Planned Residential Development

Village of Mamaroneck Planning Board Comments on Preliminary Final Environmental Impact Statement

5/22/2019

1	of	13	

Section Number	Section	Comment/ Response Number	Comment on FEIS 2 - 01/24/2019 Matrix	New Comment on FEIS 3	VHB Comments
3	Executive Summary	1.2	Response 1.2 - Does not appear to answer the question regarding the basal area of existing trees to be cut versus the basal area of new replacement trees. While there is a reference to a temporary reduction in tree basal area, that reduction is not quantified as requested.	The response states that the trees would reach maturity after 15 years but does not indicate the expected basal area at maturity. It is not clear that the trees would have a replacement basal area to meet the existing basal area with an additional five years of growth (i.e., 15 years of total growth). Therefore, this may be a permanent, not temporary, reduction in basal area. At a minimum the unavoidable impact of a temporary reduction in basal area should be noted in the Unavoidable Impacts section. The temporary reduction in basal area, from 1,575 SF to 132 SF after 10 years should be included in the Introduction and Project Description, Tree Removal and Replacement Section (first bullet on Page 1-18).	See updated narrative in Section 1-C of the Introduction (Page 1-18)
	Executive Summary	1.10	Provide an estimate of the number of blasts that may be required. The details in Response 1.10 regarding noise mitigation should be incorporated as conditions in the Findings Statement and any resolution of approval.	First sentence is not included in matrix or addressed.	See updated Response 1.10.
	Executive Summary	1.11	11	Further clarification on timing of later phases post-central platform construction would be helpful.	See Updated Response 1.11.
	Project Description	General	Provide a discussion of whether the downsized golf course can be reconfigured to move all holes at least 100' from wetlands.	Response needs further detail. Why is it infeasible?	See updated narrative in Section 1-C of the Introduction (Page 1-2)
	Project Description	General	The estimate of fill import excludes foundation areas. Will these be left open after the platform is built? Discuss potential impacts of same if true, or modify the fill estimate, if required.	Further clarification is needed. Confirm the amount of fill needed is accurate given that the most likely scenario involves grading and filling of the entire platform prior to construction of units. Therefore, some portion of the foundations that will eventually be excavated will consist of imported fill. In addition, there will likely be the need to bring in other materials, such as asphalt, structural fill, etc. Update truck trip information as needed.	See updated narrative in Section 1-C of the Introduction (Page 1-4)
	Project Description	General	Provide a more detailed discussion of project phasing focusing on construction sequencing. The discussion should start with site preparation and cover all aspects of construction, including means and methods for construction of the platform, utility construction, construction dewatering, stormwater management, dust suppression, etc. This section should provide a comprehensive and understandable description of how construction would occur and it should provide a timeline for construction.	Level of detail is lacking. Timeline is not addressed past the first nine months. 20 units are estimated to be constructed annually to meet buyer demand. Given this it is reasonable to expect that there will be work conducted in Phase 1 at the same time that subsequent phases are being finished to save time and allow for units to come on the market faster Given this it is unlikely that total soil disturbance will be limited to 5 acres or less. To accomplish 5 or less acres of disturbance the Applicant would have to wait until subsequent phases were finished and return to Phase 1 afterwards to make final utility connections, among other site planning efforts.	See updated narrative in Section 1-C of the Introduction (Page 1-4)
	Project Description	General	Provide a calculation of: > 1. The acreage of wetlands in the R-20 zone, and the acreage of said wetlands plus a 100' buffer. > 2. The acreage of wetlands in the non-golf portion of the R-20 zone, and the acreage of said wetlands plus a 100' buffer. > 3. The acreage of 15-25% and >25% slopes in the R-20 zone. > 4. The acreage of 15-25% and >25% slopes in the non-golf portion of the R-20 zone.	This information should be interwoven into the text.	See updated narrative in Section 1-C of the Introduction (Page 1-3)
	Project Description	General	Address the long-term stability of the development platforms. How will they be protected from erosion over time, especially considering ongoing and repeated heavy rainfall and flood events.	This comment is not included in the matrix.	See updated narrative in Section 1-C of the Introduction (Page 1-4)
	Project Description	Purpose, Need and Benefits	Provide additional financial information justifying the applicant's contention that the No Action Alternative is not financially viable.	It does not appear that any new significant information has been presented here.	It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to the Project Purpose, Need, and Benefits.
	Project Description	3.6	Clarify who the "Applicant" will be responsible for maintenance of the stormwater system and roads. Additionally, who will be responsible for landscape maintenance?	This response states that "the proposed open space areas would be left in a natural state and would be allowed to grow in area and succession." Please change text to "The open space areas are defined on Figure 5, and would be allowed to grow to a defined area of 30.57 acre." See also Comment/Response K.11; change here as well. This response states that "[t]he HOA would be responsible for the maintenance of these areas if problems arise or if landscaping adjustments are needed in the future." However, as shown on Figure 5, four of these areas are marked with the letters "GO" which in the legend states that the areas would be maintained by Golf Operations. Will these four areas marked as GO be allowed to move into natural succession if they are maintained by Golf Operations. Should these four areas not be included in the open space calculations if they are being maintained by/for Golf Operations.	See Updated Response 3.6 and K.11. Certain of the open space areas currently maintained by GO would continue to be maintained by GO for ease and continuity. However, the open space areas would still be allowed to grow naturally as indicated in Figure 5.
	Project Description	3.14	The response does not answer the question as it relates to managing and maintaining roads, snow removal, etc.	Matrix refers reader to 3.11, should be to 3.6.	Comment noted. The matrix should have stated Response 3.14.
	Project Description	3.18	The DEIS did not address the use of golf carts on the roadways. Is this an existing condition? Is there a record of accidents between cars and golf carts? A discussion about potential impacts to circulation and necessary safety measures should be included.	What are these paths made from? Where they appear they do not correspond with the sidewalk but would interact with the driveways. What are the safety measures for interaction with driveways and road crossing?	See Updated Response 3.18.
	Project Description	3.20	N/A	Reference should be to 3.20 not 3.30 in matrix.	Comment noted. The matrix should have stated Response 3.20.
3	Project Description	3.37	Response 3.37 - Clearly, the PRD will bring more traffic and create other impacts that do not currently exist with the current operation of the Club. The additional level of impact by adding the PRD to the existing Club operation has not been evaluated.	The response should be clarified to acknowledge that cumulative impacts will occur.	See Updated Response 3.37
3	Project Description	3.45	Is Response 3.45 a response the Village can endorse? Provide a discussion as to why the applicant has chosen not to include an affordable housing component.	Second sentence does not appear in matrix and is not addressed.	It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to the Project Description.

3 Project Description	3.46	The response should affirmatively and specifically state which green building practices are proposed to be incorporated in the project.	Does not appear in matrix and is not addressed	While the Applicant has committed to incorporating green building
		proposed to be incorporated in the project.		practices into the Project, the precise details of each practice to be incorporated into the Project have not been finalized at this stage of the review process. Such details would be identified in connection with the Site Plan and Building Permit review process. The Applicant has provided as much detail as possible for the SEQRA review stage of this Project. It is the Applicant's position that sufficient material responsive to this inquiry
				has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to the Project Description.
3 Project Description	3.47	Response 3.47 - In the fourth sentence, delete "It is anticipated" and substitute "The Applicant	Second and following sentences are not addressed.	See updated Response 3.47. It is the Applicant's position that sufficient
		projects." Has the Applicant performed any analyses supporting the statement that the Applicant expects that the number of club members and events would be the same after the project is built? provide such analyses, if available, or modify the statement, if not.		material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to the
				Project Description.
Project Description	A.1	Response A.1 - The deed restriction referred to should be incorporated as a condition of any resolution of approval. Where will the restriction apply and who will enforce it? Restate the conclusion in the final paragraph in neutral language.	Second and following sentences are not addressed.	It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to the Project Description.
3 Land Use, Zoning and Public Policy	A.7	Response A. 7 - The accuracy of the response must be reviewed with the Building Inspector and the response revised if and as necessary. Discuss the impact to the project if a waiver is found to be required and is not granted.	Second sentence is not in matrix or addressed.	It is the Applicant's position that a waiver is not required for this Project as the definition of "frontage" does not require the subject road to be public. As such, it is the Applicant's position that sufficient material responsive to
				this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to the Land Use, Zoning, and Public Policy.
3 Land Use, Zoning and Public Policy	A.15	Response A.15 - Does not appear to address the comment.	Description of Cooper Avenue as an entry and exit for residents conflicts with other descriptions as an emergency access only.	See updated Response A.15.
3 Land Use, Zoning and Public Policy	A 17	Add a discussion of potential indirect impacts.	No discussion is provided.	See updated Response A.17. Response A.17 addresses potential indirect impacts. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to impacts on Wetlands.
2 Geology - Soils, Topography, and Steep Slopes	General	Has chemical removal of bedrock been considered?	Response should be interwoven into text.	See updated Response C.13.
Geology - Soils, Topography, and Steep Slope	C.8	Response C.8 does not answer the portions of the question related to geotechnical testing and the slope of the roadway.		See updated Response C.8
Geology - Soils, Topography, and Steep Slopes	C.11	Comment seeks information on stabilization against wave action, but the response discusses flooding. Also, define significant areas of erosion.	Does not define what significant areas of erosion are.	See updated Response C.11.
Geology - Soils, Topography, and Steep Slopes	C.21		Last sentence in comment not addressed and does not appear in matrix.	See updated Response C.21.
Geology - Soils, Topography, and Steep Slope	C.22	Response C.22 Should address the comment regarding discrepancy in the cut and fill calculations.	Provide revised calculation and update related impacts, e.g. truck trips as needed.	The Applicant's calculation of cut and fill in the EIS is accurate, and therefore, impact assessments do not require revision. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Geology- Soils, Topography, and Steep Slopes.
Geology - Soils, Topography, and Steep Slope	C.23	Response C.23 should address the portion of the comment related to the amount of soil to be relocated.	Comment is not addressed,	The Applicant's calculation of cut and fill in the EIS is accurate, an therefore, impact assessments do not require revision. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Geology-Soils, Topography, and Steep Slopes.
Geology - Soils, Topography, and Steep Slopes	C.27	Response C.27 - Makes reference to forwarding the blasting plan to the Town Engineering Department and Building Department for review. Is this meant to be the Village Engineering Department and the Building Department? See also Response R.3. See also comment on Response C.13.	Partially cut off in the matrix.	See Updated Response C.27 and R.3.
3 Groundwater Resources	D.2	The comment does not address the question with regard to groundwater quality.	Remove NJ information - not relevant. Explain the BMPs that would ensure standards.	See Updated Response D.2. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Groundwater Resources.

3	Groundwater Resources	D.5	The response does not provide the requested groundwater testing results. We disagree that the results are not needed. The groundwater is and will continue to be used for irrigation purposes and the public is thus exposed to the groundwater.	Remove NJ information - not relevant. Explain the BMPs that would ensure standards.	See Updated Response D.5.
3	Surface Water Courses and Wetlands	E.6		"be" in second paragraph, last line "would [be] considerably different.	See updated pages 3E-7 and 3E-8.
3	Surface Water Courses and Wetlands	E.9	Response E.9 - The response does not address the last sentence of the comment about marking the areas as out of bounds/no cutting? Discuss impact to wetlands buffer from golfers retrieving lost balls.	Second sentence is not in matrix and is not addressed.	It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Surface Water Courses and Wetlands.
3	Surface Water Courses and Wetlands	E.16	Assessment Section 2.1 (which identifies a number of ecological communities on the site) and DEIS Table 3K-1 (which identifies four items, three of which are not recognized Ecological Community Types in New York State) both cite to the NYS Ecological Communities, but the DEIS Table 3K-1 does not use recognized NYS Ecological Communities types (either from the original NYSDEC publication or from the DEIS Appendix B). FEIS Response E.16 states "tree stands are not properly	However, when the areas of trees to be removed from Figure 14b is added together, it equals 10.6 acres. It appears that the area of tree removal should be changed from 8.43 acres to 10.6 acres throughout the FEIS. If not, please explain the discrepancy. Last paragraph on page 3E-13. Last sentence. Word "The" should not be capitalized. It is also noted that Per figure 14d, the 384 trees to be retained equal an acreage of 5.78 acres, which is approximately half the acreage of the trees to be removed. In addition, of the trees to be removed, proportionally, more of these trees are in	See Updated Response E.16.
3	Surface Water Courses and Wetlands	E.17	As a so-called "native colonizer" to Isolated Wetland A, will Common Reed be allowed to thrive in the 20-foot wide native planting area around Isolated Wetland A? Would its colonization be part of the successful 85% aerial coverage? Or would it be identified as an invasive plant within the 20-foot wide buffer of Wetland A? What percentage cover of Common Reed species would be acceptable within the Wetland A buffer zone? Discuss this exception in Appendix H. Further, will Common Reed be allowed as a "native colonizer" in the planted buffer zones around other wetlands or will eradication be attempted? The photos in DEIS Appendix B, show Common Reed around Pond 10 (see Photograph 9). Are there proposed methods to keep the Common Reed from spreading from Wetland A to other buffers, for example, through the cleaning and washing of planting machinery after work planting the Wetland A buffer? Or perhaps Wetland A buffer should be planted last? These considerations should be included in Appendix H. Strike the word "thorough" in the sentence at the end of Response E.17.	Partially cut off in the matrix.	The full response is provided in the pFEIS. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Surface Water Courses and Wetlands.
3	Stormwater Management	F.16	The evaluation referenced in this response should be provided in the FEIS.	no appendix is cited - is evaluation analysis available? Matrix refers to F.6 should be F.16.	Comment noted. The matrix should have stated Response F.16. See updated response to F.16.
3	Floodplains	G.2	Response G.2 - The reference to the Village Code Section 186-5c should be 186-5(a)(3)(c). The response should acknowledge that the Village Floodplain Administrator has determined that a variance is required. See comments on Response A.5. See also Response G.20 and G.21 and Alternatives Response 4.30.	Is still not conclusive in tone that variance is needed. Also cut off in matrix.	See updated response to G.2. The response now references the criteria the Planning Board would be considering in connection with the variance request, and then summarizes the Applicant's position on the Project's compliance with said criteria. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Floodplains.
3	Floodplains	G.9	N/A	186-6A(4)(d) - The rationale that identifies new access to reduce danger is not relevant because if there would be no need for new access if there were no new residents.	See updated response to G.9. The response identifies the criteria the Planning Board would be considering in connection with the variance request, and then summarizes the Applicant's position on the Project's compliance with said criteria. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Floodplains.

3 Floodplains	G.9	N/A	186-6A(4)(f) - The response should be rewritten to acknowledge that it is possible to develop a design on this location with less fill.	Planning Board would be considering in connection with the variance request, and then summarizes the Applicant's position on the Project's compliance with said criteria. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Floodplains.
3 Floodplains	G.9	N/A	186-6A(4)(h) -The response should include a comparison with each statement of the Comprehensive Plan that applies to the project site.	See updated response to G.9. The response identifies the criteria the Planning Board would be considering in connection with the variance request, and then summarizes the Applicant's position on the Project's compliance with said criteria. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Floodplains.
3 Floodplains	G.9	N/A	Section 186-6A(4)(I) - The response should include correspondence with Village emergency services indicating their ability to access the site under the conditions described.	See updated response to G.1 and G.9. The response identifies the criteria the Planning Board would be considering in connection with the variance request, and then summarizes the Applicant's position on the Project's compliance with said criteria. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Floodplains.
3 Floodplains	G.9	N/A	Section numbers cited should be confirmed some errors appear. Section 186-6A(4)(j) - second sentence, "without risk" is an overstatement. 186-6A(4)(l) - consideration of cost of repair to equipment after flooding events should be discussed and the response should be rewritten to indicate that the rationale must be verified by the Village.	See updated response to G.9. The response identifies the criteria the Planning Board would be considering in connection with the variance request, and then summarizes the Applicant's position on the Project's compliance with said criteria. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Floodplains.
3 Floodplains	G.9	N/A	Section 186-6A(4)(I), the response should reference the correspondence with Village emergency service providers referenced above.	See updated response to G.1 and G.9. The response identifies the criteria the Planning Board would be considering in connection with the variance request, and then summarizes the Applicant's position on the Project's compliance with said criteria. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Floodplains.
3 Floodplains	G.9	N/A	186-6B(5), page 3G-13 - The response should be rewritten in a neutral tone that recognizes that the Planning Board will determine the minimum variance necessary.	See updated response to G.9. The response identifies the criteria the Planning Board would be considering in connection with the variance request, and then summarizes the Applicant's position on the Project's compliance with said criteria. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Floodplains.
3 Floodplains	G.9	N/A	186-6B(6)(a) - statement implies that the proposed project is improving the flooding conditions of the adjacent neighborhood; however, the supposed improvement comes at the potential cost of putting incoming new residents at risk. The Applicant's claim that a project complying with the requirements would result in greater impact and disturbance should be deleted or modified since its not true for every alternative.	See updated response to G.9. The response identifies the criteria the Planning Board would be considering in connection with the variance request, and then summarizes the Applicant's position on the Project's compliance with said criteria. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Floodplains.
3 Floodplains	G.9	N/A	186-6B(6)(b), page 3G-14 - The statement response should also acknowledge that an alternative project would need no or less of a variance.	See updated response to G.9. The response identifies the criteria the Planning Board would be considering in connection with the variance request, and then summarizes the Applicant's position on the Project's compliance with said criteria. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Floodplains.

G.12 G 18	Response G.12 should acknowledge that access would be completely restricted in the event of a 2-4' sea level rise. Further, address whether flooding of roads off of the site used to exit the site in an emergency would restrict such access. In other words, would residents be able to use the access roads off of the site to exit the site in the 100- year flood and would emergency vehicles be able to access the site?		See updated response to G.12, which includes the material that was cut off in the prior matrix. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of
G 18			environmental concern identified in the Final Scope relating to Floodplains.
	Provide an expanded discussion, here or elsewhere, as to how floodwater are managed during rainfall (as opposed to tidal flooding) events. Discuss how the site would drain during a tidal flood as well as a 100-year rain only event. Discuss the ongoing use of pumps to clear the site of water during heavy rainfall events. How are sediments and contaminants filtered from this water.		It is the Applicant's position that sufficient material responsive to this inquiry has been provided in Response G.18 and the pFEIS order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Floodplains.
G.25 /D.7	sites above flood elevations. As mentioned, more than 270,000 cubic yards of net fill and excavation of existing soils will be stockpiled on site to accomplish this transformation. Stockpiling materials in floodplains violates best management practices because flooded and water saturated soils are unstable. The standard stormwater runoff measures proposed are not effective to prevent stormwater runoff water quality impacts of the large amounts of materials proposed for storage and disturbance in a flood plain. D.7: If dewatering activities help facilitate the efficiencies of cut-and-fill excavations to minimize wet soil conditions and soil density, a description of the dewatering procedures, and the protective measures to contain the runoff of fluids from		See updated response to G.25, with reference to Responses D.1 and D.7, demonstrating that dewatering would not be required because substantial groundwater would not be encountered during construction. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Floodplains.
G.33		second sentence and beyond are cut off in the matrix and not addressed in detail.	See Updated Response G.33.
N/A	N/A		Comment noted. The need for a variance is noted in the FEIS.
1.6	Confirmation of the ability of the downstream system to accommodate wastewater is required before the FEIS can be deemed complete.	Not addressed or shown in matrix.	See Updated Response I.6
1.11	·	are typically placed outside of the building and generator backup is not required as long as 24-hour storage is provided. LPS systems are also known to be reliable with maintenance periods of 10 years or greater. LPS can be installed in floodplains (as a sealed system) as long as the controls are 2 feet above flood base elevation. Maintenance of a duplex pump station would be a financial and liability burden on the municipality whether it is maintained by the HOA or another third party. With an LPS, the individual pumps would be owned and maintained by the property owners and	See Updated Response I.11
General	The sanitary force main passes by a bioretention basin which slopes down. The builder would need to ensure 4' cover on all sides of the force main, not just the top. If the side of the basin get eroded over time, it could expose the force main depending on how close they are.		The full response is included in the pFEIS. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Sanitary Sewage.
K.1		on page 3K-3. "The existing basal areas of trees to be cut is 1,575.72 square feet. The basal area of the replacement trees will be 132.53 square feet after 10 years of growth." The project will remove 53% of the trees on the site (432 trees of 816 trees total). The estimated basal area of the replacement trees after 10 years (at 132 SF) is 8% of the existing tree basal area (1,576 SF) of the trees to be cut. Therefore, after 10 years, the project will have 46% of the existing trees and approximately 4% of the habitat replaced by the new trees (53% trees removed times 8% basal area after 10 years). Second full paragraph on page 3K-3, last sentence says "creation of new trees habitat." Needs to be corrected. Last paragraph on page 3K-3 reads "minimized by replacement with 432 in-kind species." This is in conflict with the statements in response 3.20, which describes Norway Spruce, Colorado Spruce, Western Arborvitae and Leyland Cypress are being planted (which are not native evergreens), and that the deciduous trees being planted are cultivars. Strike the phrase "in-kind species" (here and wherever it occurs relative to trees being planted) and cite to Response 3.20 for the list of species being planted. The phrase in this sentence "and installation of the as well as the proposed native plant wetland buffers" is unclear and appears to be missing words. Last sentence on page 3K-3. Bird species diversity would be expected to remain stable,	See Updated Responses K.1, K.4, K.17 and K.18.
	G.33 N/A I.6 I.11 General	sites above flood elevations. As mentioned, more than 270,000 cubic yards of net fill and excavation of estiting soils will be stockpilled on site to accomplish this transformation. Stockpilling materials in floodplains violates best management practices because flooded and water saturated soils are unstable. The standard stormwater runoff measures proposed are not effective to prevent stormwater runoff water quality impacts of the large amounts of materials proposed for storage and disturbance in a flood plain. D.7: If dewatering activities help facilitate the efficiencies of cut-and-fill excavations to minimize wet soil conditions and soil density, a description of the dewatering procedures, and the protective measures to contain the runoff of fluids from newly-stockpiled or staged soil, may need to be addressed. G.33 Response G.33 - Provide an engineer's certification of the condition of the tidal gates and the conclusion stated in the response. What is the remaining useful life of the gates? What kind of maintenance is required, how often is it performed and who pays for it? N/A N/A N/A 1.6 Confirmation of the ability of the downstream system to accommodate wastewater is required before the FEIS can be deemed complete. 1.11 The Village Engineer has advised that a more thorough discussion of a low pressure sewer system should be provided. This alternative should be given serious consideration and a thorough analysis. General The sanitary force main passes by a bioretention basin which slopes down. The builder would need to ensure 4' cover on all sides of the force main, not just the top. If the side of the basin get eroded over time, it could expose the force main depending on how close they are.	suces above flood electronics. An mentance, more than 27,000 cable, yards of net fill and exacution of straining calls will be strained controlled that transferred the straining calls will be strained controlled that the straining calls are strained to the controlled that the straining calls are strained to the strai

3	Vegetation and Wildlife	lk 2	There were several original comments - see 20190124 matrix	Several of the K-1 comments are cut off in the matrix.	The two comments out off in the metric recording Decree V 1 1
J	vegetation and wilding	N.Z	There were several original comments - see 20190124 Matrix	Several of the K-1 comments are cut on in the matrix.	The two comments cut off in the matrix regarding Response K.1 were: 1) Additionally, provide a discussion as to the potential benefits and detriments to wetland functions of removing existing phragmites stands. and 2) Provide a discussion of any potential impacts, even if minor, to the Hommocks Conservation Area. Additionally, the last paragraph of this response should be written in a neutral tone.
					See Updated Response K.1.
3	Vegetation and Wildlife	К.4	Response K.4 - The overall dbh of trees being cut versus the overall dbh of trees planted should be stated in this portion of the FEIS as well. This response indicates that 53% of the trees on the site will be cut. Also note in this response that 10.6 acres of trees will cut. See Response K.1 regarding the length of time for the trees to reach the same size/maturity as existing.	Replacement trees are not "in-kind" See Comment above under K.1. The word "due" is misspelled in the last sentence.	See Updated Response K.4
ī	Vegetation and Wildlife	K.5	the project will cause the loss of between 91% to 100% of all trees of the largest size, ranging from	The loss of a significant percentage of the larger trees on the site is an Unavoidable Adverse Effect that should be noted in that portion of the FEIS and Findings. In addition, it is noted that of the 31" to 55" size class of trees, there will be 111 trees cut (84% of that age class), with only 21 trees retained (16%). While there is an approximately equal number of trees being cut in the 0" to 30" dbh range, there is a significant number of large trees being cut compared to trees being retained in the 31" to 55" dbh range. See the table below. It will take a significant period of time for trees to reach the 31" to 55" dbh range.	See Updated Response K.5
3	Vegetation and Wildlife	K.6	See comments on Response E.16.	The FEIS Figure indicates that there is 8.43 acre of tree removal; and 8.43 acre of tree removal was identified in Responses 3K-1 and 3K-4. However, when the areas of trees to be removed from Figure 14b is added together, it equals 10.6 acres. It appears that the area of tree removal should be changed from 8.43 acres to 10.6 acres throughout the FEIS. If not, please explain the discrepancy.	The FEIS has been updated to reflect 10.6 acres. All instances of 8.43 have been corrected.
3	Vegetation and Wildlife	K.12	See previous comments (especially K.5) on the length of time for trees to reach maturity. Provide documentation that smaller trees establish faster than larger trees and reach maturity faster than beginning with larger trees.	First line of response "in approximately within 20 years" is awkward.	See Updated Response K.12
3	Vegetation and Wildlife	K.13		First line of new edits "would near maturity approximately within 20 years" is awkward.	See Updated Response K.13
1	Vegetation and Wildlife	K.17	Discuss why connections cannot be made between Pond 16 and Pond 13, and between Ponds 5/6 and Pond 18 and 10. It appears that the design is looking to connect Ditch 1 down to Pond 13. Discuss movement of wildlife between natural areas and the golf course. How will fragmentation of natural areas affect wildlife movement?	Cut off in matrix.	See Updated Response K.17
3	Vegetation and Wildlife	K. 18	Discuss potential impacts to migratory species from loss of habitat on the site.	Use of phrase "in-kind species," See Comment K-1 regarding in-kind species. Last sentence in this Response reads "There would be temporary impacts on the migratory birds during construction due to construction activity but once construction ceases, the open space and golf course would continue to function ecologically similar to the existing conditions described above." This sentence should be removed. Once construction ceases, the open space and golf course would function with 50% fewer trees than what currently exists. According to Response 1.2, the existing basal areas of trees to be cut is 1,575.72 square feet. The basal area of the replacement trees will be 132.53 square feet after 10 years of growth. It is not clear that the trees would have a replacement basal area to meet the existing basal area with an additional five years of growth (i.e., 15 years of total growth). Therefore, this may be a permanent, not temporary, reduction in basal area. At a minimum the unavoidable impact of a temporary reduction in basal area should be noted in the Unavoidable Impacts section. This will likely not result in a change in bird diversity at the site but will likely result in a reduction of the overall bird population at the site for 10 to 15 years.	See Updated Response K.18
	Vegetation and Wildlife	K.19	Response does not address the comment. How will soils, hydrology be made suitable for wetland buffer plantings? See also comments on Appendix H, Wetland Mitigation Plan discussing photographs and suitability of site conditions to create buffer plantings.		See Updated Response K.19
3	Critical Environmental Area	L.1	Response L.1 - Refers to the use of drywells. However, elsewhere in the FEIS it is stated the drywells have been eliminated. If drywells are to be included, provide a discussion of their function.	Cut off in matrix.	Dry wells would not be included in the Proposed Action, and therefore no discussion of their function is provided.
3	Traffic, Transportation, Pedestrians and Transit	M.	N/A	Cooper Avenue is proposed as one-way, gated, emergency access. Given the 13-foot elevation, the single-laned, no sidewalk road may not be adequate to provide large scale emergency vehicle access and regular vehicle access in the event of stalled vehicles. Furthermore, there is no accommodation for pedestrians in the event people choose to exit on foot during an emergency. Provide correspondence with Village emergency service providers indicating their ability to access the site under the conditions described.	Letters have been sent to the Village emergency service providers and the Applicant is waiting on their responses.
	Traffic, Transportation, Pedestrians and Transit	M.1	The truck calculations cannot be verified because intermediate information is not provided such as how much fill will be brought in per phase. With respect to the accompanying Table provided in Chapter M Appendix - Construction Traffic Activity, clarification is needed on the relationship between total trucks/autos and max per- hour trips (i.e., how does total of 51.2 trucks/autos equate to 29 max per hour trips for the 9-month main platform fill phase?). Additionally, add to the estimate of truck trips for fill the truck trips required for other aspects of construction.	Cut off in matrix.	See Updated Response M.1
3	Traffic, Transportation, Pedestrians and Transit	M.6	This response should be rewritten in a neutral tone. Second sentence notes 27 accidents but 17 is shown in tables and collision diagram in the DEIS. Response to Comment M.38 provides calculation of potential increase in accidents. The M.38 response should be presented here.	Cut off in matrix.	See Updated Response M.6. The previous 27 was a typographical error. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Traffic, Transportation, Pedestrians, and Transit.

3	Traffic, Transportation, Pedestrians and Transit	M.15	Remove word "very" from 2nd sentence. Clarify whether it is the Applicant's intent to no longer use Cooper Avenue for maintenance traffic.	Cut off in matrix.	Comment is already answered in Response M.15.
	Traffic, Transportation, Pedestrians and Transit	M.16	Is Cooper Avenue meant for emergency exit for the residents as well? Does this affect the design? The response did not address whether the traffic study took into account the gating of Cooper venue and who controls access.	Cut off in matrix and not fully addressed.	See Updated Response M.16.
3	Traffic, Transportation, Pedestrians and Transit	M.19	2nd paragraph, 1st sentence - remove word "only" from four homes. Provide information on increased truck traffic on Eagle Knolls Road.	Cut off in matrix and not fully addressed.	See Updated Response M.19
	Traffic, Transportation, Peds, Transit	M.21	2nd paragraph - remove word "just" .	Not all "just" words removed.	See Updated Response M.21
	Traffic, Transportation, Pedestrians and Transit	M.25	1st sentence remove "virtually." Last sentence remove "very." This response should address whether sidewalks on Cooper Road are required because of increased numbers of school children walking to the high school from the development.	Cut off in matrix.	See Updated Response M.25
3	Traffic, Transportation, Peds, Transit	M.30	Response does not discuss alternative routes for truck traffic. Response does not address impacts on non-school related activity.	Last sentence in comment not addressed and does not appear in matrix.	The Applicant does not anticipate any truck traffic-related impacts on non-school related activities. However, as discussed in Response M.30, the Applicant is willing to evaluate during site plan review the need for reasonable restrictions to truck traffic during peak summer recreation activities, or other non school related activity.
i	Traffic, Transportation, Pedestrians and Transit	M.38	End of 1st sentence delete "which is, effectively, no accidents." Response notes 9 crashes per year but DEIS tables shows 17 over 3-year for 6 per year. Should provide more information on extra accidents of 0.15 and 0.15 were calculated - how determined and used on what variables.	Cut off in matrix.	The full response is provided in the pFEIS. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in orde for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Traffic, Transportation, Pedestrians, and Transit.
}	Traffic, Transportation, Pedestrians and Tran	M. 49	See comment G. 12 with respect to whether off-site flooding would impact the ability of vehicles to egress the site.	Response does not fully address question.	See updated response to G.12 and M.49. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Floodplains.
3	Traffic, Transportation, Pedestrians and Transit	M.51	Last sentence remove word "only." Also, Ms. Roberts is the Village's Deputy Clerk. She may have simply forwarded the comment. Check and adjust index if necessary.	Cut off in matrix.	See Updated Page 2-31, Index of Comments and Responses and Updated Comment M.51
3	Community Demographics, Facilities and Services	N.1	Table N.1-1 first line for Minipark: Minor error in calculation under Proposed Action Generated Need. Should be 0.08 – 0.17 acres, not 0.08 – 0.16 acres. Could be due to rounding. Additionally, provide current park and recreation ratios in the Town and Village.	Second sentence is not in matrix and has not been addressed here.	It is the Applicant's opinion that the Project contains sufficient passive and active recreation space on the Project Site to accommodate the additional demand for active and passive recreation resources in the Village as identified in Table N-1.1 (demand on passive resources) and Table N.1-2 (demand on active resources) of the FEIS. To the extent that the Planning Board determines during the subsequent site plan/subdivision review that the Project would result in a population requiring recreational resources that are: (i) not completely accommodated by on-site resources, and (ii) cannot be accommodated by existing resources in the Village, adequate mitigation is available in the form of a payment in lieu of land under the Village's Subdivision Regulations.
3	Community Demographics, Facilities and Services	N.1	N/A	Page 3N-6, first sentence last paragraph - If the area for passive recreation is at the same time natural habitat that will be allowed to grow in area and succession, then how will it also serve as passive recreation. Is it reasonable to claim both benefits?	It is the Applicant's opinion that the Project contains sufficient passive and active recreation space on-Site to accommodate the additional demand for active and passive recreation resources in the Village as identified in Table N-1.1 (demand on passive resources) and Table N.1-2 (demand on active resources) of the FEIS. To the extent that the Planning Board determines during the subsequent site plan/subdivision review that the Project would result in a population requiring recreational resources that are: (i) not completely accommodated by on-Site resources, and (ii) cannot be accommodated by existing resources in the Village, adequate mitigation is available in the form of a payment in lieu of land under the Village's Subdivision Regulations.
	Community Demographics, Facilities and Services	N.1	Response N.1 - Consider impact of this response on the issue of recreation fees.	Not addressed.	It is the Applicant's opinion that the Project contains sufficient passive and active recreation space on-Site to accommodate the additional demand for active and passive recreation resources in the Village as identified in Table N-1.1 (demand on passive resources) and Table N.1-2 (demand on active resources) of the FEIS. To the extent that the Planning Board determines during the subsequent site plan/subdivision review that the Project would result in a population requiring recreational resources that are: (i) not completely accommodated by on-Site resources, and (ii) cannot be accommodated by existing resources in the Village, adequate mitigation is available in the form of a payment in lieu of land under the Village's Subdivision Regulations.
3	Community Demographics, Facilities and Services	N.5	Response N.5 - Does not address the comment. Apparently, no such evaluation has been done by the Village Fire Department. The Applicant should obtain substantive responses from the Fire Department, Police Department and Emergency Services. See also Response N.6.	Cut off in matrix and not addressed. The Applicant should seek input from emergency responders as to whether emergency access would be impeded on Cooper Avenue in the event it is blocked by 1' of water and 3' of water and it should provide evidence they can provide service in this condition.	See Updated Response N.5 and G.1.

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3	Fiscal and Economic Conditions	0.5	Response 0.5 - Why is there only one comparable in Mamaroneck? It is unclear whether that comparable is in the Village or in the Town outside. See also Response 0.11.	New comps should be provided.	See Updated Response O.5 and Appendix X
3	Fiscal and Economic Conditions	0.12	There is an increase in jobs. Is the parking adequate? Provide a basis for the statement that many new residents of the project would join the club as social members.	Second sentence is not in matrix or addressed.	See Updated Response O.12.
3	Environmental Contamination	Q.7	Response does not address environmental contamination of open space areas.	The last sentence refers to residential apartments and maintenance staff. Correct and clarify.	See Updated Response Q.7.
3	Noise	R.3	Response R.3 - There should be specification of the number of days and the daily duration of	Explain basis for one month calculation/estimate.	See Updated Response Q.7.
			blasting.		
3	Noise	R.5	Response R.5 - Given the amount of daily proposed truck traffic to and from the site, can it really be treated as de minimus from a noise standpoint?	Response should be interwoven into text.	See Updated Response R.5
3	Alternatives	Alternatives	Include the rates and calculation methods for each of the following and include the calculations in the FEIS: fill and truck trip calculations; traffic generation calculations; water/wastewater calculations; population and school-age children calculations; and tax generation calculations.	Traffic generation calculations are not shown. We are not provided bedroom counts making it difficult on WW. Mixed results. Have to look at table to figure some things out.	See Updated Chapter 4, Alternatives, Summary.
3	Alternatives	4.5	N/A	Last paragraph, first sentence, "to" is needed after "similar". Last sentence continuing onto page 4- 15 is awkward.	See Updated Response 4.5
3	Alternatives	4.12	Alternatives Response 4.12 - The zoning amendment discussed by the Applicant was not proposed or discussed in the Comprehensive Plan.		The additional response is included in the pFEIS. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Alternatives.
3	Alternatives	4.13	Alternatives Response 4.13 - Statement that Alternative G cannot be considered a viable alternative under SEQRA should be revised or deleted.	Cut off in matrix.	The full response is included in the pFEIS. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Alternatives.
3	Alternatives	4.22	Alternatives Response 4.22 - Is not accurate. Alternative G is not consistent with the zoning changes discussed in the 2012 Comprehensive Plan.	Cut off in matrix.	The full response is included in the pFEIS. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Alternatives.
Appendices	Appendix C	N/A	FEIS Appendix C, Figures, Figure 5 Open Space Plan shows that the wetland mitigation plantings are within the Golf Operations and are not identified as Open Space. Elsewhere in this document, it has been stated that these buffer planting areas are going to be allowed to proceed through succession, be unmaintained, etc. for habitat and water quality enhancement (Section 1.3 states "Once established, it is anticipated that the wetland mitigation areas will significantly improve the Diversity of Wetland Vegetation and Contribution to Abundance and Diversity of Wetland Fauna function of the eight wetlands."). If the wetland mitigation plantings are maintained by the Golf Operations, per Figure 5, explain how these "significant natural areas in perpetuity" will be maintained in light of the inevitable pressure of golf course operations to clean vegetation to allow ease of play. It is suggested that this commitment be a condition of approval.	Cut off in matrix.	It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Alternatives.
Appendices	Appendix C	N/A	The two westernmost wetlands in Figure 2 are not shaded in the same fashion as the other wetlands in this figure. Make the shading uniform for all wetlands.	Not in matrix.	See Updated Appendix C
Appendices	Appendix C	N/A	N/A	Figure 4 - the tables are pixelated. Figure 8 - table in lower left is unreadable.	See Updated Appendix C
Appendices	Appendix G	N/A		How will staff know what the proper maintenance is? Will they be trained? Is there a condition needed to ensure	It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope relating to Soils.
Appendices	Appendix G	N/A	Cooper not Copper Avenue. Also, this is not a Township.	Still some instances of both in documents.	See Updated Appendix G.
Appendices	Appendix H	Section 1.7	N/A	This section uses the acronym "HCC" for Hampshire Country Club as the responsible party, but identifies the responsible party as Hampshire Recreation, LLC. The acronym should be changed.	See Updated Appendix H
Appendices	Appendix H	Section 1.7	N/A	Under Section 1.7, it says that during the first three years following installation, that routine maintenance activities including supplemental watering may be used to ensure plan success. The monitoring should continue for a period of time following the cessation of watering, to ensure that natural hydrology supports the mitigation areas. As mentioned above in Comment/Response K.19, this is a concern of both Sven Hoeger and Chazen. The monitoring could be conducted every two years for four years (an additional two monitoring reports) following cessation of routine maintenance activities for plan success.	See Updated Appendix H.

Appendices	Appendix H		N/A	Several comments in the matrix are identified for Kimley to address.	Comments are as follows:
					 The introduction of Appendix H should refer to the Figures in Appendix C, specifically Figure 5, Open Space Plan. See Updated Appendix H. A Wetland Permit Application to the Town/Village should be included in the FEIS. The Proposed Action would not impact any wetlands or wetland adjacent areas; therefore, no Wetland Permit Application is needed. Section 1.3 states that native plantings in 20-foot-wide zones will occur. How was this width chosen? Is there room for wider areas of planting, for example within the 100-foot buffers, or following contour lines? Where is this width measured from – edge of water, edge of rocks, top of bank? feet was the appropriate width determined to be sufficient to provide vegetated buffers and wildlife habitat around the ponds and wetlands. The width will be measured from ordinary high water, the banks, or edge of rock, as applicable.
Appendices	Appendix I	N/A	The drainage areas on the two figures do not have specific identification labels, so it is difficult to discuss changes pre- and post construction.		The full response is included in the pFEIS. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope.
Appendices	Appendix I	N/A	It would be helpful to overlay the Drainage Systems and Wetlands from DEIS Exhibit 3E-1 into the Existing and Proposed figures in FEIS Appendix I to determine impacts from the proposed development on the surficial and underground drainage system and associated aquatic resources.		The full response is included in the pFEIS. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope.
Appendices	Appendix I	N/A	For the drainage system flowing in to Discharge Point A. Currently, there are two ditches, flowing into Pond 13. The first flows from Pond 16 through surficial and underground drainage. The second flows into Pond 13 via a drainage ditch from the northeast. o In the proposed water budget, it appears that the 4-foot contour is highlighted in the Proposed Water Budget figure in the 4.99-acre drainage area and the 27.15 drainage area. Is there a reason why this contour is highlighted? o In the proposed condition, the drainage from the Pond 16 to Pond 13 is not shown; will this still be connected underground? o In the 27.15 drainage area, the drainage area bifurcates the various buildings/lots. Will half the stormwater flow to the rear of these houses? o The existing southeastern drainage into Pond 13 appears to be relocated in the proposed condition to the northwest out of the development footprint and enters the same surficial channel as the flow from Pond 16. Is the channel large enough for the two flows; will it need to be enlarged?		The full response is included in the pFEIS. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope.
Appendices	Appendix K	N/A	Figure 14a indicates that the largest patches of trees on the site will be removed as they are in the development areas. The area of wooded patch sizes to be removed, as shown on Figure 14b should be added and noted on the summary. It appears that 10.6 acres of treed patches are being removed, with two patches greater than one acre, and many of the patches over half an acre in size. What is the patch size of trees to remain?		The full response is included in the pFEIS. It is the Applicant's position that sufficient material responsive to this inquiry has been provided in order for the Lead and Involved Agencies to render an informed decision regarding the areas of environmental concern identified in the Final Scope.
Appendices	Appendix Z		N/A	The main body of this functional assessment does not indicate that the previous NPV assessment identified the presence of fish in all ponds and streams, frogs in the north Fairway Green pond or that the site was observed being used by egrets.	See Updated Appendix Z.

Note: In addition to the comments above, additional information has been provided in Chapter 3E - Surface Water Courses and Wetlands, related to the Applicants consultation with the United States Army Corps of Engineers regarding its Jurisdictional Determination related to the Project Site.