

As discussed in FEIS Chapter 2, "Environmental Analyses," the Preferred Alternative would not result in any new significant adverse impacts were not already analyzed in the DEIS. Rather, the Preferred Alternative would further avoid and mitigate potential adverse environmental impacts when compared to the DEIS Project. As discussed in FEIS Chapter 2, the Preferred Alternative would be consistent with the Town's Comprehensive Plan and would introduce a land use (age-restricted housing within a converted office building, and new 2-story townhomes which would not be age-restricted) at a scale and architectural design comparable with other recently constructed age-restricted residential developments in the Town.

As described throughout this FEIS, the Preferred Alternative would remove more than 262,000 square feet of building space on the Site, including two, three-story structures, while new construction would be limited to two-stories. As such, the Preferred Alternative would have less of a visual impact than the DEIS Project and significantly less visual

impact than the Currently Approved office expansion plan. Reducing the height of the construction on the Site also reduces potential impacts to the Fire Department. Through reducing the density and resultant population of the Site (from both the DEIS Project and the condition that would occur if the two office buildings were reoccupied), the burden on Town services would be reduced. At the same time, the property taxes generated by the Project Site would not only stabilize, they would increase from their current level, which is based on an owner-occupied assessment, and would more than cover the costs associated with the Project.

The Revised Proposed Zoning would address the specific comments described above. Specifically, the zoning mechanisms would be simplified through use of an existing Town zoning district, the scale and density of development proposed would be reduced, and the potential for impacts resulting from other uses or applicability to other sites would be eliminated.

CHAPTER 4: GEOLOGY AND SOILS

No comments were received on this Chapter.

CHAPTER 5: TOPOGRAPHY AND SLOPES

No comments were received on this Chapter.

CHAPTER 6: VEGETATION AND WILDLIFE

Comment 6-1: While the project site is already developed, there remains an important swath of open space that provides necessary protection to the Kensico Reservoir, provides wildlife habitat, and serves as an important wildlife corridor. A zoning change that will allow a 50 percent increase in building coverage will endanger all of these things and is strongly advised against. (Kazak_OSC_026)

Response 6-1: As discussed in FEIS Chapter 1, "Project Description," in response to evolving market needs as well as comments received on the DEIS, the Applicant has amended its original petition to request that the Town Board map the Senior Housing Portion of the Site within the Town's existing R-MF-SCH Zoning District, and map the Townhouse Portion of the Site within the Town's existing R-MF-A Zoning District. The Applicant has asked the Town Board to defer considering text changes to the Zoning Code's DOB-20A Zoning District. Under the Project Site's existing condition, building coverage is approximately 7 percent. With the Preferred Alternative, the building coverage would be approximately 18.6 percent. In the R-MF-SCH district, the maximum building coverage

is determined by the Town Board at the time of zoning approval. Under the Preferred Alternative approximately 65.4 percent of the Project Site's total area (which equates to approximately 25.36 acres) would consist of undeveloped open space that is either undisturbed (wetland area, steep slopes, forest, conservation easement area) or landscaped. This is approximately 3 acres less than were proposed with the DEIS Project (i.e., 28 acres). To mitigate this, the Applicant's proposed landscaping plan incorporates a substantial amount of new native plantings in these areas. Conservation easement areas adjacent to DEP lands and previously entered into as part of prior project proposals by MBIA will be maintained. Finally, the overall density and height of the buildings on the Project Site would be reduced.

Comment 6-2: The Applicant states that approximately six acres, or 28 percent, of mixed upland forest/field cover would be removed. The applicant contends that this removal would not have an adverse environmental impact due to the low quality of the existing habitat. However, the Conservation Board sees this as a substantial disturbance that, combined with the density and visibility of the project, will negatively impact the environment. (Black_Krupa_CB_024)

Response 6-2: As discussed in FEIS Chapter 2, "Environmental Analyses," the northern portion of the Project Site contains open canopy mixed forest/field areas resulting from previous disturbance, which would be cleared to facilitate the Preferred Alternative. A 17-lot single-family residential subdivision was removed from the northern portion of the Project and the area that contained landscaping and lawns was allowed to revert to scrub/shrub and mixed forest, creating a field-like environment with interspersed upland forest vegetation. The Preferred Alternative would disturb approximately 28.0 acres of the Project Site, which is a larger area of disturbance when compared to the DEIS Project. However, like the DEIS Project, most disturbance would be associated with the previously disturbed habitat in the northern portion of the Site (14.94 acres) and yield lower overall environmental effects than if more ecologically sensitive areas were disturbed. More heavily forested areas of the Project Site, including those areas along the western perimeter of the Project Site and the previously established conservation easement area, would be preserved and would provide continued habitat for forest interior species. The clearing of the mixed forest/field habitat on the Project Site is not anticipated to alter site biodiversity since that area is already altered as a result of previous site disturbance. The regulated wetland on the Project Site would not be disturbed and would be left intact. This area is considered the most likely migratory corridor for wildlife species on the site. Similar to the DEIS Project, several mitigation measures are

proposed to minimize the potential for impacts to vegetation and wildlife in connection with the Preferred Alternative, as described in Chapter 2, "Environmental Analysis."

Comment 6-3: Referring to the six (6) acres of vegetation to be removed for new construction, the Board would like to see a list of removed plants when the project reaches site plan stage. All Tree of Heaven plants should be removed. (Black_Krupa_CB_024)

Response 6-3: Comment noted. The Preliminary Tree Protection Plans included in both the DEIS and FEIS identify the trees having a diameter at breast height of 8 inches or greater by species, including Tree of Heaven (listed as "TOH"). All TOH specimens documented are proposed to be removed.

Comment 6-4: Comments were received with respect to the potential tree removal and other impacts to trees that could occur as a result of the Proposed Project.

> Hussain_013: For trees that have been there longer I think it would be good to understand what it would take and what implications it would have for you to protect those trees. We sometimes just pass over that and just looking at the diagrams that you had shown it seems like there is some significant changes in the landscaping that has an effect on that set up and I just would love to go deeper into that.
>
> Black_Krupa_CB_024: We are concerned with the removal of approximately six acres of woodland and 368 trees and the resultant impact in wildlife and open space.

Response 6-4: In total, the Preferred Alternative would result in the removal of approximately 744 trees with a DBH of 8 inches or greater (compared to 368 trees with the DEIS Project). Prior to removal of the approximately 744 trees identified for removal in the area of the site for which a tree survey was conducted, a permit from the Town's Building Inspector would be obtained in accordance with Chapter 308 of the Town Code. No unique trees were observed on the Project Site. A total of 898 new trees are proposed as part of the Applicant's preliminary landscaping plan for the Preferred Alternative, which is significantly more than the DEIS Project. It is expected that the landscaping plan and related planting schedule will be subject to refinement during the site plan review process. See also Responses 6-2 and 6-3.

Comment 6-5: Comments were received regarding the mitigation proposed for the Project's tree removal, including location and species of new plantings.

> Applicant plans to move trees along the roadway, approximately 451 new trees would be planted on site. I'd like to know how many new deciduous and new trees would be planted along King Street and also what would be the minimum height of those trees. (DiGiacinto_010)

The applicant also proposes removing 368 trees. Although the applicant proposes planting 451 new trees, the scientific community argues that the preservation of existing mature trees plays a vital role in combating climate change. (Black_Krupa_CB_024)

A reduced grass area gives the property owner the opportunity to increase the size of planting beds, creating "islands" of trees, shrubs, and perennials beyond what is proposed. The proposed tree rows can be enhanced with a more diverse variety of native trees, shrubs, and perennials. The increased plantings can provide shade, impede soil erosion, aid water absorption and retention, inhibit excessive runoff and flooding, enhance air quality, provide a natural habitat for wildlife, and add to the aesthetic quality of the property. Once established, rooted, and growing, these plantings require very little care. Trimming, deadheading, feeding, etc. generally are done two to three times per year, depending upon the species, and are far less costly than regular turf maintenance. The cost of these added plantings would be off-set multi-fold, over time, by the reduced costs of turf maintenance.

Suggestions of varieties of native trees and shrubs include common names: shad blow, American holly, sweetbay magnolia, chokecherry, viburnum (some varieties), chokebeny, sweetshrub, buttonbush, summersweet, artic fire red, and artic fire yellow dogwood, red rover dogwood, bottlebush, inkberry, winterberry, sweetspire, blueberry juniper, mountain laurel, ninebark, beach plum, and rose bay rhododendron. There is also an extensive variety of native ferns, ornamental grasses, and flowering perennials.

In Chapter 6, Part D, "Mitigation Measures for the Proposed Project (DEIS)," it is stated "The applicant's schematic landscaping plan includes retaining and revegetating areas within the development with native species". Detailed in the preliminary landscape plan/schedule are four (4) plant species that are NOT native; Rutgers dogwood, sycamore, white fir, and Colorado blue spruce.

The preliminary landscape plan also proposes a "thick" concentration of plantings of evergreens and some deciduous trees along the King Street border of the property, primarily for screening and noise mitigation.

Calculating the median, mature width of the proposed trees to be planted along the King Street wall, i.e., the trees proposed to be planted next to each other, is over 1,300 linear feet. The distance between the corner of Cooney Hill Road and to the approximate end of the planting is less than 1,000 feet.

Including the trees that are proposed in the staggered row behind the "front" row, these plantings will grow into each other, crowding each other's growth and preventing them from reaching their mature size and aesthetic beauty. (Black_Krupa_CB_024)

Response 6-5: The Applicant's preliminary landscaping plan incorporates a substantial amount of new native plantings in the areas of the Project Site to be maintained as open space. As shown on the plan included as Figure 1-11 in FEIS Chapter 1, "Project Description," a variety of native trees, shrubs, and perennials are proposed, with adequate spacing to ensure healthy mature growth over time. Non-native trees have been removed from the planting list. A total of 898 new trees are proposed as part of the

landscaping plan, which is significantly more than the DEIS Project. The landscaping plan and related planting schedule will be subject to refinement during the site plan review process.

Comment 6-6: Comments were received about the potential impacts to water quality from the Project's future use of fertilizers, pesticides, and fungicides.

> In addition, the Conservation Board would like to see that any approved project site plan disallow the use of fertilizers, pesticides, and fungicides. (Black_Krupa_CB_024)
>
> Increased chemical concentrations, including fertilizer and pesticide use, assumes safe applications when applied in accordance with manufacturers guidelines. This raises issues and concerns due to the multiple tenancy and ownership entities of the proposed project. (Black_Krupa_CB_024)
>
> Another proposed project mitigation measure is stated: "Elimination and Minimization of Fertilizer, Pesticide, Herbicide, Fungicide and other chemical concentrations through avoidance and containment, respectively". The Board requests that the Applicant define and detail what is being eliminated, including where, on what, and what the applied alternatives are, if any. Even if the property owner adheres to the minimal use of chemicals, the usage must be recorded. Included in the record should be what is used, what it is used for, what is it used on, how much is used, when is it applied, and who applied it. The use of organic fertilizers, pesticides, and fungicides on vegetation is a strongly recommended alternative to chemicals. Herbicides are a different story. Chemical herbicides are far more effective. However, the Board does not support the use of Glysophate based herbicides (aka round-up). (Black_Krupa_CB_024)

Response 6-6: Fertilizer and pesticide use, when applied in accordance with the manufacturer's guidelines, is not anticipated to have an impact beyond that of the Project Site's existing conditions. According to the Applicant, the integrated pest management plan (IPM) currently in place for the Project Site's existing office uses would be expected to remain in the future with the Preferred Alternative. Only reputable professionals, licensed and certified by the NYSDEC for the storage and application of these chemicals, would be contracted for landscaping services.

Comment 6-7: The Northeast Bald Eagle Project Screening Form link referenced in the DEIS is not correct. The correct link should be provided in the FEIS. The form appears to be located here: https://www.fws.gov/northeast/pafo/pdf/NE_Bald-Eagle_Project-Screening-Form_rev20200416.pdf. The Applicant should complete the form and submit the form to the Lead Agency as part of the FEIS. (Kaufman_TNC_022)

Response 6-7: Comment noted. The correct form is located at the following URL: *https://www.fws.gov/sites/default/files/documents/northeast-bald-eagle-project-screening-form-2021-12-01.pdf.* The form has been completed

and is provided in **Appendix E** of the FEIS. As noted in FEIS Chapter 2, "Environmental Analyses," the Applicant meets all the requested guidelines since the Project Site is over 0.5 miles from the known bald eagle nest and no other mitigation, beyond those measures included in the form and documented in Chapter 2, "Environmental Analyses," is required.

Comment 6-8: It was noted in the DEIS that the direct and indirect disturbances to vegetation, wildlife, and the environmental impacts due to the significant loss of trees are still unknown. Impacts to high quality habitat for wildlife, specifically the Indiana bat, Northern long-eared bat and bald eagle to name a few, have been identified as areas of concern, as these have been listed as the threatened or endangered species in this area of the Kensico waterways. (Black_Krupa_CB_024)

Response 6-8: With the Preferred Alternative, measures identified for the DEIS Project to mitigate potential impacts to threatened and endangered species remain applicable. As discussed in FEIS Chapter 2, "Environmental Analyses," while no Indiana bats or northern long-eared bats were observed on the Project Site during fieldwork, as a precautionary measure, the Applicant could limit tree-clearing activities between October 1 and March 31, unless the Applicant receives approval during Site Plan review from NYSDEC and the Planning Board that tree clearing can occur outside this time period. In addition, as recommended by the USFWS, the Applicant would ensure that no artificial dyes, coloring, insecticide, or algaecide such as copper sulfate, will be placed in stormwater control structures on the site. Per the Northeast Bald Eagle Project Screening Form (see **Appendix E**), the Applicant meets all the requested guidelines since the areas of potential blasting are more than 0.5 miles from a known bald eagle nest and no other mitigation, beyond those measures included in the form and documented in Chapter 2, "Environmental Analyses," is required.

CHAPTER 7: WETLANDS

Comment 7-1: No wetlands are to be disturbed at the Project Site. However, according to drawing C-302, small portions of two wetland buffer areas are proposed for development. The combined sum of the disturbed wetland buffer areas at both locations is about 2,800 square feet or 0.06 acres. After examining the Grading Plans, C-201 and C-202, these wetland buffer disturbances appear to be difficult to change and seem reasonable for their water quality benefits (Lake_WIG_023).

Response 7-1: Under the DEIS Project, approximately 0.19 acres of the wetland buffer would have been disturbed, including the emergency access gravel drive that was proposed, as discussed above. Under the Preferred Alternative, no direct impacts to the on-site delineated wetland would occur. The total disturbance to the 100-foot Town-regulated wetland buffer with the Preferred Alternative would be approximately 7,696 square feet, or 0.18 acres, or a decrease of 0.01 acres, or 567 square feet. However, unlike the DEIS Project, the Preferred Alternative does not include any impervious surfaces within the wetland buffer. The limited grading activities in the wetland buffer are associated with a proposed stormwater management basin, road and clubhouse. The removal of new impervious surfaces from the wetland buffer is a beneficial impact when compared to the DEIS Project and the current Site condition.

Comment 7-2: The Conservation Board request is that a Wetland Permit for this disturbance is sought in accordance with Town requirements and a plan with details for 2-1 mitigation be submitted to the Conservation Board for review, comment, and ultimate approval. (Black_Krupa_CB_024)

Response 7-2: The DEIS and FEIS acknowledge the requirement for a wetland buffer disturbance permit from the Planning Board in connection with site development. This permit would be sought at the time of site plan review. As discussed in Response 7-1 above, the 0.18acres of disturbance to the buffer under the Preferred Alternative is necessary due to proposed grading activities associated with a stormwater management basin. Unlike the DEIS Project, which impervious surfaces associated with an emergency access drive within the wetland buffer, the Preferred Alternative does not propose any new impervious areas within the buffer. Therefore, the Preferred Alternative reduces impacts to the wetland buffer when compared both to the DEIS Project and the existing condition.

CHAPTER 8: STORMWATER MANAGEMENT

Comment 8-1: The project site is situated within the Kensico Reservoir Basin, a New York City Watershed area. As such, the project will be required to comply with regulations from the NYCDEP, NYSDEC and the Town of North Castle. The NYCDEP has acknowledged the prior approval of the Stormwater Pollution Prevention Plan (SWPPP) issued in June 2005 and has compared the prior approved plan to the current proposal. The NYCDEP has indicated that the project will be reviewed as an amendment to the original approval, requiring that all newly proposed impervious surfaces be captured and treated and receive appropriate

runoff reduction. The applicant will be required to revise the plans and SWPPP as may be needed, to obtain the amended approval. In addition to approval by the NYCDEP, the plan will require coverage under the NYSDEC SPDES General Permit, GP-0-20-001, for Stormwater Discharges from Construction Activity as well as demonstrate compliance with Chapter 267, Stormwater Management of the Town Code. The owner will be required to file a Notice of Intent (NOI) with the NYSDEC to obtain the above-mentioned General Permit. The SWPPP should include a draft copy of the NOI for review. (Cermele_Kellard_KS_027)

Response 8-1: Comment noted. As indicated by NYSDEC, the Preferred alternative will be reviewed as a new project. A draft copy of the NOI is provided in Appendix M of the SWPPP.

Comment 8-2: The Wampus River and the Byram River are both County streams that flow through the Armonk hamlet just north of their confluence. The County Planning Board and the County Department of Public Works and Transportation have consistently advised the Town against the overdevelopment of new impervious surfaces near these waterways which are prone to downstream flooding. As our region continues to experience more frequent and intense rainstorms that have resulted from climate change, we are opposed to the concept of building more parking lots within this sensitive area to accommodate the parking demands created by irresponsible residential development. (Drummond_WCPB_020)

Response 8-2: The Preferred Alternative is not located within either the Wampus River or Byrum River watersheds.

Comment 8-3: The Conservation Board also recommends replacing all the proposed concrete walkways with pervious materials. (Black_Krupa_CB_024)

Response 8-3: The proposed walkway around the existing pond has been changed to porous pavement.

TECHNICAL COMMENTS ON THE PRELIMINARY SWPPP

Comment 8-4: Northeast Regional Climate Center (NRCC) meteorological data was paired with rainfall distribution data for Westchester County to evaluate water quantity. However, no supporting data is presented in Appendix A, Hydrology Existing Condition, to validate the assigned runoff curve numbers for the drainage areas to the design points and design lines. This information needs to be included in Appendix A. (Lake_WIG_023)

Response 8-4: The Extreme Precipitation Tables for the Project Site from the NRCC have been added to Appendix A of the SWPPP.

Comment 8-5: The time of concentration (T_c) is defined as the time required for a drop of water to travel from the most hydrologically remote point in a sub-catchment to the outlet. An accurate Tc is necessary to assure that excessive or erosive flows do not impact downstream reaches. Beginning on page 22/195 (page 519 DGEIS), the T_c is calculated using the unpaved coefficient for shallow concentrated flow (SCF). This out-of-date calculation is a remnant from Technical Release 55 (TR55) and should not be used for developing existing condition runoff discharges. (Pond Pack also appears to have this embedded into their hydrology calculations.) Technical Release 20 (TR20), Hydro CAD, or another more flexible model should be used to calculate the T_c, applying the unpaved coefficient for SCF. According to the U.S. Department of Agriculture National Resources Conservation Service's National Engineering Handbook, Section 4, Hydrology, Figure 15.2, there are coefficients for 9 different land cover surfaces for SCF or overland flow. TR55 only allows a "Paved" or "Unpaved" surface, which due to high velocity factors, shorten the T_c resulting in a prediction of higher existing condition runoff discharges rates and false peak discharges. Appropriate coefficients need to be used in all drainage area calculations. T_c concentrations need to be re-tabulated and the results need to be re-analyzed. (Lake_WIG_023)

Response 8-5: All coefficients used in the calculations follow TR-55, which is the industry standard and within the requirements set by NYSDEC and NYCDEP. The Applicant's engineer has confirmed with the Town's engineering consultant that this methodology is acceptable.

Comment 8-6: Comments were received regarding the preliminary Stormwater Pollution Prevention Plan (SWPPP), including suggestions about alternative data to use in calculations, additional calculations and evaluations to be performed, requests to add details to drawings including erosion and sediment control details, subsurface infiltration systems, labels, volumes, and measurements. (Lake_WIG_023, Cermele_Kellard_KS_027).

Response 8-6: Comment noted. This additional information will be provided during the Site Plan review process.

Comment 8-7: A Pollutant Load Assessment (PLA) was included in the PSWPPP. Although comprehensive, the PLA utilized data for loading rates and pollutant removal efficiencies that are over 25 years old. The 2018 "East of Hudson Watershed Corporation Stormwater Retrofit Project Design

Manual Project Years 6-10" (https://eohwc.org/wp-content/uploads/2018/02/SRP-DesignManual-Yr-6-10.pdf), includes DEC event mean concentrations and assigned pollutant removal performance ratings for specific stormwater management practices. The PLA reviewed here needs to be updated using the East of Hudson Watershed Corporation values. (Lake_WIG_023)

Response 8-7: The existing PLA and proposed PLA have been updated with the East of Hudson Watershed Corporation values and are provided in Appendices D and E of the SWPPP, respectively.

Comment 8-8: Page 1346/1852 of the DGEIS, Appendix F of the PSWPPP, provides a porous pavement worksheet and presents calculations for "permeable interlocking concrete pavers" (PICP). However, PICP do not act like porous pavement (PP). PICP only allows infiltration at the joints, whereas PP allows water to infiltrate across its whole surface. For this reason, PICP are generally assigned a runoff curve number based on the open area of the joint versus the entire pavement area. These pavers need to be re-evaluated to demonstrate their ability to allow water to pass through to the porous drainage layer beneath the paver blocks. (Lake_WIG_023)

Response 8-8: Comment noted. PICP are no longer proposed with the Preferred Alternative.

Comment 8-9: No stormwater management practice (SMP) details were presented as part of the PSWPPP submittal. These details and associated drawings must be provided to assure compliance with all criteria and permit obligations. (Lake_WIG_023)

Response 8-9: Comment noted. SMP details will be provided during the Site Plan review process.

Comment 8-10: No erosion and sediment control (ESC) details were presented in the PSWPPP design drawings. These details, which provide pertinent data and dimensions, must be added to the SWPPP to assure compliance with the General Permit (GP-0-20-001). (Lake_WIG_023)

Response 8-10: Comment noted. ESC details will be provided during the Site Plan review process.

Comment 8-11: A note needs to be added to the PSWPPP on drawing C-401 addressing how and where waste material from clearing and grubbing operations will be disposed. (Lake_WIG_023)

Response 8-11: Comment noted. A note has been added to the PSWPPP and drawing C-401 regarding waste material from clearing and grubbing.

Comment 8-12: Two subsurface infiltration systems (SSISs) need to be added to drawings C-100 and C-101. (Lake_WIG_023)

Response 8-12: One subsurface infiltration system is now proposed with the Preferred Alternative. The subsurface infiltration system is shown on drawings C-301 and C-401.

Comment 8-13: Three SSISs need to be added to drawing C-201. (Lake_WIG_023)

Response 8-13: The outline of the subsurface infiltration system is shown on drawing C-201.

Comment 8-14: On drawing C-202, all 3:1 constructed slopes are required to be labeled and covered with a rolled erosion control product (RECP) as part of the proposed site stabilization. These slopes should also be designated and shaded in the erosion and sediment control plan sheets C-401 and C-402. (Lake_WIG_023)

Response 8-14: Comment noted. All proposed slopes are 3:1 or flatter. If any slopes change to steeper than 3:1 during Site Plan Approval, they will be covered with RECP.

Comment 8-15: Generally, a disturbance limit boundary of at least 15 feet beyond the actual grading limits is shown on site plans. This 15-foot buffer allows for several field activities, such as stripping of topsoil for slopes, equipment movement, and maintenance of required erosion and sediment control practices. For the Project, it appears the disturbed limit shown on the drawings is right at the edge of the proposed completed work and does not allow for supplemental construction activity. These boundary limits need to be expanded to accommodate and support the proposed field work. (Lake_WIG_023)

Response 8-15: Comment noted. All silt fences were placed as close to the disturbed area as possible in accordance with the New York State Standards and Specifications for Erosion and Sediment Control.

Comment 8-16: On drawing C-401, the concrete truck washout station needs to be relocated from the west swale, out of the watercourse and away from the catch basin. (Lake_WIG_023)

Response 8-16: Revised concrete truck washout stations associated with the Preferred Alternative are shown on drawings C-401 and C-402.

Comment 8-17: For the sediment trap and sediment basin located on drawings C-401 and C-402 respectively, the drainage area and sediment volumes must be shown on the drawings. (Lake_WIG_023)

Response 8-17: The drainage area and sediment volume for the sediment traps and sediment basin are shown on drawings C-401 and C-402.

Comment 8-18: Stone check dams need to be placed on the plan view on drawing C-401, as noted in Note #9, Multifamily Phase Sequence. The numbering order for the general Notes column needs to be corrected. In addition, the Sequence Notes call for the topsoil stockpiles to be covered. The PSWPPP needs to specify the type of cover material to be used, such as seed and mulch or plastic sheeting. (Lake_WIG_023)

Response 8-18: Comment noted. Stone check dams have been added to the ESC plans and the plan notes. The PSWPPP notes have been revised accordingly.

Comment 8-19: On drawing C-402 the soil stockpile area is shown outside the disturbed area limit. This needs to be corrected. (Lake_WIG_023)

Response 8-19: Comment noted. All soil stockpiles are now shown within the limits of disturbance.

Comment 8-20: Recent research has shown that many stormwater treatment practices can export higher concentrations of total phosphorus (TP) than are present in their influent. Results published in the International Best Management Practices (BMP) Database: 2020 Summary Statistics, https://www.waterrf.org/system/files/resource/2020-11/DRPT-4968_0.pdf show that bioretention cells, grass strips and bioswales can export as much as 39.5 percent higher event mean concentrations (EMC) of TP. Grass roofs can also increase these values even higher if not properly designed. The final design of the soil/media mix should ensure that no increase in TP load will result from the practice. (Lake_WIG_023)

Response 8-20: Comment noted. Green roofs are no longer proposed. The soil/media mix will be in accordance with NYSDEC requirements.

Comment 8-21: The plans should include planting plans for each of the vegetated stormwater treatment systems including species, size and quantities of each planting material. (Cermele_Kellard_KS_027)

Response 8-21: Comment noted. Detailed planting plans will be prepared during the Site Plan review process.

Comment 8-22: The plans should include construction details and cross-sections of the various practices, as appropriate, to support the provided sizing calculations and demonstrate compliance with the design guidelines and specifications. (Cermele_Kellard_KS_027)

Response 8-22: Comment noted. This information will be provided during the Site Plan review process.

CHAPTER 9: UTILITIES

Comment 9-1: Comments were received regarding the DEIS Project's estimated water usage, as well as the impacts of that demand on groundwater.

> Based on the Conservation Board's review and understanding of the available background material related to water usage and supply, we do not believe that the proposed project can proceed as currently proposed. In particular, the Conservation Board believes that this project cannot proceed until:
>
> - It has been conclusively determined that on-site wells can provide 100 percent of the water required for residential and commercial use, irrigation, and fire protection. This determination has not yet been made/completed, and/or
> - Plans are submitted, reviewed, and approved for connecting this project to Town or other water sources. We do not believe that such plans have been submitted.
>
> Until the applicant can assure the Conservation Board and the Town Board that an adequate supply of water will be available, we do not believe that this project as currently proposed can proceed. (Black_Krupa_CB_024)
>
> While Swiss Re is generally supportive of the Airport Campus initiative, it remains concerned about the impact of the proposed rezoning on water supply and water quality. Based on analysis of water demand on the Swiss Re site completed by Swiss Re, the maximum water usage for the building and cooling tower for the existing Phase 1 Building on its property was recorded to be approximately 54,000 gallons per day ("gpd"). In addition, Swiss Re has the ability, and previously received approval for another similar building on its property, which could have equivalent demands as the Phase 1 Building. As such, the potential level of water usage on the Swiss Re property appears significantly greater than the estimated volume of 13,740 gpd that would be projected using the New York State Design Standards for Intermediate Sized Wastewater Treatment Systems, (2014), as reported in the Airport Campus DEIS. (Richmond_Z&S_025)
>
> In connection with this, Swiss Re would be pleased to participate in future discussions on water demand and supply, including future discussions with the County of Westchester and the Town of North Castle on alternative measures beyond on-site well water to meet future water demand, including extension of public water supply facilities along King Street. (Richmond_Z&S_025)

> Average daily water demand for the project is estimated to be 58,600 gpd. The estimate does not include irrigation supply which will be supplied from the on-site pond or fire supply which would be stored within tanks at the multifamily building. (Cermele_Kellard_KS_027)
>
> NYS Regulations require that a well supply serving a water system be able to supply twice the average daily demand with the best producing well out of service. Water supply for the project is proposed from four (4) existing on-site wells (Wells 3, 6, 7 and 8), which range between 620–760 feet deep. The applicant performed a 72-hour pump test of the four (4) on-site wells servicing the project. The combined well yield of the test was 108.5 gpm, however, with the best well out of service, the combined yield of the remaining wells is 68.5 gpm or 98,640 gpd. The proposed project requires a combined yield of 117,200 gpd (58,600 gpd x 2 = 117,200 gpd). A deficit of 18,560 gpd or 12.9 gpm. (Cermele_Kellard_KS_027)
>
> The applicant notes within the report two (2) options available to obtain the required supply. Should the project be approved as presently proposed, the applicant will need to develop and test the additional supply. (Cermele_Kellard_KS_027)
>
> Laboratory results of water quality testing of the four (4) proposed supply wells for the project have not yet been provided. (Cermele_Kellard_KS_027)
>
> Although pumping tests were performed for the on-site wells, it is important to understand whether the aquifer can be replenished during drought conditions at a rate which can support the project, as well as support the rezoned parcels. (Cermele_Kellard_KS_027)

Response 9-1: As discussed in FEIS Chapter 2, "Environmental Analyses," the Preferred Alternative is anticipated to generate approximately 53,810 gallons per day (gpd) of water demand (including potable water and sanitary wastewater), approximately 4,790 gpd less than the 58,600 gpd that was calculated for the DEIS Project. Water for on-Site irrigation would continue to be sourced from the existing on-site pond and, if permission is received from the County, one or more on-Site wells. It is conservatively estimated that 65,000 gpd would be used to irrigate the existing and proposed lawn and landscaped areas.

Unlike the DEIS Project, which contemplated the use of on-site wells to supply water, the Preferred Alternative's water would be supplied through connection to North Castle Water District #8. As a component of the Preferred Alternative, the municipal water system would be extended from its northern terminus at New King Street into the Project Site, adequately sized to supply the Project Site as well as further extension to the Town. On the Project Site, the Applicant would construct a 157,000-gallon water storage tank, to provide both domestic and fire water, as required by the Fire Code. The tank would be placed behind the proposed parking structure near the converted multifamily building on the Site. In addition, the Applicant would construct a water booster pump station adjacent to the water storage tank in order to provide adequate pressure

and flow to the Project. As such, the Project Site would be served with municipal water that has the capacity to meet the anticipated demand of the Preferred Alternative. If municipal water was unavailable, the Applicant would utilize the existing on-site groundwater supply as part of creating a community water system to meet the domestic demand of the Site. The existing on-site pond and one or more of the existing on-Site wells may still be utilized for irrigation purposes, to the extent feasible and permitted by the County.

Comment 9-2: Average daily flows for office space were changed between the project calculations provided herein and the previous calculations within the Engineering Report used when the sewer system was originally approved and constructed. Previous values used a flow per square feet for office space while the new calculations use a flow per employee, resulting in significantly lower flow values. This is an acceptable method of determining average daily flows by the Health Department when the employee population can be pre-determined. The applicant also used a multiplier of 3.39 when converting average daily flow to peak hourly flows. The standard acceptable by the Health Department is 4.0. Peak flow values should be corrected. (Cermele_Kellard_KS_027)

Response 9-2: Comment noted. The Preferred Alternative does not contain office uses. Daily water demand calculations for the Preferred Alternative in Chapter 2, "Environmental Analyses."

Comment 9-3: The applicant has examined the existing sanitary sewer infrastructure servicing the project site and parcels to be rezoned. Wastewater demand was estimated and utilized in determination of the necessary improvements to the existing sanitary sewer infrastructure. The study reveals that no modifications are required to the Town or County collection system or force mains to service the project. Pump Station #2 at King Street and #3 at New King Street will require upgrades to meet present Health Department regulations. Work would include modifications to the wet wells and new pumps at each pumping station. (Cermele_Kellard_KS_027)

Response 9-3: Comment noted.

Comment 9-4: Comments were received regarding the mitigation proposed for the Project's sanitary sewer impacts, including through reductions in Inflow & Infiltration (I&I) and other means.

> Drummond WCPB_020: While the DEIS includes a discussion regarding the need for nearby pump stations to be upgraded to current standards, the document did not include the reduction of inflow and infiltration (I&I) from

the existing infrastructure as a mitigation measure to offset the increase in flow that the development would add to the Blind Brook Sewer District.

The FEIS must include a discussion regarding the County Department of Environmental Facilities' policy requiring the applicant to identify mitigation measures that will offset the projected increase in flow through I&I at a ratio of three for one. In particular, the FEIS should provide specific details on how implementation of these improvements is to be accomplished. For example, will the applicant be required to place funds into a dedicated account for I&I work based on a per gallon cost of removal of flow through I&I? How will I&I projects be identified? Who will conduct the work and in what timeframe?

The County Planning Board further recommends that the Town implement a program that requires inspection of sewer laterals from private structures for leaks and illegal connections to the sewer system, such as from sump pumps. These private connections to the system have been found to be a significant source of avoidable flows. At a minimum, we encourage the Town to enact a requirement that a sewer lateral inspection be conducted at the time property ownership is transferred and any necessary corrective action be enforceable by the municipal building inspector.

The daily flow report included within Appendix F-2 provides a total daily flow per day between 11/13/2018–12/6/2018 and includes the corresponding daily rainfall totals. It is evident from the report that flows are higher during periods of significant rainfall events. The applicant should examine inflow and infiltration of the existing system in an effort to reduce such unwanted flows. Such a study would be appropriate during the site plan review phase of the project. (Cermele_Kellard_KS_027)

Response 9-4: The Applicant would mitigate the increase in the Preferred Alternative's sanitary sewer flow at a rate of 3 to 1. The method by which this mitigation would occur would be coordinated with the Town Engineer during site plan review and approval.

Comment 9-5: Comments were received questioning whether there is sufficient groundwater supply to serve the full build out of the DOB-20A as considered in the DGEIS.

The DGEIS estimates the total water supply to service full development of all rezoned parcels to be 146,300 gpd. This would require the development of 292,600 gpd of well supply with the best wells on each parcel not included. The ability of the rezoned parcels to support the required supply for the complete district has not been analyzed within the report. (Cermele_Kellard_KS_027)

The April 5, 2021 submission of the Draft EIS included an evaluation of the aquifer. The watershed utilized within the applicant's evaluation did not follow the surface contours of the area and appeared significantly larger than our estimate. The applicant noted their evaluation included a combination of analytical tools useful for water resource planning. Our comments at that time requested that the applicant provide the backup data to support their assessment. Instead of providing the requested data, the aquifer evaluation was removed for the report.

> The previous report expanded the watershed to 282.2 acre encompassing portions of the reservoir, lands down gradient of the project site and portions of Citigroup and Swiss Re properties.
>
> The report estimated a drought year recharge of 118,740 gpd well below the 146,300 gpd required for all parcels included within the rezoning, a 27,560 gpd deficit. The applicant should substantiate the recharge expected at the project site and also the expected recharge for the proposed rezoned parcels. (Cermele_Kellard_KS_027)

Response 9-5: As discussed in FEIS Chapter 1, "Project Description," in response to evolving market needs as well as comments received on the DEIS, the Applicant has amended its original petition to request that the Town Board map the Senior Housing Portion of the Site within the Town's existing R-MF-SCH Zoning District, and map the Townhouse Portion of the Site within the Town's existing R-MF-A Zoning District. The Preferred Alternative will repurpose the Project Site's southernmost office building as approximately 50, 2-bedroom apartments in an age-restricted (55+) multifamily building, and will construct approximately 125, 2-story, 3-bedroom townhomes.

The DEIS prepared by the Applicant, and accepted by the Lead Agency, included consideration of the potential, hypothetical, development of sites other than the Project Site (including Swiss Re) that could theoretically be permitted by the DEIS Zoning. These potential impacts were analyzed in the "generic" portion of the document, also referred to as the Draft Generic Environmental Impact Statement (DGEIS). As the Applicant has requested that the Town Board defer further consideration of zoning amendments that directly affect sites other than the Project Site while it considers the Revised Proposed Zoning, a Final Generic Environmental Impact Statement (FGEIS) is not required to, and has not, been prepared.

The Applicant will petition the Town of North Castle to include the Project Site within the North Castle Water District #8. As a component of the Preferred Alternative, the municipal water system would be extended from its currently proposed northern terminus of New King Street to the Project Site, adequately sized to supply the Project Site as well as further extension to the Town. On the Project Site, the Applicant would construct a 157,000-gallon water storage tank, to provide both domestic and fire water, as required by the Fire Code. The tank would be placed behind the proposed parking structure near the converted multifamily building on the Site. In addition, the Applicant would construct a water booster pump station adjacent to the water storage tank in order to provide adequate pressure and flow to the Project. As such, the Project Site would be served with municipal water that has the capacity to meet the anticipated demand of the Preferred Alternative. If

municipal water was unavailable, the Applicant would utilize the existing on-site groundwater supply as part of creating a community water system to meet the domestic demand of the Site.

CHAPTER 10: TRAFFIC AND TRANSPORTATION

Comment 10-1: Comments were received regarding the trip generation of the DEIS Project and how it would compare with a project that was all residential.

> In terms of the traffic studies that were done, you're saying that the traffic trips that would arise under this would be less than if it were all office. The basic question I have is whether those trips would be at the same times or different times? In some ways they appear countercyclical, which can be a good thing with residential. (Berra_002)
>
> I request that you include a table similar to Table 10-1, which is Site Generated Traffic Volume Comparisons. And if the entire parcel were to be residential. I would like to see a table showing those traffic volumes. (DiGiacinto_010)

Response 10-1: The Applicant's Preferred Alternative is exclusively residential. As discussed in FEIS Chapter 2, "Environmental Analyses," the Preferred Alternative would generate significantly less traffic when compared to the DEIS Project and significantly less traffic than if the Project Site's existing office buildings were re-occupied with office uses.

The Preferred Alternative would generate a total of 82 trips (20 entering trips and 62 exiting trips) during the Weekday Peak AM Hour, a total of 46 trips (23 entering trips and 23 exiting trips) during the Weekday Peak Midday Hour, and a total of 99 trips (62 entering trips and 37 existing trips) during the Weekday Peak PM Hour. In order to be conservative, it should be noted that no credit (reduction in trips) has been taken to account for the age-restricted nature of the multifamily housing proposed. Trip generation estimates were based on the Institute of Transportation Engineers (ITE) land use code 220 (multifamily housing).

When compared to the DEIS Project, the Preferred Alternative would result in 171 fewer total trips during the Weekday Peak AM Hour, 90 fewer total trips during the Weekday Peak Midday Hour, and 186 fewer total trips during the Weekday Peak PM Hour. FEIS **Appendix F** contains a technical memorandum completed by Colliers Engineering and Design (the Applicant's traffic engineer), which provides trip generation, arrival/departure distributions for the proposed apartments and townhomes, and the resulting traffic volumes and levels of service analyses for the study area intersections.

Comment 10-2: Page 10-6 – Chapter 10.D.1.a., Appendix G-1, Section H and Figures 24 through 31-A (Site Traffic Distribution): The site traffic distribution used in Figure 24 for the Hotel and Apartments arrivals is incorrect, as it has all volumes using the Cooney Hill Road access drive and the directional distribution is incorrect when compared to the departure distribution. Figure 24-A is correct. (Galante_H&H_021)

Response 10-2: Traffic volume figures for the Preferred Alternative have been updated and are contained in FEIS **Appendix F**.

Comment 10-3: The site traffic distribution used in Figure 30 for the Townhouses arrivals is incorrect, as it has all volumes using the NYS Route 120 access drive and the directional distribution is incorrect when compared to the departure distribution. Figure 30-A is correct. (Galante_H&H_021)

Response 10-3: Traffic volume figures for the Preferred Alternative have been updated and are contained in FEIS **Appendix F**.

Comment 10-4: 10-5 through 10-7 – Chapter 10.D.1.a., Appendix G-1, Section G and Figures 32 through 40-A (Site Traffic Generation): The errors found in the distribution figures were not carried over into the site traffic generation figures. The site traffic generation and assignment figures are appropriate. On Page 10-6, paragraph below Table 10-1, during the weekday morning peak hour there are 108 fewer trips entering, not 103 trips. (Galante_H&H_021)

Response 10-4: Traffic volume figures for the Preferred Alternative have been updated and are contained in FEIS **Appendix F**.

Comment 10-5: NYS Route 120 at Swiss Re/IBM Access Drives – The southbound right turn channelized lane should have been set to free not permitted in the timing settings; however, this improves the operations for the southbound right turn lane, southbound approach ,and intersection overall Levels of Service. The phasing does not match the timing plan; however, this was done to provide the HCM 6th Edition results required by NYSDOT and is acceptable. (Galante_H&H_021)

Response 10-5: The analyses for NYS Route 120 at Swiss Re/IMB Access Drives have been updated accordingly and are contained in FEIS **Appendix F**.

Comment 10-6: NYS Route 120 at American Lane South/113 King Street Driveway – The phasing does not match the timing plan; however, this was completed to provide the HCM 6th Edition results required by NYSDOT and is acceptable. Based on our field visit, the northbound left turn protected

arrow into the site was never activated and possibly the detection is not working. (Galante_H&H_021)

Response 10-6: Comment noted. With the redevelopment of the Project Site, the northbound left turn phase can be activated.

Comment 10-7: NYS Route 120 at Gateway Lane – The phasing does not match the timing plan; however, this was completed to provide the HCM 6th Edition results required by NYSDOT and is acceptable. The Phase 5 split should have been 45 seconds during the weekday morning peak hour; however, this does not change the results of the analysis. (Galante_H&H_021)

Response 10-7: The analyses for NYS Route 120 at Gateway Lane have been updated and are contained in FEIS **Appendix F**.

Comment 10-8: NYS Route 22 at Broadway/Sir John's Plaza – The phasing does not match the timing plan; however, this will not change the results of the analysis. (Galante_H&H_021)

Response 10-8: Comment noted.

Comment 10-9: NYS Route 22 at Central Westchester Expressway/Reservoir Road/Church Street – Based on a field visit, the eastbound approach should be a left turn only and shared left/through/right lane. (Galante_H&H_021)

Response 10-9: The analyses for NYS Route 22 at Central Westchester Expressway/Reservoir Road/Church Street have been updated accordingly and are contained in FEIS **Appendix F**.

Comment 10-10: Based on our review of the capacity tables, there are a few minor needed corrections. At the intersection of NYS Route 22 and North Broadway/Sir John's Plaza, the intersection overall Level of Service during weekday morning peak hour for the build conditions with DEP Improvements should have been "B" not "C." At the intersection of NYS Route 22 and Central Westchester Expressway & Reservoir Road/Church Street, the intersection overall Level of Service during weekday afternoon peak hour for the existing conditions should have been "E" not "D." (Galante_H&H_021)

Response 10-10: The Level of Service summary table has been updated accordingly and is contained in **FEIS Appendix F**.

Comment 10-11: Page 10-18 – Chapter 10.D.7 and Figure 10-2 and Appendix G-1, Section L (Stopping Sight Distance (SSD) Analysis): The requirements for SSD should be adjusted for approach grades, as Cooney Hill Road has a downhill grade from east to west. Also, the profiles should have an object height of 2.0 feet at the site driveway, not 3.5 feet as shown. Also, based on a field visit, there is a concern with limited sight distance exiting Cooney Hill Road onto NYS Route 120 (King Street) in both directions. The Applicant should provide an ISD analysis for this intersection and offer any mitigation to improve ISD based on required standards. (Galante_H&H_021)

Response 10-11: Updated Stopping Sight Distance (SSD) and Intersection Sight Distance (ISD) analysis has been provided for the Cooney Hill Road / NYS Route 120 (King Street) intersection (in both directions) based on the comments received. The updated analysis and associated figures are provided in Section 2.B.8.a.(ii) of Chapter 2, "Environmental Analyses."

Comment 10-12: Page 10-19 – Chapter 10.E (Mitigation): Based on a review, the Applicant provided possible timing changes to the intersection of NYS Route 120 at Gateway Lane during the weekday afternoon peak hour. Based on the results of the analysis, there is a significant impact to the southbound lane group and approach of 103.4 seconds and the intersection overall of 34.8 seconds during the weekday afternoon peak hour. The Applicant should provide improvements to this intersection for the proposed project. Also, any improvements to this intersection's signal timings will need to include intersection of NYS Route 120 at New King Street, as these two intersections are coordinated. It is recommended that the Applicant explore as part of the improvements to the NYS Route 120 at Gateway Lane intersection a southbound left turn advanced left turn arrow, as well as the feasibility of a southbound left turn lane. With the timing changes provided, the northbound and southbound lane groups will continue to operate over capacity at a volume to capacity ratio of 1.09 and 1.00 and delays just below an "F" at 79.1 seconds on the southbound approach.

As noted in Comment 6b, based on a field visit, the northbound left turn protected arrow into the site was never activated and possibly the detection is not working. The Applicant should consider upgrading the detection for the northbound left turn, as well as the American Lane South and 113 King Street Driveway approaches and revising the timing plan to have no recall on the American Lane South and 113 King Street Driveway approaches, as well as the northbound left turn.

The results of the analysis indicate that the I-684 southbound off-ramp to Airport Road will continue to operate at a Level of Service "F" (long

traffic delays) during the weekday morning peak hour, with a significant increase in vehicle delay of 93.1 seconds and the volume to capacity ratio which will change from 2.269 to 2.472 and the 95th percentile queue increasing from 1,328 feet to 1,400 feet. The Applicant should discuss if there are any mitigation options possible to address these impacts. This represents significant traffic delays, which require mitigation, where feasible. (Galante_H&H_021)

Response 10-12: As summarized in FEIS Chapter 2, "Environmental Analyses," and FEIS **Appendix F**, the Preferred Alternative will generate significantly less traffic than the DEIS Project, or the re-occupancy of the two existing office buildings, which is considered the "No Build" condition.

NYS Route 120/Gateway Lane (Intersection 8)

The Preferred Alternative is anticipated to generate 26 vehicles (6 making the left) on the shared southbound approach during the noted weekday afternoon peak hour. As shown on the updated Level of Service Summary Table in FEIS **Appendix F**, the southbound delay would be significantly reduced from the No-Build Condition (reduction of 46.4 seconds) as would the overall intersection delay (reduction of 25.8 seconds).

With the Preferred Alternative and potential signal timing changes discussed in **Appendix F**, the overall intersection is projected to operate at an improved Level of Service "C" with an improved Level of Service "D" on the southbound approach as compared to the No Build condition.

Based on the results of the analysis and anticipated additional site generated traffic, a separate left turn lane has not been considered. It should be noted that given the location of the reservoir, it is unlikely that this improvement could be made given the approval required.

In addition, the NYS Route 120/New King Street intersection analysis has been updated to optimize the off-sets to maximize coordination between the two intersections.

Airport Road/I-684 SB On/Off Ramp (Intersection 12)

As shown on the updated Level of Service Summary Table for the Preferred Alternative (see FEIS **Appendix F**), the increase in delay would be reduced from the noted 93.1 seconds to 42.6 seconds during the weekday morning peak hour (when compared to the DEIS Project). It should be noted that improved Level of Service and delays will be experienced during the weekday midday and weekday afternoon peak hours when compared to the No-Build condition.

It should be noted that for unsignalized intersections, it is not uncommon for the side road (minor approach) to operate with delays while the major

road operates at better Levels of Service. A potential mitigation for unsignalized intersections would be signalization, however it is likely that this intersection would not meet the required traffic signal warrants.

NYS Route 120/113 King Street/American Lane S. (Intersection 7)

See Response 10-6. With the redevelopment of the Project Site, the northbound left turn phase can be activated.

Comment 10-13: Comments were received regarding the walkability of the site and opining that the Applicant consider bicycle mobility as it further develops the site plan. (Drummond_WCPB_020)

> We note that the site plan shows sidewalks and paths within the interior of the site, connecting the various buildings. However, the site plan does not contain pedestrian connections between the site's buildings and King Street or Cooney Hill Road. Connections between the buildings and road frontages is an important consideration, especially due to the location of a Bee-Line bus stop located at the intersection of the site's driveway and King Street. The lack of a pedestrian connection along this driveway creates an unsafe and unequitable environment for those needing to access jobs or services on the site using Bee-Line buses. This will be especially problematic if medical offices are considered for the site since transit services are often used by patients seeking access to medical appointments. The Town should not approve the site plan for any mixed-use development on this site without this basic and essential form of access. (Drummond_WCPB_020)
>
> As new regulations are being considered for the DOB-20A district, we encourage the Town to consider the role of bicycle mobility in developments across all DOB-20A zoned sites and their proximity to the intersection of King Street and Route 22. Both roads are popular with cyclists, which is recognized by the Town's Comprehensive Plan which discusses a vision of a multi-use path along the Route 22 corridor. We recommend the proposed zoning amendments and site plan account for this and consider how bicycle mobility and access can be provided internally within each campus as well as beyond, with potential connections to adjacent properties that create a larger network of mobility that can include both King Street and Route 22. We point out that Plainsboro Township, New Jersey has had some successes with office campus conversions that have included new multi-use path segments that ultimately became part of a larger network. We encourage North Castle to think similarly about how the reinvention of these campuses can be leveraged to expand non-motorized transportation. (Drummond_WCPB_020)

Response 10-13: As discussed in FEIS Chapter 1, "Project Description," in response to evolving market needs as well as comments received on the DEIS, the Applicant has amended its original petition to request that the Town Board map the Senior Housing Portion of the Site within the Town's existing R-MF-SCH Zoning District, and map the Townhouse Portion of the Site within the Town's existing R-MF-A Zoning District. The Applicant is no longer proposing text changes to the DOB-20A Zoning

District, and no adjacent sites in the DOB-20A district would be affected by the Applicant's amended petition. The Preferred Alternative would repurpose the Project Site's southernmost office building as approximately 50, 2-bedroom apartments in an age-restricted (55+) multifamily building, and will construct approximately 125, 2-story, 3-bedroom townhomes.

The Applicant recognizes the importance of providing safe access to the existing Bee-Line bus stop along King Street and safe connections for bicyclists to access the Route 22 and King Street corridors. As discussed in FEIS Chapter 2, "Environmental Analyses," the Preferred Alternative's residential use (absent a hotel and office use) would generate significantly less vehicle trips during peak hours, and traffic internal to the site will be comparable to other age-restricted developments in the Town. The proposed internal circulation drives would be a minimum of 24 feet wide and designed to safely accommodate pedestrians and bicyclists. Details of crosswalks, sidewalks, and traffic calming measures within the development would be finalized during the site plan review process. It is also noted that the Preferred Alternative would include the development of on-site walking paths.

Comment 10-14: This project, along with other proposed projects near the Armonk Hamlet, may create unacceptable traffic, parking and congestion impacts within the hamlet area. The Town has recently completed the Armonk Parking Study. Part of the report notes that "a 20 percent increase in downtown activity, for example, generated by the new near downtown households and hotel rooms, would result in peak-hour occupancy measures closer to the low-end of the model projections – 577 parked cars, compared to the model projection of 574 parked cars. Such a dramatically positive response to these new developments, in terms of increased downtown shopping, dining, and other activity, would utilize about 86 percent of the existing supply. (Kaufman_TNC_022)

In a well-managed system, this is an optimal balance of demand/supply efficiency. This suggests that there is significant capacity to accommodate increased downtown activity, particularly with the implementation of parking management strategies outlined in this report.

As more downtown and near downtown development continues, however, the Town may want to plan for supply expansions to accommodate peak parking demand of closer to high-end of the model projections—663 parked vehicles—which would suggest an optimal, well-managed supply of 730-765 spaces."

Given the recommendations of the report, the Lead Agency will begin planning for expanded parking in the Armonk hamlet. The Applicant

should indicate whether consideration would be given to contributing toward this goal as part of a Community Benefits Agreement. (Kaufman_TNC_022)

Response 10-14: The Preferred Alternative is a significantly less-intense development of the Project Site than the DEIS Project in terms of the density, intensity, and mix of uses. It is also a less intense use than if the current office buildings were re-occupied. As such, the Preferred Alternative would not contribute to a potential increase in demand for parking in the hamlet. As noted in the DEIS, the Lead Agency anticipated a Community Benefit Agreement, or some other mechanism, would be established to financially assist the Town in implementing long-term parking solutions for the hamlet. The Applicant would continue to coordinate with the Town on whether further mitigation was appropriate for the Preferred Alternative or other community needs.

Comment 10-15: The DEIS acknowledges that the placement of a high-density apartment building in this isolated location could add to cumulative traffic and parking impacts in the Armonk hamlet. While the DEIS discusses a potential community benefit agreement that could assist with the construction of more parking in the hamlet, a better solution would be for the Town to focus on creating more residential development that is walkable to the Armonk hamlet. (Drummond_WCPB_020)

Response 10-15: Comment noted. See Response to Comment 10-14.

Comment 10-16: The Applicant should depict on the plans and describe a bus stop along NYS Route 120 or Cooney Hill Road. The proposed bus stop should be located in a convenient, and safe, location for students and families. It should be noted, that it is the Lead Agency's understanding that the Byram Hills Central School District will only make bus stops on public roads. (Kaufman_TNC_022)

Response 10-16: Comment noted. The Applicant will work with the School District to identify the appropriate location for future potential bus stop(s), if necessary, based on enrollment during a specific school year. The existing location of the Bee-Line bus stop along King Street would remain the same.

Comment 10-17: It is noted that each parking space is required to be accessible. It is not clear whether the proposed 4 off-street parking spaces for each residential Townhome will be accessible. If the garage spaces are inaccessible when cars are parked in the driveway spaces, only two spaces could be counted in that scenario. In addition, the Applicant is proposing to share required parking between the office and hotel. Since hotel parking would be

required during typical office occupancy, the Applicant should further explain the rationale for the proposed shared parking arrangement. (Kaufman_TNC_022)

Response 10-17: A shared parking arrangement is no longer proposed since the office and hotel uses have been removed as part of the Applicant's Preferred Alternative. The Preferred Alternative has been designed to meet and exceed the R-MF-SCH zoning district requirements for parking (two parking spaces per dwelling unit), and to meet and exceed the R-MF-A zoning district requirements for parking (two parking spaces per dwelling unit). For the townhomes, space available to park four cars is provided; each townhouse would have two garage spaces, plus enough space in each driveway for two additional parked cars. In terms of zoning compliance, it is understood that the Town would only count spaces that could be continuously accessible and, therefore, each townhouse would have two "parking spaces" as required by the Town. In addition, there would be approximately 22 guest parking spaces within the townhouse area, near the proposed clubhouse.

CHAPTER 11: VISUAL RESOURCES AND COMMUNITY CHARACTER

Comment 11-1: A comment was received questioning whether the methodology used for the visual simulations was appropriate.

> I'm going to want to understand, because I said before I think there are inherent limitations in visualizations. I don't think you've done a drive-by visualization, but you have the other ones. But, you know, professionals, I'm sure, know that there are certain limits to them and what they—different factors are that go into it and what they try to compensate for or whatever. So, if there's same way to get input on that, it would be appreciated. (Berra_002)

Response 11-1: The analysis of potential visual impacts in the DEIS was performed using the thresholds established by the New York State Department of Conservation (NYSDEC). The use of computer-generated photo simulations in visual impact analysis under SEQRA is an industry standard practice. For the DEIS, the simulations were generated using a 3-D model of the DEIS Project and the topographic conditions of the Project Site and surroundings, superimposed onto photographs. The photo simulations completed for the DEIS Project also showed the proposed enhancement of the Project Site's existing landscaped buffer along King Street, which would serve to mitigate any potential for impacts. The Project Site has very limited visibility from publicly accessible vantage points. The interior of the Project Site is only visible to motorists traveling along King Street and even that visibility is severely limited by the existing landscaped berm. Based on consultation

with the Town Planner, four locations along King Street were selected to best represent the view of motorists passing the Project Site along King Street. No other publicly accessible vantage points were determined to be necessary for the analysis.

It is also noted that the Preferred Alternative has significantly less potential for visual impacts than the DEIS Project, which proposed a five-story residential building on top of two levels of structured parking. The Preferred Alternative also includes the removal of approximately 262,000 sf of existing buildings, further reducing the site's visual profile.

Comment 11-2: Comments were received regarding the visibility of the DEIS Project from King Street and opining that the DEIS Project may have adverse visual impacts.

> One of the concerns I have is how visible those buildings are and if the site is visible from the Route 22 bridge as you're going north. (Berra_002)
>
> So, I would really quibble with the point that you're going 55 miles an hour and you won't see the project.
>
> Provide further specific mitigation measures as well as modifications, such as increase setbacks and reduction of building height in order to reduce the visual impact from King Street. (DiGiacinto_010)
>
> Generally, the NYS Route 120 corridor is defined by heavily wooded frontages and rising topography. The Lead Agency will need to determine whether the visual impacts of the proposed action are acceptable. If not, the Applicant may wish to provide additional mitigation measures including the relocation of the multifamily building, providing larger setbacks, reducing building height, or providing additional screening. (Kaufman_TNC_022)
>
> A second significant concern is with the project's height; the visual impact of a seven-story apartment building is not in keeping with the character of our town. The building's height is too great to be successfully mitigated by the landscaped berm along King Street and any additional tree planting. (Black_Krupa_CB_024)
>
> As stated in the June 23, 2021, DEIS and DGEIS (l.D.11, pg. 1-23, 1-24), "It is noted that the Lead Agency [North Castle Town Board] 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." The North Castle Conservation Board unequivocally believes that the Proposed Action will have a significant adverse visual impact, for the Proposed Action neither complements nor represents the aesthetic and community character of the Town of North Castle. The Conservation Board also believes that the applicant has underplayed the visual impact that this Proposed Action will have.
>
> According to the applicant, "From south… [the Proposed Action will be] moderately visible during leaf-off condition" and, also, "The views that are available would only be visible for a few seconds while driving along King Street." As that the Proposed Action will be sited on a rise in the topography

> and as that no trees on the property will be as tall as the height of the Proposed Action, these assertions seem improbable, and the Conservation Board challenges these assertions (the applicant's own 3D renderings seem to contradict these statements as well). The Conservation Board recommends that the Town Board insist on more studies as to the visual impact of the Proposed Action, perhaps including the flying of balloons at the height of the proposed construction (even in leaf-on conditions).
>
> The applicant also states that "[The Proposed Action] is proposed to minimize and mitigate potential visual impacts… The new multifamily building and town homes would be designed to approximately relate to the character of the area". As that the Town of North Castle has no buildings as tall as what is being proposed, it is impossible that such buildings are in the "character of the area." The Conservation Board recommends the Lead Agency seek the advice of the North Castle Architectural Review Board (the Board which most often determines if a building is in character with others in the community), instead of accepting the applicant's opinion as fact.
>
> Many residents of North Castle have fled the skyscrapers of New York City to plant roots in this bucolic community. The Town Board of North Castle has a responsibility to its residents to keep North Castle the serene, suburban setting that we know it to be, and to not let fall the first domino of tall, unsightly buildings. If this project were to move forward as proposed, our community character and visual resources will be foreve1more, irrevocably changed for the worse. (Black_Krupa_CB_024)

Response 11-2: As discussed in FEIS Chapter 1, "Project Description," in response to evolving market needs as well as comments received on the DEIS, the Applicant has amended its original petition to request that the Town Board map the Senior Housing Portion of the Site within the Town's existing R-MF-SCH Zoning District, and map the Townhouse Portion of the Site within the Town's existing R-MF-A Zoning District. The Applicant has asked the Town Board to defer consideration of text amendments to the DOB-20A zoning district. Specifically, and in response to public comments, the Applicant is proposing only the reuse of an existing three-story office building and construction of new two-story structures on the Project Site. As such, the scale and height of the Preferred Alternative is significantly reduced from the DEIS Project. The Preferred Alternative also includes the removal of approximately 262,000 sf of existing buildings, further reducing the site's visual profile.

In addition, and as discussed in the DEIS, the Project Site has limited visibility from publicly accessible vantage points under existing conditions. The interior of the Project Site is only visible to motorists traveling along King Street. Due to intervening distance and topography, the Project Site is not visible from the Route 22 bridge over the Kensico Reservoir, which is approximately one mile to the west of the Project Site.

The appearance of the proposed townhomes on the Project Site would be consistent with other recent townhouse developments in the North Castle. The Preferred Alternative would also return the Site to active use, which

is consistent with the goals of the Town's Comprehensive Plan, while re-purposing an existing office building (and associated pond/water feature) that are already sited at a considerable distance from King Street and are only minimally visible from the road.

Similar to the DEIS Project, several measures have been incorporated into the Preferred Alternative's design and layout to avoid, minimize, and mitigate potential impacts to visual resources and community character. The existing southern office building (to be converted to residential use) is set back considerably from King Street and not easily visible to motorists. The minimum front yard setback of 64 feet for the new townhomes, when considered together with the existing berm and landscaping along King Street (to be enhanced), would serve to mitigate potential visual impacts.

CHAPTER 12: COMMUNITY FACILITIES

Comment 12-1: Page 12-11. The chart entitled Proposed Project Residential Population Projections uses a 2006 source. I think we should have a more current source that meets our demographics. (DiGiacinto_010)

Response 12-1: The Preferred Alternative consists of 50 age-restricted residential units in the multifamily building, and 125 two-story, three-bedroom townhomes. The estimated residential population of the Preferred Alternative is estimated at 389 persons based on a different publication than was used in the DEIS (though that source is also from 2006).[1] As discussed in Chapter 2, "Environmental Analyses," the residential population estimate is only used to estimate the potential increase in municipal cost attributable to the Preferred Alternative. As stated therein, the Preferred Alternative would generate more in direct property tax revenue than it would cost the Town in new services.

Comment 12-2: Comments were received regarding the DEIS Project's potential impact on the police department and whether more than one additional police officer would be needed as a result of the Proposed Project and the redevelopment of the Swiss Re site. The Proposed Project's estimated residential population was also questioned. (Berra_009, DiGiacinto_010, Reiter_011)

[1] New Jersey Demographic Multipliers, The Profile of Occupants of Residential and Nonresidential Development, Rutgers University, Center for Urban Policy Research, 2006.

> You were saying that with the addition of 500 new residence it would require hiring one more – clearly the hiring of more than one police officer? (Berra_009)
>
> You can't always do sort of calculations, but if we are adding 500 people that's roughly 4 percent to the population we have now, so 1/24 of the police department is a little bit more than one, but then again there are some functions, like dispatcher, that would have to be added. (Berra_009)
>
> One of the things that I did have the opportunity to do was to speak with the chief of police as one of the liaisons. He definitely had some concerns about the numbers and the calculations, and I think the best thing to do is maybe we invite him and have him comment on what he thinks would be applicable to this particular project. (Reiter_011)
>
> I thought that this particular part of the study was a little light in terms of the financial impact on our police department so I would like to see perhaps more interaction with Chief Simonsen to have a better understanding of how this project could impact the need for perhaps even—and it is not just hiring one police officer, it is perhaps hiring another police car and all the other things that go along with being a police officer. (DiGiacinto_010)

Response 12-2: The Preferred Alternative consists of 50 age-restricted residential units, and 125 townhomes, and is anticipated to have a population of 389 persons.

An updated fiscal impact analysis has been provided in Chapter 2, "Environmental Analyses." As demonstrated therein, the Preferred Alternative would increase the property tax revenue generated by the Project Site in its current condition. Specifically, the Town of North Castle, including the Police Department, would receive approximately $541,705 per year in direct property tax revenue that would more than cover the approximately $256,740 in incremental Town costs, including the Police Department.

Given the lower intensity of the use proposed, including the elimination of office uses and a previously proposed hotel use, the Preferred Alternative would have a significantly lower daytime population, and therefore daytime police demand, than either the DEIS Project (which had proposed an office use and hotel use) or re-occupancy of the Site's existing 261,000 sf of office space.

Comment 12-3: Comments were received concerning the impacts of the DEIS project on the staffing and equipment needs of the Armonk Fire Department as well as what the appropriate mitigation for those impacts is.

> I am really, really concerned about fire department access, not in terms of being able to go in there, and there's talk about an extra road, things like that, but in terms of having the equipment to get to the top of the building. They don't currently have that equipment. That's one of the reasons, aside from visibility, why I was asking what the four-story version was like, because it has two additional stories underneath aboveground. So, I'm very

> concerned about that, and also the strains on the man- and womanpower of the volunteer fire department and at some point, whether we just put too much of a burden on them and we can no longer have an entirely volunteer fire department. (Berra_002)
>
> North White Plains is the only fire district that has a ladder truck, and their ladder truck, I'm sure, wouldn't be sufficient for a seven-story building. (DiGiacinto_001)
>
> Certainly if they get a hook and ladder truck, that's something they can use in other places, but they wouldn't have to spend that money otherwise. So, you've got to look at what projects they are acquiring it for and not simply say, "We're part of the fire district, we'll pay our proportional share and that will cover it." It could be a significant fixed cost. (Berra_002)
>
> Armonk Fire Department indicated they will need a new ladder truck. Armonk Fire Department should indicate the exact ladder truck they would need, they come you know, in all different sizes in terms of their ladder extensions, the cost of the truck, the ability to house it. The applicant has stated in terms of a dollar amount, "Applicant is willing to contribute fair share for the purchase of a ladder truck." I would like a more specific dollar amount. The Armonk Fire Department and applicant agree the project will result in an increase of call volumes, I mean, that's obvious, as well as a need for more volunteers. Unfortunately, and this is true of any projects, when we have a project where it is going to be multifamily moving in, unfortunately we don't even have one new volunteer from that project, which is unfortunate. (DiGiacinto_001)
>
> If this project results in the need to hire paid fighters, the applicant indicates a willingness 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." I think once again I would like a more firm dollar figure in terms of the pledge by the applicant if we have to hire a paid firefighter. (DiGiacinto_001)
>
> The Fire Department has raised serious concerns regarding the project. Specifically, the Department noted that a ladder truck would be necessary to provide adequate fire protection. Additionally, the Department noted that the project will add additional call volume without providing an adequate number of new volunteers to staff the Department. The Applicant should further describe how the Fire Department's concerns will be addressed. (Kaufman_TNC_022)
>
> The same thing with the fire department, I've spoken to them, they have some concerns, the ladder, you know, volunteers are absolutely impossible to get now, in fact, we are losing some. We are paying an EMT for prime shift during the day time and I think there is even a meeting coming up with the Westchester Emergency Services with the paramedics which we are gonna get an update on, you know, the coverage and consortium of municipalities that participate, and that may be something that you know, I can find out and see how that would affect ad if it would at all. (Reiter_011)

Response 12-3: In response to public comments, the Applicant is no longer proposing construction of a seven-story multifamily building. Instead, the Applicant is proposing construction of two-story townhouse units, a product that is common within the Fire District and would not create the need for

additional equipment. Similarly, reuse of the existing three-story office building would not require any new equipment due both to its limited height, and also due to the fact that it is an existing structure already served by the Fire District. Given the lower intensity of the use proposed, including the elimination of office uses and a previously proposed hotel use, the Preferred Alternative would have a significantly lower daytime population, and therefore daytime EMS demand, than either the DEIS Project (which had proposed an office use and hotel use) or re-occupancy of the Site's existing 261,000 sf of office space.

Comment 12-4: What is the all-in cost for an EMT? I would like the Armonk Fire Department to comment on the need to hire additional EMT or EMTs if this project were to be approved. (DiGiacinto_010)

Response 12-4: Given the lower intensity of the use proposed, including the elimination of office uses and a previously proposed hotel use, the Preferred Alternative would have a significantly lower daytime population, and therefore daytime EMS demand, than either the DEIS Project (which had proposed an office use and hotel use) or re-occupancy of the Site's existing 261,000 sf of office space. It is not anticipated that the Preferred Alternative would require the addition of an additional EMT.

Comment 12-5: I also ask, to provide the specific additional expenses if this project were to be 100 percent residential because obviously we certainly would need more than one police officer. (DiGiacinto_010)

Response 12-5: The Applicant's Preferred Alternative is now a 100 percent residential plan, with 50 age-restricted multifamily units, and 125 townhomes. The anticipated resident population of the Preferred Alternative would be 389 people (compared to the DEIS Project, which was anticipated to generate a residential population of 375, as well as an additional transient population of hotel guests and office workers). Approximately $3.33 million would be generated in annual property tax revenue to various taxing jurisdictions. As described in Chapter 2, "Environmental Analyses," the Town of North Castle, including the Police Department, would receive approximately $541,705 per year in direct property tax revenue that would more than cover the approximately $256,740 in incremental Town costs, including the Police Department.

Comment 12-6: Comments were received regarding the existing and potential future conditions of the BHSD with respect to enrollment if the DEIS Project were not approved.

> The Applicant stated that enrollment in the District was at 2,300 students in the 2018–2019 school year and expected to see a decline based on a Demographer Report from the District. (Lamia_BHSD_019)
>
> The Applicant cited the Superintendent that the peak of 2,818 students in the past had our schools at capacity. Due to recent home sales, likely as a result of the pandemic, the District has already enrolled 2,316 students for 2021-2022, which is 69 students above what was predicted in the Demographer's Report. Those numbers do not yet represent the additional dozens of students we have traditionally registered throughout the summer. Enrollment is no longer declining, and with the renewed housing market activity, it is increasing. It is important to note that the peak of 2,818 was reached with the existing footprint of housing stock within our District, and it is certainly possible that we reach that number again at some point in the future. We believe that a lack of housing turnover has depressed these numbers, and turnover has increased during the pandemic with the current trend of families moving out of more densely populated areas. (Lamia_BHSD_019)
>
> The District has had to add two new sections of kindergarten since June 2021 due to increased enrollment and may have to add a section of grade 2 before September if there are more entrants. Kindergarten, 1st grade and 2nd grade are currently at capacity before additional teachers and aides need to be employed. (Lamia_BHSD_019)
>
> The District also asks the Town Board to consider that there are other proposed housing development projects in process in the District. (Lamia_BHSD_019)
>
> To date, meaning September 9th, 2021, the Applicant should provide the actual number of school children in the Byram Hills School District and I would like that number compared for the last four years in the Byram Hills School District. (DiGiacinto_010)

Response 12-6: Comments noted. **Table 3-1** presents the BHCSD enrollment over the past 19 years based on data provided by the BHCSD (for 2015 to 2023), and from the Cornell Program on Applied Demographics (for 2004 to 2014).

Table 3-1
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	2,468	-2.9%
2016/17	2,374	-4.0%
2017/18	2,352	-1.0%
2018/19	2,307	-2.1%
2019/20	2,278	-1.1%
2020/21	2,261	-0.6%
2021/22	2,314	+2.3%
2022/23	2,333	+0.9%

Sources: Byram Hills Central School District 2022–2023 Budget Hearing I (January 18, 2022)[2]; Byram Hills Central School District 2018–2019 Proposed Budget Presentation (March 6, 2018)[3]; Cornell Program on Applied Demographics – Total Enrollment.

Comment 12-7: Comments were received questioning whether the number of PSAC estimated to live within the DEIS project is accurate.

> District requests that the Town Board consider District concerns that the proposed approval of a new 151-unit multifamily building and 22 townhouse unit will likely generate more than the estimated 27 school-aged children, the cost of which will not be offset by net new tax revenue identified by the Applicant as associated with the Proposed Project ($291,870). It is the District's opinion that a burden of additional cost will be borne by existing taxpayers in the school community based upon the number of students resulting from this project and the inability of the proposed new tax revenue to meet those fiscal needs. (Lamia_BHSD_019)
>
> The Applicant utilized the Rutger's Multiplier Method for estimating the potential school aged children, which is based on Census data from 2000 and based on housing prices from 2005. The Rutgers Multiplier Method is often criticized for its ability to be used as a unilateral tool across different

[2] https://www.byramhills.org/uploaded/BOE/2022-23_Budget/Presentation_from_January_18_-_Budget_Hearing_I.pdf

[3] https://www.byramhills.org/uploaded/BOE/18-19_Budget/18-19_ADMINISTRATIONS_PROPOSED_BUDGET_03-06-18.pdf

towns and states to estimate the number of school age students anywhere in the nation over any number of years. (Lamia_BHSD_019)

The Multiplier Method used accounted for a projected number of only 27 students from up to 151 rental units (39 one-bedroom and 110 two-bedroom units) and 22 three-bedroom single family attached townhomes. The District does not identify this multiplier as a reliable method for estimating the number of potential students from the Project. It is important to note that the same multiplier would be used in determining PSAC in areas as different as New York City, Buffalo, and Westchester. (Lamia_BHSD_019)

The District is concerned about the use of the Case Study as a fair estimate for predicting numbers of public school age children in Byram Hills.

- The 2015 ESI Demographic Multipliers Report of 2017 shared at the National Planning Conference on Demographic Multipliers cautions that, "SAC (School Age Children) multipliers generated by local surveys of recent developments can be misleading. These surveys reflect conditions of a very small sample of developments. Because of aging, the snapshot data becomes obsolete once the student cohorts shift upward." (https://econsultsolutions.com/wp-content/uploads/2018/04/NY.pdf).
- The District wonders if the numbers in the Case Study are further misleading as the Applicant notes that the numbers of students enrolled in the Case Study Method was, "Based on average enrollment of 2015–2016 to 2018–2019 school years, where available," indicating that the information presented may not be complete.
- The information from the case study is also inclusive of school years starting from 2015 to 2018, which may now be outdated data for Westchester considering that city dwellers with children have been moving to the suburbs in large numbers as a result of the pandemic.
- The case study projections show the total number of units and the total number of students enrolled as inconsistent, indicating that these numbers may not be valid for comparison. For example, Bronxville yielded 31 students to 110 units while Mamaroneck only yielded 14 students to 227 units in 1-, 2-, and 3-bedroom units.
- It is unclear if these units are located in similar settings, which may have affected the disparate numbers produced.
- There are many townhome and condominium units within Armonk proper that could have been studied more recently to more accurately portray the number of students living in those units and in the town where the proposed Project is located.
- The towns cited above are in southern Westchester where there is generally a large stock of multifamily housing. This proposed Project would be more unique for Armonk, which could render these comparisons less relevant and comparable. (Lamia_BHSD_019)

You have to be very careful in concluding how much the extra cost would result from having all those students. And I think it is worth for everybody, all interested parents to look at it. She's also pointed out as I was saying

before how the numbers of students may well not be accurate and that's one thing I thought about before, I know I've raised it before and I think there may have been some sort of response to it, but I think it is important that we go back in time. (Berra_009)

I think one thing that might be helpful to us is to request that we get some sort of analysis that the developments that are taking place here and maybe in comparable localities, maybe we can figure out which one those should be to see what the anticipated number of additional students were from a project and then see what the actual numbers were in own town specifically, I would look at that. I would look at Old Route 22 even, which are big developments in numbers there, but also looking at comparable localities and we can figure out which one those should be. (Berra_009)

My first point is that the record multiplier method, and I'm citing from page 12-5 of Chapter 12, is based on data for 2000 census and the 2005 housing crisis and I really would like to see this multiplier applied to current census and a current housing crisis. (DiGiacinto_010)

I would like the Applicant to look into using the public micro data sample. (DiGiacinto_010)

My second point is "the case study method of estimated school age children, focused on schools located in lower Westchester." And these districts are not anywhere similar to the Byram Hills School District. They used data based on enrollment for 2015 and 2016, and 2018/19 and then it said where available. So I question if the data is really as complete as we would need. (DiGiacinto_010)

We need complete enrollment data from September 2015 up to and including September 2021 from school districts as Jose mentioned before that are similar, you know, most likely northern Westchester school districts. (DiGiacinto_010)

I would like the applicant to provide a study of the number of students residing in townhomes, in condominiums located in Armonk, Whippoorwill Hills, including the MIUs, Whippoorwill Ridge, including the MIUs, Cider Mill and Armonk Square, including the MIUs, Whippoorwill Commons, including MIUs, Leisure Farm, approved Eagle Ridge, including MIUs. 470 Main Street Condominiums, including MIUs. (DiGiacinto_010)

I would like to know, when each project was completed, all residential units sold, and the number of school age children enrolled in the Byram Hills School District from these developments. (DiGiacinto_010)

That piece is important about making sure we understand the impacts of the student population from those developments. (Schiliro_008)

Jen Lamia also referred to how it is affecting her estimation of how many students she can expect to have because of pandemic related trends. (Hussain_012)

So I'll just focus on the 55 plus. You were talking about projected versus the results. You projected two kids at Whippoorwill Hills and went over the rules or whatever it was, I don't know, you are the one that said what that study was – it ended up in more resulted kids [sic]. So I don't know what made you think that the projected number of Eagle Ridge, I don't know if Jen Lamia provided the same exact [sic]. (Clark_028)

Response 12-7: The Preferred Alternative's residential uses would consist of an approximately 50-unit multifamily building which would be age-restricted (55+) and approximately 125 townhomes. As such, the Preferred Alternative would include PSAC.

As discussed in FEIS Chapter 2, "Environmental Analyses," the proposed development could be anticipated to have up to 51 school age children living in the proposed 125 townhomes. This estimate is based on an analysis of recently constructed townhouses throughout the state of New Jersey. As with any estimate, the number of students may be higher or lower than actually predicted. However, as confirmed by the School District Superintendent (see **Appendix I**), the additional cost associated with PSAC from the Preferred Alternative who enroll in the District—even if that number is greater than 51—would be offset by the additional property tax revenues that could be generated for the District.

Comment 12-8: Comments were received questioning the potential additional cost to the School District as a result of the PSAC that could live in the DEIS Project, if constructed.

> It is the District's concern that the proposed Project will have a greater impact on the resources of the District than indicated in The State Environmental Quality Review / Notice of Completion of Draft Environmental Impact Statement and that the projected costs to the District will not be covered by the estimated net new tax revenue identified in the report. (Lamia_BHSD_019)
>
> The Applicant assumes that additional students will not result in additional teachers and staff, which is only possible if all students are spread between all grade levels and that students do not require special education services. Even then, some sections may have to be increased (as indicated in our current K, 1, 2 enrollment numbers). New buses would also need to be purchased (at least 2), and 2 full time drivers and monitors hired with benefits as there would be a minimum of 8 school runs anticipated to or from Airport Campus daily, including late buses at the middle and high schools. (Lamia_BHSD_019)
>
> The needs of the District for the Proposed Project would far exceed the estimated $291,870 increase in property tax revenues received and identified below from the Applicant's report. The District is concerned that the current taxpayers will be impacted by an enrollment increase. (Lamia_BHSD_019)
>
> The Byram Hills School District has expressed a concern in the quote that Dr. Lamia made, "current taxpayers will be impacted by an enrollment increase." And that's a very nice way of saying our school taxes could increase, and we have many people in this town that I fear would not be able to stay here if that were the case. (DiGiacinto_010)
>
> Point number five, to provide data obtained from the Byram Hills School District of the estimated expenses for the school district for the alternative plans in Chapter 18 of the DEIS. The school district's expenses should

> include but not [be] limited to cost per student to educate, staffing, employee benefits, number of sections, school buses and cost to operate them, etc. (DiGiacinto_010)

Response 12-8: The Preferred Alternative's residential uses would consist of an approximately 50-unit multifamily building which would be age-restricted (55+) and approximately 125 townhomes. Using an industry standard multiplier created from statewide data, the Applicant estimated that the Preferred Alternative would be likely to have 51 PSAC. As discussed in FEIS Chapter 2, "Environmental Analyses," the Preferred Alternative is estimated to yield approximately $2.25 million in annual property tax revenues for the Byram Hills Central School District, which is an increase from the revenue currently generated by the Site (which is itself based on an assessment of an owner-occupied office building). Based on that estimate, and as discussed in more detail in Chapter 2, "Environmental Analyses," the Preferred Alternative could result in a potential annual cost to the School District of approximately $1.4 million. This additional cost would be more than covered by the approximately $2.25 million in property tax revenue estimated to be generated by the Preferred Alternative. Further, as confirmed by the School District Superintendent, even if more than 51 PSAC live within the Preferred Alternative, the increase in tax revenue would be anticipated to cover the costs of the additional students (see **Appendix I**).

Comment 12-9: Should the Project be approved for changed zoning at 113 King Street, the District wonders about the potential for the other commercial properties to make a similar request, particularly since the other properties would now be in a mixed-use zoning area. (Lamia_BHSD_019)

Response 12-9: The Applicant has requested the Town Board defer review of text amendments to the DOB-20A zoning district, which have the potential to affect other commercial office properties. As such, no other properties would be affected by the Revised Proposed Zoning.

CHAPTER 13: FISCAL AND MARKET IMPACTS

Comment 13-1: Comments were received questioning the findings of the market study presented in the DEIS with respect to the market demand for hotels within the Town.

> When we looked at Eagle Ridge for the hotel, there was a feasibility study that was provided. And I think a lot of people generally have experience that, you know, feasibility studies you might take with a grain of salt given [that] people are hiring them and they look at it in certain ways, not to say anything bad about professionalism of people who spend their lives and

> study doing this. But have you done a feasibility study on the hotel here? (Berra_002)
>
> You referred to the comp plan saying there's room for two hotels, that was when we had La Quinta. Presumably this will be at least a somewhat greater grade than La Quinta was. But what happens, Eagle Ridge goes ahead, they actually build a hotel. Does that impact you? (Berra_002)
>
> You've looked at what happens if Eagle Ridge opens up a nice hotel? I'm guessing you won't go ahead with it unless you think the economics work. But I'm just trying to probe a little bit. (Berra_002)
>
> [In Section 13 under 1, it says] "Currently North Castle has one place of accommodation open to the public, La Quinta." I think one thing that might be useful is the demand equation is really important here for us to understand. And that's changed a ton the last two years. So, I'd just ask that you redo that section, you know. Or provide commentary on top of that section to indicate what changes exist, and then what you think we should think about given those changes, especially as it relates to the alternate options that you also looked at. Because I just need to make sure I understand how it relates in terms of that logic, because a lot of the base foundations of what you're proposing rely on the demand that you expect. So that's something we need to understand. (Hussain_003)
>
> La Quinta is closed permanently, and I think Arrowwood is as well. So that should be more accurately reflected in the FEIS. (Baroni_005)
>
> Section 13.B.1.C, Hotels, cites La Quinta and other hotels that are now closed so obviously that should be updated and to update the last paragraph dealing with Eagle Ridge now that that has passed. (DiGiacinto_010)

Response 13-1: Subsequent to the DEIS, the Applicant has amended its zoning request and mix of uses proposed for the Project Site. Specifically, hotel and office uses are no longer proposed by the Applicant.

Comment 13-2: Comments were received regarding the overall feasibility and market demand of the DEIS Project's mix of uses, given the economic changes that have occurred since the completion of the market study included in the DGEIS.

> I'm wondering, same way I'm wondering about the demand for the hotel and the need for it, the [demand for] office space. The owners have been trying to rent out the office space for some time. I'd be curious to know what the use would be of the office building: what type of tenants, multiple tenants, single tenants, still to be determined, and also to know whether there have been studies done on that. (Berra_002)
>
> I have a concern for the residential. What shows that it's feasible? I'd just like to understand the overall economics, and that projects are realistic. Not saying to what degree, if any, that impacts the ultimate decisions. But I'd like to understand the big picture. And I think it's helpful for people and our residents to know that. One thing I've seen is that, and this I can cite to page 1-5 in the Executive Summary. This relates to the notion that—what do you call it, the Cooney Hill section? Where there were 17 residences, and now

> the basic proposal is to have 22 townhomes, and it could expand beyond that, right? (Berra_002)
>
> I think the analysis that is shown, we just need a whole new view of that because I do think things have really evolved since that was shown and for me to be able to evaluate how this would fair against demand really requires us to look at what is going on now. (Hussain_012)
>
> So the point I was making was that in the market assessment that's done is doing a demand estimation on what we are expecting for townhomes, for multifamily homes and for hotels, and that is an outdated analysis from everything that I can see, and I expect it to be very different now and I would like to be looking at current information in order to then assess what's relevant for the town today. (Hussain_013)
>
> So that's a really important thing that needs to be addressed, it's not like a sentence correction, it's like a relook at the demand estimation. (Hussain_013)
>
> A reevaluating on the demand and what's really needed given all the changes that have happened in the last two years, and I think that is warranting a reevaluation. (Hussain_015)

Response 13-2: Subsequent to the DEIS, the Applicant has changed its zoning request and mix of uses proposed for the Project Site. Specifically, hotel and office uses are no longer proposed. The proposed residential use is one with significant local and regional market demand. In addition, development of these uses is consistent with the Town Comprehensive Plan, which seeks to add housing options for seniors as well as diversify the housing options available within the Town.

Comment 13-3: Comments were received regarding the potential price of the residential units in the DEIS Project.

> Is there a sense of what the residential units will sell or rent for? Because one of the things that's discussed, I think it was in the presentation, is that it will help people who can't afford a single-family home, and some of the prices we're seeing both at Eagle Ridge and some other places I don't think helps those people. (Berra_002)

Response 13-3: As stated in Chapter 2, "Environmental Analyses," the Applicant anticipates that the townhomes would sell for an average of between $1.25 million and $1.5 million. For a conservative analysis, a sales value of $1.25 million was used. Rents for the multifamily building's units have not been determined but were conservatively analyzed using a $17,350,000 market value for the entire multifamily building for fiscal purposes. As required by Town law, 10 percent of the units would be affordable units and would, therefore, have a market value of $300,000 (as discussed more fully in Chapter 2, "Environmental Analyses") for the townhouses, and rents set to 60 percent AMI for the multifamily units.

Comment 13-4: In the Fiscal Impact section, it's noted that Cider Mill/Whippoorwill Hills/Whippoorwill Ridge comprise 100 units approximately. It's more like 230. So that should be corrected. (Baroni_005)

Response 13-4: Comment noted. An updated fiscal impact analysis, focused on the Preferred Alternative's residential uses, has been provided in Chapter 2, "Environmental Analyses."

Comment 13-5: So I think it is great that the Board is asking these kinds of questions around the increment of taxation versus the cost to serve, I think that's really important. I've been concerned for a while about the kind of taxation projects that have been approved and just the potential for them to drag on the budget. So I think you know, these kinds of questions are great and important and I think from my perspective just as a resident I think the project really needs to be additive and accretive both to the town budget, the school budget and quality of life. So in that last regard on quality of line, Barbara, I thought it was great that you've made these comments and come around to adding some of those rec facilities. I thought those ideas that were mentioned were great, I just really hope that we can follow through with that and this is what a number of us in town have been pushing for a long time and I think it would be additive. So that's all I have to say… I love the hockey idea, I love the idea of a turf field too. (Milim_029)

Response 13-5: Comment noted. An updated fiscal impact analysis, focused on the Preferred Alternative's residential uses, has been provided in Chapter 2, "Environmental Analyses." As shown in that analysis, the Preferred Alternative, which includes fee simple ownership of the townhouse lots, is anticipated to generate more property tax revenue than it may cost the Town in increased services.

CHAPTER 14: HISTORIC, ARCHAEOLOGICAL, AND CULTURAL RESOURCES

Comment 14-1: Comments were received requesting that the Phase 1B archaeological field testing be completed as part of the SEQRA process rather than as part of a future site plan approval.

> History is more delicate than you'd think; it's often easily forgotten. "Based on available information, this project [Airport Campus] is in a archaeologically sensitive area" states Philip Parazio of New York State Parks, Recreation and Historic Preservation in a memo sent to the North Castle Town Board on September 26, 2018. In this memo, he recommends "A 36 CFR 61 qualified archeologist should be retained to undertake the Phase 1 survey." The Conservation Board is aware that a Survey "1A" was undertaken. We believe that more studies are necessary ("1B") before moving forward with this project. (Black_Krupa_CB_024)

Given the Town Board recognizes the historical significance of the site; the Conservation Board recommends that all appropriate studies and actions have been taken for the correct archeological handling of this site. The Conservation Board would like the Town Board to take action to preserve and protect archaeologically important sites within the Town of North Castle. "A nation that forgets its past has no future." – Winston Churchill. (Black_Krupa_CB_024)

It is recommended that the Applicant complete Phase 1B archeological field testing so that results can be incorporated into the Environmental Findings to be prepared by the Lead Agency. (Kaufman_TNC_022)

Response 14-1: As discussed in FEIS Chapter 2, "Environmental Analyses," it was recommended that the Phase 1B archaeological testing be implemented once the Applicant seeks 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. The Applicant will continue consultation with OPRHP as the Preferred Alternative advances towards site plan approval with the Town.

CHAPTER 15: AIR QUALITY

Comment 15-1: Based on the Conservation Board's review and understanding of the available background material related to air quality, we do not believe that the proposed [DEIS] project can proceed in its current form. In particular, in section 1.D.15. of the DEIS, the applicant indicates that the proposed project:

"Has the potential to impact ambient air quality from stationary sources (i.e., fossil fuel-fired HVAC equipment) and from mobile sources (i.e., traffic generated by the Proposed Project)."

And the applicant continues:

"It is the applicant's opinion that there would be no potential for significant adverse air quality impacts from the emission of nitrogen dioxide, sulfur dioxide, and particulate matter in connection with the Proposed Projects HVAC systems."

The applicant further continues by explaining that:

"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."

Related to traffic-related pollution, the applicant concludes by stating that, based on several analyses that they had completed:

"It is the applicant's opinion that Project-generated traffic would not result in a significant air quality impact."

Until the applicant can provide the Conservation Board with an independent, professional evaluation of the proposed project's impact on air quality (i.e., an assessment that is not based on the applicant's opinion), the Conservation Board does not believe that this project can proceed. (Black_Krupa_CB_024)

Response 15-1: As discussed in DEIS Chapter 15, "Air Quality," an analysis of the potential impact to ambient air quality from both stationary sources and mobile sources was undertaken following NYSDOT and USEPA screening level guidance. The assessment demonstrated that the DEIS Project would not result in potential significant adverse air quality impacts from stationary sources or mobile sources. As discussed in FEIS Chapter 2, "Environmental Analyses," since the Preferred Alternative would result in less development than the DEIS Project, there would be lesser potential impact on air quality, as compared to the DEIS Project.

CHAPTER 16: NOISE

Comment 16-1: Comments were received about the compatibility of the proposed residential uses with aircraft noise associated with the nearby Westchester County Airport and whether the project contains sufficient mitigation with respect to potential noise impacts on future residents.

> We disagree with the DEIS's conclusion that airport-related noise will not be an issue for the future residents who would live on this site. While the DEIS references noise contours to make this assessment, we point out that the contours were developed in 1999 and 2005 and have yet to be updated. The County is undertaking a new Airport Master Plan which will contain a new series of contours. This master planning effort has also called attention to the large number of noise complaints the County already receives from residents in Purchase and Armonk. In light of these ongoing findings, we are opposed to the construction of any full-time residential uses this close to the Airport, especially at this scale. (Drummond_WCPB_020)
>
> While the proposed new residential development would not be located inside of the 65 DNL threshold for significant aircraft noise exposure, the development is within the 60 DNL contour. The Applicant has stated that standard construction methods would provide at least 20 dBA of sound attenuation. The Applicant should evaluate whether enhanced construction could further reduce noise impacts. Given the proposed residential location near the County Airport, maximum practical reduction of noise impacts would appear to be warranted. (Kaufman_TNC_022)
>
> The Conservation Board's concern with noise is less about the noise generated by the new development than about the impact of existing airport noise on the residences, particularly the proposed seven story apartment building. Any development adjacent to an airport—especially a mixed-

> development project like this that is subject to constant air traffic noise—begs heightened scrutiny by the reviewing Boards. (Black_Krupa_CB_024)

Response 16-1: The mix of uses contemplated for the DEIS Project is no longer proposed, and the proposed multifamily units would be contained within an existing office building to be converted to residential use. In terms of the Preferred Alternative's compatibility with the Westchester County Airport and the appropriateness of the Project Site for residential use, considering that the site is predominately located within the airport's 60 Day-Night Average Sound Level (DNL) noise contour, no land use impacts are anticipated. As stated in the DEIS, the existing noise levels from the airport in the vicinity of the Project Site do not reach a level requiring a degree of window-wall attenuation above what can be achieved through standard multifamily residential construction practices. As was the case with the DEIS Project, the reintroduction of residential uses to the Project Site with the Preferred Alternative 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) and the Bellfaire and Kingfield projects (Rye Brook, New York).

CHAPTER 17: CONSTRUCTION

No comments were received on this Chapter.

CHAPTER 18: ALTERNATIVES

Comment 18-1: Comments were received requesting information on the impacts associated with full residential build out of the DOB-20A zoning district under the DEIS Zoning as well as the impacts associated with the currently approved office expansion plans.

> Since the proposed legislation would allow the entire 113 King Street parcel to become 100 percent residential, this too should be included as an alternate therefore we need the potential maximum number of residential units, number of bedrooms, types of residential units, projected number of school children. (DiGiacinto_010)

> I would like a matrix or summary of all impacts associated with the approved but unbuilt project, and I am referring to the 238,000 square foot office space, the 20,000-square-foot meeting house, and the five-story parking garage. I want a matrix of summaries, so all the impacts associated. (DiGiacinto_010)

Response 18-1: A summary of the impacts of the currently approved development plan, existing conditions, DEIS Project, and other DEIS alternatives is included in the tables at the end of the DEIS "Executive Summary" and "Alternatives" chapters. In addition, it is noted that the Applicant is requesting that the Town Board map the Senior Housing Portion of the Project Site within the Town's existing R-MF-SCH Zoning District, and the Townhouse Portion of the Project Site within the Town's existing R-MF-A Zoning District.

Comment 18-2: A comment was received regarding the relative market demand of the alternatives studied in the DGEIS.

> You have a set of alternatives that we can see, and for alternatives you have a very extended table that describes for each of the alternatives what are the things to consider. For each alternative, how does that actually meet or not meet the needs of the market. There is one row I could find where you could have addressed that which is called the Fiscal and Economic Impact or something like that, and for [the entire set of] alternatives you actually just have that not represent any change. So, I would actually ask for you to expand on Alternatives, how it meets or doesn't meet the demand better or worse than what you are proposing (Hussain_013)

Response 18-2: As discussed in FEIS Chapter 1, "Project Description," the Applicant is no longer requesting approval of the DEIS Project that included a mix of uses on the Site. Rather, the Applicant seeks approval of the Preferred Alternative, which consists of only residential housing. The market for residential housing is quite strong locally and regionally and is a much more stable use than office or hotel uses, as noted in the Town's own Comprehensive Plan (page 150).

Comment 18-3: Comments were received requesting that in addition to senior housing as an alternative, age-restricted housing also be considered as an alternative.

> My main comment was about the age restricted component on the alternative section, Chapter 18. That I think should be looked at. You have senior housing there and I am not sure if that applies directly to age restricted, because that could have a couple of different meanings. So that was my main piece, to make sure that was studied. (Schiliro_014)

> That would be helpful that the component were studied if it's determined that that [age-restricted housing] really is a separate housing class and product, which I think it is. (Schiliro_008)

Response 18-3: As discussed in FEIS Chapter 1, "Project Description," consistent with SEQRA regulations at §617.9, and in response to comments from the Lead Agency, Interested and Involved Agencies, and the public, the Applicant has developed an additional alternative for achieving the purpose and need described in the DEIS that avoids, reduces and further mitigates the potential adverse impacts associated with the DEIS Project.

This additional alternative is iterative of the Alternatives presented in the DEIS and, as described in Chapter 2 of this FEIS, does not result in an adverse environmental impact that was not considered in the DEIS. The new alternative consists of developing a portion of the Site with 125 townhomes and re-using the existing southern office building as a 50-unit, age-restricted, multifamily housing building. To develop the Preferred Alternative, the Applicant has amended its original zoning petition to request that the Town Board map the Senior Housing Portion of the Site within the Town's existing R-MF-SCH Zoning District, and map the Townhouse Portion of the Site within the Town's existing R-MF-A Zoning District

CHAPTER 19: UNAVOIDABLE ADVERSE IMPACTS

Comment 19-1: Comments were received on the general content and findings of the Unavoidable Adverse Impacts chapter.

> Unavoidable Adverse Impacts is just one short paragraph. I think there needs to be a much more specific expansion on the Unavoidable Adverse Impacts on the proposed zoning amendment and proposed local law as it applies to all three parcels in the DOB 20A zoning district. (DiGiacinto_010)
>
> I asked about the unavoidable adverse impacts, fire and police are critical, additional town expenses. (Schiliro_008)

Response 19-1: The Applicant has requested the Town Board defer further review of text changes to the DOB-20A Zoning District, and no adjacent sites in the DOB-20A district would be affected by the Applicant's Preferred Alternative as part of the amended zoning petition. The Preferred Alternative would repurpose the Project Site's southernmost office building as approximately 50, 2-bedroom apartments in an age-restricted multifamily building, and will construct approximately 125, 2-story, 3-bedroom townhomes. The Preferred Alternative proposes less intense development and a less intense mix of land uses on the Project Site when compared to the DEIS Project.

As discussed in FEIS Chapter 2, "Environmental Analyses," the Preferred Alternative is likely to result in physical changes to, and new construction and uses within, the Project Site. These changes will result in impacts to various environmental resources, as described throughout the DEIS and this FEIS, however these potential impacts would not be significant. The design of the Preferred Alternative avoids certain impacts that would have occurred with the DEIS Project and mitigates other potential impacts to levels that are not considered significant.

An updated fiscal impact analysis, and analyses of potential impacts to community facilities and services (focused on the Preferred Alternative's

residential uses) has been provided in FEIS Chapter 2, "Environmental Analyses." As noted therein, the Town would receive approximately $541,705 per year in direct property taxes, which far exceeds the estimated $256,740 of increased municipal cost.

CHAPTER 20: OTHER ANALYSES

Comment 20-1: The FEIS should include a discussion of measures to avoid or reduce both an action's impacts on climate change and associated impacts due to the effects of climate change such as sea level rise and flooding pursuant to Section 617.9(b)(5)(iii) of SEQRA. (Kaufman_TNC_022)

The Town Board as Lead Agency has a duty to consider the impacts of climate change on our Town and an obligation to mitigate those impacts when evaluating and approving new developments and zoning changes. The experts have clearly stated that the proposed Airport Campus project will exacerbate the impacts of climate change. Their advice must be followed. (Kazak_OSC_026)

Response 20-1: Comments noted. FEIS Chapter 2, "Environmental Analyses" includes a discussion of the Applicant's Preferred Alternative with the New York State Climate Leadership and Community Protection Act which was passed in 2019. Among other design considerations, the Preferred Alternative proposes to incorporate green building technologies such as green roof areas, energy efficient appliances, LED lighting, and charging options for electric vehicles. The Project Site is not subject to direct impacts from sea level rise, nor is it located in an area of increased susceptibility of flooding. ✷