

George Latimer  
County Executive

September 28, 2020

Carolyn Saracino, Planning Board Secretary  
Town of Mount Pleasant Planning Board  
One Town Hall Plaza  
Valhalla, NY 10595

**County Planning Board Referral File MTP 20-002 – The North 60  
Zoning Text and Map Amendments, Site Plan, and Subdivision Approvals  
Draft Environmental Impact Statement (DEIS)**

Dear Ms. Saracino:

The Westchester County Planning Board has received a draft environmental impact statement (DEIS) (dated accepted July 2, 2020) for the proposed development of a new mixed use community on an undeveloped portion of the County's Grasslands Campus commonly referred to as "The North 60". This approximately 60-acre, County-owned area would be combined with seven additional parcels totaling 20-acres that are owned by the applicant for a total site development of approximately 80 acres. Lots included within the site are demarcated SBL 116.8-1-3 through 9, and SBL 111.20-1-80. The site is located at the north end of the Grasslands Campus, on the north side of Hospital Road (County Road 301). The eastern boundary of the site is the Sprain Brook Parkway and its associated exit for Bradhurst Avenue (NYS Route 100) and Hospital Road. The site also touches Saw Mill River Road (NYS Route 9A) to the northwest, with residential and commercial properties bordering it along its north and west sides. The site is mostly woodland, with some on-site structures which would be demolished. Two streams run north through the site that are tributary to the Saw Mill River.

Because the Town does not currently have zoning controls to regulate a development of this size and scope, the applicant is petitioning the Town to add a new OB-5 MP - Office Business Master Plan district with new regulations that would permit the proposed development. This new zone would follow many of the regulations of the OB-5 – Office Business zone, but allow all of the various uses requested by the applicant. This zone would only be applicable to sites larger than 60 acres, and bordered by a State or County highway. The applicant would then seek to rezone the site from its current split designation of OB-6 and R-20 to OB-5. Once the zoning amendments are in place, the applicant would seek a Master Development Plan approval as well as site plan and subdivision approvals from the Mount Pleasant Planning Board for Phase One of a two-phase development.

Under the Master Development Plan, the applicant is seeking to develop this site with approximately 3 million square feet of bio-tech research and development space combined with retail areas, offices, a children's science center, and a hotel. The 20 buildings on the site are proposed to be between two and seven stories tall. 8,592 total parking spaces are proposed on the site, divided between underground parking garages, two seven-story garages and 434 surface parking spaces. A new street network is proposed throughout the site which would make a connection between Saw Mill River Road and Hospital Road.

The DEIS also presents a development concept that could potentially include 660 residential units in place of some of the medical office space. This scenario, presented as Alternative C, has been proposed according to the recommendations of the *North 60 Market and Financial Feasibility Study*, also known as the Weitzman Study, which is included as Appendix M in the DEIS.

We have reviewed the DEIS under the provisions of Section 239 L, M and N of the General Municipal Law and Section 277.61 of the County Administrative Code and we offer the following comments:

### **1. Consistency with County Planning Board Policies.**

The proposed concept of mixed-use development on the North 60 site is generally consistent with 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. The North 60 development has the potential to compliment the existing uses on the Grasslands Campus and it will continue to direct additional growth of research and development space to an area that has long been home to such uses and that can support the additional development. This proposal is consistent with County economic development goals to increase the concentration of science-related research/technical industries in Westchester.

Although not specifically called for in the preliminary concept for this development, we encourage the Town to consider adding a housing component to the development as discussed in Alternative C, since it would help fill the critical need for more housing in Westchester. This need is highlighted by County's *2019 Housing Needs Assessment*, which provides findings on a wide variety of demographic, housing stock and housing affordability issues; and provides recommendations to help the County move forward in meeting its affordable housing needs. We recommend that any housing component be expanded to include a wider range of unit types to better accommodate a diversity of household types. The FEIS should also acknowledge that any housing constructed as part of this development must abide by County requirements.

We also recommend that more flexibility be considered for the retail component of the project, perhaps allowing for more retail opportunities if there is demand created from the residential component and the nearby community.

### **2. Traffic and transportation impacts.**

The proposed development will have impacts on both County and State roads, which will require review from the Westchester County Department of Public Works and Transportation under Section 239-F of General Municipal Law as well as from the NYS Department of Transportation.

Extensive changes are proposed on Hospital Road along the site's frontage. A new eastbound lane is proposed to be added, along with turning lanes at three new entrances to the North 60 site. New traffic signals are also proposed at these intersections. In addition, a roundabout is proposed at the intersection of Hospital Road and Bradhurst Avenue with the northbound Sprain Brook Parkway exit ramp. A new road, to be known as West Street, would also be constructed to provide a new connection between Saw

Mill River Road and Hospital Road through the site, potentially impacting traffic on Saw Mill River Road. We offer the following detailed comments on each of the following aspects:

*a. Roundabout*

The proposed development includes a roundabout which is proposed to replace the existing signalized intersection at Hospital Road and Bradhurst Avenue. The roundabout would feature an unconventional layout where all vehicles exiting the Sprain Brook Parkway at the Hospital Road/Bradhurst Avenue exit would be required to make a right turn and then enter the roundabout in order to access Hospital Road.

While the roundabout is being proposed as a means to keep traffic circulating and prevent backups on the Sprain Brook Parkway ramp, we are concerned about the confusion the roundabout could create, since vehicles will have to “go right to go left”. This confusion could also be exacerbated by the sharpness of the right turn from the ramp into oncoming traffic from the west. It would be preferable to have a more intuitive design, especially since ambulances driving to the hospital from the northbound Sprain Brook Parkway will need to travel via this roundabout. The roundabout is also unconventional in its layout in that it is not in alignment with Bradhurst Avenue, which is the primary road going through the roundabout.

Although the roundabout design in the DEIS is conceptual, we also have concerns about transit, pedestrian and bicycle movements through the roundabout. The roundabout must be able to accommodate trucks as well as both 40-foot and 60-foot (articulated) Bee-Line buses, and should be designed carefully to accommodate bicycles and pedestrians. We point out that the proposed development will put retail and restaurant uses within close walking distance of a large employment site located at 19 Bradhurst Avenue. The roundabout’s pedestrian and bicycle elements should be constructed to maximize safety and they should connect to pedestrian and bicycle facilities on the Hospital Road bridge over the Sprain Brook Parkway.

*b. Cumulative traffic impacts to Saw Mill River Road*

The proposed addition of West Street to the North 60 site, connecting Hospital Road and Saw Mill River Road, will be a valuable connection to alleviate traffic cutting through the residential neighborhood north of Stevens Avenue, and would allow for easier navigation to the Grasslands Campus from the north.

However, as we stated in our recent review of the Acquest Development distribution center, we are concerned about a cumulative traffic impact to Saw Mill River Road that may impact the surrounding municipalities, particularly Elmsford and Greenburgh. Saw Mill River Road is an important traffic artery in central Westchester County in that it is the primary north-south truck route in the area. The addition of hundreds of delivery van trips per day on this corridor, combined with the new development on the North 60 site, warrants additional study which the DEIS does not discuss. We recommend the FEIS include a revised traffic study examining the cumulative traffic impacts to Saw Mill River Road from both of these developments. Specifically, the trip generation analysis of the North 60 development should also include rates for the expected number of heavy vehicle trips along with their distribution on the network.

We also point out that there is an existing emergency access connection between Skyline Drive and the right-of-way which will be utilized for West Street. We recommend that this access point be opened for vehicles, bicycles and pedestrians to avoid a situation where people must travel between Skyline Drive and the North 60 using a circuitous route via Saw Mill River Road.

*c. Traffic monitoring program*

The DEIS describes a traffic monitoring program that would establish a means for the applicant to report to the Town any changes to the traffic pattern due to development on the site. By collecting data in an ongoing manner throughout the buildout of the development plan, full studies will not have to be conducted for every addition to the site, and continuous data will be available to ensure any problems are recognized and can be mitigated as a whole rather than in piecemeal fashion.

While we are generally supportive of this approach, we recommend shifting the focus away from a level of service model, and instead monitor traffic impacts from the perspective of vehicle miles traveled. The goal with this approach is to reduce the distance vehicles need to travel to reach their destination along with incentivizing the use of mass transit and alternative transportation options through a transportation demand management program. In addition, while the traffic study analysis only includes a peak AM and PM hour based on existing traffic volumes, the monitoring program should consider other weekday or weekend periods that may be impacted due to the development's future generated trips.

### **3. Transportation demand management and multi-modal access and circulation**

One of the policy goals of *Patterns for Westchester* calls for the reduction of single occupant vehicle travel. Reducing solo-driving has many benefits, including reduced congestion, improved air quality and reduced demand for parking. We point out that the proposed development plan would include 8,592 parking spaces. Since the number of on-site employees is anticipated to be approximately 8,000, the number of parking spaces provided assumes that a majority of employees will drive to their jobs alone in their cars, which is counter to the County Planning Board's policies.

We recommend the applicant be required implement a transportation demand management (TDM) program aimed at promoting alternatives to single occupant vehicle travel. TDM programs should include physical elements, such as the inclusion of protected bike lanes and paths, pedestrian facilities, bus stops and bus stop amenities. Programmatic elements should include an overall parking management plan that incorporates the cost of parking into a fee structure, and that offers incentives in the form of tax-free commuter benefits for employees to use mass transit, ride sharing, van pooling, non-motorized transportation, bike/scooter sharing and telecommuting opportunities. We note that the County is undertaking a TDM plan for the larger Grasslands Campus, and that any work conducted by the applicant should be integrated into the County's plan. It is also worthwhile to note that the County is currently undertaking a County Mobility and Bus Redesign Study, with an expected completion date of 2021, which may result in a modified transit framework at the Campus.

We also recommend that any public financing, such as IDA financing or payment in lieu of taxes (PILOT) agreements, be conditioned on the creation of a TDM program that aims to reduce single occupancy vehicle travel.

We offer the following comments about specific modes of access and circulation that should be included in both the development plan and the TDM:

*Transit*

While the DEIS discusses the possibility of instituting a shuttle service from the site to the Hawthorne and Valhalla train stations, we encourage the applicant to also work with the Bee-Line bus system to install new bus stops or layover areas connected to the many bus lines that terminate or run through the Grasslands campus. The County’s Bus Stop Planning and Design Guidelines should be consulted for both bus stop and new roadway design and are available through this link: <https://transportation.westchestergov.com/bus-stop-planning-and-design-guidelines>. For bus stop treatments around separated/protected bike lanes, we recommend using guidelines contained within the NACTO Transit Street Design Guidelines located through this link: <https://nacto.org/publication/transit-street-design-guide/> Other comments related more specifically to the traffic impact study technical analysis include:

- As part of the Phase One trip generation, no assignments were made for mass transit, since the transit improvements are only recommended as part of Phase Two. However, we would recommended including transit improvements for Phase One since the Grasslands Campus has existing transit users.
- The FEIS should include any backup sources pertaining to the assumption that 25% of trips will utilize the proposed shuttle service. Backup sources should also be provided for the parking index number provided in the parking plan.
- The proposed street network recommendations for Hospital Road do not reflect the existing northbound (eastbound direction) bus stop, where there is a proposal to construct a channelized right turn lane.

*Pedestrian circulation*

While the DEIS notes that sidewalks are proposed along all new streets, and that walking paths are proposed for the surrounding wooded areas, it will be important to ensure that pedestrian connections are made to adjacent areas on Skyline Drive and Bradhurst Avenue, as well as to the rest of the Grasslands Campus. As the DEIS points out, the center of the development site is envisioned to act as a “Main Street”, with public plazas and seating areas. It will be important for pedestrians to be able to access this area from the surrounding areas without needing to drive.

*Bicycle circulation.*

Off-street bike paths are proposed along Hospital Road, and along part of West Street. The remaining streets would be marked with sharrow pavement markings as a way to accommodate bicycles. We believe sharrows to be an insufficient design treatment, especially given how the DEIS states that a potential bike sharing program is being considered in conjunction with other uses on the Grasslands Campus. We would be supportive of seeing a bike sharing system implemented, and we believe that this development should include separated bicycle infrastructure along all streets within the development. Bicycle storage areas should be provided for all of the proposed buildings, and racks should be provided outside all retail locations. Charging stations should also be provided at various bike parking locations, for cyclists utilizing e-bikes.

*Tarrytown-Kensico Trailway*

We note that the DEIS does not include a discussion regarding the proposed Tarrytown-Kensico County Trailway, which is to run along the southern border of the site, parallel to Hospital Road. This trailway would provide an east-west non-motorized connection across central Westchester, connecting the North County Trailway and the Bronx River Pathway. The Tarrytown-Kensico trailway will also have the regional benefit of connecting a number of large employment and educational sites to the County's trailway network.

We point out that the proposed widening of Hospital Road and the new roundabout could affect the design plans for the trailway. This should be discussed in detail in the FEIS and any new construction that occurs on the North 60 site should accommodate, and not preclude, the installation of the trailway. We also recommend the Town consider if additional segments of this trailway could be constructed beyond the project site to help better facilitate non-motorized travel to and from the North 60.

**4. Phasing**

The Master Development Plan is proposed to be completed in two phases. The first phase proposes the construction of 500,000 square feet of the Master Plan's building space, including the hotel, sections of the retail and medical offices, and one of the biotech buildings. These buildings would be arrayed around the new Main Street and along Hospital Road. West Street is also proposed to be constructed during this phase, along with some of the interior streets. Unlike the full master plan, a large portion of the parking area is to be constructed as surface parking. The applicant proposes 905 surface parking spaces and 886 spaces located within garages below the proposed buildings. The Phase One parking lots are proposed to be constructed within the footprints of the proposed Phase Two buildings. The stormwater management and wetland remediation programs would begin during Phase One, including the construction of a pond, retention basins, and underground retention tanks.

While we are appreciative of the applicant providing most of the master plan's parking within structures or below grade, we are concerned about the amount of surface parking proposed in Phase One. If the full master development plan never gets constructed, a large amount of impermeable surface parking would remain. We recommend revisions to Phase One to reduce the amount of surface parking, or to only construct the parking that is needed.

**5. Sewage flows.**

We note that the DEIS includes a discussion of the County Department of Environmental Facilities' policy requiring inflow and infiltration (I&I) mitigation for projected increases in sewer system flows from the site.

As a general matter, the County Planning Board further recommends that the Town implement a Town-wide 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.

**6. Maintenance of infrastructure.**

The DEIS does not contain a discussion about the overall financial productivity of the North 60 in terms of validating whether taxes and payments to the County will be sufficient to pay for future infrastructure rebuilds which the County will bear in future years. We recommend the FEIS include this discussion.

**7. Recycling.**

The EIS should demonstrate that there will be sufficient storage measures provided to accommodate the County's recycling program and that the development will comply with reporting requirements for recycling. County regulations for recycling may be found at <http://environment.westchestergov.com>.

In addition, given the large size of the development site, and the likelihood that food waste will be generated, the final EIS should also contain a discussion concerning the potential for the on-site composting of food waste. Composting can contribute substantially towards reducing the waste stream that the County must process. Composting can also provide a resource in maintaining on-site landscaping.

**8. Green building technology.**

We are supportive of the applicant's intention to construct the proposed development following LEED energy standards, and we commend their dedication to establish the Science Center.

Please inform us of the Town's decision so that we can make it a part of the record.

Thank you for calling this matter to our attention.

Respectfully,  
WESTCHESTER COUNTY PLANNING BOARD

By:



Norma V. Drummond  
Commissioner

NVD/MV

- cc: Lance MacMillan, Regional Director, NYS Department of Transportation, Region 8
- Anne Darelus, NYS Department of Transportation, Region 8
- Christopher Lee, NYS Department of Transportation, Region 8
- Michael Dispenza, Contract Administrator, County Department of Public Works and Transportation
- Kevin Roseman, Traffic Engineer, County Department of Public Works and Transportation
- Hon. Paul Feiner, Supervisor, Town of Greenburgh
- Garrett Duquesne, Commissioner, Town of Greenburgh Department of Community Development & Conservation
- Hon. Robert Williams, Mayor, Village of Elmsford
- Michael C. Mills, Village Administrator, Village of Elmsford