



# TARRYTOWN-ON-HUDSON

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April 4, 2005

Hon. Philip Zegarelli, Mayor  
Village of Sleepy Hollow  
28 Beekman Avenue  
Sleepy Hollow, New York 10591

Re: Lighthouse Landing DEIS Comments

Dear Mayor Zegarelli:

I want to assure you that it is the Village of Tarrytown's desire to see the site of the former General Motors plant developed to the benefit of the residents of the Village of Sleepy Hollow. I and the Tarrytown Board of Trustees have been pleased with the openness and professionalism of your review thus far, and we are confident that we can continue to work cooperatively as the environmental review process moves forward. At the same time as Mayor of the Village of Tarrytown, it is my responsibility to insure that the development will not have a severe adverse impact on the health, safety and welfare of the residents of the Village of Tarrytown. Therefore, enclosed please find the reports of Adler Consulting and BFJ Planning, the traffic and planning consultants for the Village of Tarrytown regarding the Village of Tarrytown's comments on the Lighthouse Landing DEIS. I will summarize some of the key findings below.

The Lighthouse Landing Draft Environmental Impact Statement [DEIS] and the reports by Adler Consulting and BFJ Planning conclude that Lighthouse Landing will have traffic and parking impacts in Tarrytown. The Applicant has described physical road improvements in the DEIS to mitigate some of these impacts, many of which require approval of the Village of Tarrytown. Given these circumstances, we have been advised that, as defined in Section 6 of New York Codes Rules and Regulations (NYCRR), since the Village of Tarrytown is "an agency that has jurisdiction by law to fund, approve or directly undertake an action" [§617.2(s), also page II-100 of the DEIS], we are an

“involved” agency. The DEIS should be corrected on Page I-5 and in Section ID to reflect this status.

Adler Consulting's analysis concludes that the traffic generated by the proposed development in the critical peak PM highway hours will result in considerably greater negative impacts than those described in the DEIS. Even at the lower traffic levels of the DEIS, the Applicant describes a series of mitigation measures to be undertaken in Tarrytown, including the elimination of parking spaces to provide for vehicle turning lanes and the installation of traffic control devices at intersections where only stop signs exist today. Specifically:

[a] The installation of a traffic light at the County House Road/Neperan Road intersection located by the Tarrytown Lakes;

[b] The elimination of 15 on-street parking spaces to create north and southbound left-turn lanes at the intersection of Broadway and Main Street;

[c] Signal timing modifications at Main Street by Depot Plaza due to a reduction in operating conditions during the Peak AM/PM and Saturday hours;

[d] The implementation of left turn restrictions on Riverview Avenue at Franklin Street due to reduced level of operating conditions – this mitigation measure may also effect traffic operations at the intersection of Miller Avenue and Franklin Street, which will need to be analyzed;

[e] The installation of a traffic light and the elimination of approximately 20 on-street parking spaces to create a northbound left-turn lane at the intersection of Franklin Street at Broadway;

[f] The conversion of the existing northbound right-turn lane at Benedict Avenue at Broadway into a through/right-turn lane. This conversion would also necessitate the elimination of parking spaces for Franklin Street at Broadway;

[g] The re-striping of Route 119 approach at Broadway to permit right turns from the middle lane as well as the right-hand lane;

[h] Signal timing modifications on Route 119 at the I-287 Westbound Ramps;

[i] Yet to be determined mitigation measures at the intersection of Central Avenue and Broadway in order to address operating conditions anticipated to be "failing" during the Peak PM and Saturday hours;

[j] Yet to be determined mitigation measures at the intersection of Prospect Avenue and Broadway. This intersection is arguably the "most congested intersection in the Village of Tarrytown" and given that the DEIS already notes

that significant traffic impacts will occur to the signalized intersections upstream and downstream from those for which the need for mitigation has been identified;

[k] Yet to be determined mitigation measures for the Miller Park neighborhood. The DEIS fails to recognize and mitigate potential impacts to this area; however, it is anticipated that more than 100 trips will be added unless specific and effective traffic calming measures are identified and implemented.

We have reviewed these proposed mitigation measures and have concluded that the Village of Tarrytown will not implement [as listed above] [a], [b], [d], [e], [f] and [g]. Further, the Village of Tarrytown cannot respond to items [i], [j] and [k] because no mitigation measures have been proposed for the impacts at these locations.

With respect to [a], the installation of a traffic light at the County House Road/Neperan Road intersection located by the Tarrytown Lakes would negatively impact the scenic character of the lakes. Moreover, in 1997 this measure was considered and rejected as both inappropriate and ineffective in a series of public hearings reviewing roadway improvements to Neperan Road.

With respect to [b], [e] and [f], the elimination of on street parking and the creation of dedicated turning lanes would harm local businesses and residences by exacerbating the existing parking shortage and would also severely negatively impact the "small town" character of our business district. On street parking is not only critical to the Tarrytown central business district but also acts as a pedestrian barrier. The removal of parking would enhance the "highway" aspects of Broadway and would lead to a situation currently experienced by Villages such as Ossining where Route 9 has become a major high-speed boulevard and pedestrian traffic is minimal.

With respect to [d] the implementation of turn restrictions simply moves the problem to another location and does not mitigate the impact.

With respect to [g], New York Department of Transportation Regulations prohibit double right-hand turn lanes such as that which is proposed by the applicant.

We are also concerned that the proposed addition of over 1500 residential units will undoubtedly create parking impacts in the Tarrytown central business district, which currently is already near or at capacity on Saturday or at times during the week. The proposed addition of over 1500 residential units at the Lighthouse Landing site can only make the condition worse. Therefore, it is important that Sleepy Hollow and Tarrytown to work together in the environmental review process of this major development proposal to insure that negative impacts on the Village of Tarrytown are adequately addressed.

Our consultants also have informed us that a fundamental shortcoming of the DEIS is its overly optimistic projections of future traffic generated by the development. In particular, they point out that the DEIS has utilized very liberal assumptions made with

regard to the sources of the trip-generation estimates, the level of mass transit use, as well as the level of synergy created on the site and that support for these assumptions is lacking. We believe that the Village of Sleepy Hollow should require that that Applicant conduct a conservative analysis, not a liberal one, to insure that if the projections do not materialize as forecast, the traffic impacts would be better than expected rather than worse.

The development's negative impacts on the Miller Park neighborhood, as well as its adverse impact on emergency response times, are also highlighted by our consultant's reviews. As indicated in a January 2005 joint letter from both Villages' traffic consultants, there already is extensive traffic congestion in both Villages, a situation that hinders emergency response vehicles when called to an incident. Consequently, we urge that the Applicant be required to more carefully review both of these areas of concern

Our consultants also have noted that the DEIS has not adequately addressed the impacts of truck traffic during both the construction and post-construction periods. Because of the current weight restrictions on the Beekman Avenue bridge, all heavy truck traffic must pass through the unsignalized intersection of Broadway and Central Avenue. This situation seriously destabilizes the Broadway corridor and is of paramount concern to the Village of Tarrytown. Therefore, we believe that it is incumbent upon the Village of Sleepy Hollow to require that the Beekman Avenue bridge be repaired prior to any development at the site so that the weight limitation on the bridge can be lifted. This would allow a more appropriate distribution of truck traffic throughout our two Villages and alleviate a portion of the negative impacts on the Central Avenue intersection.

In sum, our consultants' reviews indicate that the measure proposed by the Applicant in the DEIS are not likely to adequately mitigate the serious negative environmental impacts to be generated by the project. Based on our consultants' analyses, we believe that the Final Environmental Impact Statement (FEIS) should include a review of an alternative that would include a 50 percent reduction in density, or an alternative that would provide for similar levels of mitigation.

I and the Board of Trustees look forward to working with the Village of Sleepy Hollow in order to insure that the needs and concerns of both municipalities are carefully reviewed and addressed. Working together, I am certain we can help create a waterfront development that will benefit all of our residents.

Very truly yours,

Drew Fixell, Mayor  
Village of Tarrytown