

Larry Schopfer

From: Raby, James <James.Raby@blackrock.com>
Sent: Friday, January 15, 2016 1:03 PM
To: lschopfer@irvingtonny.gov
Cc: bsmith@irvingtonny.gov; cgiliberti@irvingtonny.gov; ckehoe@irvingtonny.gov; mgilliland@irvingtonny.gov; jsilverberg@irvingtonny.gov; 'Kimberly DeRosier Raby (kimberly.d.raby@gmail.com)'; Louis Maggiotto; 'Joe DiSalvo'
Subject: Brightview Development: Comments on DEIS
Attachments: Letter to Irv BOT_Brightview_vf.pdf

Larry, Brian, Christina, Mark, Connie and Janice,

Please find attached a letter from my wife, my daughter and I on the proposed Brightview development at 88-94 North Broadway.

Kind regards
James Raby

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January 15, 2016

Attention:

Lawrence Schofer
Village Administrator
Village of Irvington
85 Main Street
Irvington, NY 1053

Cc:

Brian Smith
Christina Gilliberti
Mark Gilliland
Constance Kehoe
Janice Silverberg

Re: Brightview Broadway development

Brian, Christina, Mark, Connie, Janice,

We are writing to you with regards to the proposed Brightview Senior Living development at 88-94 North Broadway.

As background, we live at 20 Strawberry Lane with our 3 year old daughter, Tennyson. 20 Strawberry Lane shares a property line with the proposed development (our north property line). We are relative newcomers to Irvington, having purchased the property in October 2014. Previously we lived in Manhattan and were drawn to the beauty of Irvington, the warm hospitality of the people and its small residential village charm which stands in contrast to the commercially developed Tarrytown and some other Rivertowns.

Let us start by saying we are not against the development of a facility to serve the elderly. We recognize it is a critical offering for those who live in the Westchester region and want to age locally. Our most significant concern is the size and scale of the proposed development, which we feel is completely out of character with our village, and its impact on us as neighbors and the village as a whole.

We have reviewed the DEIS and attended a number of Village Board Meetings on the topic (including the recent Public Hearings in December and January) and have a number of concerns we do not believe the DEIS appropriately addresses.

The first relates to the construction of the property. We live in a 160-year old carriage house. It is a beautiful and stately house and we immediately fell in love with the prospect of living and caring for a piece of history. But it is 160 years old and we are gravely concerned of the impact of blasting of dozens of feet of Westchester rock. We are concerned there could be significant damage to our foundations and stone retaining walls. Furthermore, we expect the construction of the property will disturb a large number of animals who have made the current property their home and will migrate to our property. Finally, even beyond the blasting, we clearly have reservations of having to suffer through a 2 year construction period, with constant dust, noise and light pollution, when Kim and Tennyson spend the majority of their time at home.

Post-construction we will be living next to a property which is six times larger than the current house, which already takes up a significant portion of our northward view. One of the most endearing aspects of our house is a stone patio on the north side of the house, where we spend all spring, summer and autumn. The new Brightview complex will completely over-

shadow this space. While we recognize the Brightview property, as designed, will not be significantly higher, the fact it will be set so far back into the property will mean it will dominate our northward view. The neighborhood we live in is very quiet and we are also concerned with the noise and light pollution of maintaining a development with 150 units and 40 on-site staff, constant deliveries, ambulance/IVAC visits. It will shatter our peaceful enclave.

One other concern is the impact of traffic on Broadway. We have reviewed the traffic analysis in the DEIS and are not convinced that the Brightview development will have minimal impact. We all know what Broadway can be like during peak hours. As we live on the east side of Broadway, it is often very difficult (and dangerous) to turn south. The addition of 40 workers, friends/family visitors, deliveries and residents driving will just exacerbate the traffic. We often thought how wonderful it would be for our daughter to walk to school, but we don't see this in her future given there is no walkway on the east side of Broadway and she would need to cross Broadway "frogger" style. We are also doubtful of the viewpoint from Brightview that residents don't drive. Given the location and the residents age, it's unlikely residents would walk to town, library, etc, and I would imagine a portion would choose to drive (why else would Brightview include 114 parking spaces on site?), which then heightens our concerns of an increased number of accidents.

Finally, re-zoning 88-94 North Broadway risks opening pandora's box. Once the property is re-zoned for commercial use and the 150-unit building is constructed, it's there for good. And if Brightview decides to close operations and sell, as far as we understand it there is little the Village can do to stop the sale to a developer who could convert the property for some other purpose. Instead of 150 units of aged citizens we may be facing families choking up our roads and flooding our school system. This is a realistic prospect – over the past year 2 senior living centers in White Plains and Brooklyn announced plans to evict their tenants and sell to developers who plan to convert the property into to commercial apartments. Irvington's property is valuable, and hopefully for all residents (and its impact on Village property taxes) it will continue to rise, providing Brightview with incentive at some stage to potentially pack up and sell.

In a short period of time we have fallen in love with Irvington. We were hoping to find a warm community to raise our daughter in a safe residential neighborhood, which we thought we had. We love the fact that the Main Street of Irvington is full of small independent stores and restaurants. We love the history of the village and its grand houses. We don't believe the "big-box" Brightview development is in keeping with this and implore you not to re-zone the land and allow this oversized complex to be built.

James, Kim and Tennyson Raby



View of the current property from our north boundary – just imagine it 6 times bigger!

Dennis Flood

From: "Dennis Flood" <mayoriv@optonline.net>
Date: Friday, January 15, 2016 12:53 PM
To: <lschopfer@irvingtonny.gov>
Subject: brightview

Our family has lived on Meadowbrook Road for 40 years plus and we always have some kind of parking issue due to dog walkers and joggers, etc. It has become a way of life. We would like to know if the applicant and the village board has come to a way of handling the overflow of traffic at this facility, when there is an event or Thanksgiving or their Holiday that would have more people than the parking can handle. I would like to know what remedy they came up with to reassure us that Meadowbrook Road will not be the new parking lot-

Thank you,
DENNIS P FLOOD
Patricia A Flood
(C) 914-355-0532
(H) 914-591-8225

Dennis P. and Patricia A. Flood
4 Meadowbrook Rd.
Irvington, N. y. 10533

Larry Schopfer, Administrator
Village of Irvington
85 Main Street
Irvington, N. Y. 10533

Re: Brightview Request for Special Permit

There are so many negatives with respect to this request for special permit it boggles our minds that this process has come so far, this fast. But for the sake of brevity the following are questions that most concern us:

- 1) Although the applicant has referenced the Village's 2003 Comprehensive Plan as allowing this use, I can tell you as the Mayor of Irvington who adopted the plan this use is not permissible. Does it make sense that any Village Board would ever consent or envision a building of such a massive structure within the Village that would forever change the history, character and physical appearance of Irvington in a Comprehensive Plan for the future of the Village? Our question is how do you explain the justification of this request when you consider the above.
- 2) If the applicant believes in this project will you sign a document that permits this use only? Also if this project fails economically, will you also agree to tear down the structure and restore the site to its present state?
- 3) What studies has the applicant done over a 10 year period during and post construction of the values of private residents' within a half mile of the site and what were the results?

Thank you.

Dennis P. and Patricia A. Flood

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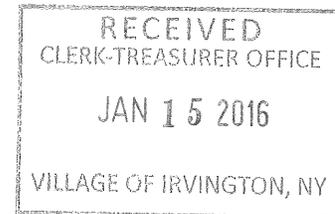
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**ALSO ADMITTED IN NEW JERSEY

FACSIMILE (914) 337-6913

January 15, 2016

By Hand and by Email

Lawrence S. Schopfer
Village Administrator
Village of Irvington
85 Main Street
Irvington, NY 10533



Re: Comments to DEIS dated November 16, 2015

Developer: Shelter Development LLC (“Applicant”)
Property: 88-94 North Broadway
Village of Irvington, NY (“Site”)
Irvington Residents: Kimberly and James Raby
20 Strawberry Lane

Dear Mr. Schopfer:

I am Of Counsel to the law firm of Nobile, Magarian & DiSalvo. We make these comments as counsel representing Irvington residents Kimberly and James Raby. Their residence, 20 Strawberry Lane, is adjacent to the Southern property line of the Site.

Notes:

- Unless another document is mentioned, all citations are to Applicant’s DEIS.
- Paragraph is designated “¶”.

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Applicant Did Not Satisfy NEPA and SEQRA

Applicant's had a heavy burden to draft a DEIS that satisfied the requirements of the National Environmental Policy Act ("NEPA") and the New York State Environmental Quality Review Act ("SEQRA"), a hurdle higher than usual to clear. Regrettably, that hurdle has not been cleared. Consequently, we respectfully suggest that Applicant be required to file a Supplemental Environmental Impact Statement ("Supplemental EIS").

Applicant's Heavy Burden

For the following reasons Applicant had a heavy burden:

- a. Applicant seeks a zoning change: very little it seeks to build on the Site is as of right;
- b. Applicant's requested zoning could be reasonably characterized as "spot zoning", spot zoning because (i.) the proposed zoning ordinance is tailored so that the zoning changes would apply to few or no other sites in Irvington and (ii.) the proposed ordinance prevents the assemblage of properties to create a site that could take advantage of this zoning (IV.B-9);
- c. Applicant's proposed use for the Site is not found anywhere in Irvington;
- d. Applicant requests that it be exempt from the requirements of Irvington's Resource Protection Code;
- e. Applicant's proposed development is not consistent with Irvington's Comprehensive Plan;
- f. Applicant's proposed building has three times the footprint and almost six times the square footage as the building currently on the site;
- g. Applicant seeks to build on Broadway, Route 9, a thoroughfare rich in history; and
- h. Construction will be lengthy, disruptive, and will involve substantial amount of blasting.

Insufficient Justification For Not Complying With Resource Protection Code.

Applicant requests that it not be required to comply with Irvington's Resource Protection Code (sometimes "RPC"). The absence of predictable, known regulations places a heavy burden

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on Applicant to comprehensively explain in that DEIS why the proposed development meets all the requirements of good zoning as well as those standards set forth in the RPC. Instead, without the required analysis, Applicant argues that the special permit application process will insure that the environment will be protected. Given its lack of the required analysis, the DEIS is inadequate and a supplemental EIS is required.

There is insufficient detail on how what the Applicant will do provides protection comparable to the protections of the Irvington Resource Protection Code.

Applicant acknowledges that the Resource Protection Code would not permit as many residential units as Applicant wants but provides little or no reason why it should be permitted to build so many units (except for the inadequate economic rationale, see *infra* pages 3-4). In meeting the requirements of a satisfactory DEIS, Applicant should state how many units the RPC would permit Applicant to build.

Applicant attempts to justify its inadequate analysis by pointing to the special permit process that would take place after the Zoning Petition is granted, suggesting that the special permit process will result in protections comparable to those in the RPC. (IV.B-3, first full ¶) We respectfully submit that the Applicant should come forward now with proposals that demonstrate comparable protections so that the Irvington Trustees can now make at least a preliminary determination that there is a reasonable possibility that comparable protections are available. To require this from the Applicant may save substantial time and money. This analysis can only be done in a Supplemental EIS.

Failure to Demonstrate Compliance with Comprehensive Plan (IV.A-1 *et seq.*)

Applicant's failure to support its assertion that Applicant's proposed development is consistent with Irvington's Comprehensive Plan is demonstrative of the proposition that Applicant's proposed development is **not** consistent with Irvington's Comprehensive Plan. The statements made by the Applicant supporting the proposition that what the Applicant wants to do is consistent with the Comprehensive Plan can be fairly characterized as;

Iipse Dixit: (i.e., it is so because I say it is so) (I-4);

Accurate but fails to advance the ball: the comprehensive plan is what Irvington has done but Applicant makes no showing how what has been built in Irvington is consistent with what the Applicant wants to do;

Boot Strapping: If Board of Trustees goes through the process of evaluating Applicant's request for a zoning change and grants the application to change the zoning, what

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Irvington will have in the end is consistent with the Comprehensive Plan (IV.A-8, beginning of last ¶);

Non sequitur: Applicant states: Westchester County says housing for the aged is a good thing and itself points out that there are more people over 65 than there used to be but Applicant makes no explanation of what these points have to do with Irvington's Comprehensive Plan; and

Confusing: For example, see the first complete paragraph on page IV.A-3.

Applicant Does Not Demonstrate a Need for This Kind of Facility

Applicant fails to provide any fact regarding competitive facilities of the type Applicant proposes. (III-1-III-5) Applicant should be required to document what facilities within an hour drive from Irvington, are being built, and are being applied for. The number of units in each facility should be identified and information should be obtained on the vacancy rates.

Applicant does not address the closing of comparable facilities and why those closing do not demonstrate that there is an oversupply.

Discussion of why the proposed project is a good thing for seniors is beside the point. Why is another such facility needed?

The fact that there are more people of a certain age is relevant but at best only half the story. What about the health of the over 65 population. Most of us feel we are "younger" than our parents or grandparents were at a certain age.

Claimed Economic Need for Large Facility

On more than one occasion, Applicant in the DEIS links the need for a certain number of units to the feasibility of the kind of facility being proposed. (IV.B-4, "Resource Protection", first ¶) The Applicant never specifies what that is. Applicant should be required to state what that number is. Applicant should also indicate what it believes a reasonable rate of return would have to be to justify its investment and at least generally demonstrate a linkage between the targeted expected rate of return and the number of units required.

Impact on Raby Residence

In the document setting forth the required Scope of the DEIS ("Scope") under the topic "Visual/Aesthetics/Neighborhood Character", the Scope mentions 20 Strawberry Lane, the Raby

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residence, three times. Applicant was required to cover the impact on the Raby Residence by discussing buffers, documenting by photographs or renderings the existing view from the Raby property, leaves off the trees, and what the similar view would be after the Applicant built the proposed building. (Scope, 12-13)

Rather than deal head on with this requirement, Applicant a number of times fails to even mention the existence of the Raby residence. In the following places in the DEIS, under the headings indicated below, when discussing abutting property, either no mention is made of any residence or a passing reference is made to residences and no specific mention is made of the Raby residence.

“*Surrounding Neighborhood*” (II-5-II-6) no mention of residences on the southern boundary of the site, where the Raby residence abuts.

“*Existing Conditions, Potential Impacts and Mitigation Measures, A. Land Use, 1. Existing Conditions,*” first ¶ entitled “*On Site and Surrounding Land Uses within ¼ Mile*”: no mention of residences on the southern boundary of the site, where the Raby residence abuts (IV.A-1).

“*2. Potential Impacts*”, first paragraph entitled “*Compatibility and Surrounding Land Uses*”: passing reference to fact that “surrounding neighborhood” has “single-family and multifamily residences” but no mention of Raby Residence. There are specific references to neighbors to the South of the Site that are not residences but there is no mention of the Raby residence. (IV.A-5-A-6)

In mentioning unidentified buffers along the boundaries of the site that “approach existing land uses” Applicant makes no mention of any residences. (IV.A-11, fourth ¶)

Statements in the DEIS on the impact on residences are unnecessarily equivocal. For example “The proposed development could **potentially** [emphasis added] result in some visual impacts to abutting properties.” (IV.A-6)

This failure to focus on the Raby property is consistent with the imprecise statements made when the Applicant tries to deal with the subject head on.

In its DEIS, Applicant states: “*20 Strawberry Lane (North-South)*, ... The **proposed work** [emphasis added] on the site **will not likely** [emphasis added] be visible from

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20 Strawberry Lane **driveway** [emphasis added] given the distance and vegetation [no specifics] between the house and the proposed Brightview building. However, since the existing building on the Site is partially visible from the north side of the residence (leaf off condition) it is likely that the proposed Brightview building would be partially visible as well with leaves off. The proposed Landscape Plan indicates evergreen screening along the property line in this area to address this condition.” (IV.J-7)

The Applicant should comply with the Scope and provide a rendering of what the view from the Raby patio (from where photo of existing view was taken) will be like after the proposed building is built immediately after the trees are planted and a rendering of the view after a number of years when the trees are taller and more full. (An example of the kind of rendering Applicant should create is Figure IV.J-5)

Also Applicant should identify what trees are being taken down along the southern border and which trees will be planted. We could not determine this information from the figures in the DEIS.

Construction

Regarding construction Scope required Applicant indicate “time frame for project completion” and “potential impacts” Scope, (XV(A and B) at 14); the Applicant has yet to provide the public with adequate information regarding where construction impacts will be experienced and by whom. This methodology is inadequate in that, by way of example, the Raby’s cannot ascertain from the DEIS whether their family will be impacted by escaping rodents and other animals, or fugitive dust or particulate emissions from construction equipment, generated by the construction of proposed building

Construction Traffic: The analysis lacks sufficient detail. (IV.N-1 et.seq.) It is necessary that Applicant quantitatively illustrate these impacts with more detail as these impacts apply to each important intersection extending over a long time period. The projected traffic conditions and Levels of Service (LOS) during the expected lengthy construction period should be analyzed during both the Peak AM and PM Hours for Traffic in the DEIS. In addition, existing conditions should be analyzed among the study intersections during the anticipated construction traffic peak hours. A LOS comparison should be made between the existing conditions and conditions during construction for all peak hours defined. Specific attention should be paid to the existing truck routes and how the trucks servicing other businesses in Irvington may be impacted during construction.

Blasting: Applicant fails to adequately cover the mitigation efforts it will take to deal with the adverse impacts of the extensive blasting that will be required.

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There is no identification of the buildings that will be affected by the blasting is in the DEIS. For example, Applicant should be required to state that it will a pre-blast survey of both the exterior and interior of the Rabys' 155 year old residence as well as pre-blast survey of any walls or other structures on the property.

There is no indication over what period of time the blasting will occur.

More detail on the strength of each blast should be provided.

Impact on Irvington's Emergency Services

Applicant fails to back up its claim that the IVAC will not be overburdened. The experience of other communities having these kind of facilities should be provided. The passing reference to someone's comment from Briarcliff Manor is not sufficient.

There is nothing but speculation supporting the notion that the ability of IVAC to be at the site more quickly than Empress will not result in IVAC being called more often than Applicant predicts.

Applicant fails to address the impact of not having a nurse on duty, for six hours, presumably late night time hours, on increased emergency calls. Common knowledge is that these hours generate health concerns on the part of elderly people.

Community Facilities

There is no analysis behind the statement that the residents of Applicant's facility will not avail themselves of Irvington's activities for seniors.

- a. No statistics about what happens at other facilities of Applicant;
- b. No surveys for what is happening in communities that have this kind of facility; and
- c. Failure to address the intuitive point that the independent seniors at Applicant's proposed facility might want to mingle with other independent seniors in Irvington.

Affordable Housing

In more than one occasion in the DEIS, Applicant states that Irvington should grant its zoning petition because granting the zoning petition will provide affordable housing. (See e.g. III-5 third ¶, IV.B-13, first full ¶.) We accept that Irvington has a moral obligation to facilitate

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the construction of affordable housing and may have a legal obligation as well, but the least negative comment one could make about Applicant's rationale is that it is quite a stretch to justify a zoning change permitting the construction of a huge building with over 150 housing units because 10 of the units would be affordable. If granting the zoning change is not a good idea, any benefit affordable housing units bring to Irvington will not mitigate a bad decision.

If this argument is to be seriously entertained, which we respectfully suggest it should not, Applicant should:

- a. be required to demonstrate that there are few if any other sites in Irvington suitable for affordable housing;
- b. provide detailed support for the statement that "economics" prevent Applicant from offering to build more affordable housing units; and
- c. provide details on the integration and segregation of the individuals occupying the affordable units (i.e. where they will not be permitted to go on the site and what resources will not be available to them) and a justification of the segregation.

Taxes

Applicant should be required to state how much more taxes will be collected by the Village by the proposed facility compared to taxes to be collected if single family homes were built on the site.

We estimate that the increase in taxes collected by the Village would be approximately \$100,000. That calculation is based on Applicant being allowed to build a facility as big as it wants to build it. Applicant should be required to estimate what the taxes would be on a building of 125 units, 100 units, 75 units and 50 units.

Impact on Schools

The statement that the proposed six non-senior affordable housing will only produce one child needs further support.

Traffic

Applicant makes no comment on the fact that proposed facility will bring more elderly drivers into Irvington traveling on Broadway, its busiest street.

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Applicant fails to adequately analyze the intersection of Broadway and Strawberry Lane with respect to site lines looking North and accident statistics. (IV.G-8-G-9).

Alternatives (V-1-V-17)

The analysis of "Alternatives," is flawed. Alternative analysis is the "lynch-pin" of a properly-prepared EIS. The alternative study is particularly flawed because of its primary assumption that the Applicant must have more than 150 residential units. There should have been an analysis of similar type buildings of smaller size.

While SEQRA alternatives must be consistent with Applicant's objective, that objective cannot be defined as a specific number of units that presumably only has something to do with Applicant's desired economics return.

A true alternatives analysis may be objectionable to Applicant because it perceives a reduced economic return that it would make such an alternative unfeasible or inconsistent with Applicant's objective, but that possibility has yet to be demonstrated by the EIS.

Examples of flawed analysis of the single family home development include:

Presumption that existing stone buildings would be demolished; and

Failure to note that impacts on the community of construction would be substantially less regardless of the phasing.

Conclusion

We respectfully submit that the foregoing deficiencies cannot be remedied by responses in the FEIS. We respectfully request that the Board of Trustees require Applicant to file a Supplemental EIS.

Very truly yours,
NOBILE, MAGARIAN & DiSALVO, LLP.

By: 
Louis J. Maggionto

LJM:dw

cc: Marianne Stecich, Esq. (by e-mail)

Larry Schopfer

From: Kris Woll <kriswoll@aol.com>
Sent: Friday, January 15, 2016 11:21 AM
To: bsmith@irvingtonny.gov; ckehoe@irvingtonny.gov; mgilliland@irvingtonny.gov; cgiliberti@irvingtonny.gov; jsilverberg@irvingtonny.gov; lschopfer@irvingtonny.gov; masjeb@aol.com; sjainchill@akrf.com; gtreload@akrf.com
Subject: Comments on the Brightview DEIS

Hi Brian, BOT, Marianne, Susan and Graham,

An important aspect of this special permit is that it circumvents the Resource Protection provisions in our code and Comprehensive Plan, which is not mitigable.

According to the Draft Environmental Impact Statement, the impact is greater in every category:

- Size - Completely disproportionate to any other structure in the village
- Site disturbance 4.9 acres
- Tree removal - 75 almost twice as many as an alternative would require
- Impervious surface (3 acres)
- Building Height - 48 feet instead of 35 feet (our building code limit is 35 feet)
- Trip generation (traffic, waste removal, deliveries)
- Waste water (19,000 gpd instead of \approx 3,300) more than 5 times more onto Broadway, a New York State DOT maintained road (not very responsive to flooding)
- Visual Impacts are horrific - a behemoth warehouse type of complex with a "colonial facade"

The additional property tax revenue is not very much, certainly not worth destroying the quality of every citizens' life for.

If we compare the facility to 6 residential single family homes the difference in additional revenue is:
Village tax difference is \$110,000 more (The Village has a **very healthy** \$16 million budget, with a \$404,000 surplus last year)
School tax difference is \$260,000 more (IUFSD has a \$57 million dollar budget, with a tax increase last year that was \$385,000 under the tax cap. Also, IUFSD is setting up a \$1.5 million capital reserve fund - **very healthy**)

I know that this village is committed to increasing our housing opportunities for all demographics. This does not accomplish that.

We should acknowledge that most of this "senior living" housing is luxury housing. But for the 10 affordable housing units (4 which could be a pie-in-the-sky promise in the facility and 6 which are in old beautiful, but in poor condition, structures which Brightview has not promised to renovate), the other 146 units are very very expensive.

Brightview Tarrytown only has Asstd Living (no Ind. Living). AL is \$7,295/month for a one-bedroom and add \$1500 for a second person

Atria Woodlands IndLiv is \$7,500 and \$1,500 for a second person - the 2 BR is \$9,100 (\$1,500 second person) And they have one year leases with annual increases between 5-8% (not a very friendly policy) When you're out of money, you're evicted.

Finally, if Brightview has expanded too quickly (there are pending applications in Harrison and Pleasantville) we could end up with an empty big box which will have to be repurposed into God knows what.

Sincerely,

Kristen Woll
Former Irvington Village Trustee
(914) 591-6894
c: (914) 356-0767

Karen Buccheri

From: Larry Schopfer <lschopfer@irvingtonny.gov>
Sent: Thursday, January 14, 2016 3:19 PM
To: Karen Buccheri
Subject: FW: Brightview

From: Jean McLoughlin [<mailto:jeanmcloughlin63@gmail.com>]
Sent: Tuesday, January 12, 2016 9:05 AM
To: lschopfer@irvingtonny.gov
Subject: Brightview

Hi Mr. Schopfer-

I understand you are accepting questions about the potential for construction of Brightview.

1. How does the village plan on managing the increased traffic during the construction phase and once it is completed?
2. I am concerned with the long term plans of Brightview, so my question is- what will happen if in 5 years down the road Brightview sells this property/ building because of low occupancy?
Does this in turn become a massive apartment building or a hotel?
3. How does this structure impact the environment in regards to water run-off, trees taken down, rock blasting ?

Thank you-
Jean McLoughlin
17 Meadowbrook Rd

IVAC

Wrong about

32 members

18 EMT

11 EMT ride ambulance

12 paid per diem

Same 591-8080 → calls go there

IFD some paid

Brightview conserve day
security overnight

Nurse 18 hours

Licensed first aid person doesn't exist

80,000 calls in county
EL - believes it's alot more

Empress now covers New Rehabele - large area to cover.

Empress serves Cabrini. Never has an ambulance available

So DFVAC and IVAC multiple times per week.

1/12/16

4pm

Meeting

w/

Captain

Ellen Levit

- Empress EMT's certifications are expired. Many of them.
 - Local volunteer ambulance will be staffed by Empress personnel. Can't happen
 - Response times. 42 seconds? Dispatch time is when call comes in for ambulance service. 3 minutes typical ost
 - Never know where ^{Empress} ambulance is coming from.
 - Ambulance will be moved where the calls are the most. Yonkers, Mt Vernon, etc. DF Hospital is assigned post. but there is never an ambulance posted there. "On Paper".
 - 6-9 minutes DF Hospital to Brightview. ⁵⁴⁻ 4 minutes at most.
 - Anticipated EMS Brightview 120/year.
Atria has 400/year from ^{Wesley} A-VAC.
- Empress is only responding to priority 1 call which is ~~cardiac~~ cardiac arrest. We only get 1 or 2 cardiac arrest in Irv. per year.
- All other things are not priority and will dispatch a mutual aid ambulance - IVAC
- Q What about cell phones that dial 911?

- By law, need to get here in 8 minutes. If not, they will dispatch mutual aid.
- EL - "Empress wont set foot on the property"
- Call volume to IVAC ^{will be} 16 calls per year

They'll file so they don't need to pay taxes.

Location is irrelevant where patient

Incident command might not be readily available

Caretakers have no medical background

Dementia patients - no ID bracelet. What if they get out.

What about oxygen patients after 72 hours generator runs out.

Empress reserves right to dispatch mutual aid.
Time gets wasted to do all of this call transferring around "20 minutes".

~~And~~ Andsley regrets ever approving Atria.

Larry Schopfer

From: Barbara ☺ <barbgman@gmail.com>
Sent: Monday, January 04, 2016 4:27 PM
To: lschopfer@irvingtonny.gov
Subject: Assisted living

Dear Liz,

I just realized that You are supposed to be copied in on all emails to the Mayor and Trustees. I have recently sent them each a note urging them to vote "no" on the assisted living project. I am pasting a copy below:

Dear Brian,

Please vote against the assisted living site. I believe it will be very bad for our community. I respectfully urge you to vote "no" and to protect our lovely town against this development.

Best,

Barbara Goodman
97 Fargo Lane

Regards,

Barbara Goodman

Larry Schopfer

From: Connie Kehoe <litware@gmail.com>
Sent: Tuesday, January 05, 2016 7:52 AM
To: Larry Schopfer
Subject: Fwd: Assisted Living facility proposed for 150 Broadway

Connie Kehoe
Sent from my iPhone

Begin forwarded message:

From: jeff goodman <jeffgman82@gmail.com>
Date: January 4, 2016 at 7:01:23 PM EST
To: jsilverberg@irvingtonny.gov, cgiliberti@irvingtonny.gov, mgilliland@irvingtonny.gov,
ckehoe@irvingtonny.gov, kwooll@irvingtonny.gov
Subject: Assisted Living facility proposed for 150 Broadway

Dear Trustees,

Please vote against the assisted living site. I believe it will be very bad for our community. I respectfully urge you to vote "no" and to protect our lovely town against this development.

Best,

Jeff Goodman
97 Fargo Lane

Larry Schopfer

From: Connie Kehoe <litware@gmail.com>
Sent: Tuesday, January 05, 2016 7:52 AM
To: Larry Schopfer
Subject: Fwd: Brightview

Connie Kehoe
Sent from my iPhone

Begin forwarded message:

From: "McDougall, Eliza" <eliza.mcdougall@whitecase.com>
Date: January 4, 2016 at 6:57:32 PM EST
To: "bsmith@irvingtonny.gov" <bsmith@irvingtonny.gov>, "cgiliberti@irvingtonny.gov" <cgiliberti@irvingtonny.gov>, "mgilliland@irvingtonny.gov" <mgilliland@irvingtonny.gov>, "ckehoe@irvingtonny.gov" <ckehoe@irvingtonny.gov>, "kwooll@irvingtonny.gov" <kwooll@irvingtonny.gov>, "jsilverberg@irvingtonny.gov" <jsilverberg@irvingtonny.gov>
Subject: Brightview

Dear Board of Trustees,
My husband, John McNulty, and I live at 63 Field Ter in Irvington. We are not able to make it to the planning board meeting this evening but would like to express our strong objection to the proposed Brightview development on N. Broadway. We moved from the city 3 years ago and selected this town specifically because of the peace, grace and charm of the town all of which will be threatened by this proposal and the implications of granting a variance. We would be happy to discuss further and respectfully request you consider the serious and long standing implications for the future of the village and its attractiveness as a destination for young families such as ourselves going forward should this development be approved.

Best regards,
Eliza

Eliza McDougall | Partner
T +1 212 819 2590 M +1 212 851 6197 E emcdougall@whitecase.com
White & Case LLP | 1155 Avenue of the Americas | New York, NY 10036-2787
WHITE & CASE

This email communication is confidential and is intended only for the individual(s) or entity named above and others who have been specifically authorized to receive it. If you are not the intended recipient, please do not read, copy, use or disclose the contents of this communication to others. Please notify the sender that you have received this email in error by replying to the email or by telephoning +1 212 819 8200. Please then delete the email and any copies of it.
Thank you.

=====

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January 4, 2016

Comments to Brightview Senior Living DEIS Document

Ann Acheson
18 S Dutcher St.
Irvington NY 10533

The DEIS document begins with an Executive Summary (Section I) that starts with an overview of the proposed project. It will have 150 units and 4 residential stories. It will be located 300 feet from the front property line on North Broadway, whereas the existing main office building is located approximately 425 feet from the front property line. The proposed footprint will be approximately 65,775 square feet.

The DEIS document does not summarize in bullet point form what the environmental impacts of the proposed project would be, but it does summarize proposed mitigation measures that the project would offer. One has to assume that the mitigation measure cited offsets or partially offsets some perceived adverse impact.

The proposed mitigation measures cited in the Executive Summary are:

- *"Maintain the existing appearance and character of the Site from North Broadway, including maintaining one primary means of ingress and egress, along the existing driveway/curb cut on Route 9/North Broadway."*

This is not a mitigation of any potential impact – any other use would still use the existing curb cut because there's no other possibility given the site's topography and the necessary access to the existing historic buildings. The walls and entry pillars are also protected under Irvington Code.

- *"Provide large, landscaped front yard setbacks from North Broadway to the proposed Brightview Facility building. This setback, in addition to the provision of underground parking for the majority of the spaces proposed, would preserve open space on the Site, preserve the character of the viewshed along North Broadway and maintain previously undeveloped portions of the Site."*

The idea of large landscaped front yard setbacks sounds nice, but the notion that the proposed plan would preserve open space is disingenuous – it will in fact vastly decrease open space on the site. To say that the project maintains previously undeveloped portions of the site is also double-speak – the areas that aren't being developed are resource-protected by virtue of their slope and/or the presence of bedrock outcrops, and would of practical necessity or by Code be preserved no matter how the site is developed.

- *"Include architectural design and details of the new facility intended to emulate the character of the Village. Brightview Irvington is a contemporary interpretation of a colonial revival Hudson River Valley mansion with features of the Italianate buildings which are currently on the site. Precedents for a colonial style include the Irvington Town Hall, 76 North Broadway, 164 Washington Avenue and 2 Fargo Lane in the Village of Irvington."*

The precedents described here don't make any sense. Neither 76 N Broadway nor 2 Fargo Lane are visible from public streets and, as such, can hardly be hallmarks of the character of the Village. 164 Washington Avenue is in Dobbs Ferry. The secondary point to be made is that historic preservation architects, including several with considerable expertise and reputation living in Irvington, believe that

new buildings should not be "made to look old", but rather be "of their period" yet fitting into their context.

- *"Maintain the existing pedestrian easement on the Site with no disturbance. Adaptively re-use and preserve the three existing stone outbuildings on Site, as 6 non-age restricted Fair and Affordable Housing units Protect existing vegetation on the Site, and install landscape buffers along the property lines that approach existing adjacent land uses, including office uses to the north and south. "*

The document asserts earlier that the easement is not being used. So not disturbing it can hardly be mitigating anything. I question whether the proposed plan can adequately protect the existing vegetation (see below). Installing landscape buffers for adjacent land uses would not have to be done if the open space was being preserved, and is not the "vernacular" of this stretch of the North Broadway "viewshed".

- *"Provision of housing options for the aging population with various levels of independence, not currently available in the Village. Contribute to the Village's and County's goal of strengthening existing centers and corridors of development by providing a viable residential use as a replacement to on an underutilized office use."*

The provision of housing options does not mitigate the impact of this development on the environment. While it is true that older individuals may eventually need to use Assisted Living, the size and scope of the proposed development is not related to any specific needs of Irvington, but rather relate solely to the profit to be made by the facility. Otherwise, a much smaller facility could be proposed. It may be true that Westchester County has a goal to strengthen existing corridors of development by adding housing, but it is debatable whether you could term North Broadway an existing corridor of development. As far as the Village of Irvington's goals, I would think that goals for North Broadway would be the polar opposite of a "development corridor" - preservation of open space, resource protection, and preservation of Village character come to mind. Assisted Living is different than "specialized housing for seniors seeking to age in place in their communities" (p. I-5 of the DEIS). It would be great to have the Village prioritize ways to help older folks "age in place" – but that's quite different than 150 units of Assisted Living. To lump them together in the Executive Summary is somewhat misleading.

Additional issues and questions:

On this 8 acre property, 4.9 acres will be disturbed (graded) (60% of the site). I personally do not believe that certain parts of the site will remain undisturbed (see below) so I think that the true area of disturbance will be above 5 acres. 50,000 cu yds of cut material is to be exported from the site, 15,000 cu yds of which will be cut from bedrock. The DEIS estimates that 1,700 trucks will be needed to haul it all away - 50 trucks per day for 2 months. The proposed mitigation for the extensive heavy truck and other construction traffic/ generally increased traffic in and out of the site includes changing the timing on some of the traffic lights along Broadway to allow better traffic flow. The efficacy of proposed timing changes needs to be examined by Village consultants – is this really a mitigation measure?

The DEIS also proposes installation of a tracking pad to keep mud off Broadway, but constraints to the placement and specifications for tracking pads on slopes are not addressed. How does the considerable slope of the existing driveway affect the length of the tracking pad or how it will be constructed? How

does the intersection of the driveway with North Broadway constrain placement of a water bar to assure that muddy run-off from the construction site doesn't enter the stormwater system along Broadway? Do any special measures need to be taken to ensure that the tracking pad doesn't affect traffic flow in the right lane of Broadway driving north?

The DEIS also speaks of dust control using water to wet down bare soil, but does not address where the dust control water will flow and how sediment will be removed from it before it is allowed to leave the site.

The DEIS does not speak to parking for construction workers, nor to equipment storage and construction vehicle parking. Are these parking and storage areas part of the "site disturbance" calculations? If not, soil will need to be protected in these areas and potentially remediated at the end.

If construction activities continue during winter, access points should be enlarged and stabilized to provide for snow stockpiling. In addition, a snow management plan should be prepared with adequate storage and control of meltwater. The plan should specify that drainage structures will be kept open and free of snow and ice dams.

Stormwater management: The proposed plan is not up to the LID standards that our Village should be requiring. Virtually all the stormwater run-off is to be put into Cultechs (or the equivalent) for eventual infiltration – a "standard" practice. NYS DEC regulations tell us that green infrastructure (GI) practices must be used to the maximum extent possible to reduce run-off and treat the required Water Quality Volume. Standard practices may then be added to the plan to reduce any remaining run-off that can't be handled by GI. Green infrastructure techniques are grouped into two categories:

- Practices resulting in a reduction of contributing area; examples are preservation/restoration of conservation areas, and vegetated channels
- Practices resulting in a reduction of contributing volume; examples are green roofs, stormwater planters and rain gardens

In the case of Westchester County, we are a phosphorus-impaired watershed, so the Water Quality Volume is equal to the 1-year storm run-off. Information presented in the DEIS document (not only in an Appendix) should clearly delineate the required Water Quality Volume for the site, calculated according to the formula in the NYS Stormwater Manual. It should explain what GI practices are proposed and how much Run-off Reduction Volume they each contribute. If GI practices are not part of the plan, the DEIS document should explain why.

Before the Run-off Reduction volume can be assessed for standard infiltration practices, as are proposed here, infiltration tests done properly (e.g. using a pipe so there is not infiltration into the sides of the hole; proper spacing of a test grid) and measured at 2 feet below the design bottom must be performed. If there are high permeability rates, the water has to be cleaned up on the surface before it is allowed to infiltrate. The DEIS should explain why infiltration practices have been chosen (site constraints?) and why bioretention is not included in the plan, which would allow evaporation as well as infiltration and would also provide some habitat restoration. Also, disturbed soils that are not restored count as impermeable surface in Water Quality Volume calculations. The DEIS should state whether the proposed Stormwater Plan meets NYS DEC technical Standards.

Recipient: Irvington Board of Trustees

Letter: Greetings,

One of the most important reasons we choose to live in Irvington is because of the village's small-town historic charm. The cornerstone of this heritage is Broadway, the former Albany Post Road, which is still lined with stonewalls, nineteenth-century churches, grand Hudson River estates, and only a handful of traffic lights.

Those who have signed their names to this petition believe that protecting Broadway's heritage is central to protecting Irvington's small-town charm as well as our strong sense of community. Doing so also supports Irvington's Comprehensive Plan.

We therefore submit this petition to the Irvington Board of Trustees in opposition to amending the village's zoning laws to allow for development such as that proposed for 88-94 Broadway.

Name	City	State	Postal Code	Country	Signed On
Neil Maher	Irvington	New York		United States	12/31/2015
Kim Raby	Irvington	New York	10533	United States	1/1/2016
James Raby	Irvington	New York	10533	United States	1/1/2016
Beth Propper	Irvington	New York	10533	United States	1/1/2016
Joshua S Freeman	Irvington	New York	10533	United States	1/1/2016
Julie B	Irvington	New York	10533	United States	1/1/2016
Paula Veale	Irvington	New York	10533	United States	1/1/2016
Eva Edibe	Irvington	New York	10533	United States	1/1/2016
Allyson Felix	Irvington	New York	10533	United States	1/1/2016
Jonathan Wissner	Irvington	New York	10533	United States	1/1/2016
Claire Cornish	Irvington	New York	10533	United States	1/1/2016
CAROL DYER	Pearl River	New York	10965	United States	1/1/2016
Stephanie Luftig	Irvington	New York	10533	United States	1/1/2016
Erin Coyne	Irvington	New York	10533	United States	1/1/2016
Sarah Peres	Irvington	New York	10533	United States	1/1/2016
Jean Van der Spuy	Irvington	New York	10533	United States	1/1/2016
Joseph Rosario	Irvington	New York	10533	United States	1/1/2016
Mary Toomy	Irvington	New York	10533	United States	1/2/2016
Suzie Fromer	Tarrytown	New York	10591	United States	1/2/2016
Anastasia Angelova	Irvington	New York	10533	United States	1/2/2016
Gina Rosenblatt	Irvington	New York	10533	United States	1/2/2016
Barbara carrozzi	Irvington	New York	10533	United States	1/2/2016
Erica Halliwell	Irvington	New York	10533	United States	1/2/2016
Sandra Abate	Irvington	New York	10533	United States	1/2/2016
Ellen Weissman	Irvington	New York	10533	United States	1/2/2016
Maura Gedid	Irvington	New York	10533	United States	1/2/2016
Sharon Hammer	Irvington	New York	10533	United States	1/2/2016
Jola Burnett	White Plains	New York	10607	United States	1/2/2016
Peter Blass	Irvington	New York	10533	United States	1/2/2016
Carlen Leeser	Irvington	New York	10533	United States	1/2/2016
Sarah Chabon	Irvington	New York	10533	United States	1/2/2016
Laura Wahnnon	Irvington	New York	10533	United States	1/2/2016
Benjamin Tamarin	Irvington	New York	10533	United States	1/2/2016
Guy Leeser	Irvington	New York	10533	United States	1/2/2016
David Graeber	Irvington	New York	10533	United States	1/2/2016
Jennifer Murray	Tarrytown	New York	10591	United States	1/2/2016
Catherine Saraniti	Irvington	New York	10533	United States	1/2/2016
Robin Abbott	Irvington	New York	10533	United States	1/2/2016
Jean McLoughlin	Irvington	New York	10533	United States	1/2/2016
Renee Richmond	Irvington	New York	10533	United States	1/2/2016
wendy handler	Irvington	New York	10533	United States	1/2/2016
Concerned Citizen	New City	New York	10956-2406	United States	1/2/2016

David Rubin	Irvington	New York	10533 United States	1/2/2016
Cynthia Link	Irvington	New York	10533 United States	1/2/2016
Donna Hess	Irvington	New York	10533 United States	1/2/2016
Olga Mesonjnik	Irvington	New York	10533 United States	1/2/2016
Arthur Chabon	Irvington	New York	10533 United States	1/2/2016
Jacob Chabon	Irvington	New York	10533 United States	1/2/2016
Jairo Vela	Irvington	New York	10533 United States	1/2/2016
Wayne Ferguson	Irvington	New York	10533 United States	1/2/2016
steven Halliwell	IRVINGTON	New York	Irvington United States	1/2/2016
Steve Hess	Irvington	New York	10533 United States	1/2/2016
Jay Greenberg	Irvington	New York	10533 United States	1/2/2016
Kristen Woll	Irvington	New York	10533 United States	1/2/2016
Robert Sable	Irvington	New York	10533 United States	1/2/2016
Shari Wels	Irvington	New York	10533 United States	1/2/2016
anne halliwell	Irvington	New York	10533 United States	1/3/2016
Jason Laks	Irvington	New York	10533 United States	1/3/2016
Juliette and David Gober	Irvington	New York	10533 United States	1/3/2016
Sandi Sack	Irvington	New York	10533 United States	1/3/2016
Rachel Tamarin	Geneseo	New York	14454 United States	1/3/2016
Mark Keefe	Irvington	New York	10533 United States	1/3/2016
Delia Gallo	Irvington	New York	10533 United States	1/3/2016
Ginny Read	Irvington	New York	10533 United States	1/3/2016
jill bannister	irvington	New York	10533-1863 United States	1/3/2016
Eleni LaSenna	Irvington	New York	10533 United States	1/3/2016
Laurie Chock	Irvington	New York	10533 United States	1/3/2016
Wendy Odabashian	Irvington	New York	10533 United States	1/3/2016
Iris Greenberg	Irvington	New York	10533 United States	1/3/2016
Natasha Pekelis	Tarrytown	New York	10591 United States	1/3/2016
Jose Tavares	Irvington	New York	10533 United States	1/3/2016
Chris Canning	Irvington	New York	10533 United States	1/3/2016
Kelly Lynch	Irvington	New York	10533 United States	1/3/2016
Kathy Kaufman	Irvington	New York	10533 United States	1/3/2016
Staci McLaughlin	Irvington	New York	10533 United States	1/3/2016
Pam Boland	Grovetown	Georgia	30813 United States	1/3/2016
Paul Reeve	IPSWICH		IP4 2HR United Kingd	1/3/2016
Virginia Bartlett	Irvington	New York	10533 United States	1/3/2016
Michele Firpo-Cappiello	Irvington	New York	10533 United States	1/3/2016
Zoe Denahy	Irvington	New York	10533 United States	1/3/2016
Lisa Antonelli	Irvington	New York	10533 United States	1/3/2016
Monica Getz	Irvington	New York	10533 United States	1/3/2016
Bonnie Rofé	Irvington	New York	10533 United States	1/3/2016
Karyn Silverhardt	Irvington	New York	10533 United States	1/3/2016
Sophie Cornish-Keefe	Irvington	New York	10533 United States	1/3/2016

Rochelle Langer	Irvington	New York	10533	United States	1/3/2016
Paige Sollecito	Tarrytown	New York	10591	United States	1/3/2016
Monica Levy	Irvington	New York	10533	United States	1/3/2016
Isaac Chabon	Irvington	New York	10533	United States	1/3/2016
Barry Graubart	Irvington	New York	10533	United States	1/3/2016
Michael Hanna	Irvington	New York	10533	United States	1/3/2016
jane berger	Irvington	New York	10533	United States	1/3/2016
Kathleen McNamara	Irvington	New York	10533	United States	1/3/2016
Mary Leach	Hicksville	New York	11801	United States	1/3/2016
Dorothy Dailey	Irvington	New York	10533	United States	1/3/2016
Rupert Murray	Tarrytown	New York	NY 10591	United States	1/3/2016
Sonya Terjanian	Philadelphia	Pennsylvania	19130	United States	1/3/2016
Meg Ruley	Irvington	New York	10533	United States	1/3/2016
Noah Lang	Irvington	New York	10533	United States	1/3/2016
Craig Stern	Vahalla	New York	10595	United States	1/3/2016
Robin Kolodzinski	Irvington	New York	10533	United States	1/3/2016
christine suszko	Dobbs Ferry	New York	10522	United States	1/3/2016
Tanya Hunt	Irvington	New York	10533	United States	1/3/2016
Bonnie Grande	Irvington	New York	10533	United States	1/3/2016
Julia Wexler	Irvington	New York	10533	United States	1/3/2016
Patricia Graubart	Irvington	New York	10533	United States	1/3/2016
Marcie Cuff	Irvington	New York	10533	United States	1/3/2016
Anna-Lisa Corrales	Dobbs Ferry	New York	10522	United States	1/3/2016
Vembar Ranganathan	Irvington	New York	10533	United States	1/3/2016
Emily Burley	Irvington	New York	10533	United States	1/3/2016
Amy Sherwood	Irvington	New York	10533	United States	1/3/2016
Boris Rubinstein	Irvington	New York	10533	United States	1/3/2016
jason valentzas	Irvington	New York	10533	United States	1/3/2016
Jessica Halprin	Irvington	New York	10533	United States	1/3/2016
Richard DeRosier	Henrico	Virginia	23233	United States	1/3/2016
Sian Brown	Irvington	New York	10533	United States	1/3/2016
Alexandra Plazas	Irvington	New York	10533	United States	1/3/2016
Ron Cohen	Irvington	New York	10533	United States	1/3/2016
Philippa Clarke	Tarrytown	New York	10591	United States	1/3/2016
Peter Wilson	Tarrytown	New York	10591	United States	1/3/2016
Jonathan Ackerman	Irvington	New York	10533	United States	1/3/2016
Marcus Witte	Irvington	New York	10533	United States	1/3/2016
Catherine Palmieri	Irvington	New York	10533	United States	1/3/2016
Stanley Grubel	Irvington	New York	10533	United States	1/3/2016
Pamela Eskind	Irvington	New York	10533	United States	1/3/2016
Audrey Woods	Irvington	New York	10533	United States	1/3/2016
Shawn Manning	Carmel	New York	10512	United States	1/3/2016
Maria DiNardo	Irvington	New York	10533	United States	1/3/2016

kit demirdelen	Hastings-on-Hudson	New York	10706 United States	1/3/2016
Alexandra Schlesinger	Irvington	New York	10533 United States	1/3/2016
Eric Jacobs	Irvington	New York	10533 United States	1/3/2016
Patricia Ann Flood flood	Irvington	New York	10533 United States	1/3/2016
Susan Wells	Layton	Utah	84040 United States	1/3/2016
Rebekah FioRito Rebekah F	Irvington	New York	10533 United States	1/3/2016
Barbara Dailey	Irvington	New York	10533 United States	1/3/2016
William FioRito	Irvington	New York	10533 United States	1/3/2016
Dan McGiffin	Irvington	New York	10533 United States	1/3/2016
Rita Blum	Irvington	New York	10533 United States	1/3/2016
Lincoln Valentine	Irvington	New York	10533 United States	1/3/2016
Barbara G Scott	Irvington	New York	10533 United States	1/3/2016
Janine Harrison	Irvington	New York	10533 United States	1/3/2016
Andrew Frenkiel	Irvington	New York	10533 United States	1/3/2016
Linda Pierpont	Irvington	New York	10533 United States	1/3/2016
Jaclyn Ward	Irvington	New York	10533 United States	1/3/2016
Susan Freedman	Irvington	New York	10633 United States	1/3/2016
Natalia Broido	Irvington	New York	10533 United States	1/3/2016
dana gandsman	Dobbs Ferry	New York	10522 United States	1/3/2016
Alex Leeser	Irvington	New York	10533 United States	1/3/2016
Elizabeth Leeser	Irvington	New York	10533 United States	1/3/2016
Ali Saraniti	Irvington	New York	10533 United States	1/3/2016
Mary-Jo Weber	Irvington	New York	10533 United States	1/3/2016
Noah Montgomery	Irvington	New York	10533 United States	1/3/2016
Lindsay Goldberg	Irvington	New York	10533 United States	1/3/2016
M Jessica Ewing	Irvington	New York	10533 United States	1/3/2016
Marianne Levin	Irvington,	New York	10533 United States	1/3/2016
Peter Littell	Irvington	New York	10533 United States	1/3/2016
Chelsea Behrens	Irvington	New York	10533 United States	1/3/2016
Leila Littell	Irvington	New York	10533 United States	1/3/2016
Susanna Odabashian	Irvington	New York	10533 United States	1/3/2016
Dennis Kaplan	Mayfield Heights	Ohio	44124 United States	1/3/2016
Steve Wolfert	Irvington	New York	10533 United States	1/3/2016
susannah owen	Irvington	New York	10533 United States	1/3/2016
robyn McRae	Irvington	New York	10533 United States	1/3/2016
JILL REMBAR	Irvington	New York	10533 United States	1/3/2016
Philip Whitney	Irvington	New York	10533 United States	1/3/2016
Richard Goldman	Irvington	New York	10533 United States	1/3/2016
Meadowbrook Westchester	Irvington	New York	10533 United States	1/4/2016
Mia Pescetti	Irvington	New York	10533 United States	1/4/2016
Amy Heffner	Brooklyn	New York	11238 United States	1/4/2016
Pat Riley	Irvington	New York	10533 United States	1/4/2016
Okna Freeman	Irvington	New York	10533 United States	1/4/2016

Juliet Kwan	New York	New York	10025 United States	1/4/2016
Amy Annicharico	Tarrytown	New York	10591 United States	1/4/2016
Mary Saffran	Irvington	New York	10533 United States	1/4/2016
James Koepfel	Irvington	New York	10533 United States	1/4/2016
Christina Bochicchio	Irvington	New York	10533 United States	1/4/2016
Anita marshall	Irvington	New York	10533 United States	1/4/2016
Marion Asnes	Irvington	New York	10533 United States	1/4/2016
Allison Waguespack	Irvington	New York	10533 United States	1/4/2016
Jessica O'Reilly	Irvington	New York	10533 United States	1/4/2016
Thomas Hannon	Spokane	Washington	99208 United States	1/4/2016
Katerina Medina	Irvington	New York	10533-2605 United States	1/4/2016
claire fishman	Irvington	New York	10533 United States	1/4/2016
Nancy Frank	Irvington	New York	10533 United States	1/4/2016
Jared Zerman	Irvington	New York	10533 United States	1/4/2016
Fred LaSenna	Irvington	New York	10533 United States	1/4/2016
Rita milo	Irvington	New York	10533 United States	1/4/2016
Csilla Kroop	Irvington	New York	10533 United States	1/4/2016
Peter Bernstein	Irvington	New York	10533 United States	1/4/2016
Athur Semetis	Irvington	New York	10533 United States	1/4/2016
Edward Kolisz	Shrub Oak	New York	10588 United States	1/4/2016
Doris Bertocci	Irvington	New York	10533 United States	1/4/2016
Steven Kroop	Yonkers	New York	10701 United States	1/4/2016
Michelle DeForest	Hastings on H	New York	10706 United States	1/4/2016
Roderick Johnson	Irvington	New York	10533 United States	1/4/2016
Elyse Milun	Tarrytown	New York	10591 United States	1/4/2016
Laura G	Irvington	New York	10533 United States	1/4/2016
Jennifer Barnett	Irvington	New York	10533 United States	1/4/2016
Ramona Segreti	Irvington	New York	10533 United States	1/4/2016
Philip Striano	Irvington	New York	10533 United States	1/4/2016
John McNulty	Irvington	New York	10533 United States	1/4/2016
Liesbeth Severiens Parke	Irvington	New York	10533 United States	1/4/2016
Stacy Cusick	Tarrytown	New York	10591 United States	1/4/2016
Elissa Hecker	Irvington	New York	10533 United States	1/4/2016
Eric Frank	Irvington	New York	10533 United States	1/4/2016
Lauren Cooper	Irvington	New York	10533 United States	1/4/2016
Maureen Popiel	Irvington	New York	10533 United States	1/4/2016
Emily Berry	Irvington	New York	10533 United States	1/4/2016
Chrisitan (JUDD) Harcsar	Irvington	New York	10533 United States	1/4/2016
Keri Millstein	Irvington	New York	10533 United States	1/4/2016
katherien harcsar	Irvington	New York	10533 United States	1/4/2016
Dale Daniel	Irvington	New York	10533 United States	1/4/2016
Maggie Kadro	Irvington	New York	10533 United States	1/4/2016
Cintia Parsons	Irvington	New York	10533 United States	1/4/2016

David Leach	Irvington	New York	10533 United States	1/4/2016
Janelle Disick	Irvington	New York	10533 United States	1/4/2016
Nancy Mazur	Irvington	New York	10533 United States	1/4/2016
Robert Grados	Irvington	New York	10533 United States	1/4/2016
Vera Chaplin	Irvington	New York	10533 United States	1/4/2016
Beatrice Kessler-Goldsmit	Irvington	New York	10533 United States	1/4/2016
Linda Jenkins	Irvington	New York	10533 United States	1/4/2016
gib dunham	Irvington	New York	10533 United States	1/4/2016
Michelle Rimland	Irvington	New York	10533 United States	1/4/2016
Danielle Claro	Irvington	New York	10533 United States	1/4/2016
Emily Fisher	Irvington	New York	10533 United States	1/4/2016
Nancy Messing	Irvington	New York	10533 United States	1/4/2016
Claire Hallock	Irvington	New York	10533 United States	1/4/2016

Comments

Name	Location	Date	Comment
Joshua S Freeman	Irvington, NY	2016-01-01	i would like to see our community leaders adhere to the restrictions set forth in the comprehensive plan and maintain are current zoning restrictions in order to maintain the character of our village and the roadway corridor.
Claire Cornish	Irvington, NY	2016-01-01	The proposed development is out of character with the Village of Irvington. It would add to the congestion of this already busy thoroughfare. I am also concerned about the environmental impact of paving over 3 acres and blasting into the hillside of this steep slope.
Ellen Weissman	Irvington, NY	2016-01-02	This development is way too large for Irvington and will adversely affect the character of the village. It will also increase traffic volume on Broadway. It's already difficult to turn onto Broadway during the morning rush and additional flow will increase risk for accidents (already a concern), I oppose changing the zoning to accommodate a development that conflicts with our comprehensive plan.
Jean McLoughlin	Irvington, NY	2016-01-02	I oppose the building of Brightview
wendy Handler	Irvington, NY	2016-01-02	I am concerned that this rezoning will adversely affect our community in the long term.
David Rubin	Irvington, NY	2016-01-02	We have zoning laws for a reason. Amending them merely for the benefit of greedy real estate developers and non civic-minded corporations should be objectionable to all Irvingtonians
Cynthia Link	Irvington, NY	2016-01-02	When I lived on the corner of Riverview and Broadway they wouldn't even let me out up a fence. Now they want to put this giant unit right on Broadway. That is not staying with historical Irvington
Arthur Chabon	Irvington, NY	2016-01-02	We have recently witnessed the tragically insensitive over-development of Dobbs Ferry along the Saw Mill River Parkway forever devistating one of the most beautiful parkways in our region and irreparably scaring a previously wooded hillside. We have seen Route 87 in Yonkers completely transformed by hideously over-scaled poorly landscaped commercial developments that include Ridge Hill, Home Depot and Stew Leonard's; the latter offering a rear view of its grotesque roof top signage to drivers on the Saw Mill. Once a region is re-zoned there is little one can do to stop development. We simply cannot allow our village whose charm and beauty is so much about the sensitive scale of our buildings, what remains of the density of our landscape and Irvington's predominantly residential character, to be forever ruined by development that will bring larger commercial buildings, decrease the density of mature foliage and increase traffic congestion. Remember this is not about one building. A zoning amendment sets a precedent that can have a larger more ominous affect on the town at large. Broadway is our gateway. Its graciousness--compromised in the past-- must be enhanced in the future. If there is rezoning, it must encourage more trees, less traffic and preservation of our historic architecture. It is the responsibility of the Trustees to protect Irvington's natural assets and preserve the long term interests of the residents they represent.
Wayne Ferguson	Irvington, NY	2016-01-02	Assisted living too close to non profit faculty already in Irvington

Name	Location	Date	Comment
Steven Halliwell	Irvington, NY	2016-01-02	Development must be curbed if Irvington is to maintain its character. Arthur Chabon's comments are right on the mark -- we allowed a hideous development directly on the Saw Mill, the only commercialization on the entire length of that Parkway, and will pay the consequences in traffic congestion and further degradation of the area for decades to come. Brightview is welcome, but should work with the existing building, and not encroach on Broadway.
Jay Greenberg	Irvington, NY	2016-01-02	I wish to maintain the open feeling and architectural integrity of Broadway. Also to keep the traffic flowing as well as possible, which is clearly becoming a problem in the area.
Kristen woll	irvington, NY	2016-01-02	I believe that this proposed development will have a very large negative impact on the village.
Robert Sable	Irvington, NY	2016-01-02	Our comprehensive zoning plan was to allow development, but to keep the character of our village. It should not be amended to satisfy a developer without a compelling reason to do so. The zoning should not be amended to allow this development.
			The abomination at Lawrence street should not take place in our town.
Anne Halliwell	Irvington, NY	2016-01-03	We already have more and more traffic on Broadway and the feeling of Irvington as a little village is beginning to dissipate. It appears that this development will bring minimal tax benefit to our village -- but what we will lose is consequential. While I think a well planned assisted living center could be a positive addition -- the developers appear to require a size that is inconsistent with the scale of activity in Irvington. Why can't the developers use the existing historic building and pare down their plans? The reason appears to be all about Brightview's profit -- and not about the quality of life in our lovely village... I understand that this is business -- however their gain is not beneficial for Irvington. I urge the Trustees NOT to amend our zoning.
Mark Keefe	Irvington, NY	2016-01-03	Prevent rezoning to benefit greedy commercial development and save historic Broadway, our village's most important thoroughfare.
Ginny Read	Irvington, NY	2016-01-03	Development would significantly alter character of Broadway, contribute to already overloaded commuter traffic on the only north-south artery, and duplicate the same complex on 119, which I don't think is full.
Eleni LaSenna	Irvington, NY	2016-01-03	I'm signing because once again and seems wuite often these days, our village seems to not have the integrity of a historic town that we claim to be. Hmhhh:
Wendy Odabashian	Irvington, NY	2016-01-03	It is not the type of commercial property that will benefit the local residents
Staci McLaughlin	Irvington, NY	2016-01-03	I think this proposal is completely out of character for our village and requires far too many amendments to our zoning, primarily just for the profit of the developer. This project as currently proposed would be a terrible mistake.
Lisa Antonelli	Irvington, NY	2016-01-03	I don't want our shared village code changed for one interested party.
Rochelle Langer	Irvington, NY	2016-01-03	Totally against.
Carlen Leeser	Irvington, NY	2016-01-03	I am against amending the zoning laws for this development. What has been proposed is much too large and not at all appropriate for Irvington.
Barry Graubart	Irvington, NY	2016-01-03	We cannot change our zoning laws simply to allow applicants to get above-market returns. The zoning laws are there to serve the community, not the P&Ls of corporations.

Name	Location	Date	Comment
Jennifer Murray	Tarrytown, NY	2016-01-03	Although not an Irvington town resident, my son will attend the Irvington school and I am in town almost daily. The increased noise, traffic, use of resources, etc that will be caused by this commercial venture are not things that I want for my home environment. I chose to live here for the rural feeling quiet this area provides.
Rupert Murray	Tarrytown, NY	2016-01-03	To preserve the unique historic and green landscape of the Irvington school district
Sonya Terjanian	Philadelphia, PA	2016-01-03	We need to protect our green space and small-town environment.
Margaret Ruley	Irvington, NY	2016-01-03	Broadway is already a congested, scary speedway. An influx of more traffic from a development like this will exacerbate the situation. It's antithetical to the "village" ethos we all appreciate.
Craig Stern	Vahalla, NY	2016-01-03	Irvington has already lost too many of it's unique architectural gems that were thoughtlessly replaced by ugly, low-quality structures that cheapen the precious character of the village.
christine suszko	Dobbs Ferry, NY	2016-01-03	I want to preserve the character of the stretch of Broadway that runs through Irvington. I feel it would overburden traffic and volunteer ambulance.
Vembar Ranganathan	Irvington, NY	2016-01-03	Irvington is a small residential village. I strongly oppose zoning law changes which changes the character of the village.
Boris Rubinstein	Irvington, NY	2016-01-03	This enterprise will not benefit the residents of Irvington and will dramatically change the quality of life of the town
Ron Cohen	Irvington, NY	2016-01-03	I oppose changes to our zoning to suit the financial goals of a single seller. We pay among the highest taxes in the country here, in exchange, we hope, for a beautiful community and a high standard of living. Like the Continuum proposal before it, this complex would be a visual blight in our town and a drain on our resources and services. This should be rejected outright, I hope without the prolonged agony and time sink that characterized the Continuum experience.
Allyson Felix	Irvington, NY	2016-01-03	This re-zoning will negatively impact our village in the short and long-term.
Jonathan Ackerman	Irvington, NY	2016-01-03	Let's keep the feeling Irvington intact for future generations!
Marcus Witte	Irvington, NY	2016-01-03	While assisted living is a worthy endeavor, there are plenty of places in Westchester that are properly zoned to accommodate this type of building, and the developers should look there. We absolutely should not allow this zoning amendment or we risk over development and further congestion. Broadway would become a traffic nightmare as the 150 resident's visitors and workers to maintain the facility would stress the already stressed infrastructure. Then there is the additional noise pollution from increased traffic and ambulances (and there will be plenty of sirens). To pave over the lawn with asphalt would also damage the curb appeal of our town and thus property value. If this is just an attempt to offload the property, it would be a shortsighted endeavor that would negatively impact much more than just the beauty of the town. Trustees - we won't allow a dog park, but we would allow this four story beast? Do your job and reject this petition.
Patricia Ann Flood flood	Irvington, NY	2016-01-03	I am signing for it would be horrible for our small community to have such a big impact on our town. It will affect traffic as well as volume of people coming through our town.
Susan Wells	Layton, UT	2016-01-03	I grew up not too far from Irvington, and had many family and friends there. I am so sorry to see this same thing happening all over our country. Why are we demolishing our past, our history? Don't allow this in your area!
Lincoln Valentine	Irvington, NY	2016-01-03	I don't believe a development of this scale is appropriate in terms of retaining the character of the village of Irvington.

Name	Location	Date	Comment
Andy Frenkiel	Irvington, NY	2016-01-03	This development is not consistent with the intent of the zoning for the area, and is important to preserve the character of the town.
Patricia Graubart	Irvington, NY	2016-01-03	Perhaps most concerning, there is still no way to mitigate the adverse impact on the Irvington Volunteer Ambulance Corps. Our understanding is that IVAC is at the breaking point, already engaging per diem paid staff. Why is the Board of Trustees even considering this massive expansion of an already overwhelming responsibility? The proposed use of Empress is a red herring as there is no way to implement the plan practically. Again, as a licensed ALF, no medical care can be rendered. How could we expect non-medical staff or residents to have to determine the severity of an injury and figure who to call in the event of a medical emergency. With the constant turnover of residents and staff, it is unlikely this plan can be effective. How will this issue be managed in perpetuity? What happens if Brightview sells the facility? And what happens to the Irvington residents who will be at the mercy of this preposterous arrangement? Why would any responsible entity or municipality add steps to access to emergency care? The health and safety of the residents is the last thing the Board of Trustees should take chances with!
Mary-Jo Weber	Irvington, NY	2016-01-03	Irvington is a unique and beautiful community. I hope the character of the community will be preserved.
Steve Wolfert	Hartsdale, NY	2016-01-03	The area doesn't need another assisted living facility that will create immense traffic, drain the resources of the Voluntary Ambulance service, and be a visual eyesore not in keeping with the character of the Village.
JILL REMBAR	Irvington, NY	2016-01-03	No to rezoning and no to Brightview! Aside from being a massive presence hanging over Broadway, the proposed project will bring traffic that will impede all of our traveling through the Village... forget getting to school or the train station in a reasonable amount of time in the morning. Financially great for the developer, sure; for the Village -- an amount that's insignificant in comparison to the trouble it would come with.
Richard Goldman	Irvington, NY	2016-01-03	I want to preserve the character of Irvington and Broadway is the gateway to our village.
Allison Waguespack	Irvington, NY	2016-01-04	I'm signing this because with the new Brightview development on 119, I am concerned that another development so close will flood the market.
Katerina Medina	New York, NY	2016-01-04	The village is wonderful the way it is: historic, family oriented, with lots of green space and manageable traffic on Broadway. I would not want any of the above to change. Furthermore, current village residents including myself pay a lot in taxes so that the village does not change its character.
claire fishman	Irvington, NY	2016-01-04	This proposed construction should definitely NOT be given the green light for so many reasons, not the least of which is that it is totally out of character with the very special qualities of our village of Irvington!
Edward Kolisz	Shrub Oak, NY	2016-01-04	I love Irvington! Keep it's character intact.
Doris Bertocci	Irvington, NY	2016-01-04	I agree with all points
Ramona Segreti	Irvington, NY	2016-01-04	When I first heard about this project, it was said that the current building would be retained and most of the new construction would be behind it, only slightly altering the property's appearance from Broadway. This seems like a far larger project.

Name	Location	Date	Comment
Maureen Popiel	Irvington, NY	2016-01-04	The first Land Use Committee, composed of an impressive and talented group of citizens, thoroughly explored zoning issues throughout the village in the late '80's. Their report was unanimously accepted and enacted in '89 by the then-Board of Trustees of which I was a member. The village has only grown since then and I see no reason to add to the density and traffic of the northern end, as attractive as the concept of a local assisted living center might be.,
keri millstein	Irvington, NY	2016-01-04	i care!
katherine harcsar	Irvington, NY	2016-01-04	the proposed facility is too large and would have a negative impact on our community.
Nancy Mazur	Irvington, NY	2016-01-04	Please insure that any development stays within our villages guidelines- do not give them a variance!
Beatrice Goldsmitj	Irvington, NY	2016-01-04	The infrastructure to our village cannot support such vast project. Traffic, sanitation and quality of living will negatively impacted.

Larry Schopfer

From: Linda Jenkins <jenkins_lcj@yahoo.com>
Sent: Monday, January 04, 2016 12:02 PM
To: bsmith@irvingtonny.gov; cgiliberti@irvingtonny.gov; mgilliland@irvingtonny.gov; ckehoe@irvingtonny.gov; jsilverberg@irvingtonny.gov
Cc: lschopfer@irvingtonny.gov
Subject: Brightview Project

Dear Mayor Smith, and Village Trustees

I am writing to voice my deep concerns about the HUGE planned scope of the proposed Broadway Brightview Project. Broadway traffic is already crowded during many times of day, and the project as proposed will only add to that congestion. It is way too large to fit into the ambiance of our village, and, at the least, the developer should be required to cut the scope significantly before it might be allowed to proceed.

I also feel like I'm learning about the details of this project very late in the proceedings. It seems they have been obscured from the village residents and a more rigorous effort to advise residents would have been appropriate. I rely on the local river village paper for information and I don't recall seeing much, if any, information.

Respectfully submitted,

Linda C. Jenkins
Irvington, NY 10533
jenkins_lcj@yahoo.com
www.mytradesofhope.com/LindaJenkins

Catherine Sun & Jacob Styburski
18 Meadowbrook Road, Irvington NY 10533
Cell: 415.939.7864
Cell: 646.255.8309

January 4th 2016

To the Irvington Board of Trustees
Irvington, NY 10533

Dear Board of Trustees:

This letter is to express our view on the Brightview Senior Living submission that you will be reviewing.

Before expressing our shared opinions, while we respect and understand that all submissions to the Board are entitled to a fair review, hearing and evaluation. However to put this proposal quickly into perspective, the Board and the Elected members who have to review this should quickly revisit the position the village in the majority took 18 months ago in regard to the Continuum proposed project. That project was rightfully rejected after a tremendous amount of time invested by Board members and a large group of local residents. The same reasons Continuum was flatly and rightly rejected in the end will save a lot of time if those concerns are quickly and clearly revisited early as the underlying reasons for that rejection will apply to this latest submissions.

Had the Continuum project been approved, it would have been started and then fallen apart – and that is what in fact we saw, as all the people who presented for months, quickly vanished from the company as that proposal rightly was rejected. The same question arises again - what happens if Brightview sells the facility or decides not to complete the project if they get approval to start it?

We all learned much through the process of evaluating the Continuum proposal, particularly with regard to the original 2003 Comprehensive plan for the Village of Irvington, which was adopted and should remain in affect. Right at the outset, there is again a request to change our zoning laws, simply to meet the financial goals of an individual property owner.

The latest proposed plan is again wholly inconsistent with the current zoning laws in Irvington, the current needs of the community. The property in question is currently zoned for commercial use, including office space or multifamily housing. Many in our community agree there is a strong need for additional multifamily housing and affordable housing, to meet a host of needs. However this proposal from the first appearance clearly does not accomplish that. A few affordable units that are being proposed would be at odds with inclusionary zoning, a core requirement for successful affordable housing. Who is their focus demographic – soon to be empty nesters like my family or seniors - who they really should be appealing to?

As with Continuum this project is massive in scope -150 units, with plans to exceed Village zoning ordinances for height, bulk and density. I have revisited the Brightview Senior Living facility on Route 119, which I understand has only 90 units, its an ugly monstrosity and dwarfed by a third to this latest proposal. From here I can fall into a repeating speech we all plead regarding size, scale and the subsequent impact on our Villages' small and very limited Irvington Volunteer Ambulance Corps. IVAC was at the breaking point, during the last round of

discussions for Continuum and to our knowledge little has changed since then, so unless there is a magic fix we don't already know about, there is no reason for the Board of Trustees even considering to revisit potentially breaking an infrastructure that is already so challenged. We have limited understanding of the extent of the potential medical ramifications that will occur in such a facility, but common sense indicates we do not have anything close to the infrastructure to support those needs here in Irvington.

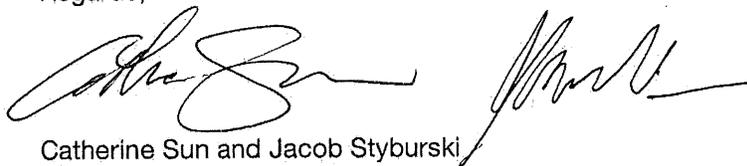
The current property owner chose to seek guidance from the Board and the Community about a possible sale and opinions were expressed that the preference was that the seller seek a buyer who would build a multifamily dwelling on the site. What happened to change that direction and so radically? Our view - its all about monetary gain for the seller and it should not be at the expense of the people who already dwell an will live with the outcome of this already in our community.

This proposal will find virtually no support within the community – so why beleaguer months of messing around when there are so many obvious reasons to spare everyone a lot of wasted time, to satisfy a few who are looking just to profit here. We were part of a sizable group of residents that spent a lot of time researching the issues during the Continuum application process and many of us along with the Board became clear why a project of this size and scope does not make sense within the boundaries of Irvington.

We hope the Board of Trustees uses its wisdom and doesn't entertain this proposal for long and that you swiftly reject the request to change our zoning laws and continue to focus on the welfare of the community at large. This proposal serves no benefit to the existing Irvington community and your concerns should not be for the financial goals of the applicant.

We recently became homeowners in Irvington in 2013, and allowed this proposed new plan is allowed to pass, we feel it sends a poor message about the future of the Village and the priorities of the Board.

Regards,

The image shows two handwritten signatures in black ink. The signature on the left is for Catherine Sun, and the signature on the right is for Jacob Styburski. Both signatures are fluid and cursive.

Catherine Sun and Jacob Styburski

Larry Schopfer

From: Connie Kehoe <litware@gmail.com>
Sent: Monday, January 04, 2016 12:57 PM
To: Larry Schopfer
Subject: Fwd: Proposed zoning changes for Brightview

Connie Kehoe
Sent from my iPhone

Begin forwarded message:

From: Ellen Weissman <ellenweissman@optonline.net>
Date: January 4, 2016 at 12:21:46 PM EST
To: bsmith@irvingtonny.gov, cgiliberti@irvingtonny.gov, mgylliland@irvingtonny.gov,
jsilverberg@irvingtonny.gov, ckehoe@irvingtonny.gov
Subject: Proposed zoning changes for Brightview

To the Board of Trustees:

I am writing to voice my strong opposition to changing zoning on North Broadway. I am a resident of Meadowbrook Road and have lived in Irvington since 1999.

The most attractive draw to living in Irvington was (and is) its ambiance and beauty. This distinguishes Irvington from other more generic suburban communities. Thoughtful zoning and planning differentiate communities that retain their individuality from ones that become bland or downright ugly.

Fortunately, Irvington has had stewards who have taken community planning seriously. The Comprehensive Plan reflects these priorities. I strongly urge you to uphold the Plan and the zoning that underpins it and to continue this legacy.

The proposed building is enormous -- a behemoth -- and will permanently change the atmosphere of Irvington for visitors and residents alike. Changing zoning would also set an unfortunate precedent for future projects.

I am also writing as a village resident who would be adversely affected by the increased traffic this facility would generate. I respectfully disagree with the assertion that there will be little increased traffic. My own parents live in a similar facility in Illinois, and I see an enormous flow of people into and out of the facility daily. This includes not just staff and residents, but a whole array of privately paid caregivers, physical therapists and occupational therapists (often engaged after a resident has had a medical issue), visitors, and other support people not directly employed by the facility.

My concerns about traffic are two-fold. First, congestion on Broadway is a significant problem. It can be extremely difficult to turn onto Broadway from Meadowbrook Rd or Fargo Lane in the morning during peak time for parents driving children to school and commuters driving to the train station. In the afternoon, traffic going toward Tarrytown and I-287 backs up significantly. Changing zoning to accommodate so many more people will aggravate an already

clogged road. We don't need to create another bottleneck here like the one in Ardsley at the intersection of 9A and Ashford.

Second, we have had several motor vehicle accidents involving children hit by cars. Irvington has other initiatives aimed at enhancing pedestrian safety like the Irvington Pace Car project. Do we really need to add to the risk by having such a high density facility? It is also worth noting that independent living residents are likely to have their own cars and that octogenarian drivers have more limited vision and slower reflexes than younger drivers.

While I understand that there could be some positive aspects to this proposed development such as a small number of affordable housing units, I believe that those benefits could be achieved without sacrificing the other priorities of our community.

Lastly, I am perplexed that the Board would consider having a chain business in the Village when that has been explicitly rejected repeatedly over the years. If a storefront Starbucks cafe isn't in keeping with the village's priorities, how can such a humongous chain business as this be ok?

I thank you for hearing my perspective and hope that you will vote to uphold our zoning laws.

Sincerely,
Ellen Weissman
19 Meadowbrook Road
Irvington

Larry Schopfer

From: Connie Kehoe <litware@gmail.com>
Sent: Monday, January 04, 2016 2:41 PM
To: Larry Schopfer
Subject: Fwd: Bright view Complex

Connie Kehoe
Sent from my iPhone

Begin forwarded message:

From: Jeff Ritter <jmr94@optonline.net>
Date: January 4, 2016 at 2:04:28 PM EST
To: bsmith@irvingtonny.gov, ckehoe@irvingtonny.gov, mgilliland@irvingtonny.gov,
cgiliberti@irvingtonny.gov, jsilverberg@irvingtonny.gov
Cc: Anastasia Angelova <angelova@optonline.net>
Subject: Bright view Complex

Honorable Trustees,

As we understand it, a developer has petitioned the Irvington Board of Trustees to amend the village's zoning code to allow the construction of a large assisted living center (Brightview) at 88-94 Broadway. We write to oppose such an amendment.

It is our understanding that the proposed development would be six times the size of the existing structure on the property, that it would be significantly taller than allowed for under the zoning code, and that it has already received a negative environmental impact statement. We hope that the board will take a firm line and reject a proposal so dramatically out of step with the village's comprehensive plan and zoning rules.

We moved to Irvington from a town in New Jersey that regularly altered its master plan and zoning code to accommodate ambitious new developments promising additional property tax revenue. The results were always regrettable, and they eventually strained the town's infrastructure to the breaking point.

We want to make clear that we do not oppose the project *per se*. We understand the growing need for senior assisted living facilities and we certainly understand why Irvington would be an attractive location for this sort of development. But new development proposals should make a good-faith effort to comply with the existing zoning code. Giving ground on this issue will only encourage every developer who comes to down to "ask big" in the expectation of wrangling concessions from the village.

Jeffrey M. Ritter
Anastasia A. Angelova

Larry Schopfer

From: christine mortell plazas <mortellplazas@usa.net>
Sent: Monday, January 04, 2016 2:50 PM
To: bsmith@irvingtonny.gov; ggiliberti@irinvtonny.gov; ckehoe@irvingtonny.gov;
kwoll@irvingtonny.gov; jsiverberg@irvingtonny.gov
Cc: Lschopler@irvingtonny.gov
Subject: Oposition to changing the Irvington Comprehensive Plan

Dear Honorable Smith and Board of Trustees,

One of the most important reasons my family and I choose to live in Irvington is because of the village's small-town historic charm. The cornerstone of this heritage is Broadway, the former Albany Post Road, which is still lined with stonewalls, nineteenth-century churches, grand Hudson River estates, and only a handful of traffic lights.

I believe that protecting Broadway's heritage is central to protecting Irvington's small-town charm as well as our strong sense of community. Doing so also supports Irvington's Comprehensive Plan.

I oppose amending the village's zoning laws to allow for development such as that proposed for 88-94 Broadway.

I believe that changing the character of the Village of Irvington will in the long run hurt the local economy and will drive tourism away from the area.

Sincerely,

Christine Mortell Plazas

Four Richmond Hill

*Christine Mortell Plazas
Four Richmond Hill
Irvington-on-Hudson, NY 10533
(914) 591-6768
(914) 557-2209 mobile*

Larry Schopfer

From: Connie Kehoe <litware@gmail.com>
Sent: Monday, January 04, 2016 4:02 PM
To: Larry Schopfer
Subject: Fwd: Proposed Brightview Development

Connie Kehoe
Sent from my iPhone

Begin forwarded message:

From: "Erica Halliwell" <erica@hairstory.com>
Date: January 4, 2016 at 3:57:22 PM EST
To: <bsmith@irvingtonny.gov>, <cgiliberti@irvingtonny.gov>, <mgilliland@irvingtonny.gov>, <ckehoe@irvingtonny.gov>, <kwoll@irvingtonny.gov>, <jsilverberg@irvingtonny.gov>
Cc: "Eli Halliwell" <eli@hairstory.com>
Subject: Proposed Brightview Development

Irvington Trustees

Eli and I are writing this morning to voice our concern over the proposed Brightview plans.

We live almost directly 'down the hill' from the site, on Fargo Lane.

I first want to be clear that we are not against the idea of an assisted living facility in Irvington, what concerns us is the incredible scale of what is being proposed. It seems completely out of sync with the ethos of our town. We don't have any big box stores, we don't have tall buildings or even any developments that feel like they are outsized for the piece of land they inhabit. Part of what draws people to Irvington is this genuine small town existence. We need to leave the towns' borders for most amenities, and I'm guessing many residents are very happy to do so since that is what has maintained this special and unique feel to Irvington.

When I look at the proposal for the Brightview Assisted Living development, when I look at the very fancy (and expensive) animation they created and see what they have already built on 119 -- I cringe. How could our town allow such a unsightly development that is so clearly outside the aesthetic of our town. I have to believe there is a solution where both the owners can profit but our town is not so compromised. The increase in traffic and burden on our community and town resources simply seems completely out of line when compared to the potential benefits (except of course the benefits of larger profit for developer and owners).

Again, this isn't a complaint from a resident who wants zero development in Irvington ever. It is from a long time Irvington family who is concerned about preserving what makes our town so wonderful.

Thank you for taking the time to read through our concerns and for taking them into consideration while you move through the approval process for zoning variances, and the such.

Best,
Erica and Eli Halliwell
94 Fargo Lane

Hairstory: Modern professional hair care products for independent hairdressers.

Erica Halliwell
www.hairstory.com
@hairstorystudio
917.684.8429



This email has been checked for viruses by Avast antivirus software.
www.avast.com



Robert P. Astorino
County Executive

Westchester County Planning Board

January 4, 2016

Larry Schopfer, Village Administrator
Village of Irvington
85 Main Street
Irvington, NY 10533

Subject: **Referral File No. IRV 16-001 – Brightview Senior Living
Zoning Text Amendment, Special Permit & Site Plan
Draft Environmental Impact Statement**

Dear Mr. Schopfer:

The Westchester County Planning Board has received a draft environmental impact statement (EIS) (dated accepted November 16, 2015) for the above referenced set of proposed actions. The applicant is petitioning the Village to amend the text of the Village Zoning Ordinance to add assisted living facilities as a special permit use in the 1F-40 zoning district. If approved, the applicant would seek special permit and site plan approvals to construct a 150-unit assisted and independent living facility consisting of 85 independent units, 39 assisted living units and 26 memory care units as well as indoor and outdoor amenities for residents. The subject site consists of eight acres located at 88-90 North Broadway. The site currently contains an office building and three outbuildings. While the office building would be demolished to accommodate the construction of the new building, the three outbuildings would remain and would be renovated to provide six affordable affirmatively furthering fair housing (AFFH) units. In addition, four age-restricted affordable AFFH units are proposed among the independent living units within the proposed Brightview facility for a total of 10 affordable AFFH units across the entire project. 114 parking spaces are proposed to accommodate the entire development. Vehicular access will be provided via an existing curb cut along North Broadway.

We have reviewed the draft EIS 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. Affirmatively furthering fair housing. We are supportive of the inclusion of 10 affordable AFFH units in the development proposal. The inclusion of both non-age restricted and age-restricted independent living units is a unique solution towards helping senior living facilities contribute towards increasing the supply of affordable housing units that are in dire need in Westchester County. This aspect of the project is 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, which calls for increasing the range of housing types in Westchester County.

2. Sewage flows. The draft EIS notes that the proposed development will generate 19,250 gallons per day of sanitary wastewater which will add to the volume requiring treatment at the Yonkers Joint Wastewater Treatment Plant operated by Westchester County. The draft EIS does not propose any mitigation measures to offset this increase in flow.

We point out that it is the policy of the County Department of Environmental Facilities to recommend that municipalities require the identification of mitigation measures that will offset the projected increase in flow for large development proposals. The best means to mitigate these impacts is through reductions in inflow/infiltration (I&I) at a ratio of three for one for market rate units and at a ratio of one for one for any affordable AFFH units. We ask that the final EIS provide specific details on how implementation of these improvements is to be accomplished. For example, will the applicant be required to place funds into a dedicated account for I&I work based on a per gallon cost of removal of flow through I&I? How will I&I projects be identified? Who will conduct the work and in what timeframe?

3. Pedestrian and transit access. *Section IV.G Traffic and Parking* includes an inadequate discussion of pedestrian and transit access to the proposed development. By changing the use on the site from office to senior living development, there may be an increase in transit ridership by employees of the proposed facility. Currently the site has no sidewalk along its frontage. In addition, while Bee-Line bus routes serve Broadway, no Bee-Line bus stops are located along the site's frontage, requiring all bus riders accessing the site to cross Broadway without the aid of a crosswalk to access the sidewalk on the west side of the street.

The Village should require the applicant to contact the County Department of Public Works and Transportation to discuss the forecasted amount of ridership to the site, particularly with respect to future employees. We also recommend that the provision of safe access to public transit also be written into the special permit requirements for senior/assisted living facilities in the village. The final EIS should identify mitigation measures that can be put into place to allow safe access to the bus stops near the development. The draft EIS points out that there has recently been one pedestrian-related crash along Broadway. If the facility is likely to generate transit trips by employees or visitors to the site, then it will be imperative to implement measures to get bus passengers between the site and bus stops safely.

4. Provisions for recycling and composting. The Village should ensure that the applicant provides sufficient space for the storing of recyclables in the new development. The applicant should be made aware of the expanded County recycling program that now includes plastics with numbers 1 through 7. County regulations for plastic recycling may be found at <http://environment.westchestergov.com>.

In addition, because the proposed development will feature foodservice amenities for residents, we urge the applicant to consider using a food composter on site to recycle food waste and to discuss this potential in the final EIS. This will help in reducing the waste stream from the site into the waste management system.

5. Green building technology and bicycle parking. Page II-15 and II-16 of the draft EIS contains a discussion of the use of green building techniques in the proposed development. We commend the applicant for including this discussion. We note that that discussion did not include the provision of a bicycle rack for employees to use if they bike to work. We recommend this be added as it is a low-cost way to encourage non-motorized transportation.

Thank you for calling this matter to our attention.

Respectfully,
WESTCHESTER COUNTY PLANNING BOARD

FOR:

By:



Edward Buroughs, AICP
Commissioner

EEB/LH

cc: Naomi Klein, Director of Planning, County Department of Public Works and Transportation

Larry Schopfer

From: Constance Kehoe <litware@gmail.com>
Sent: Friday, January 01, 2016 10:34 AM
To: Larry Schopfer
Subject: Fwd: Brightview

FYI.

----- Forwarded message -----

From: **Claire Cornish** <clairefrances@mac.com>

Date: Thu, Dec 31, 2015 at 7:03 PM

Subject: Brightview

To: bsmith@irvingtonny.gov, mgilliland@irvingtonny.gov, ckehoe@irvingtonny.gov,
cgilberti@irvingtonny.gov, jsilverberg@irvingtonny.gov

I urge you *not* to vote in favour of amending the zoning code for the parcel of land on Broadway.
The Assisted Living Facility being proposed by Brightview is out of scale & out of character for the village of Irvington.

I am concerned about the environmental impact (especially the water run-off caused from such a large amount of coverage on this steep slope), as well as the impact on traffic along an already busy thoroughway.

This kind of size facility is not appropriate for what is essentially a residential neighborhood.

Thank you & Happy New Year!

Claire Cornish
85 North Broadway

--

Connie Kehoe
litware@gmail.com
914 231 6969 (land line)

Larry Schopfer

From: Edward Gahan <ehbgahan@optonline.net>
Sent: Friday, January 01, 2016 4:17 PM
To: bsmith@irvingtonny.gov; ckehoe@irvingtonny.gov; cgiliberti@irvingtonny.gov; mgilliland@irvingtonny.gov; jsilverberg@irvingtonny.gov
Cc: lschopfer@irvingtonny.gov; 'Edward Gahan'
Subject: 88-94 North Broadway DEIS and Proposed Zoning Change - 1-1-2016

The Board of Trustees
Village of Irvington
85 Main Street
New York, NY 10533

1-1-2016

To Members of the Irvington Board of Trustees,

First, we want to thank you for proceeding with DEIS in such a diligent and professional manner, we appreciate the amount of time and consideration you have spent on this matter.

After reviewing the DEIS, we want to go on record that we are opposed to the current developer's plans for 88-94 North Broadway for the following reasons:

1. After attending the public hearing in December we discovered that the full height above grade for the proposed facility would be approximately 48 ft high, coupled with the higher elevation from Broadway, and the site plan showing the proposed building considerably closer to North Broadway, those conditions would make the overall structure much larger than the existing structure. No amount of landscaping could hide the increased scale and size of the proposed building. The structure would also be much larger in scale to nearby properties and thereby would not fit in with our neighborhood, which is currently made up of period to contemporary architectural styles mostly residential in nature, all or most of which were scaled and designed to fit in with the "natural" topography.
2. This leads to our next point, the proposed blasting of the natural rock base and excavation of the current topography at the site to accommodate the proposed structure. The site's topography has been this way for many hundreds/ thousands of years, this landscape would not be recognizable once construction is complete, the pastoral scene we currently view and recognize as "Irvington's gateway" would be lost forever.
3. We are also concerned about the damage such blasting would have on neighboring homes, specifically to the foundations of those homes, possibly causing structural damage to the those properties during or after the proposed construction period, or after ground settling has been completed.
4. The construction period of approximately two years in length would have a serious impact on the quality of life to immediate neighbors, impacting all residents travelling to and from our village via Route 9 /North Broadway to Tarrytown, Taxter Road, Route 119, I87 or I287.
5. North Broadway being a state road should have a independent traffic study conducted by the State Department of Transportation, we are not sure if this was required of the DEIS, if not we believe that such a study be conducted and reviewed the NYS Dept of Transport to meet current state safety standards. Once the proposed facility is operational the impact on traffic from both employees (up to three shifts per day at 35 employees per shift as noted at the hearing), plus visitors and deliveries to the site could be significant, especially during busy rush hours. A new environmental impact to residents could result in increased time to get to and from our village center, an increase in slow moving vehicles at rush hours which means more vehicle pollution and longer travel times. Residents who currently commute daily have considerable obstacles to overcome to make it to the Metro North station on time, this situation would only get worse if the proposed facility is approved. Traffic light software and timing adjustments would simply not be enough of a solution to address this issue which was stated as a solution at the Public hearing last December.

6. Irvington was voted as one of "the best places to live" in Westchester Magazine a couple of years ago, if this development proceeds the desirability to live in our village and the ability to attract new families would diminish, as would the tax base. Many residents who chose to live in Irvington moved here for a better quality of life for themselves and their families, that quality would be adversely impacted by the approval of the proposed development.
7. If you have visited the new senior development located on Route 119 you would see what could be in store for our village, take a close look at it and imagine a larger structure on Irvington's North Broadway corridor. While a facility on this scale is in keeping with a corporate/ commercial location as the one on Route 119, North Broadway in Irvington is distinctly different in character.
8. Use of exterior lighting is also a major concern, currently the site is relatively dark at night time, once this structure is completed it would need a considerable amount of on-site exterior lighting which could disturb immediate neighbors causing increased light pollution or light trespass. The evidence is illustrated again by taking a look at the new senior facility on Route 119 at night viewed from across the road at the Super Stop & Shop, from that location there you would see what we mean by light pollution.
9. Finally, we are concerned about the additional waste water emanating from the proposed facility, it is noted in the DEIS as having no impact on our aging system of sewers and water distribution infrastructure. We do not believe this is the case, we continue to be concerned about the impact of additional waste water of the magnitude stated and its impact on our waste water management system.

Approving this DEIS will forever change the character of our Village, there is no turning back once the board has voted to approve the Zoning Change to accommodate this proposed development, we urge the Board to reject the DEIS as unsuitable for our scenic and historic rivertown village.

Sincerely,

Edward and Noirin Gahan

*81 North Broadway
Irvington NY 10533*

Larry Schopfer

From: Mark Gilliland <mg@markg.org>
Sent: Friday, January 01, 2016 4:43 PM
To: Irv - Larry Schopfer
Subject: Fwd: Please do not approve/accept the Brightview DEIS
Attachments: Brightview-Shelter_ LLC.pdf; Untitled attachment 00102.htm

- mg -

Mark Gilliland
914.714.3056

Sent from my portable brain unit.

☠ Don't blame the typist, blame the auto-correct.

Begin forwarded message:

From: Kris Woll <kriswoll@aol.com>
Date: January 1, 2016 at 4:08:38 PM EST
To: bsmith@irvingtonny.gov, ckehoe@irvingtonny.gov, mgilliland@irvingtonny.gov,
cgilberti@irvingtonny.gov, jsilverberg@irvingtonny.gov
Subject: **Please do not approve/accept the Brightview DEIS**

Hi Brian, Connie, Mark, Christina and Janice,

When Brightview's team first approached our Board, they hadn't studied the topography yet and had left the possibility open of excavating behind the existing white house (and the plan included underground parking, etc.). So we as a Board said that we were "conceptually open to the idea of assisted living" and said that they could continue to develop their plan.

As a government body, we were required to 'view their petition' and as a New York State government body, we were required to proceed with the DEIS. Now that the process has been completed, and we have the relevant facts, I implore you to deny the zoning text amendment and deny the petition.

I hope the Board will not allow themselves to be persuaded to accept the petitioner's request to mitigate "any concerns." ***This project as proposed cannot be mitigated.*** Shelter Development Corp. LLC was given the opportunity to design an appropriately sized project in Irvington. We asked if they could excavate behind the white house (it's a very deep parcel), and they said they would research the possibilities. But they came back to the Board on March 2 with a completely new design, *in front* of the white house, AND even closer to Broadway. They brought the parking lot above ground, and proposed language in our zoning code to allow a "set back for height swap" provision. Not mitigatable.

Since they were given the opportunity back in February to design a deeply set back appropriately sized project, (but didn't take it) I don't believe that mitigation is possible. They should draft a new petition. I believe that allowing mitigation instead of rejecting the petition, based on the DEIS findings, could open the door to litigation. But if we deny it now, they can't sue a village for NOT amending its code. What are their damages? This could be the Rubicon.

I'm hoping that you ALL reject the Brightview Assisted Living petition based on the devastating impact this development would have on all Irvingtonians.

The 4 story 165,000 square foot facility will be 13 feet taller than the current white building, and 125 feet closer to Broadway.

According to the Draft Environmental Impact Statement, the impact is greater in every category:

Size

Site disturbance

Tree removal

Impervious surface (3 acres)

Building Height - 48 feet instead of 35 feet (our building code limit is 35 feet)

Trip generation (traffic, waste removal, deliveries)

Waste water (19,000 gpd instead of \approx 5,000) 4 times more onto Broadway, a New York State DOT maintained road (not very responsive to flooding)

Visual Impacts are horrific - a behemoth warehouse type of complex with a "colonial facade"

The ONLY positive impact (which the petitioners have strategically emphasized) is property tax revenue. However it is not very much at all.

If we compare the facility to 6 residential single family homes the difference in additional revenue is:

Village tax difference is \$110,000 more (The Village has a *very healthy* \$16 million budget, with a \$404,000 surplus last year)

School tax difference is \$260,000 more (IUFSD has a \$57 million dollar budget, with a tax increase last year that was \$385,000 under the tax cap. Also, IUFSD is setting up a \$1.5 million capital reserve fund - *very healthy*.)

Irvington's school nor village budgets need to destroy our quality of life by paving 3 acres and allowing a 4 story complex so as to generate an unneeded insignificant bit of tax dollars.

As far as aging-in-place: Irvington is a 2.5 square mile village. Yes, it may be difficult to "age" within the exact zip code of 10533, but there are a plethora of facilities close by. If we lived in a normal-sized village, these facilities would be considered "in-place." Brightview Greenburgh is 3 miles from Main Street IRV.

I hope Irvington doesn't let the developers hold the stone buildings and the promise of a couple more affordable housing units hostage for their giant FOR-PROFIT real estate deal. It's just not worth it (plus it is only they who say any other developer would destroy those buildings). Far too often we have heard *other villages'* Board members lament, "I didn't realize how big it was." Let's learn from their mistakes.

Please don't toy with this - just say NO.

Sincerely,

Kristen Woll

(914) 591-6894

c: (914) 356-0767

PROTECT HISTORIC BROADWAY

A developer has petitioned the Irvington Board of Trustees to amend the village's zoning code to allow the construction of a large assisted living center at 88-94 North Broadway.

The developer would demolish the stately white building with columns sitting at the top of the lawn, and replace it with a 150-unit, four-story apartment complex that would be six times as large.

One of Irvington's most endearing qualities is its small-town historic charm. The cornerstone of this heritage is Broadway, the former Old Post Road, which is still lined with stonewalls, nineteenth-century churches, grand Hudson River estates, and only a handful of traffic lights. This proposed building will disturb that feeling in a stark and unsettling way.

If you believe that protecting Broadway's heritage is central to protecting Irvington's small-town charm as well as our strong sense of community, please sign a petition in opposition to amending the village's zoning laws via Facebook: 'Protect Historic Broadway'.

A public hearing will be held to discuss the proposed development and hear public opinion:

January 4, 2016

7-9pm

Irvington Village Town Hall

85 Main Street

For questions/comments please email:

Irvington Board of Trustees
(<http://www.irvingtonny.gov>)

OR

Protecthistoricirv@gmail.com

PROTECT HISTORIC BROADWAY

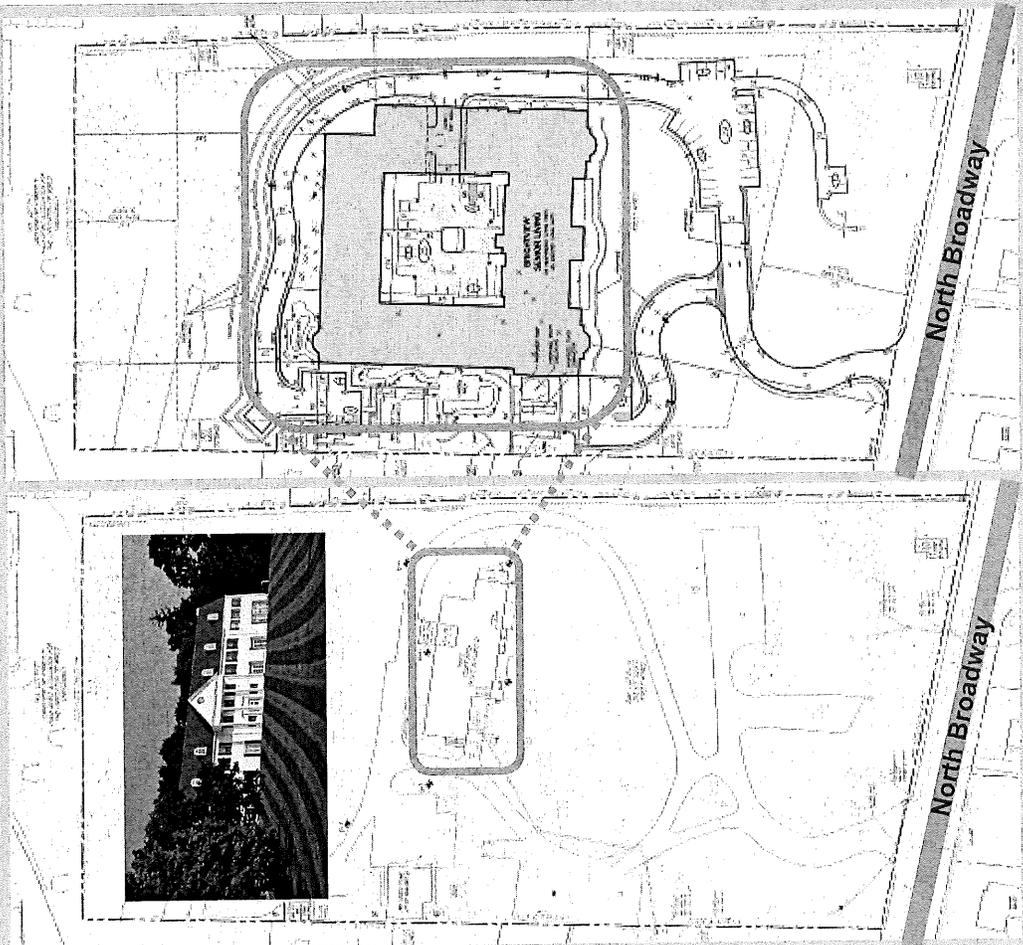
**88-94 NORTH BROADWAY
CURRENT**



KEY STATS:

- 3 paved acres with a 165,000 sq-ft. 4 story complex
- Increase existing traffic congestion on Broadway (proposal for 114 on-site parking spaces)
- Utilize over-stretched Irvington Volunteer Ambulance Corps (IVAC) as back-up emergency rescue
- 6x size of existing building
- 125 ft. closer to Broadway
- Directly contradicts current Comprehensive Plan

PROPOSED



Larry Schopfer

From: Constance Kehoe <litware@gmail.com>
Sent: Saturday, January 02, 2016 9:52 AM
To: Larry Schopfer
Subject: Fwd: Brightview assisted living facility

FYI

----- Forwarded message -----

From: **Scott Odabashian** <jsodabashian@gmail.com>
Date: Fri, Jan 1, 2016 at 10:26 PM
Subject: Brightview assisted living facility
To: bsmith@irvingtonny.gov, ckehoe@irvingtonny.gov, mgylliland@irvingtonny.gov,
cgiliberty@irvingtonny.gov, jsilverberg@irvingtonny.gov

I urge you to deny the zoning text amendment and do not approve the DEIS for the Brightview assisted living facility as it undermines the comprehensive plan and circumvents the Irvington resource protection laws. Plus, the facility will ruin the charm of our town while adding undue traffic congestion.

Thank you very much,

Scott Odabashian

Sent from my iPhone

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Connie Kehoe
litware@gmail.com
914 231 6969 (land line)

Larry Schopfer

From: Connie Kehoe <litware@gmail.com>
Sent: Saturday, January 02, 2016 11:15 AM
To: mgilliland@irvingtonny.gov; jsilverberg@irvingtonny.gov; Christina Giliberti; Brian Smith; Larry Schopfer; Marianne Stecich
Subject: Fwd: Development Along Broadway

Connie Kehoe
Sent from my iPhone

Begin forwarded message:

From: Maher Neil <maher@njit.edu>
Date: January 1, 2016 at 2:30:06 PM EST
To: Maher Neil <maher@njit.edu>, Maher Chris <cmaher1004@yahoo.com>, Jellcom@juno.com, echeckeresq@echeckeresq.com, Tania Moore-Barrett <tmoorebarrett@yahoo.com>, Debhargraves@verizon.net, bghunt23@optonline.net, becky.fiorito@cbmoves.com, "veronica.gedrich@verizon.net Gedrich" <veronica.gedrich@verizon.net>, bsciulli@optonline.net, Mary Toomy <maryltoomy@gmail.com>, barbec1@verizon.com, "barbec1@verizon.net Crowley" <barbec1@verizon.net>, rfarina@arlfergusonarchitect.com, Pat Ryan <jppjryan@aol.com>, upsiddown@gmail.com, JDNCD@aol.com, greytowers@yahoo.com, carol.fabbri@gmail.com, M_jessica_ewing@yahoo.com, MelanieOkun@gmail.com, thehil4@aol.com, Joseph Lombardi <lombardi55@aol.com>, "Angelova@optonline.net A. Angelova" <angelova@optonline.net>, Shaliwell29@gmail.com, noahlang@hotmail.com, Alison O'Connor <Alisonoconnornyc@hotmail.com>, "deborah.flock@gmail.com Flock and Charlie" <deborah.flock@gmail.com>, Reneeny@aol.com, Eweinrauch@hotmail.com, Connie Kehoe <litware@gmail.com>, Ciaravella The Great Stacy <sciaravella@hotmail.com>, Ruth Farina <rfarina@earlfergusonarchitect.com>, Maher Gina <Gina.Maher@IrvingtonSchools.Org>, suziefromer@gmail.com, Kimberly.d.raby@gmail.com
Subject: Development Along Broadway

Dear Friends of Historic Irvington,

A developer has petitioned the Irvington Board of Trustees to amend our village zoning code to allow the development of a 150 unit, 4-story assisted living complex along Broadway. The complex, called Brightview, would be six time larger than the current building on the property, which is the stately white building with pillars sitting at the top of the lawn at 88-94 North Broadway.

Local community members opposed to such development have started a petition, which will be sent to the Board of Trustees. To learn more about this important local issues, please visit:

<https://www.change.org/p/irvington-board-of-trustees-protect-irvington-s-historic-broadway>

Thanks.

ps. PLEASE forward this email to others who might be interested!

Neil M. Maher
Associate Professor
Federated History Department
NJIT—Rutgers University, Newark
University Heights
Newark, NJ 07102
(o) 973-596-6348
(c) 646-325-3704

Visit: neilmaher.com
Read: [Nature's New Deal](#)

Larry Schopfer

From: Constance Kehoe <litware@gmail.com>
Sent: Sunday, January 03, 2016 8:27 AM
To: Larry Schopfer
Subject: Fwd: No rezoning for Brightview!!

FYI

----- Forwarded message -----

From: **Monica Levy** <monica@leapsmart.org>
Date: Sat, Jan 2, 2016 at 4:31 PM
Subject: No rezoning for Brightview!!
To: bsmith@irvingtonny.gov, ckehoe@irvingtonny.gov, cgilberti@irvingtonny.gov,
jsilverberg@irvingtonny.gov, mgilliland@irvingtongov.ny

Dear Trustees,

I am writing to express my concern over the proposed Brightview project. Having lived in Irvington for over 10 years, what originally drew me to the town was the lack of commercial properties. Actually the realtor made sure to let me know that is what sets Irvington apart from the surrounding Rivertowns. The emphasis on community and a small town village atmosphere was and still is what makes Irvington so special. The unique character of Broadway with it's stone walls was a huge draw for me. This project is so massive and in such a prominent location that it's impact will negatively impact all the inhabitants of this town and destroy what makes Irvington so special.

I urge you to reject the proposal for rezoning and not allow this project to move forward. I am also concerned that it will open a can of worms for other commercial ventures. It will put a strain on traffic, the volunteer ambulance, the health and well being of the surrounding neighborhood due to blasting.

Sincerely,

Monica Levy

--

Monica Levy
Director: Leapsmart
tel: [877.669.5867](tel:877.669.5867)
fax: [855.884.2799](tel:855.884.2799)
www.leapsmart.org

--

Connie Kehoe
litware@gmail.com

Larry Schopfer

From: Connie Kehoe <litware@gmail.com>
Sent: Sunday, January 03, 2016 1:48 PM
To: Brian Smith; Larry Schopfer
Subject: Fwd: Brightview Assisted Living

Paula does not want the letter published or read. Thanks!

Connie Kehoe
Sent from my iPhone

Begin forwarded message:

From: Paula Romanow Etzel <paula.romanow.etzel@gmail.com>
Date: January 1, 2016 at 3:20:32 PM EST
To: Brian Smith <bsmith@irvingtonny.gov>, "ckehoe@irvingtonny.gov" <ckehoe@irvingtonny.gov>, mgilliland@irvingtonny.gov, cgiliberti@irvingtonny.gov, jsilverberg@irvingtonny.gov
Subject: Brightview Assisted Living

Dear Irvington Village Board,

I am in favor of the Brightview Assisted Living project, and (pending your judgment upon review of the details, which I trust fully) urge you to move forward with the petition.

Thanks,
Paula

Barry S. Graubart
11 Sycamore Lane
Irvington NY 10533
914 591 0090
barry@graubart.com

January 2, 2016

Irvington Board of Trustees
Irvington, NY 10533

To the Board of Trustees:

I am writing in regard to the Brightview Senior Living submission.

I find it disappointing that, 18 months after Continuum, we again find the Village considering a proposal to change our zoning laws, simply to meet the financial goals of an individual property owner.

The proposed plan is wholly inconsistent with the current zoning laws in Irvington, the current needs of the community, and with the 2003 Comprehensive Plan. The property in question is currently zoned for commercial use, including office space or multifamily housing.

As many in the Village have previously expressed, there is a strong need for additional multifamily housing, to meet the needs of empty nesters wishing to remain in the Village, as well as young families, looking to bring new growth to Irvington. This proposal does not accomplish this. And, of course, we have a strong need for affordable housing, to meet the terms of the Westchester settlement; and to meet our moral obligations to the community at large. And while the applicant has proposed the inclusion of a token handful of affordable units, these standalone buildings would be at odds with inclusionary zoning, a core tenet of successful affordable housing.

In their submission, the applicant mischaracterizes the intent of the 2003 Comprehensive Plan when they reference the discussion about "affordable or senior housing". Having spoken with several members of the community who participated in authoring the 2003 plan, they made clear to me that the focus was on "cost-effective housing" for empty nesters wishing to reduce their monthly mortgage/taxes, not on \$4-8k per month warehousing of seniors.

The proposed structure is massive – 150 units, with plans to exceed Village zoning ordinances for height, bulk and density. One need only drive past the Brightview Senior Living facility on Rte 119, which has only 90 units, to see what a monstrosity this proposed development would be.

Perhaps most concerning, there is still no way to mitigate the adverse impact on the Irvington Volunteer Ambulance Corps. Our understanding is that IVAC is at the breaking point, already engaging per diem paid staff. Why is the Board of Trustees even considering this massive expansion of an already overwhelming responsibility?

The proposed use of Empress is a red herring as there is no way to implement the plan practically. Again, as a licensed ALF, no medical care can be rendered. How could we expect non-medical staff or residents to have to determine the severity of an injury and figure who to call in the event of a medical emergency. With the constant turnover of residents and staff, it is unlikely this plan can be effective. How will this issue be managed in perpetuity? What happens if Brightview sells the facility?

And what happens to the Irvington residents who will be at the mercy of this preposterous arrangement? Why would any responsible entity or municipality add steps to access to emergency care? The health and safety of the residents is the last thing the Board of Trustees should take chances with!

We were initially pleased last year, when the property seller chose to seek guidance from the Board and the Community about a possible sale. At that time, Board members and residents alike expressed their preference that the seller seek a buyer who would build a multifamily dwelling on the site. Many of us were surprised when, months later, the seller instead chose this path. While we understand every seller's desire to maximize their financial return, the Village and its residents should not feel the obligation to change our zoning laws simply so that a single seller may get above market value for their property.

In closing, we strongly urge the Board of Trustees to reject the request to change our zoning laws. The purpose of zoning laws are to further community planning and promote the general welfare of the community at large. This proposal is wholly inconsistent with the common good of the Irvington community and would solely serve the financial goals of the applicant.

Sincerely,

Barry & Patricia Graubart
11 Sycamore Lane
Irvington, NY 10533

Larry Schopfer

From: Constance Kehoe <litware@gmail.com>
Sent: Sunday, January 03, 2016 7:16 PM
To: Larry Schopfer
Subject: Fwd: Brightview Assisted Living Project

----- Forwarded message -----

From: **Staci McLaughlin** <sirrobyn@msn.com>
Date: Sat, Jan 2, 2016 at 12:45 PM
Subject: Brightview Assisted Living Project
To: "bsmith@irvingtonny.gov" <bsmith@irvingtonny.gov>, "ckehoe@irvingtonny.gov" <ckehoe@irvingtonny.gov>, "mgilliland@irvingtonny.gov" <mgilliland@irvingtonny.gov>, "cgiliberti@irvingtonny.gov" <cgiliberti@irvingtonny.gov>, "jsilverberg@irvingtonny.gov" <jsilverberg@irvingtonny.gov>

Dear Members of the Board,

I encourage you to reject the current proposal for the Brightview Project on Broadway due to it's overlarge size, it's impact on the neighborhood, our quality of life and the environmental impacts of wastewater, tree removal, impervious surface and increased traffic, deliveries and garbage/recycling removal. The small increase in tax revenue (as compared to 6 homes on the property) is not worth ignoring our building codes and creating such a large project in our small town. It is not only inappropriate in scale and style, it sets very undesirable precedents for future projects. Please reject this proposal and its necessary variances.

Thank you,
Staci McLaughlin, Irvington Resident and Homeowner

--

Connie Kehoe
litware@gmail.com
914 231 6969 (land line)

Larry Schopfer

From: Constance Kehoe <litware@gmail.com>
Sent: Sunday, January 03, 2016 10:35 PM
To: Larry Schopfer
Subject: Fwd: please reject the Brightview Assisted Living petition based on the devastating impact this development would have on all Irvingtonians

----- Forwarded message -----

From: **Katerina Kireyeva** <katerina.kireyeva@gmail.com>
Date: Sun, Jan 3, 2016 at 10:14 PM
Subject: please reject the Brightview Assisted Living petition based on the devastating impact this development would have on all Irvingtonians
To: bsmith@irvingtonny.gov, ckehoe@irvingtonny.gov, mgilliland@irvingtonny.gov,
cgiliberti@irvingtonny.gov, jsilverberg@irvingtonny.gov
Cc: Humberto Medina <humbertomedina@yahoo.com>

Hello,

We recently moved into Irvington with my family. What attracted us the most is that the village is small, family-oriented (we have two little children), has lots of green space, historic and absolutely lovely the whole year round. We fell in love with the village so that we decided to buy a property on Cindy Lane where it intersects with Broadway.

Having said the above, we strongly reject any changes that might affect the character of the neighborhood, its safety, its family-oriented nature, its looks, etc. Specifically, the biggest concern is the village to become overly crowded and cause bad traffic on Broadway (Tarrytown is "good" example with its terrible traffic on Broadway and Main St). Given our house is located on intersection of Broadway and Cindy Ln where traffic lights and even pedestrian crosswalk are nonexistent (and are denied by the state authorities), any multi-residential dwellings in Irvington are of potential concern as they are to cause the traffic to become significantly worse making it impossible for us to safely cross Broadway with the stroller. FYI, we have 6 little children living at Cindy Lane and we cannot risk their lives and health should the traffic become worse and make safe crossing imposable. The is no other way for residents of Cindy Lane to leave our tiny cul-de-sac but to cross Broadway to reach pedestrian walkway which is located on the opposite side of Broadway.

Hence, we are strongly against Brightview Assisted Living development.

Sincerely,

Katerina and Humberto Medina
residents of 5 Cindy Ln
Irvington, NY

--

Jamie and Steven Wilson
28 Sycamore Lane Irvington NY 10533
Home: 914.693.6320
Cell: 646.644.0403

January 3rd 2016

To the Irvington Board of Trustees
Irvington, NY 10533

Dear Board of Trustees

This letter from my wife and I is to express our view on the Brightview Senior Living submission that you will be reviewing.

Before expressing our shared opinions, while we respect and understand that all submissions to the Board are entitled to a fair review, hearing and evaluation. However to put this proposal quickly into perspective, the Board and the Elected members who have to review this should quickly revisit the position the village in the majority took 18 months ago in regard to the Continuum proposed project. That project was rightfully rejected after a tremendous amount of time invested by Board members and a large group of local residents. The same reasons Continuum was flatly and rightly rejected in the end will save a lot of time if those concerns are quickly and clearly revisited early as the underlying reasons for that rejection will apply to this latest submissions.

Had the Continuum project been approved, it would have been started and then fallen apart – and that is what in fact we saw, as all the people who presented for months, quickly vanished from the company as that proposal rightly was rejected. The same question arises again - what happens if Brightview sells the facility or decides not to complete the project if they get approval to start it?

We all learned much through the process of evaluating the Continuum proposal, particularly with regard to the original 2003 Comprehensive plan for the Village of Irvington, which was adopted and should remain in affect. Right at the outset, there is again a request to change our zoning laws, simply to meet the financial goals of an individual property owner.

The latest proposed plan is again wholly inconsistent with the current zoning laws in Irvington, the current needs of the community. The property in question is currently zoned for commercial use, including office space or multifamily housing. Many in our community agree there is a strong need for additional multifamily housing and affordable housing, to meet a host of needs. However this proposal from the first appearance clearly does not accomplish that. A few affordable units that are being proposed would be at odds with inclusionary zoning, a core requirement for successful affordable housing. Who is their focus demographic – soon to be empty nesters like my family or seniors - who they really should be appealing to?

As with Continuum this project is massive in scope -150 units, with plans to exceed Village zoning ordinances for height, bulk and density. I have revisited the Brightview Senior Living facility on Route 119, which I understand has only 90 units, its an ugly monstrosity and dwarfed by a third to this latest proposal. From here I can fall into a repeating speech we all plead regarding size, scale and the subsequent impact on our Villages' small and very limited Irvington Volunteer Ambulance Corps. IVAC was at the breaking point, during the last round of discussions for Continuum and to our knowledge little has changed since then, so unless there is a

magic fix we don't already know about, there is no reason for the Board of Trustees even considering to revisit potentially breaking an infrastructure that is already so challenged. We have limited understanding of the extent of the potential medical ramifications that will occur in such a facility, but common sense indicates we do not have anything close to the infrastructure to support those needs here in Irvington.

The current property owner chose to seek guidance from the Board and the Community about a possible sale and opinions were expressed that the preference was that the seller seek a buyer who would build a multifamily dwelling on the site. What happened to change that direction and so radically? Our view - its all about monetary gain for the seller and it should not be at the expense of the people who already dwell an will live with the outcome of this already in our community.

This proposal will find virtually no support within the community – so why beleaguer months of messing around when there are so many obvious reasons to spare everyone a lot of wasted time, to satisfy a few who are looking just to profit here. We were part of a sizable group of residents that spent a lot of time researching the issues during the Continuum application process and many of us along with the Board became clear why a project of this size and scope does not make sense within the boundaries of Irvington.

We hope the Board of Trustees uses its wisdom and doesn't entertain this proposal for long and that you swiftly reject the request to change our zoning laws and continue to focus on the welfare of the community at large. This proposal serves no benefit to the existing Irvington community and your concerns should not be for the financial goals of the applicant.

Kind regards

Steven and Jamie Wilson

RON COHEN AND AMY MARTINI

246 Harriman Road
Irvington, NY 10533
Tel: (914) 693-6345

By Email

January 4, 2016

Irvington Board of Trustees
85 Main Street
Irvington, NY 10533

Dear Irvington Board of Trustees :

We are writing to express strong opposition to the Brightview Assisted Living Facility proposal currently under consideration by the Board.

We are aware that others have raised specific concerns to the Board, including the issues around the visual blight entailed by the massive bulk of the proposed facility, the strain on our Volunteer Ambulance Corps and other services, and the need for affordable multi-family residential units, which this proposal does not seriously address. We share all of these concerns.

We also are dismayed to find ourselves and our Irvington neighbors again spending valuable time and energy fighting a request for substantial changes to Irvington's zoning laws for the benefit of a particular seller, so soon after the prolonged process involving Continuum.

We respectfully request that the Board reject the Brightview proposal expeditiously, without resort to another arduous, 18 month process.

Sincerely,

The image shows two handwritten signatures in black ink. The signature on the left is for Ron Cohen, and the signature on the right is for Amy D. Martini. Both signatures are fluid and cursive.

Ron Cohen, M.D. and Amy D. Martini

4a

Larry Schopfer

From: Jill Bailin Rembar
Sent: Thursday, December 10, 2015 10:48 AM
To: Brian Smith; Christina Giliberti; Connie Kehoe; Mark Gilliland;
jsilverberg@irvingtonny.gov
Cc: Larry Schopfer
Subject: say no to changing the zoning

Dear Mayor and Trustees:

If any of you travel Broadway to drop kids off to school in the morning or if you're trying to catch a train at rush hour, you can see how bad the traffic is already -- in both directions on Broadway... And for longer time frames than the hours studied by Brightview. Add to the mix years of construction traffic, and it's a nightmare.

The traffic that would ensue for the years of construction (150-200 construction workers/day? that wasn't in the traffic graphic, was it?), and then for subsequent years of trucks and deliveries of food and laundry, and EMS usage, etc., will affect anyone in Irvington -- and beyond -- who uses Broadway.

Add to that -- among seniors who live in independent living -- and in this project that could be anywhere from 85 (number of "independent living" units) to 170 (if they're married couples) seniors, there are some number of them who should have stopped driving but refuse to give up their independence... Having any more people driving around Irvington who shouldn't be driving ... Another nightmare waiting to happen.

Having a Monstrosity on the Hill rather than a big white house on the hill is going to change the character of the street and of our village. The tax revenue to the village is just not worth it, not for the \$116,000 or whatever it is the village would get -- or even multiples of that number. This or any slightly-tweaked plan can't possibly make anyone happy, except Brightview.

Can you please just say no to changing the zoning?

Respectfully,

Jill Bailin Rembar



46

Lino J. Sciarretta
914.872.7790 (direct)
Lino.Sciarretta@wilsonelser.com

Via Email and Federal Express

January 12, 2015

Marianne Stecich, Esq.
Stecich Murphy & Lammers, LLP
828 S. Broadway – Suite 201
Tarrytown, New York 10591

Re: Application of Shelter Development, LLC for 88-90 North Broadway

Dear Marianne:

We represent 106 North Broadway, LLC (“106 NB”), the owner of 88-90 North Broadway (the “Property”). As you know, the Property is currently the subject of a petition for a zoning text amendment by Shelter Development, LLC (“Shelter”), the contract vendee. The Mayor and Trustees considered and discussed the zone petition and accompanying Environmental Assessment Form (“EAF”) at its January 5, 2015 meeting. Upon review of the video broadcast of that meeting, there were certain mistaken remarks made concerning the current traffic levels and operation of the Property. We request that those comments be corrected at the next Board of Trustees’ meeting.

By way of background, the Property currently operates under a use variance granted in 1979 for “multi-tenant general business/office use and any use incidental thereto.” Over the course of 30-plus years, the Property, and the adjoining parcel known as 106 North Broadway, has had numerous tenants, collectively utilizing in excess of 130 parking spaces.

In reviewing the broadcast, beginning at time stamp 1:05:2, you stated that the owner of the Property “...hasn’t rented it out for 10 years.” When discussing the EAF pertaining to traffic levels, you stated that “...the property has not been used as an office building for many, many years...present level is nothing is going on” (beginning at time stamp at 1:09:12). These statements are not accurate. Up until April 30, 2014, there were approximately 110 employees utilizing the Property, not including tenants from the other buildings in the complex. Since April 2014, 106 NB has not entertained any long term tenancies for the Property as a result of its current situation with Shelter. However, 106 NB remains a landlord to seven current tenants at 88, 90, 94, and 106 North Broadway.

1133 Westchester Avenue • White Plains, NY 10604 • p 914.323.7000 • f 914.323.7001

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Milwaukee • New Jersey • New York • Orlando • Philadelphia • San Diego • San Francisco • Virginia • Washington, DC • West Palm Beach • White Plains

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wilsonelser.com

Accordingly, we respectfully request and would appreciate you clarifying those statements at the next meeting as they do not accurately represent how the Property has been utilized. My clients are concerned that such comments, when made at a public meeting, could potentially generate misinformation in the community about the current application, as well as compromise the marketability, development and value of the Property going forward. To the extent you should have any questions about the Property, 106 NB would be glad to answer them. Thank you for your attention to this.

Very truly yours,



Wilson Elser Moskowitz Edelman & Dicker LLP

Lino J. Sciarretta

cc: Gerald Carrafiello (*via email*)
David Steinmetz, Esq. (*via email*)

Larry Schopfer

From: Marianne Stecich <masjeb@aol.com>
Sent: Friday, March 27, 2015 3:05 PM
To: lschopfer@irvingtonny.gov; mg@markg.org; bjeselnik@irvingtonny.gov;
cgiliberti@irvingtonny.gov; kriswoll@aol.com; ckehoe@irvingtonny.gov;
bsmith@irvingtonny.gov
Subject: Fwd: IMPT: Proposed development North Broadway, Irvington

Marianne Stecich
Stecich Murphy & Lammers, LLP
828 South Broadway, Suite 201
Tarrytown, New York 10591
914-674-4100 Ext. 302
914-674-2987 Fax

-----Original Message-----

From: HilaryLevy <thehil4@aol.com>
To: Pat Natarelli <patricknatarelli@hotmail.com>; Ed Marron <emarron@irvingtonny.gov>; Marianne Stecich <masjeb@aol.com>; Chet Morton <chetmorton24@gmail.com>; George Boyle <george@gbarch.com>; Sheila Attai <sheilaattai@hotmail.com>; Cesare510 <Cesare510@aol.com>
Sent: Fri, Mar 27, 2015 2:52 pm
Subject: Fwd: IMPT: Proposed development North Broadway, Irvington

And so it begins....

Hilary
914.479.7110

Begin forwarded message:

From: Carlen Leeser <ccleeser@aol.com>
Date: March 27, 2015 at 2:17:01 PM EDT
To: WENDY HANDLER <handler.wendy@gmail.com>, Diane Mundree <dianemundree@gmail.com>, Karyn Matza Silverhardt <kar1116@aol.com>, Rochelle Langer <rslanger121@aol.com>, Cheryl Silverstein <cherylhutt@gmail.com>, Saul Silverstein <saulsilverstein@gmail.com>, RORY TISHELMAN <rtishelman@houlihanlawrence.com>, TISHELMAN <pondhouse@att.net>, HOWIE HANDLER <howard.handler@mllsoccer.com>, Mary Beth Dooley <mbdewlee@optonline.net>, Marion Montgomery <abbysamreb@aol.com>, Robin Abbott <joabb5@aol.com>, Carol Goldstein Barlia <barliac@optonline.net>, Catherine Woods <cathyimdj@aol.com>, Hillary Chenel <thehil4@aol.com>, Pam Eskind <pameskind1@gmail.com>, Rene Gargano <reeneeny@aol.com>, Sheri Silver <sheri1217@aol.com>, Casper Linda & Ted <theoghost@aol.com>, TONY SARANITI <ASaraniti@aol.com>, PATTY WENIG <paw10@aol.com>, VIVIANE LIPTON <vlipton@aol.com>
Subject: Fwd: IMPT: Proposed development North Broadway, Irvington

Passing this important email on to be sure ya'll are all aware of what might be happening on Broadway unless it is stopped.

If you want to be kept up to date about future meetings please email Ellen Weissman and she will add you to the list.

This is going to really impact Broadway and the town of Irvington.

Please forward it to other Irvington residents.

Thanks
Carlen.

Sent from my iPhone

Begin forwarded message:

From: Ellen Weissman <ellenweissman@optonline.net>
Date: March 25, 2015 at 6:40:09 PM EDT
To: Jean McLoughlin <jeanmcloughlin63@gmail.com>, Sarah Chabon <schabon@optonline.net>, Csilla Kroop <csillafk@yahoo.com>, "wodabashian@gtm.com" <wodabashian@gtm.com>, Carlen Leaser <CCLeaser@aol.com>, Beth Propper <bethpropper@gmail.com>, "Audrey S. Feinberg" <audrey007@optonline.net>, kimberly.d.raby@gmail.com, maggie kadro <maggiekadro@hotmail.com>, Maggie Kadro <maggiekadro@gmail.com>, "J.A. Tavares" <jota@aol.com>, jill jackowitz <jilljackowitz@earthlink.net>, John Montgomery <john.montgomery@nera.com>
Subject: **IMPT: Proposed development North Broadway, Irvington**

Hi all -

IMPORTANT MEETING MARCH 31 7pm - Please read below:

A very large Senior Living facility has been proposed for the property at 88-94 North Broadway, where a large white office building now sits set far back from the road. Instead, a 150 Unit facility - four stories, 150,000 square feet, plus an underground garage will be built closer to Broadway. An affordable housing component will also be included.

ALL Irvingtonians need to be aware of this and participate in the process if possible. Potential issues include

- Impact on character of the village especially when approached from the north
- Density
- Traffic on North Broadway especially at shift changes (early morning, late afternoon)
- Demand for EMS services and other infrastructure
- Parking overflow for visitors, etc on high volume days (holidays?)
- Drainage
- Precedent for zoning changes if other similar properties are sold (Abbott House?)

Please consider attending an important meeting Tuesday MARCH 31 from 7-9pm

I will try to maintain an email list to keep people informed of meetings so please let me know if you know anyone who wants to be added.

SPECIAL MEETING - Brightview "Scoping Session"

Tuesday, March 31

The Board of Trustees will hold a public "Scoping Session" on March 31, 2015 at 7PM in Village Hall located at 85 Main Street, Irvington, NY to allow all involved and interested agencies, as well as the public, to comment on the scope of the environmental review to be undertaken. A draft scope has been prepared and posted on the Village website (see the Agenda link). Issues identified during the scoping process will be studied in the preparation of the Draft Environmental Impact Statement.

Karen Buccheri

From: Larry Schopfer <lschopfer@irvingtonny.gov>
Sent: Wednesday, February 25, 2015 1:10 PM
To: barry@graubart.com
Cc: Karen Buccheri; Brian Smith; Christina Giliberti; Connie Kehoe; Kris Woll; Mark Gilliland
Subject: Correspondence concerning Brightview

Barry,

Thank you for your comments to the Board of Trustees concerning the Brightview application. They will be considered during the upcoming review process.

Larry Schopfer
Village Administrator

Village of Irvington
85 Main St.
Irvington, NY 10533
Tel: 914-591-4358
Fax: 914-591-4072

Barry Graubart
11 Sycamore Lane
Irvington NY 10533
barry@graubart.com

February 4, 2015

Board of Trustees
Village of Irvington, New York

To the Board:

I'm writing in regard to the proposed plan for the Brightview assisted-living/independent living facility at 88-94 North Broadway.

I was pleased that the owner came to the Board in 2014 to explore potential uses for the property. Many of us left that meeting feeling that a clear message had been sent by the Board – that the most appropriate use for the property would be for multi-family housing. So, I was a bit surprised to learn that the seller chose a different use, one for which the property is not zoned and where there remain compelling doubts about whether the Village could support that use.

The most significant issue for such use is whether the Irvington Volunteer Ambulance Corps (“IVAC”) can handle the dramatically increased load which an assisted living facility will place on it. Those of us who have found ourselves needing emergency care have always been able to rely on the exceptional service provided by IVAC and its volunteers. Yet, in its most recent reports, IVAC acknowledged that it was already stretched beyond its capacity. Even with no increased demand for its services, IVAC is in a precarious position.

As we're all well aware, a previous applicant spent more than two years and several million dollars trying, unsuccessfully, to demonstrate that it was possible to mitigate that impact. Despite all their efforts, they were unable to identify a workable solution. And that's because there simply is no way to mitigate the impact on IVAC (and the community) without changing its structure to a for-profit ambulance company.

Before the Board considers any applicant for this use, I would urge it to hire an independent expert to carefully assess IVAC's current position and to project the impact of a generic assisted and/or assisted/independent living facility. One need only look to our neighbors to the south, Ardsley, where an estimated 50% of EMT calls originate at the Atria facility, itself comprised of a mix of assisted and independent living units.

What would be the impact of a 50-100% increase in the number of calls for our volunteers? IVAC has served the Irvington community for 49 years. Will this Board ensure that it's still here to see its 50th? We've already learned that there's simply no way to mitigate the increased demand a facility like this will place on IVAC.

At the same time, I'm disappointed that the seller has not chosen to seek a buyer for multifamily housing, which is in high demand and short supply throughout lower Westchester. With the Board's stated commitment to increase the amount of affordable housing, in order to meet Irvington's commitment under the federal housing settlement, this should be a primary consideration. Before

we invest many more months or years entertaining a proposal that would adversely impact the quality of life for residents, we should encourage further exploration of a clear need that is consistent with the needs of the Village and our Comprehensive Plan.

Sincerely,

Barry S. Graubart

11 Sycamore Lane
Irvington NY 10533

Larry Schopfer

From: Larry Schopfer <lschopfer@irvingtonny.gov>
Sent: Friday, February 13, 2015 12:50 PM
To: 'Lee, Christopher T (DOT)'
Cc: Marianne Stecich (masjeb@aol.com)
Subject: RE: Brightview Senior Living proposal

Mr. Lee,

Brightview's representative is David Cooper from Zarin & Steinmetz. His email address is: Dcooper@zarin-steinmetz.com

Larry Schopfer

From: Lee, Christopher T (DOT) [<mailto:Christopher.Lee@dot.ny.gov>]
Sent: Friday, February 13, 2015 12:40 PM
To: lschopfer@irvingtonny.gov
Subject: Brightview Senior Living proposal

Mr. Schopfer,

I want to inform you regarding a change in the NSYDOT highway work permit process. The Brightview project is a potential candidate for the new process. Do you have an email address for the developer (or representative) I can pass this on to?

As a part of Governor Cuomo's Lean NY initiative, the New York State Department of Transportation is undertaking a number of Lean process review projects, including a review of the Highway Work Permit process for commercial driveway permits. As a result of this review, and after a series of customer interviews with developers, consulting engineers, and other frequent commercial permit applicants, a structured process has been developed that is expected to provide a more consistent experience for permit applicants across all eleven regions. This new process will provide clearer guidance on what information is required at each stage of the process, coupled with technical guidance and direction on what elements need to be included in plan submissions.

The department is currently running a beta test of the new process in select regions, including Region 3 (Syracuse), Region 8 (Poughkeepsie), and Region 10 (Hauppauge).

As an applicant in one of these three regions, we are asking that you submit your plans using the new PERM 33-COM form, which combines a three-stage application with an interactive checklist. The PERM 33-COM will replace use of the standard PERM 33 application for commercial work permit applications. The PERM 33-COM provides assistance in determining what studies, if any, may be required, provides direction to standard details, and clearly outlines what is to be shown on your plan submission. It is expected that with the use of this document, packages will be more complete, and review time will ultimately be reduced:

You can access the PERM 33-COM at www.dot.ny.gov/permits-beta

The process is comprised of three stages; an Initial Proposal Review, a Design Review, and a Final Submission. The PERM 33-COM will indicate the information required and provide guidance at each stage of submission. Any new project should be initiated by completing Stage 1 of the PERM 33-COM (pages 3-6) and submission of your preliminary plans. A meeting is recommended in the first stage, and will be scheduled after receipt of your initial submission.

Please note, that as this is a beta test, some elements of the process may be modified prior to full statewide rollout of the process. In the meantime, please feel free to provide feedback on the process and the new form. You may email comments and feedback to me at Christopher.lee@dot.ny.gov, and ask that you include HWP Program Manager Anthony Ilacqua at Anthony.ilacqua@dot.ny.gov as well. We greatly appreciate your participation in the test of this new process, as we work to upgrade the experience and improve our service to you.

Chris Lee

Assistant Resident Engineer/Permit Engineer

New York State Department of Transportation, Westchester County South Residency

1 Dana Road, Valhalla, NY 10595

(914) 592-6557 | christopher.lee@dot.ny.gov

www.dot.ny.gov

Larry Schopfer

From: Kathy K <kakaufman@gmail.com>
Sent: Friday, January 15, 2016 7:35 PM
To: bsmith@irvingtonny.gov; cgiliberti@irvingtonny.gov; mgilliland@irvingtonny.gov; Connie Kehoe; jsilverberg@irvingtonny.gov
Cc: Larry Schopfer
Subject: Brightview Senior Living Proposal: Comments
Attachments: md-09-sp808b4j_trip-generation-studies-for-special-generators-report.pdf; Trip generation of senior housing_Corcoran.pdf; DEIS comments_Brightview proposal_Kathy Kaufman_1-15-2016.pdf

Dear Mayor and Board of Trustees,

I am writing to register my concern that the proposed Brightview Senior Living development is too large for the Village of Irvington. Specifically, I am very concerned that the development would generate much more traffic than the Village streets -- already overwhelmed during school and work rush-hours -- can accommodate.

Please find a detailed explanation of my concerns in the document attached to this letter (titled "DEIS comments_Brightview proposal_Kathy Kaufman_1-15-2016.pdf"), as well as 2 additional articles that I've referred to in that document.

Thank you in advance for your consideration.

Sincerely,

Kathy Kaufman

Kathy A. Kaufman
28 N. Eckar Street, Irvington, NY 10533
914.591.4036 (h)
914.413.7644 (m)
kakaufman@gmail.com

Kathy Kaufman's comments: DEIS BRIGHTVIEW SENIOR LIVING IRVINGTON

January 15, 2016

Section	Issue
I-4	<p>Exerpt The Applicant believes that proposed action is compliant with the Comprehensive Plan, and therefore amending the Comprehensive Plan is not necessary to support this action. In addition, a municipality's comprehensive plan is not confined to the four corners of single document drafted over a decade ago, but rather, is reflected in all available and relevant evidence of the municipality's land use policies. This includes updating existing policies during the planning and environmental review process where a municipality evaluates the benefits and potential impacts of enacting new zoning legislation.</p>
	<p>Comment I find the breadth of the above-highlighted statement concerning. If the Village grants the Zoning Text Amendment, does it then implicitly also accept the above interpretation stating that its Comprehensive Plan is constituted by "all available and relevant evidence of the municipality's land use policies"?</p>
I-7	<p>Exerpt The Zoning Text Amendment would clarify that the measuring point of any facility subject to the Special Permit is the finished grade of the first floor. This language permits the Applicant to take advantage of the topography of the Site by locating parking underneath the first floor of the building without impacting the permitted height of the Brightview Facility. In addition, the Zoning Text Amendment clarifies that certain roof elements required to accommodate the special infrastructure and safety needs of the facility residents are not counted in the measurement of the "highest point" of a building. These measures are necessary so that those elements necessary for the safe operation of a senior independent/assisted living facility may be added to the permitted height of the building.</p>
	<p>Comment The above-highlighted statement is concerning in that it would appear to leave the potential height of the built facility unlimited. At a minimum it would seem to create ambiguity in an area where the current Village code is quite specific.</p>
I-7	<p>Exerpt Similar to the Village's creation of the below-market-rate housing Special Permit in 1993, the limited scope of the Zoning Text Amendment is an appropriate mechanism to "provide a choice of housing opportunities" in the Village.</p>
	<p>Comment The above-statement regarding the provision of housing choice to Village residents appears to exaggerate the proportion of <i>current</i> Village residents who would be able to afford housing at Brightview. According to the 2014 American Community Survey (ACS) conducted by the US Census Department, the total median household income of Irvington residents over the age of 65 was \$68,313, (including income from wages, social security, pensions, and income from assets). This median is a measure of central tendency that belies considerable variation across households. In actuality, 45 percent of Irvington households with householders over age 65 have total annual incomes of less than \$59,000 annually. The Brightview Tarrytown</p>

Section**Issue**

facility charges \$9,000/month for 2 seniors sharing 1 bedroom (\$7,500 for one person, plus an additional person fee of \$1,500). Assuming that the proposed Irvington facility charged similar rents, using the conventionally applied standard of affordability – which pegs housing as “affordable” if it consumes under one-third of household income -- relatively few Irvington seniors would be able to “afford” Brightview’s assisted living units, even if we reduce their estimated cost by the average monthly cost of food for persons over age 65. Unfortunately, we cannot consider the cost of Brightview’s independent living (IL) units as we don’t currently know their monthly rent.

I-26

Exerpt

It is the opinion of the Applicant that a recreation fee would not be required in this case because of the availability of on-Site activities and recreational programs, therefore placing less of a burden on Village activities and programs, while also providing Village seniors (non-residents) the opportunity to participate in Brightview's activities and programs.

Comment

How is this secured into the future?

I-37

Comment

Referring to: Trip Generation (TABLE IV.G-2: PROPOSED DEVELOPMENT VOLUMES)

I cannot speak to the specific multipliers used in DEIS Table IV because they are not stated explicitly. However, several authors comparing the number of predicted versus actual trips generated by age-restricted housing have found that the ITE’s trip generation multipliers – i.e. those referenced in the DEIS – significantly underestimate the number of trip ends.

Specifically:

- Maryland DOT’s “State Highway Administration Research Report: Trip Generation Studies for Special Generators” (Jeihani and Camilo, 2009) found that “that ITE manual underestimates trips generated by age-restricted housing. The ITE trip rates are 1/3 of what we calculated.”
- A meta-analysis of observed trips at 8 suburban senior housing sites (“Senior Housing Trip Generation and Parking Demand Characteristics” by Stephen B. Corcoran, 1996) finds an average of 5.64 trips per unit per day after excluding one above-average size (3,300 bed) facility.
- Flynn and Boenau’s “Trip Generation Characteristics of Age-Restricted Housing” (ITE Journal, Feb. 2007) observed 3.71 trips per unit per day.

SENIOR HOUSING TRIP GENERATION AND PARKING DEMAND CHARACTERISTICS

by

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INTRODUCTION

As the baby boomer generation ages, special housing projects have been developed for them in lieu of the traditional single-family home or apartment. Congregate care facilities, independent living apartments, assisted-care units, and senior apartments are being marketed, developed, and built to handle the needs of older adults.

The changing lifestyle of older adults affects their transportation needs and usage as well. Trip generation and parking demand within this age group vary significantly from traditional residential uses because residents no longer have to be at work, pick up their children, or do their shopping at specific times. Also many senior communities provide on-site services to meet their residents' needs. This paper will present the author's experiences with senior housing and its trip and parking characteristics along with data on projects in suburban Chicago, Illinois and around the United States.

SENIOR HOUSING TYPES

Older adults have many special needs that change over time. Many seniors are clearly independent and need little assistance other than help with major chores or repairs. They are generally active and healthy. As time goes by, however, their needs change and grab bars become important, as well as, other features such as higher electrical outlets, emergency response systems, and lower reach cabinets. Good nutrition, socialization, and access to medical and supportive care also becomes more important. Several distinct types of housing have been developed to accommodate these needs:

Senior Single Family Homes are senior-only subdivisions which have been developed for retirees ages 55 and up in the southeast and southwest sections of the United States. These developments typically include recreational facilities. Many of the residents are retired.

Senior Apartments are traditional apartment complexes with a minimum age requirement of 55 years old. Some amenities include recreational facilities, security, and special design features. Residents are independent and may still be working.

Independent Living Units are cottages or apartments where older adults live independently but without the worries of maintenance or housekeeping. Medical care can be available at the facility or by visiting medical staff. A variety of amenities are provided for the residents depending on the size of the community.

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Assisted-Care Units are for older adults having difficulty managing in an independent living arrangement but who do not need nursing home care. Assisted-care is usually apartment living with additional staff to help with normal daily activities.

Congregate Care Facilities contain a full spectrum of housing types in one development with town homes or cottages, independent living units, assisted-care units, and nursing care. Congregate Care Facilities (CCF) allow the elderly to age in one place with nursing care available if they need it. This is particularly important for elderly couples wishing to stay together with one spouse needing special care. CCFs are in essence self-contained communities. **Table 1** lists the amenities that are typically available at a CCF.

Table 1

Typical Congregate Care Facility On-Site Services and Facilities

Standard Services	Extra Services	Common Facilities
<ul style="list-style-type: none"> • Main Meal of the Day • 24-Hour Nursing • Daily Check-In • Weekly Laundry • Utilities • Housecleaning • Organized Programs • In Room Food Service • Bus Shuttle • 24-Hour Security • Complete Maintenance • Free Parking • Garbage Collection • Notary Public Service • Supportive Care Nurse • Chaplain 	<ul style="list-style-type: none"> • Breakfast and Lunch • Extended Room Service • Specialized Diets • Guest Meals • Catering • Physician • Podiatrist • Physical/Speech Therapy • Insurance • Chauffeur Service • Garages • Telephone • Cable TV • Photocopying 	<ul style="list-style-type: none"> • Lounge Area • Dining Room • Library • Chapel • Recreation Room • Country Store • Pharmacy • Arts and Crafts Room • Workshop • Cafe • Exercise Room • Beauty/Barber Shop • Bank Branch Office • Solarium • Whirlpool • Outside Patio • Garden Plots

Source: Milwaukee, Wisconsin CCF Brochure

LITERATURE REVIEW

A review was made of available data on senior trip generation and parking demands. Information was obtained from the Institute of Transportation Engineers Trip and Parking Generation Manuals, the author's files, data from other consultants, as well as, information from California, Arizona, and Florida Departments of Transportation. After reviewing the data, it became clear that the amount of data is small and that the definition of senior housing was not consistent among each source. The data did not distinguish between the five categories mentioned previously.

FACTORS AFFECTING TRIP GENERATION AND PARKING

Several factors affect the trip generation and parking demand at any particular facility. These include the number of dwelling units, nursing beds, average age of residents, resident's affluence, number of employees, and available bus shuttle/chauffeur service. More data needs to be collected in order to properly analyze their relationship to trip generation and parking demand. The trip generation rates for individual facilities varied. Insufficient information on all the survey locations made it difficult to statistically draw conclusions on individual impact of those factors.

However, experience has indicated that as the average age of residents increases, the number of trips and parking demand decreases. This is an obvious affect of the aging process. Nursing beds require more staff to service a patient needs than a more independent resident. When the proportion of nursing beds to residential units increases, the amount of traffic and parking generally increase. The economic well being of residents increases the likelihood that they own a car and thus drive and park. Lastly, bus shuttle/chauffeur service will provide an option to the auto for residents keeping traffic and parking rates lower.

DAILY TRAFFIC GENERATION

Information on daily trip ends was obtained from surveys by the California Department of Transportation (Caltrans) and the Florida and Arizona Departments of Transportation. This data generally categorized the facilities as retirement communities but included CCFs, senior apartment complexes, and may have nursing beds. The author's data consisted of one CCF in Pennsylvania. **Table 2** summarizes the trip data and rates. The average trip rate daily varied between 2.78 and 8.91 trips per unit. The variation in rates supports the conclusion that the number of units/beds is not the only variable influencing trip production. The weighted average trip ends were 4.52 trips per unit which included one large development of 3,122 units. Without the 3,122 unit project, the weighted average rate was 5.64 trips per units.

The weighted daily trip generation rate, was 5.64 trip ends a day for senior housing developments. Senior housing generates two-thirds the amount of traffic compared to a typical single-family development. It's closer to other multi-family categories, including apartments (6.47 trips/unit) and condominiums or townhouses (5.86 trips/units). **Table 3** shows the weekly variation in volumes based on one facility. The weekday volumes were consistent. Weekend traffic volumes were slightly lower.

Table 4 illustrates the hourly distribution of traffic throughout an average weekday, Saturday, and Sunday. The peak-hour volumes of the facility occurred at lunch time and mid-afternoon (2:00 to 4:00 PM). Caltrans data indicated that the peak-hour occurred between 11:00 AM and 4:00 PM, depending on the facility. These peak-hour times do not coincide with the peak-hour of adjacent street traffic because the residents do not have or want to travel during the rush hour. Also, the employee shifts are generally off peak. Most facilities are staffed 24 hours a day with a 7:00 AM-3:00 PM, 3:00 PM -11:00 PM, 11:00 PM-7:00 AM shift schedule. Some administrative staff follow a typical 9:00 AM to 5:00 PM shift.

PEAK-HOUR TRIP GENERATION RATES

Table 5 shows the trip generation rates for eight facilities during the morning and evening peak-hour of the adjacent street system. The weighted average trip rate was 0.222 trips per unit/bed in the morning peak and 0.247 trips per unit/bed in the evening peak. Trip rates ranged from 0.085 to 0.450 per unit. The directional splits were 65% inbound and 35% outbound in the morning and 40% inbound and 60% outbound in the evening. Compared to other residential land-uses, senior developments generate significantly less traffic on a per unit basis.

Table 2

Daily Trip Generation Rates for Senior Housing

Source	Number of Dwelling Units	Daily Trips	Trip Rates
Caltrans	3122	9630	3.09
	300	830	2.78
	108	310	2.87
	76	260	3.42
	460	2252	4.90
	Florida DOT	366	3262
560		1985	3.55
187		1449	7.75
120		901	7.51
127		561	4.42
Arizona DOT		125	972
	176	855	4.86
	74	447	6.04
	60	285	4.75
	216	1386	6.42
	175	1058	6.05
	129	941	7.30
	112	922	8.23
	106	820	7.74
	89	538	6.05
	81	529	6.53
	60	494	8.23
	59	432	7.30
Penn. CCF	247	1163	4.71
Weighted Average	7135	32282	4.52
Without 3,122 units	4013	22652	5.64
ITE Average Weekday Daily Rates			
Single-Family (Code 210)			9.55
Apartment (Code 220)			6.47
Condo/townhouse (Code 230)			5.86
Congregate Care Facility (Code 251)			2.15

Table 3

Weekly Volume Distribution

Day of the Week	Percentage
Monday	15%
Tuesday	15%
Wednesday	16%
Thursday	17%
Friday	15%
Saturday	12%
Sunday	10%
Total	100%

Table 4

Hourly Traffic Distribution

Start Hour	Average Weekday	Saturday	Sunday
12:00 AM	1.46%	1.45%	2.76%
1:00 AM	0.07%	0.12%	0.26%
2:00 AM	0%	0.00%	0.26%
3:00 AM	0.12%	0.00%	0.00%
4:00 AM	0.46%	0.00%	0.66%
5:00 AM	0.41%	0.60%	0.39%
6:00 AM	1.94%	2.05%	1.71%
7:00 AM	5.74%	5.06%	3.94%
8:00 AM	6.70%	5.06%	4.99%
9:00 AM	6.19%	5.78%	6.17%
10:00 AM	7.20%	9.40%	7.74%
11:00 AM	9.33%	9.04%	8.53%
12:00 PM	7.05%	8.07%	8.01%
1:00 PM	7.44%	6.27%	4.86%
2:00 PM	9.76%	7.59%	8.40%
3:00 PM	9.54%	10.24%	9.84%
4:00 PM	8.39%	9.40%	9.32%
5:00 PM	5.26%	6.14%	6.96%
6:00 PM	3.14%	3.25%	3.54%
7:00 PM	2.90%	2.89%	4.20%
8:00 PM	2.59%	2.05%	2.49%
9:00 PM	1.10%	1.57%	1.31%
10:00 PM	1.24%	1.33%	1.05%
11:00 PM	1.96%	2.65%	2.62%

Table 5

Peak-Hour Trip Generation Rates

Facility	Location	Occupied Units			AM Peak Volume	Rate	PM Peak Volume
		Dwelling Units	Nursing Beds	Total			
Covenant Village	Northbrook, IL	220	151	371	86	.231	133
Friendship Village	Lombard, IL	620	100	720	86	.120	180
Presbyterian Home	Evanston, IL	312	166	478	92	.193	139
Glenview Terrace	Glenview, IL	243		243			21
Good Shephard Manor	Barrington, IL	102		102	18	.180	17
Mayslake	Oakbrook, IL	630		630	67	.106	75
Leisure Village	New Jersey	200		200	65	.325	62
Pennsylvania CCF		210	37	247	78	.316	111
Totals		2537	454	2991	492		738
Weighted Average Trip Rate						.164	.247
					Inbound Percentage	65%	40%
					Outbound Percentage	35%	60%
Comparison to other ITE Residential Rates							
Single Family Homes (Land Use Code 26)						0.74	1.01
Apartments (Land Use Code 220)						0.51	0.63
Condominiums/Townhouses (Land Use Code 230)						0.44	0.55

PARKING DEMAND SURVEYS

Parking demand characteristics were obtained from a number of surveys conducted in the Chicago metropolitan area. The peak parking demand occurred during the mid-day between 11:00 AM to 3:00 PM corresponding, in part, with the largest employee shift on-site. **Table 6** summarizes those surveys. The peak day of the year is Mother's Day when many facilities run out of visitor parking, according to the on-site staff.

The peak parking demand rates varied between 0.214 and 0.579 vehicles per unit/bed with a weighted average rate of 0.404 vehicles per unit/bed. Employee, resident, and visitor parking is included. This rate is one third to one half the parking rate of other residential uses. Readers should note that the survey sites with the higher parking rates generally have more nursing beds which requires more employees than the residential units.

Table 6

Peak Parking Demand Surveys

<u>Development</u>	<u>Location</u>	<u>Dwelling Units</u>	<u>Nursing Beds</u>	<u>Total Units/Beds</u>	<u>Peak Parking Rate</u>	<u>Peak Parking Demand</u>
Covenant Village	Northbrook, IL	220	151	371	0.490	182
Beacon Hill	Lombard, IL	235	23	258	0.565	146
Friendship Village	Schaumburg, IL	620	100	720	0.390	281
Presbyterian Home	Evanston, IL	312	166	478	0.579	277
Glenview Terrace	Glenview, IL	243		243	0.214	52
Mayslake	Oakbrook, IL	630		630	0.408	257
<u>EJM Engineering Studies</u>						
Lilac Lodge	Waukegan, IL	203		203	0.315	64
Deerfield Place	Deerfield, IL	98		98	0.230	23
<u>ITE Parking Manual, 2nd Ed</u>						
Retirement Community (Land Use Code 250)		500		500	0.270	135
		3061	440	3501		1417
Weighted Average					0.404	
<u>ITE Parking Manual, 2nd Edition</u>						
Low/Mid-Rise Apartments (Land Use Code 221)					1.21	
High-Rise Apartments (Land Use Code 222)					0.88	
Residential Condominium (Land Use Code 230)					1.11	

Conclusions

Based on the analyses and studies for this paper, the following findings were made:

1. The overall category of senior housing should be broken down into at least five categories for trip generation and parking demand purposes. These categories could be:
 - Senior Single-Family Housing
 - Senior Apartments
 - Independent Living Units
 - Assisted-Care Units
 - Congregate Care Facility
2. Several factors affect the trip generation and parking demand at any particular facility. Any new survey should include the number of dwelling units, nursing beds, average age of residents, resident's affluence, number of employees, and available bus shuttle/chauffeur service. More data needs to be collected in order to properly analyze their relationship to trip generation and parking demand.
3. Daily trip generation rates were found to be 4.52 to 5.64 trip ends a day for senior housing developments. Senior housing generates two-thirds the amount of traffic compared to a typical single-family development. Its daily rates are similar to other multi-family categories, including apartments (6.47 trips/unit) and condominiums/townhouses (5.86 trips/units).
4. Trip generation rates during the peak hour of adjacent street traffic are significantly less because most employees arrive/depart during off-peak periods and residents avoid the peak-hour congestion. The peak hour rates are one-half to one-fourth that of other residential land-uses.
5. The peak-hours of site traffic occurs in the late-morning or early afternoon.
6. The peak parking demand at most senior facilities occurred midday with an average peak demand of 0.40 vehicles per dwelling unit for residents, employees, and visitors. Mother's Day is the highest parking day of the year with many facilities short of spaces for that one day.

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RESEARCH REPORT

TRIP GENERATION STUDIES FOR SPECIAL GENERATORS

MANSOUREH JEIHANI AND RICARDO A. CAMILO

MORGAN STATE UNIVERSITY

Project number MD-09-SP808B4J
FINAL REPORT

December 2009

The contents of this report reflect the views of the author who is responsible for the facts and the accuracy of the data presented herein. The contents do not necessarily reflect the official views or policies of the Maryland State Highway Administration. This document is disseminated under the sponsorship of the U.S. Department of Transportation, University Transportation Centers Program, in the interest of information exchange. The U.S. government assumes no liability for the contents or use thereof. This report does not constitute a standard, specification or regulation.

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EXECUTIVE SUMMARY

This research examines the effects of town center and senior housing developments on surrounding roadways and nearby transit. The Institute of Transportation Engineers (ITE) Trip Generation Manual, which determines the number of trips produced or attracted by different developments, does not include town centers. It has also been argued that the ITE manual underestimates trip rates for senior housing. This, coupled with the prominence of these types of developments in Maryland, merits further study into their impact on the surrounding roadway systems.

The results verified that the ITE manual underestimates trips generated by age-restricted housing. The ITE trip rates are one-third of the calculated ones. However, the studied age-restricted developments generated 27 to 63 percent fewer trips than regular housing. The results have been sent to the ITE for incorporation in their manual.

Town centers seem to have a completely different trip generation patterns than shopping centers. Therefore, town center needs to be included as a new category in the ITE manual.

INTRODUCTION

The ITE Trip Generation Manual is a planner's main resource for determining how many vehicle trips will be added to surrounding roadways as a result of new development. This manual contains rates from a composite of trip generation studies done across the country. It is updated approximately every five years with new data from additional studies or new types of land use.

Although this resource is widely accepted as the standard for trip generation, it has several weaknesses. Since the manual draws from studies done across the country, the rates may not accurately reflect what happens here in Maryland. It is also difficult for the manual to keep up with new or unusual land use practices. We have identified town center (with or without transit access) and age-restricted housing developments as being inadequately represented by the ITE manual.

Many counties in Maryland are proposing varying degrees of town center development. The sizes of these multi-use developments vary and they may include stores, banks, restaurants and residential units. A town center can also mean different things in different jurisdictions: some carry their own zoning and some have a transit component. One of the main questions when analyzing this type of development is how many trips will utilize transit. Many reports deduct a percentage of trips that are assumed to use transit but this is done without data supporting the claim. Planners must also consider the number of internal trips (i.e., trips captured by another part of the same development).

Age-restricted housing, also referred to as retirement or senior (55 years old and older) housing, is the other land use that has become more common in Maryland. The growing demand is due to an aging population, rising incomes along with cultural and lifestyle changes. Senior housing developments consist of detached or attached independent-living units and the community amenities may include golf courses, swimming pools, security and transportation. The ITE manual has age-restricted housing in a special category but its rates are based on limited empirical data due to the relative newness of the development type.

A recent study published in the ITE Journal found that the ITE manual underestimates age-restricted housing trips (Flynn and Boenau, 2007). A study of four retirement communities in Evansville, Indiana also found that locally developed trip generation rates were higher than those published in the ITE manual (Evansville Urban Transportation Study, 2001). The Southern New Hampshire Planning Commission's report on senior housing developments matched the ITE's average trip generation rate for weekdays, Saturday and Sunday but the weekday morning and evening peak trip rates were much higher (Southern New Hampshire Planning Commission, 2007).

The ITE's current evening peak-hour trip rate for detached senior housing is approximately one-fourth that of detached single-family housing, a very low number. However, further study is needed to find if ITE manual underestimates the age-restricted housing trips.

Objectives

The main objective of this project is to determine how senior housing and town center developments affect surrounding roadways and transit. The actual trips from nine developments in Maryland — five senior housing and four town centers — were tracked for one week with counters installed at each development's entrances and exits. The traffic outside of the land uses was also counted and transit riders at the town centers were surveyed. From this research we are able to provide trip rates, equations and data plots for the two developments. In addition to reflecting Maryland-specific travel behavior, this study will help planners confronted with projecting traffic in areas with unusual land-use proposals that are inadequately addressed by the ITE manual.

LITERATURE REVIEW

The general purpose of a trip generation study is to collect and analyze data on the relationships between trips attracted and produced to and from a development, as well as the characteristics of the land use. It provides trip rates, equations and data plots based on traffic counts and characteristics of the surveyed land uses. The trip rates are appropriate for planning purposes and traffic impact studies. In order to estimate trip rates for senior housing and town centers, we followed the procedures detailed in the ITE handbook.

Site selection is critical to achieving representative and consistent trip generation rates. At least three sites in each category should be selected. According to the 2004 edition of the ITE manual, the selected sites should have at least 85 percent occupancy, been established for at least two years, be able to be isolated in order to collect the required data and have a limited number of driveways.

Transit-Oriented Development

Town centers are sometimes built as a transit-oriented development (TOD), which refers to a higher-density development with pedestrian priority that is located within walking distance of a public transit stop. TODs have the potential to boost transit ridership, increase walking, mitigate sprawl, accommodate growth and reduce vehicle traffic and its associated pollution. However, the trip generation rates in the ITE manual are generally from a vehicle-trip perspective for stand-alone suburban development even though trip generation can also be viewed from a person-oriented perspective. As a result, individual entities have had to adjust the ITE trip generation rates for mixed-use, pedestrian-oriented and transit-oriented development.

Determining the Nature of Town Center

A town center, as defined by the 1998 edition of the Baltimore County zoning regulations, is a primary center of commerce for an area with a population of 100,000 or more persons that is locally designated and delimited by the Planning Board (Greenhorne and Omara, 2005). A town center might include residential units or residential units might be located near it. As stated earlier, a town center may also have transit access.

To have a more precise estimate of trip rates, we chose town centers of varying size and transit accessibility.

Current Practices

As developers became more interested in mixed-use development and travel impact studies became more prevalent traffic study preparers and reviewers focused on internal trip capture.

Internal trips are those trips that do not impact the external street system. These trips are made using the internal roadways within a multi-use development. They can be made by either a vehicle or by walking. Pass-by trips, made by motorists already on the roadway adjacent to the development, impact the driveways of the development but not the external interception. These trips are made by “traffic passing the site” on the way from an origin to an ultimate destination. They may not add new traffic to the adjacent street system (Trip Generation Handbook, 2004). The internal trip capture is usually expressed as a percentage or rate but it can also be described as an equation. Internal trip rate estimates are primarily used to adjust the trip generation estimates in traffic impact studies. Internal trips reduce the magnitude of external trip generation by combining travels for different purposes due to the various land uses in one development (Barton Ashman Associates, Inc., 1993).

Procedures for determining internal capture rate vary significantly. In a 1993 survey of 15 Texas cities that required traffic impact studies, 11 allowed reductions for mixed-use developments (Barton Ashman Associates, Inc., 1993). The law in Destin, Florida, states that any applicant’s internal capture rate must be justified with empirical data from an industry-recognized source that is for a similar land use in a similar urban environment. Additionally, any internal data capture rate exceeding 25 percent must be justified and approved by the city (Capital Improvement Inventories and Analysis, 2004). San Diego, California, stipulates internal capture reduction by land use type (i.e., residential, office, and retail) and time of day (e.g., AM peak, PM peak, daily) (Traffic Impact Study Manual, 1998).

A traffic impact study for the Heber City Town Center in Heber Utah attempted to project the site’s trip generation and distribution for expected conditions in 2006, 2011 and 2030 in order to see what improvements were necessary (Horrocks Engineers, 2008).

The Town Center South Transportation Study also tried to estimate the development’s potential traffic impact in Guildford, Connecticut (Cloug Harbour & Associated LLP, 2008). While the study resulted in recommendations, they probably will not be enacted until significant traffic growth materializes on the studied roadways

Bochner (2006) defines town centers as one or multiple blocks of ground floor retail (with residential and or office space on the upper floors) that face the street. This report considers town centers as part of a recent trend in modern mixed-use developments. A primary form of a mixed-use development is a mixed-use center, which is often developed on a single interconnected site and contains several uses that may or may not be fully interactive. This model of building became the norm for developers and was ingrained in local zoning and

building codes to protect suburban homeowners from some of the noxious uses found in cities. While the study concluded that trip generation rates and mode split for mixed-use developments are affected by traveler characteristics (e.g., income and vehicle availability), the project did not collect site-internal travel data that included those details because it was for a proposed development in the zoning stage (and that information is difficult to project).

In a comparison of the weekday trip generation rates for age-restricted and unrestricted (i.e., a typical single family development) housing, Racca (2006) concluded that senior housing generates two-thirds of the traffic made by unrestricted housing, showing that trips decrease with age.

METHODOLOGY

The nine developments selected for this study were chosen based on the ITE guidelines, as well as the SHA's current projects, development practices and staff recommendations. As suggested by the National Cooperative Highway Research Program's data collection framework, we contacted the owners and managers of the selected properties to discuss the nature of our project and the purpose of our data collection (NCHRP, 2007). We stressed that our work would not impede patrons or divulge proprietary or sensitive information. In some cases, we had to choose another property when we failed to receive permission from the management.

The selected age-restricted developments are in Baltimore, Owings Mills, Annapolis, Columbia and Frederick. The characteristics of the sites can be seen in Table 1. Due to confidentiality issues, the development names and specific characteristics are not presented. ARH2¹ was added because the results for ARH4 were biased and inconclusive. ARH4 was removed from this study because unsold units in the complex were attracting extra traffic from potential buyers, producing biased results. (As can be seen later in Table 3 and Figure 10.1, ARH4 had the highest trip rate of all the retirement communities.) The two properties in Frederick were treated as one aggregated development due to their proximity and shared parking lot.

Development Name	City	Total Units	Occupied Units	# of Parking	# of Employees
ARH1	Baltimore	100	97	180	4
ARH2	Owings Mills	72	69	140	0
ARH3	Annapolis	166	120	328	3
ARH4	Columbia	132	132	200	2
ARH5-1	Frederick	120	114	156	4
ARH5-2	Frederick	51	42	75	0

Table 1: Characteristics of the Selected Age-Restricted Developments in Maryland

¹ Age Restricted Housing #2

Table 2 details the selected town centers. All of the town centers have a gross leaseable area of at least 300,000 square feet.

Development Name	City	Gross Floor Area	Rentable Area	Total Acres	# of Parking
TC1*	Nottingham	1,200,000	1,152,000	250	6,800
TC2	Cockeysville	1,140,000	900,000	85	4,300
TC3	Owings Mills	1,200,000	1,080,000	280	5,300
TC4	Glen Burnie	1,070,000	1,070,000	75	5,100

Table 2: Characteristics of the Selected Town Centers in Maryland

*: Town Center #1

Data Collection

The owners of the aforementioned developments gave us permission to install counting devices at all entrances and exits so that we could count the number of cars entering and exiting the property for one week.

The counting device — JTF-HS-16M-4RT-S, Trax Flex High Speed Counter with lock and chain — tallies vehicles in both high and low speed situations. The device also calculates the speed, number of axels and length of each vehicle. The counting result of each situation was validated by manual counting.

We also obtained the street counts from SHA for the adjacent streets and performed counts on the adjacent streets which were not available by the SHA. The traffic was counted for a full seven-day period so we could determine the peak period of the generator and the adjacent streets.

Transit Survey

Knowing the trip purpose can also be useful in the estimation of internal trip capture (NCHRP, 2007). To this end, we surveyed bus riders at all four town centers. We explained the purpose of the survey and they were told that participation was not mandatory. A total of 275 bus riders participated.

In addition to demographic questions (e.g., age, race, and gender), survey participants were asked the time of day they usually take the bus to and from the mall and the frequency, duration, and purpose of their mall visits.

RESEARCH FINDINGS

Age-Restricted Housing

The morning and evening peak periods for the developments and their adjacent streets were averaged separately and identified based on the average of 15-minute counts. Table 3 presents the counting results for each housing development. The averaging was done separately because, as Table 4 shows, the peak periods of the senior housing and the adjacent streets differ due to the fact that many of the development's residents are retired and do not go to work every day.

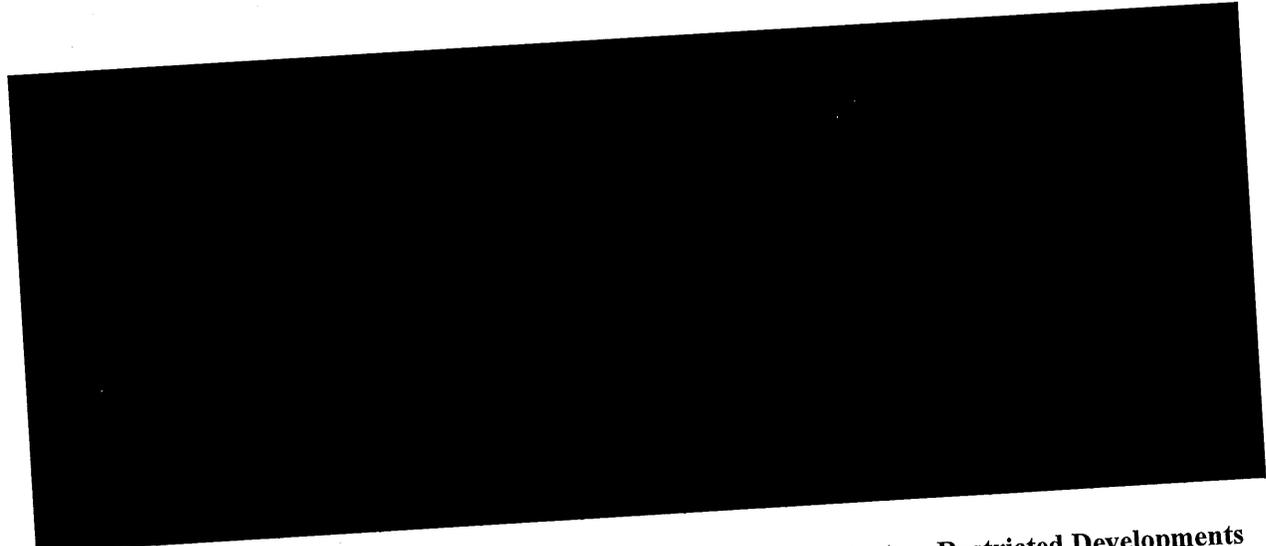


Table 3: Total Trips Ends and Directional Distribution of Trips in Age-Restricted Developments

As presented in Table 3 and Figure 10-1, ARH4 has a very high number of trips compared to other developments. We investigated the problem and found that there are many unsold units in the ARH4-II. In order to visit ARH4-II which is not our study site, visitors had to enter and pass ARH4-I (our study site). Therefore, the results are biased and inconclusive. We removed the results of this site and included another development (Wyndham Commons) to be studied.

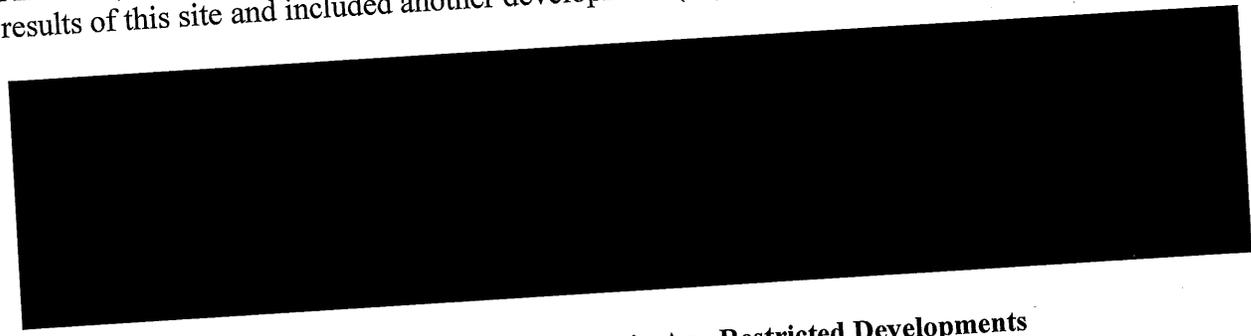


Table 4: Peak Periods of Trips in Age-Restricted Developments

Figures 10-17 show the relationship between the trip ends of each age-restricted development and the number of dwelling units by time of day.

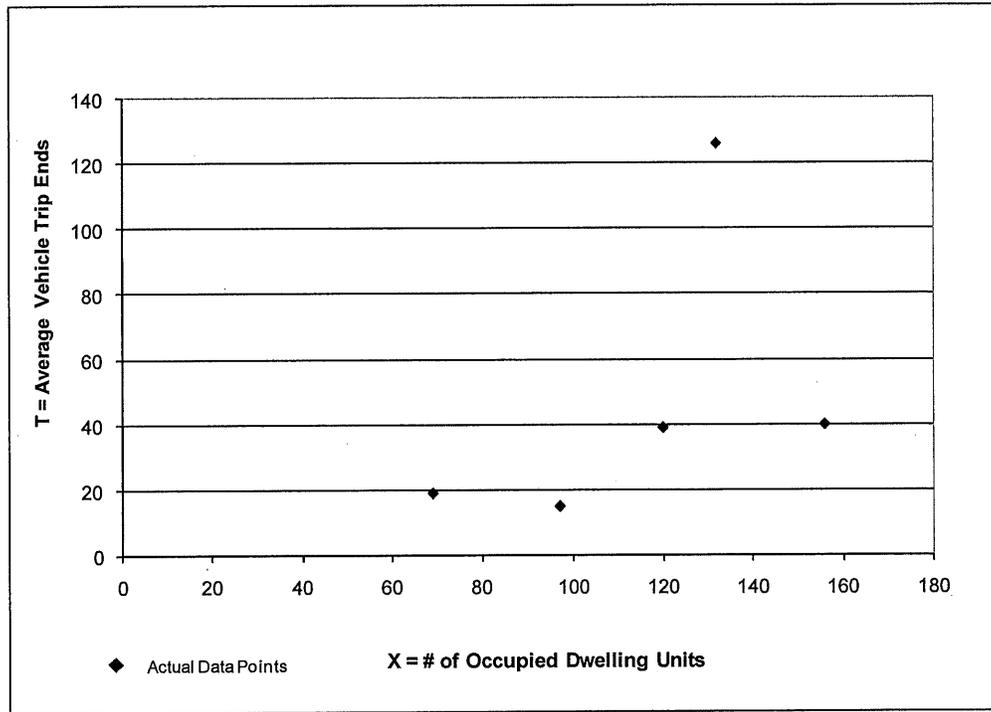


Figure 1.1: Average Vehicle Trip Ends versus Occupied Dwelling Units on a Weekday, AM Peak Period of the Adjacent Street (including ARH#4)

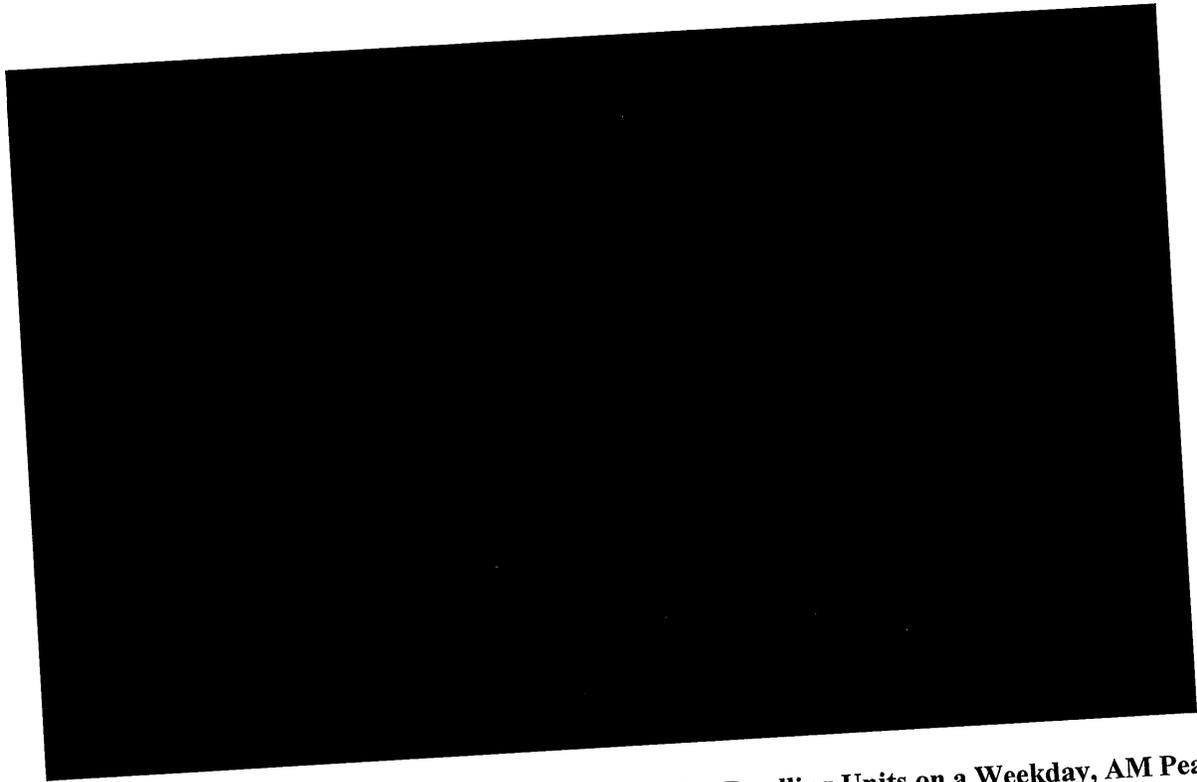


Figure 1.2: Average Vehicle Trip Ends versus Occupied Dwelling Units on a Weekday, AM Peak Period of the Adjacent Street

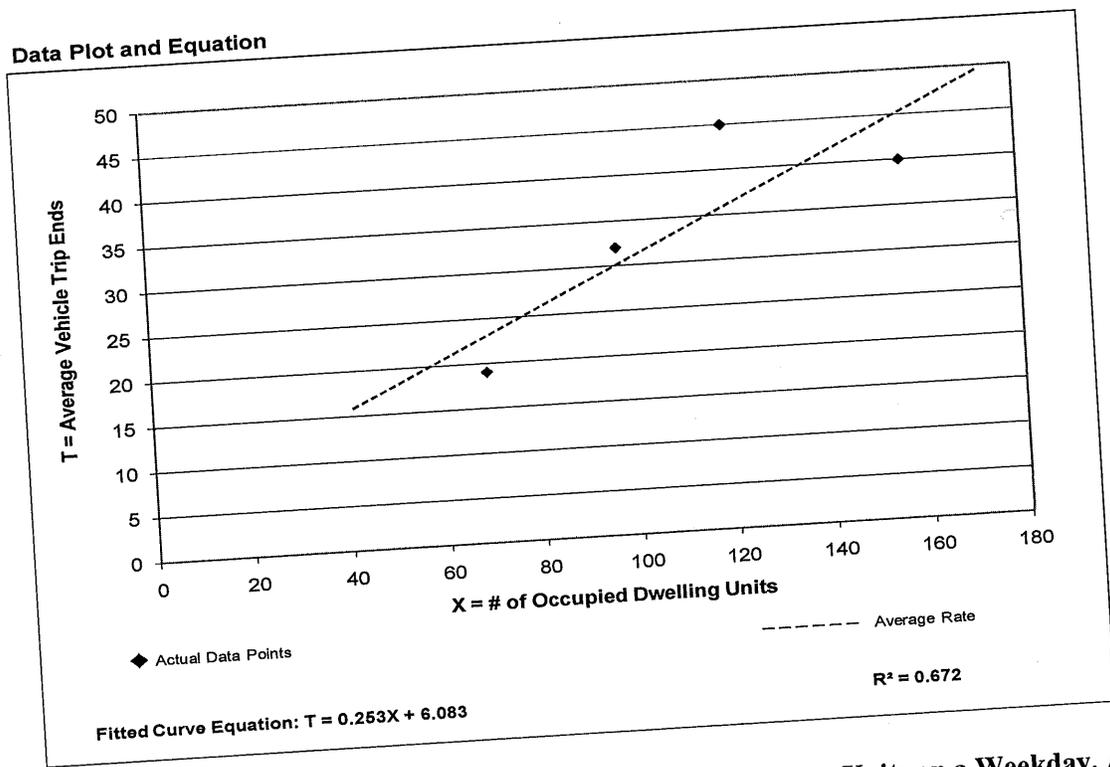


Figure 2: Average Vehicle Trip Ends versus Occupied Dwelling Units on a Weekday, AM Peak Period of the Development

Data Plot and Equation

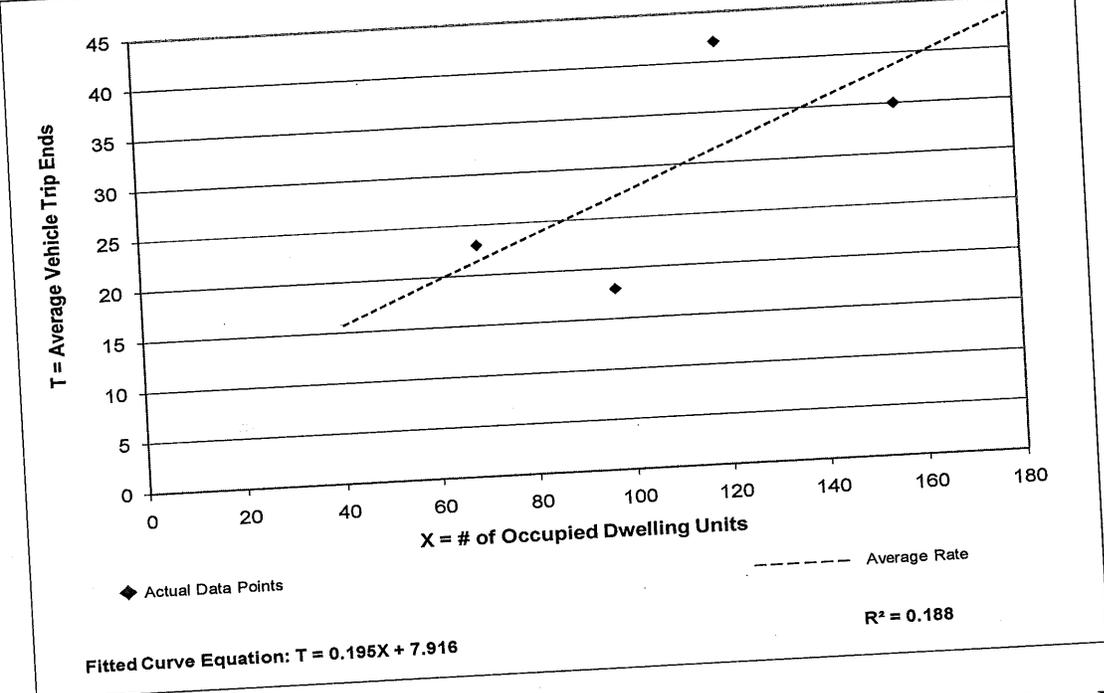


Figure 3: Average Vehicle Trip Ends versus Occupied Dwelling Units on a Weekday, PM Peak Period of the Adjacent Street

Data Plot and Equation

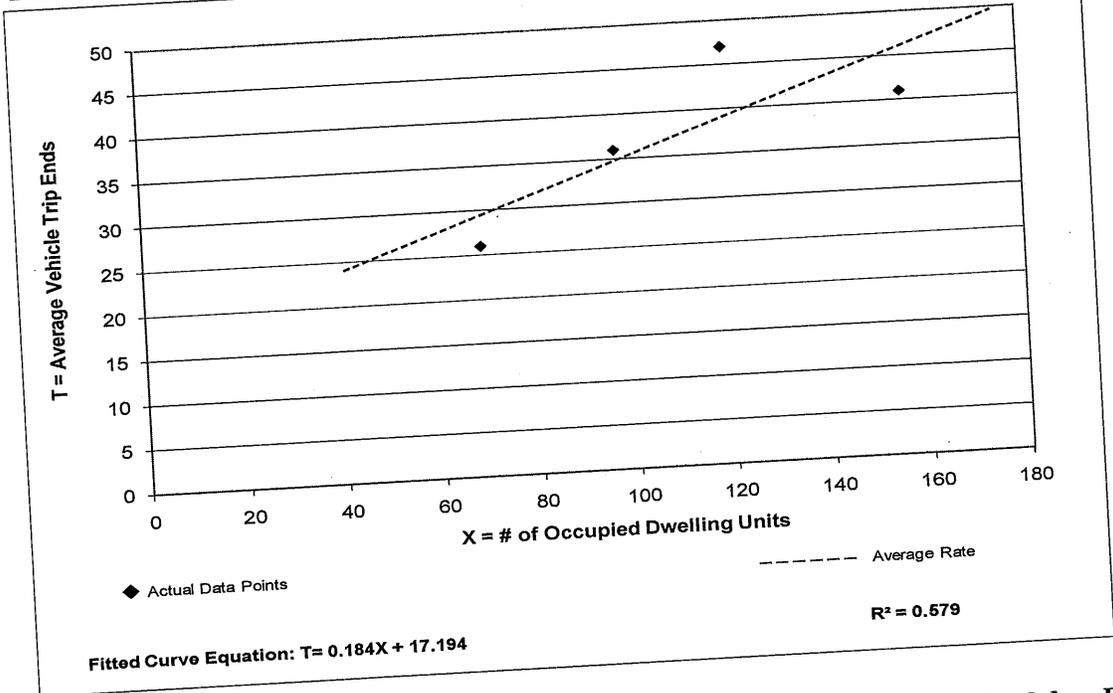


Figure 4: Average Vehicle Trip Ends versus Occupied Dwelling Units on a Weekday, PM Peak Period of the Development

Data Plot and Equation

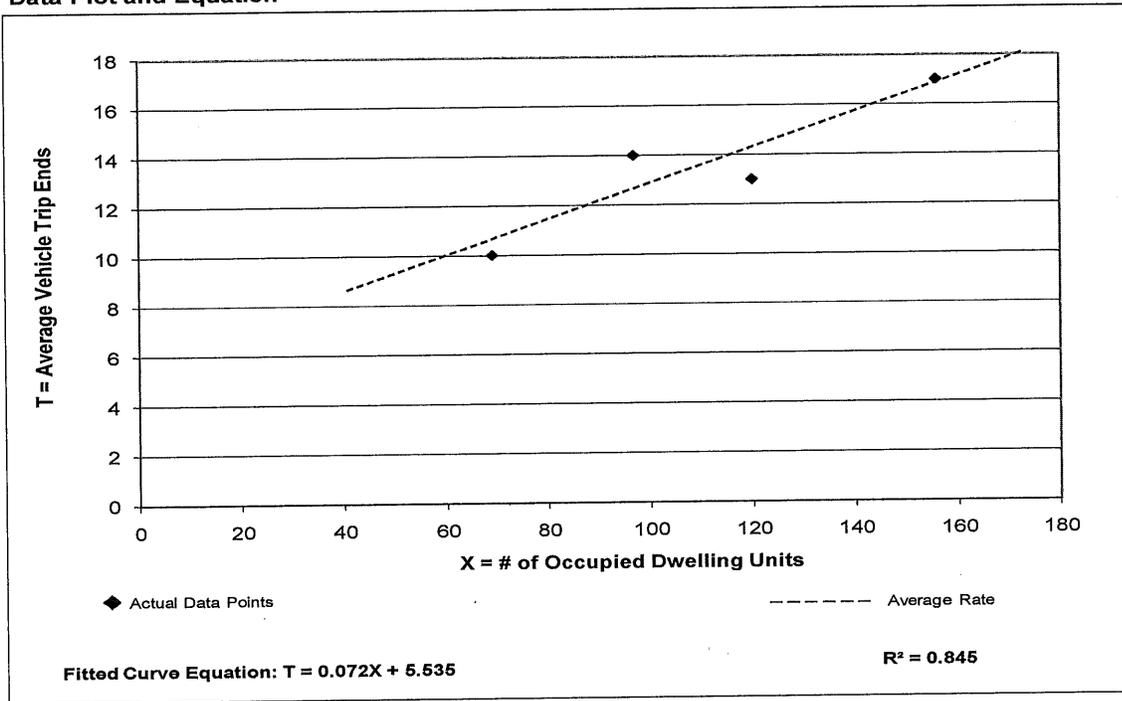


Figure 5: Average Vehicle Trip Ends versus Occupied Dwelling Units on a Saturday, All Day

Data Plot and Equation

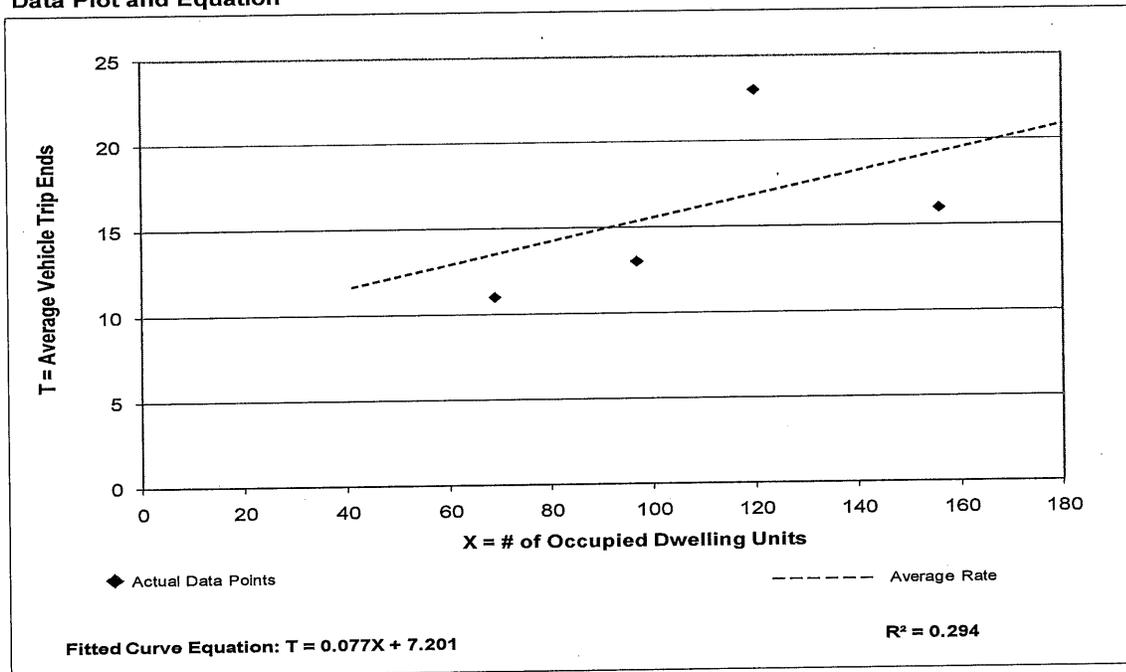


Figure 6: Average Vehicle Trip Ends versus Occupied Dwelling Units on a Sunday, All Day

Data Plot and Equation

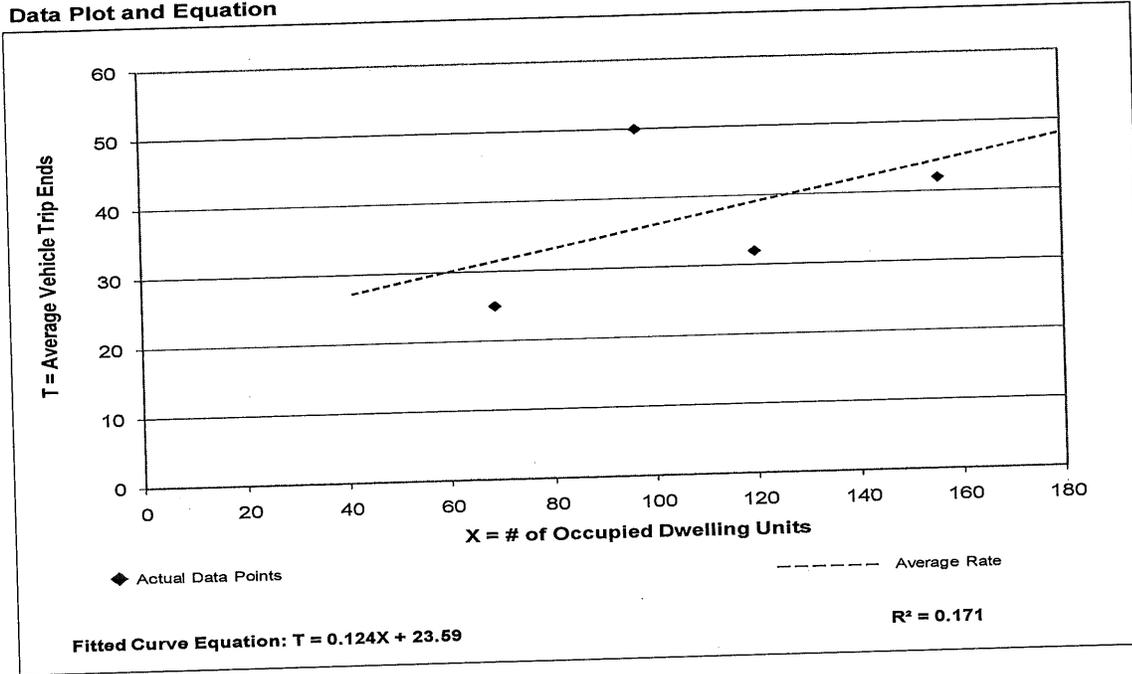


Figure 7: Average Vehicle Trip Ends versus Occupied Dwelling Units on a Saturday, Peak Period of Development

Data Plot and Equation

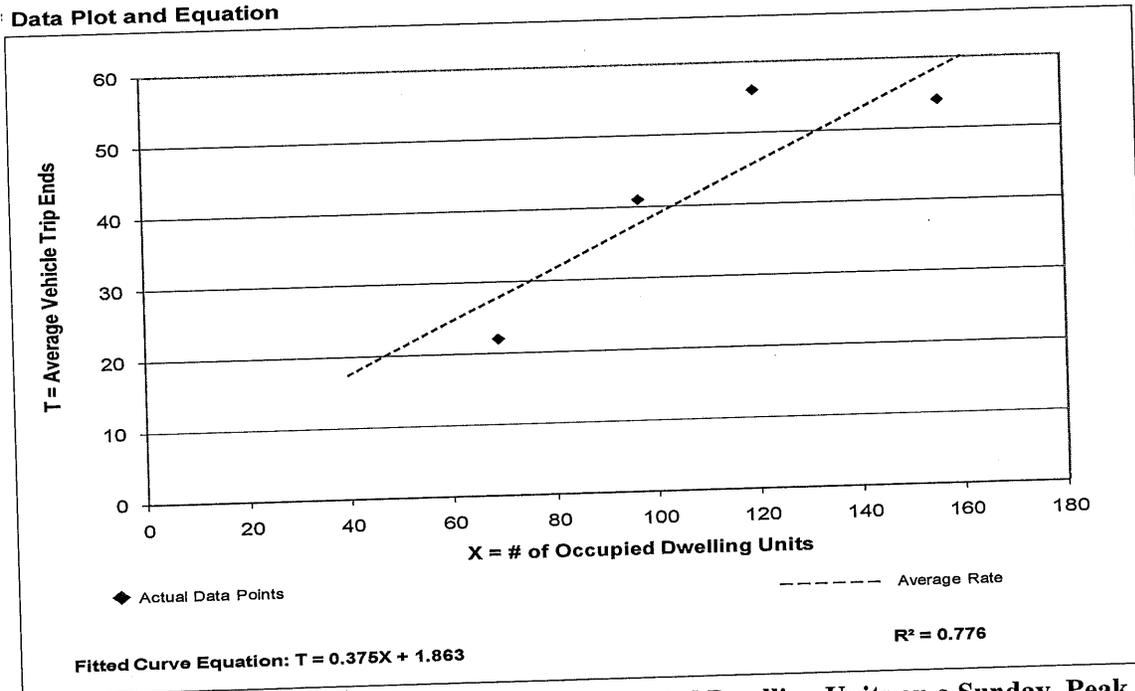


Figure 8: Average Vehicle Trip Ends versus Occupied Dwelling Units on a Sunday, Peak Period of Development

Figures 18-21 plot our observed trip rates and the ITE rates on the same graph. It is clear that the developments under study produce more trips than is reported in the ITE handbook for each time of day.

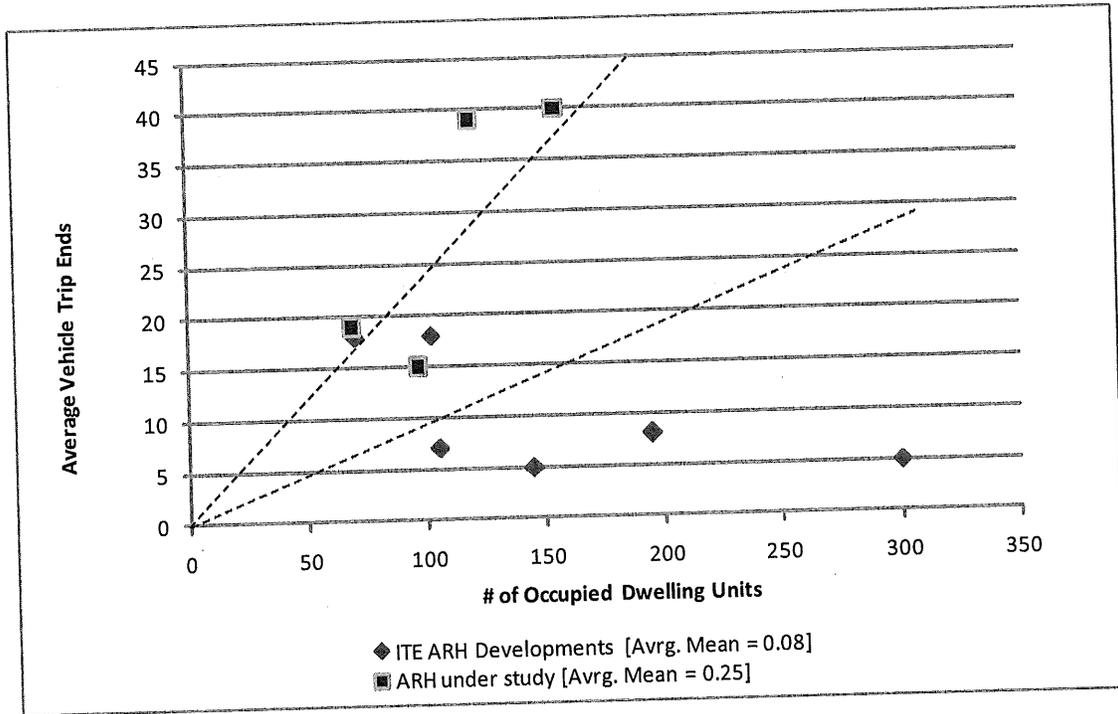


Figure 9: Average Vehicle Trip Ends versus Occupied Dwelling Units on a Weekday, AM Peak Period of the Adjacent Street- Combining the age-restricted housings under study with the ITE developments

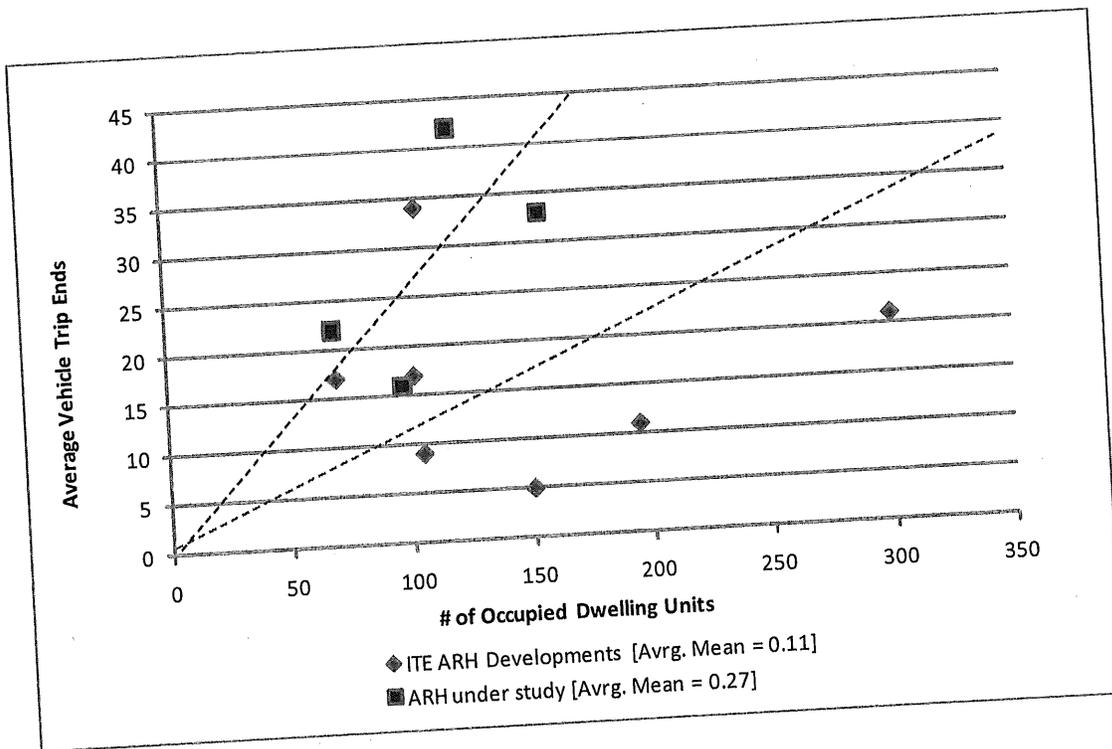


Figure 10: Average Vehicle Trip Ends versus Occupied Dwelling Units on a Weekday, AM Peak Period of the Development-Combining the Age-Restricted Housings under Study with the ITE Developments

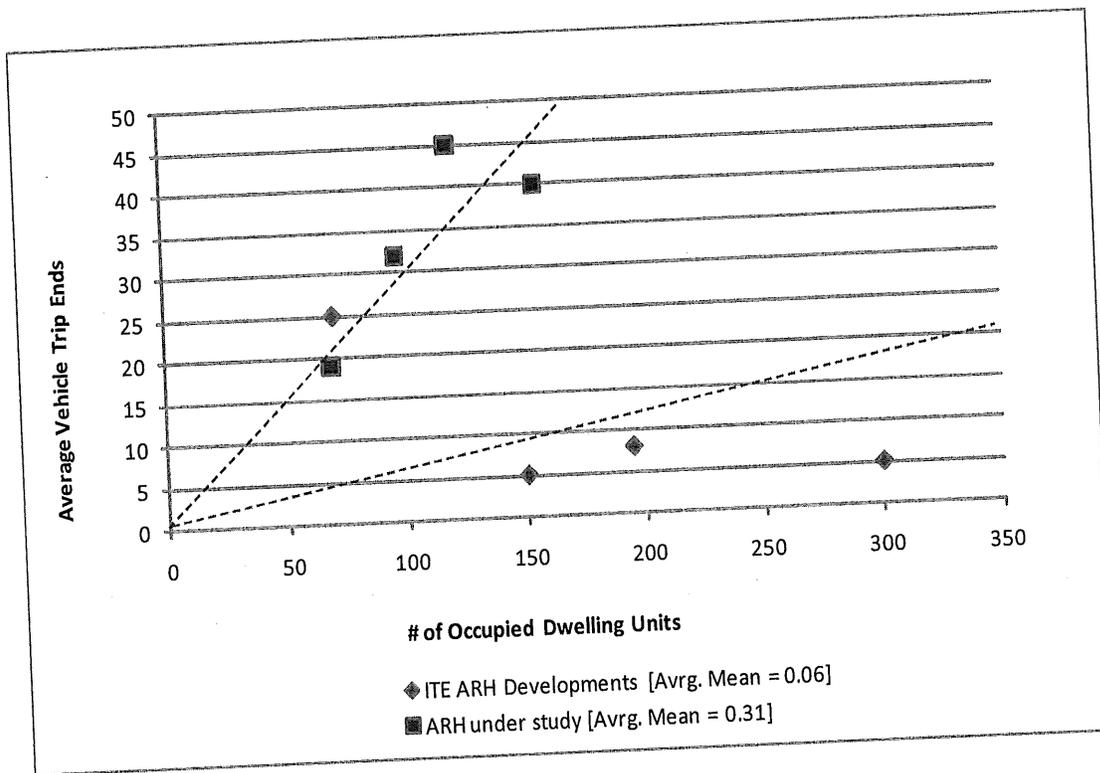


Figure 11: Average Vehicle Trip Ends versus Occupied Dwelling Units on a Weekday, PM Peak Period of the Adjacent Street-Combining the Age-Restricted Housings under Study with the ITE Developments

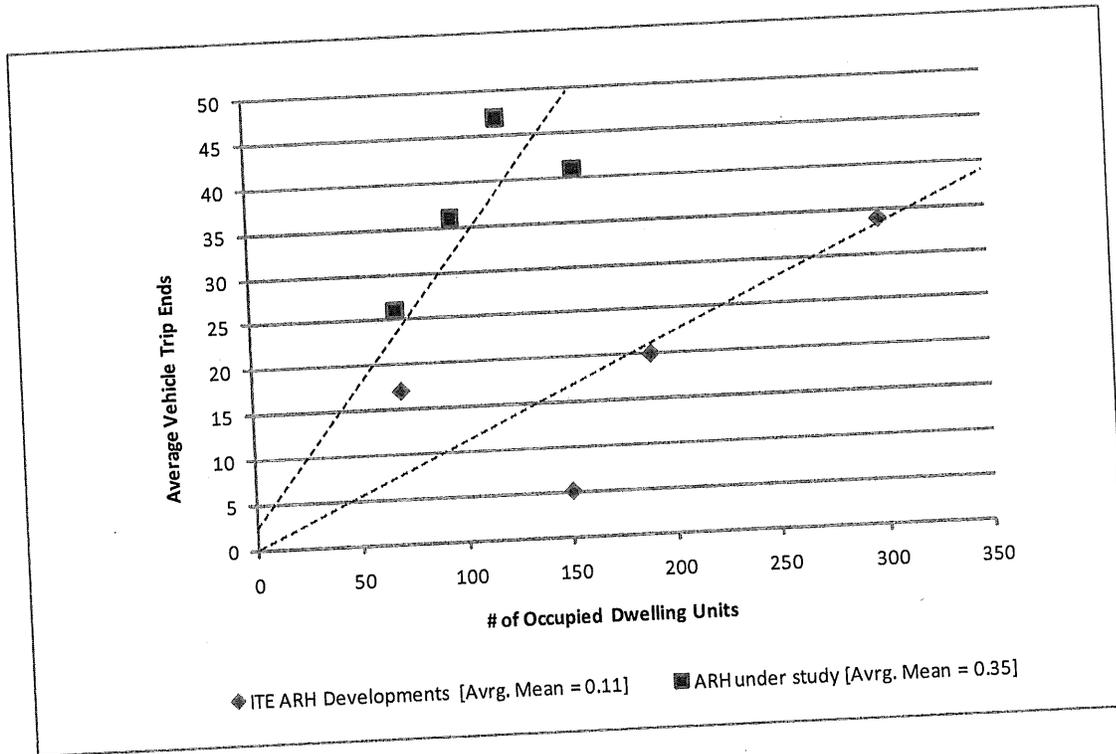


Figure 12: Average Vehicle Trip Ends versus Occupied Dwelling Units on a Weekday, PM Peak Period of the Development-Combining the Age-Restricted Housings under Study with the ITE Developments

Table 5a compares the ITE manual's estimated trip rates with our study's, and Table 5b compares our results with other studies in the literature. The ITE trip rates are around one-third of our trip rates, and our trip rates are similar to those produced by other studies.

	Average ARH Trip Rates			
	AM Peak Adj. St.	PM Peak Adj. St.	AM Peak Generator	PM Peak Generator
Studied Developments	0.25	0.27	0.31	0.35
ITE Rates for ARH	0.08	0.11	0.06	0.11

Table 5a: Trip Rates Comparison for Age-Restricted Housings on a Weekday

	Age-Restricted Housings - Summary of Trip Rates								
	Weekday	AM Peak - Adj. St.	AM Peak - Devlpmt.	PM Peak - Adj. St.	PM Peak - Devlpmt.	Saturday Peak	Saturday - All day	Sunday Peak	Sunday - All day
Maryland (Our ARHs)	3.83	0.25	0.31	0.27	0.35	0.35	0.13	0.39	0.15
New Jersey	2.58	0.15	-	0.22	-	-	-	-	-
City of Evansville, IN	3.94	0.26	0.35	0.30	0.39	-	-	-	-
New Hampshire	3.42	0.18	0.40	0.23	0.33	0.29	0.11	0.36	0.12

Table 5b: Trip Rates Comparison for Age-Restricted Housings with Other Studies

A *t*-test, which yielded a *t*-value of -8.224 and a *P*-value of 0.004, confirmed that there are statistically significant differences between our rates and the ITE's trip rates for age-restricted housing (Table 6).

Paired Samples Statistics

		Mean	N	Std. Deviation
Pair 1	MSU	.2925	4	.04787
	ITE	.0900	4	.02449

Paired Samples Correlations

		N	Correlation	Sig.
Pair 1	MSU & ITE	4	.199	.801

Paired Samples Test

		Paired Differences			t	df	Sig. (2-tailed)	
		Mean	Std. Deviation	95% Confidence Interval of the Difference				
				Lower	Upper			
Pair 1	MSU - ITE	.20250	.04924	.12414	.28086	8.224	3	.004

Table 6: T-test - Comparison of Age-Restricted Housing Trip Rates from Our Study and ITE.

We also counted the number of passing cars on the streets surrounding each development, which is presented in Table 7.

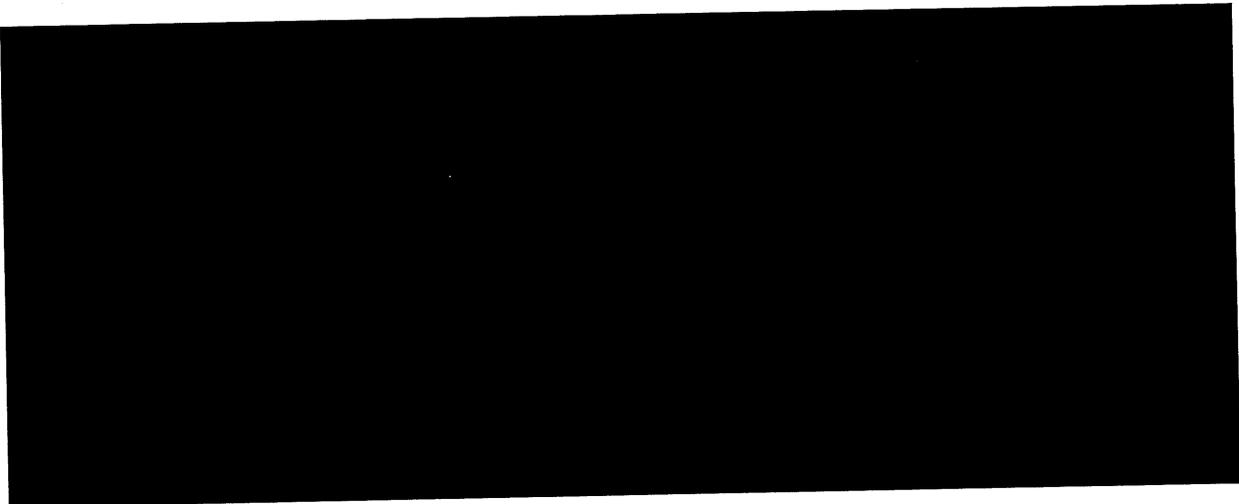


Table 7: Trip Ends on the Adjacent Streets of the Age-Restricted Developments

To see how the trips differed, we compared our trip rates for age-restricted housing to the ITE manual's trip rates for regular, low-rise condominiums and townhouses. The results indicate that, on average, age-restricted housing residents make 27 to 63 percent less trips than regular housing residents (Tables 8 and 9).

Age-Restricted Housing	Average ARH Trip Rates			
	AM Peak Adj. St.	PM Peak Adj. St.	AM Peak Generator	PM Peak Generator
Studied Developments	0.25	0.27	0.31	0.35
Regular Housing	0.61	0.38	0.53	0.63

Table 8: Trip Rate Comparison between Age-Restricted and Regular Housing

	Development Name	Occupied Dwelling Units	ITE Trip Ends	Trip Ends Variation	Age-Restricted Housings
Weekday AM Peak of Adjacent St.	ARH1	97	36	-58%	15
	ARH3	120	56	-30%	39
	ARH2	69	11	72%	19
	ARH5	156	88	-54%	40
Weekday PM Peak of Adjacent St.	ARH1	97	NA	NA	18
	ARH3	120	NA	NA	42
	ARH2	69	NA	NA	23
	ARH5	156	NA	NA	35
Weekday AM Peak of Development	ARH1	97	57	-44%	32
	ARH3	120	69	-35%	45
	ARH2	69	42	-55%	19
	ARH5	156	88	-54%	40
Weekday PM Peak of Development	ARH1	97	55	-34%	36
	ARH3	120	66	-29%	47
	ARH2	69	40	-36%	26
	ARH5	156	83	-51%	41

Table 9: Trip Ends of Age-Restricted Housings versus ITE-Estimated Trip Ends for Regular Low-Raise Condominium/Town House

The ITE regression models reported for regular low-raise condominiums and town houses for each time period are as follows:

Equation 1: Trip Ends for Weekday AM Peak Period of Adjacent Streets

$$\ln(T) = 0.88x + 49.7$$

Equation 2: Trip Ends for Weekday AM Peak Period of Development

$$\ln(T) = 0.9 \ln(x) + 0.07$$

Equation 3: Trip Ends for Weekday PM Peak Period of Development

$$\ln(T) = 0.89 \ln(x) + 0.07$$

where T denotes average vehicle trip ends, and x denotes occupied dwelling units.

Town Center

As with senior housing, we counted the trip ends of the town centers and their adjacent streets for one week and calculated the peak periods for the weekday mornings and evenings, as well as Saturday and Sunday (Table 10). Table 11 presents the peak periods of the studied town centers and Table 12 shows the hourly variation in town center traffic. Detailed in Table 13 are the traffic counts for each development's surrounding streets that we obtained from the Traffic Monitoring System Report Module on the SHA's website.

		Town Centers - Summary of Trip Ends Averages (per hour)								Total Count	
		AM Peak Adj. St.	AM Peak Devlpmt.	PM Peak Adj. St.	PM Peak Devlpmt.	Saturday Peak	Saturday All day	Sunday Peak	Sunday All day	Saturday	Sunday
TC2	Total	754	1,806	2,344	2,699	2,652	1,240	1,772	964	29,766	21,201
	Entering (%)	63%	63%	58%	59%	51%	52%	48%	53%	52%	52%
	Exiting (%)	37%	37%	42%	41%	49%	48%	52%	47%	48%	48%
TC4	Total	280	1,130	1,589	1,659	2,598	1,126	1,722	578	26,611	13,861
	Entering (%)	65%	55%	48%	48%	46%	43%	52%	46%	44%	46%
	Exiting (%)	35%	45%	52%	52%	54%	57%	48%	54%	56%	54%
TC3	Total	1,302	1,302	1,805	1,805	1,809	843	1,381	519	20,222	12,455
	Entering (%)	74%	74%	38%	38%	47%	50%	48%	50%	50%	50%
	Exiting (%)	26%	26%	62%	62%	53%	50%	52%	50%	50%	50%
TC1	Total	976	2,565	3,616	3,616	4,211	2,004	3,698	1,415	48,089	32,483
	Entering (%)	61%	58%	46%	46%	49%	49%	48%	49%	49%	50%
	Exiting (%)	39%	42%	54%	54%	51%	51%	52%	51%	51%	50%

Table 10: Total Trips and Directional Distribution of Trips in Town Centers

	Town Centers - Peak Periods					
	AM Peak - Adjacent St.	AM Peak - Devlpmt.	PM Peak - Adjacent St.	PM Peak - Devlpmt.	Saturday Peak	Sunday Peak
TC2	7:00 - 9:00	11:00 - 12:00	16:00 - 18:00	12:00 - 13:00	15:00 - 16:00	15:00 - 16:00
TC4	7:00 - 9:00	11:00 - 12:00	16:00 - 18:00	18:00 - 19:00	14:00 - 15:00	13:00 - 14:00
TC3	7:00 - 9:00	8:00 - 9:00	16:00 - 18:00	17:00 - 18:00	15:00 - 16:00	16:00 - 17:00
TC1	7:00 - 9:00	11:00 - 12:00	16:00 - 18:00	17:00 - 18:00	14:00 - 15:00	15:00 - 16:00

Table 11: Peak Periods of Trips in Town Centers

Time	Average Weekday		Average Saturday		Average Sunday	
	Percent of 24 Hour Entering Traffic	Percent of 24 Hour Exiting Traffic	Percent of 24 Hour Entering Traffic	Percent of 24 Hour Exiting Traffic	Percent of 24 Hour Entering Traffic	Percent of 24 Hour Exiting Traffic
10 - 11 a. m.	6%	3%	7%	3%	6%	3%
11 a. m. - 12 p. m.	7%	5%	8%	5%	10%	5%
12 - 1 p. m.	9%	8%	9%	7%	12%	8%
1 - 2 p. m.	8%	8%	9%	8%	12%	10%
2 - 3 p. m.	7%	8%	9%	9%	11%	11%
3 - 4 p. m.	7%	8%	8%	9%	10%	11%
4 - 5 p. m.	7%	8%	8%	8%	9%	10%
5 - 6 p. m.	9%	9%	8%	8%	6%	10%
6 - 7 p. m.	9%	9%	8%	9%	4%	7%
7 - 8 p. m.	7%	8%	7%	8%	2%	3%
8 - 9 p. m.	5%	7%	5%	7%	2%	2%
9 - 10 p. m.	3%	7%	3%	7%		

Total Entering trips (Weekdays)	233,736
Total Exiting trips (Weekdays)	245,425
Total Entering trips (Saturdays)	60,861
Total Exiting trips (Saturdays)	63,826
Total Entering trips (Sundays)	39,853
Total Exiting trips (Sundays)	40,148

Table 12: Hourly Variation in Town Center Traffic

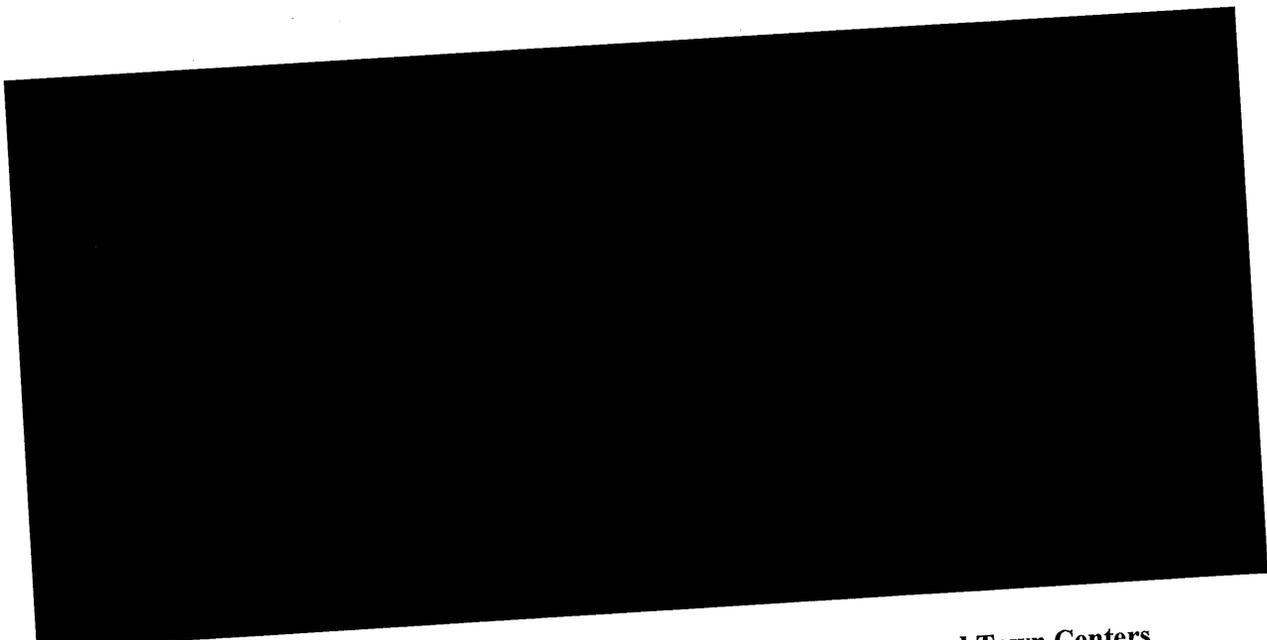


Table 13: Traffic Volumes on the Adjacent Streets around Town Centers

There is no trip estimation for town centers in the ITE handbook. Therefore, we classified the developments (or tenants) in each town center according to the development types listed in the

ITE manual, added the trip rates (ends) and compared them to our results. The results of the comparison can be seen in Tables 14-16.

Tenant	Type	Sq. Ft.	Total Area	Trip Ends Comparison								
				Weekday	AM PK Ad	PM PK Ad	AM PK Gen	PM PK Gen	Saturday	Sat Pk	Sunday	Sun Pk
Developer Retail Buildings	Shopping Center	778,271 28,379	806.7	26,380	548	2,483	548	2,483	34,424	3,362	16,822	2,383
Ikea	Furniture Store	201,300	201.3	1,032	34	93	81	107	996	161	946	181
Bank of America	Drive-in Bank	2,000	2.0	622	25	92	82	105	111	80	45	8
Burger King Wendys	Fast-Food Restaurant with Drive Through Window	2,500 2,500	5.0	2,500	275	183	288	225	3,700	300	2,740	294
7 Eleven	Gasoline/ Service Station with Convenience Market	8,500	8.5	9,252	633	833	633	833	9,252	385	9,252	385
Olive Garden	Quality Restaurant	7,200	7.2	648	6	54	40	65	641	78	524	58
Jared P F Chan	Shopping Center	6,000 7,500	13.5	1,848	47	167	47	167	2,617	236	4,425	138
Giant Food	Supermarket	53,687	53.7	4,986	211	571	581	576	9,539	612	8,950	975
Total ITE Suggested Trip Ends		-	1,098	47,267	1,779	4,476	2,300	4,562	61,280	5,215	43,704	4,423
Dvlpmt. Under Study Trip Ends		-	1,200	40,896	976	3,616	2,565	3,616	48,096	4,211	33,960	3,698
ITE Suggested Trip Rates		-	-	43.05	1.62	4.08	2.09	4.16	55.82	4.75	39.81	4.03
Dvlpmt. Under Study Trip Rates		-	-	34.08	0.81	3.01	2.14	3.01	40.08	3.51	28.30	3.08
Diff. %		-	-	-26.33%	-99.20%	-35.30%	2.00%	-37.89%	-39.27%	-35.36%	-40.67%	-30.74%

Table 14a: Trip Ends Calculations from ITE for Each Development Type and Trip Rate Comparisons with Our Results at TC1

Tenant	Type	Sq. Ft.	Total Area	Trip Ends Comparison								
				Weekday	AM PK Ad St	PM PK Ad St	AM PK Gen	PM PK Gen	Saturday	Sat Pk	Sunday	Sun Pk
Developer Retail Buildings	Shopping Center	546,915	546.92	20,492	434	1,921	434	1,921	26,949	2,612	12,763	1,648
Regal Cinemas	Multiplex Movie Theater	45,600	45.60	4,508	N/A	194	N/A	805	3,892	695	3,500	625
M & T Bank Sun Trust Bank	Drive-in Bank	3,200 2,500	5.70	1,296	70	260	164	300	431	210	120	23
Carrabba's Italian Grill Damon's Sports Theatre and Grille Greystone Grill Outback Steakhouse	Quality Restaurant	6,200 11,905 6,130 6,800	31.04	2,794	25	233	171	279	2,929	337	2,193	230
Wegmans	Supermarket	140,000	140.00	10,765	1,076	1,217	1,692	1,229	24,858	1,245	23,333	2,485
Total ITE Suggested Trip Ends		769,250	769	40,112	1,605	3,825	2,461	4,534	59,059	5,099	41,909	5,012
Dvlpmt. Under Study Trip Ends		-	1,016	27,288	754	2,344	1,806	2,699	29,760	2,652	23,136	1,772
ITE Suggested Trip Rates		-	-	52.14	2.09	4.97	3.20	5.89	76.77	6.63	54.48	6.52
Dvlpmt. Under Study Trip Rates		-	-	26.86	0.74	2.31	1.78	2.66	29.29	2.61	22.77	1.74
Diff. %		-	-	-94.14%	-181.07%	-115.52%	-79.97%	-121.88%	-162.11%	-153.92%	-139.24%	-273.55%

Table 14b: Trip Ends Calculations from ITE for Each Development Type and Trip Rate Comparisons with Our Results at TC2

Tenant	Type	Sq. Ft.	Total Area	Trip Ends Comparison								
				Weekday	AM PK Ad	PM PK Ad	AM PK Gen	PM PK Gen	Saturday	Sat Pk	Sunday	Sun Pk
Developer Retail Buildings	Shopping Center	645,000	645.00	22,811	479	2,142	479	2,142	29,900	2,907	14,296	1,925
AMC	Multiplex Movie Theater	68,800	68.80	6,894	N/A	338	N/A	1,231	6,373	1,138	5,740	1,025
Don Pablo's Mexican Kitchen	Quality Restaurant	5,400	17.00	1,530	14	128	94	153	1,566	184	1,210	131
Red Lobster		3,200										
Red Robin		2,800										
Tony Roma's		5,600										
OM Corporate Offices	General Office Building	50,000	50.00	782	108	135	108	135	125	21	39	9
Total ITE Suggested Trip Ends		678,800	781	32,017	601	2,743	681	3,661	37,965	4,251	21,285	3,089
Dvlpmt. Under Study Trip Ends		-	1,040	18,960	1,302	1,805	1,302	1,805	20,232	1,809	12,456	1,381
ITE Suggested Trip Rates		-	-	41.01	0.77	3.51	0.87	4.69	48.62	5.44	27.26	3.96
Dvlpmt. Under Study Trip Rates		-	-	18.23	1.25	1.74	1.25	1.74	19.45	1.74	11.98	1.33
Diff. %		-	-	-124.93%	38.55%	-102.41%	30.37%	-170.14%	149.94%	213.02%	127.61%	197.93%

Table 14c: Trip Ends Calculations from ITE for Each Development Type and Trip Rate Comparisons with Our Results at TC3

Tenant	Type	Sq. Ft.	Total Area	Trip Ends Comparison								
				Weekday	AM PK Ad St	PM PK Ad St	AM PK Gen	PM PK Gen	Saturday	Sat Pk	Sunday	Sun Pk
Developer Retail Buildings	Shopping Center	894,000	894.00	28,204	583	2,658	583	2,658	36,728	3,595	18,188	2,879
Total ITE Suggested Trip Ends		894,000	894	28,204	583	2,658	583	2,658	36,728	3,595	18,188	2,879
Dvlpmt. Under Study Trip Ends		-	-	16,704	280	1,589	1,130	1,659	27,024	2,598	13,872	1,722
ITE Suggested Trip Rates		-	-	31.55	0.65	2.97	0.65	2.97	41.08	4.02	20.34	3.22
Dvlpmt. Under Study Trip Rates		-	-	18.68	0.31	1.78	1.26	1.86	30.23	2.91	15.52	1.93
Diff. %		-	-	-68.84%	-108.06%	-67.25%	48.45%	-60.19%	-35.91%	-38.36%	-31.11%	-67.19%

Table 14d: Trip Ends Calculations from ITE for Each Development Type and Trip Rate Comparisons with Our Results at TC4

	Trip Rates Summary									
	Weekday	AM PK Ad St	PM PK Ad St	AM PK Gen	PM PK Gen	Saturday	Sat Pk	Sunday	Sun Pk	
ITE (Summary of Dvlpmts)	43.05	1.62	4.08	2.09	4.16	55.82	4.75	39.81	4.03	
TC1	34.08	0.81	3.01	2.14	3.01	40.08	3.51	28.30	3.08	
Difference (%)	-26.3%	-99.2%	-35.3%	2.0%	-37.9%	-39.3%	-35.4%	-40.7%	-30.7%	
ITE (Summary of Dvlpmts)	52.14	2.09	4.97	3.20	5.89	76.77	6.63	54.48	6.52	
TC2	26.86	0.74	2.31	1.78	2.66	29.29	2.61	22.77	1.74	
Difference (%)	-94.1%	-181.1%	-115.5%	-80.0%	-121.9%	-162.1%	-153.9%	-139.2%	-273.5%	
ITE (Summary of Dvlpmts)	41.01	0.77	3.51	0.87	4.69	48.62	5.44	27.26	3.96	
TC3	18.23	1.25	1.74	1.25	1.74	19.45	1.74	11.98	1.33	
Difference (%)	-124.9%	38.6%	-102.4%	30.4%	-170.1%	-149.9%	-213.0%	-127.6%	-197.9%	
ITE (Summary of Dvlpmts)	31.55	0.65	2.97	0.65	2.97	41.08	4.02	20.34	3.22	
TC4	18.68	0.31	1.78	1.26	1.86	30.23	2.91	15.52	1.93	
Difference (%)	-68.8%	-108.1%	-67.2%	48.4%	-60.2%	-35.9%	-38.4%	-31.1%	-67.2%	

Table 15: Trip Rates Comparisons between ITE and Our Results

	Trip Ends Summary								
	Weekday	AM PK Ad St	PM PK Ad St	AM PK Gen	PM PK Gen	Saturday	Sat Pk	Sunday	Sun Pk
ITE (Summary of Dvlpmts)	47,267	1,779	4,476	2,300	4,562	61,280	5,215	43,704	4,423
TC1	40,896	976	3,616	2,565	3,616	48,096	4,211	33,960	3,698
Difference (%)	-15.6%	-82.2%	-23.8%	10.3%	-26.1%	-27.4%	-23.8%	-28.7%	-19.6%
ITE (Summary of Dvlpmts)	40,112	1,605	3,825	2,461	4,534	59,059	5,099	41,909	5,012
TC2	27,288	754	2,344	1,806	2,699	29,760	2,652	23,136	1,772
Difference (%)	-47.0%	-112.8%	-63.2%	-36.3%	-68.0%	-98.5%	-92.3%	-81.1%	-182.8%
ITE (Summary of Dvlpmts)	32,017	601	2,743	681	3,661	37,965	4,251	21,285	3,089
TC3	18,960	1,302	1,805	1,302	1,805	20,232	1,809	12,456	1,381
Difference (%)	-68.9%	53.9%	-52.0%	47.7%	-102.8%	-87.6%	-135.0%	-70.9%	-123.7%
ITE (Summary of Dvlpmts)	28,204	583	2,658	583	2,658	36,728	3,595	18,188	2,879
TC4	16,704	280	1,589	1,130	1,659	27,024	2,598	13,872	1,722
Difference (%)	-68.8%	-108.1%	-67.2%	48.4%	-60.2%	-35.9%	-38.4%	-31.1%	-67.2%

Table 16: Trip Ends Comparisons between ITE and Our Results

CONCLUSIONS

The results verify the findings of a study presented in ITE Journal (Flynn and Boenau, 2007), therefore they verify that ITE manual underestimates trips generated by age-restricted housing. The ITE trip rates are 1/3 of what we calculated. However, the age-restricted housings under study make between 27 to 63 percent fewer trips than the regular housing. The results have been sent to the ITE to be incorporated in their manual.

The results also indicate that town centers warrant their own listing in the manual. Not only is it one of the fastest-growing development types in the United States but our comparison of the studied town center trip rates and the ITE rates for shopping centers denotes that town centers generate different trip rates.

Our survey of transit riders to the four town centers found that most are African Americans with an annual income of less than \$30,000. The riders are mostly 16-34 years old and have no available vehicle in their household.

We hope that the SHA will use these results for traffic impact study and planning purposes. We also sent the results to the ITE so they can incorporate the more realistic trip rate estimates into their study.

APPENDIX 1
TRIP RATE COMPARISONS

	AM Peak Adj. St. ARH Veh. Trip Rate	Average ITE Rate			Regression ITE Rate		
		ITE Rate	ARH Rate as % of ITE Rate	% point difference from ITE Rate	ITE Rate	ARH Rate as % of ITE Rate	% point difference from ITE Rate
Age-Restricted Housings							
ARH1	0.15	0.37	42%	-58%	-	-	-
ARH3	0.27	0.47	57%	-43%	-	-	-
ARH2	0.28	0.16	172%	72%	-	-	-
ARH5	0.26	0.56	46%	-54%	-	-	-
Mean	0.24	-	79%	-21%			
Std. Dev.	0.05	-	54%	54%			

Note: Fitted Curve Equation for Apartments: $\ln(T) = 0.88\ln(x) + 49.7$, where T = average vehicle trip ends and x = 1000 square feet gross leasable area.

Table A1-1: AM Peak Period of Adjacent Street Trip Rates for Age-Restricted Housings

	AM Peak Dvlpmt. ARH Veh. Trip Rate	Average ITE Rate			Regression ITE Rate		
		ITE Rate	ARH Rate as % of ITE Rate	% point difference from ITE Rate	ITE Rate	ARH Rate as % of ITE Rate	% point difference from ITE Rate
Age-Restricted Housings							
ARH1	0.33	0.59	56%	-44%	-	-	-
ARH3	0.38	0.58	65%	-35%	-	-	-
ARH2	0.28	0.61	45%	-55%	-	-	-
ARH5	0.26	0.56	46%	-54%	-	-	-
Mean	0.31	-	53%	-47%			
Std. Dev.	0.05	-	8%	8%			

Note: Fitted Curve Equation for Apartments: $\ln(T) = 0.9\ln(x) + 0.07$, where T = average vehicle trip ends and x = 1000 square feet gross leasable area.

Table A1-2: AM Peak Period of Development Trip Rates for Age-Restricted Housings

	PM Peak Dvlpmt. ARH Veh. Trip Rate	Average ITE Rate			Regression ITE Rate		
		ITE Rate	ARH Rate as % of ITE Rate	% point difference from ITE Rate	ITE Rate	ARH Rate as % of ITE Rate	% point difference from ITE Rate
Age-Restricted Housings							
ARH1	0.37	0.56	66%	-34%	-	-	-
ARH3	0.39	0.55	71%	-29%	-	-	-
ARH2	0.38	0.59	64%	-36%	-	-	-
ARH5	0.26	0.54	49%	-51%	-	-	-
Mean	0.35	-	63%	-37%			
Std. Dev.	0.05	-	8%	8%			

Note: Fitted Curve Equation for Apartments: $\ln(T) = 0.89\ln(x) + 0.07$, where T = average vehicle trip ends and x = 1000 square feet gross leasable area.

Table A1-3: PM Peak Period of Development Trip Rates for Age-Restricted Housings

	Weekday TC Veh. Trip Rate	Average ITE Rate			Regression ITE Rate		
		ITE Rate	TC Rate as % of ITE Rate	% point difference from ITE Rate	ITE Rate	TC Rate as % of ITE Rate	% point difference from ITE Rate
Town Centers							
TC2	30.32	-	-	-	31.47	96%	-4%
TC4	15.61	-	-	-	29.62	53%	-47%
TC3	17.55	-	-	-	29.53	59%	-41%
TC1	35.50	-	-	-	28.87	123%	23%
Mean	24.74				-	83%	-17%
Std. Dev.	8.40				-	29%	29%

Note: Fitted Curve Equation for Apartments: $\ln(T) = 0.65\ln(x) + 5.83$, where T = average vehicle trip ends and x = 1000 square feet gross leasable area.

Table A1-4: Average Weekday Daily Trip Rates for Town Centers

	AM Peak Adj. St. TC Veh. Trip Rate	Average ITE Rate			Regression ITE Rate		
		ITE Rate	TC Rate as % of ITE Rate	% point difference from ITE Rate	ITE Rate	TC Rate as % of ITE Rate	% point difference from ITE Rate
Town Centers							
TC2	2.01	-	-	-	0.65	309%	209%
TC4	0.92	-	-	-	0.61	152%	52%
TC3	1.21	-	-	-	0.60	200%	100%
TC1	2.23	-	-	-	0.59	378%	278%
Mean	1.59				-	260%	160%
Std. Dev.	0.54				-	89%	89%

Note: Fitted Curve Equation for Apartments: $\ln(T) = 0.6\ln(x) + 2.29$, where T = average vehicle trip ends and x = 1000 square feet gross leasable area.

Table A1-5: AM Peak Period of Adjacent Street Trip Rates for Town Centers

	PM Peak Adj. St. TC Veh. Trip Rate	Average ITE Rate			Regression ITE Rate		
		ITE Rate	TC Rate as % of ITE Rate	% point difference from ITE Rate	ITE Rate	TC Rate as % of ITE Rate	% point difference from ITE Rate
Town Centers							
TC2	3.00	-	-	-	2.97	101%	1%
TC4	1.55	-	-	-	2.80	55%	-45%
TC3	1.67	-	-	-	2.79	60%	-40%
TC1	3.14	-	-	-	2.73	115%	15%
Mean	2.34				-	83%	-17%
Std. Dev.	0.73				-	26%	26%

Note: Fitted Curve Equation for Apartments: $\ln(T) = 0.66\ln(x) + 3.4$, where T = average vehicle trip ends and x = 1000 square feet gross leasable area.

Table A1-6: PM Peak Period of Adjacent Street Trip Rates for Town Centers

	Saturday TC Veh. Trip Rate	Average ITE Rate			Regression ITE Rate		
		ITE Rate	TC Rate as % of ITE Rate	% point difference from ITE Rate	ITE Rate	TC Rate as % of ITE Rate	% point difference from ITE Rate
Town Centers							
TC2	33.07	-	-	-	40.98	81%	-19%
TC4	24.87	-	-	-	38.44	65%	-35%
TC4	18.72	-	-	-	38.31	49%	-51%
TC1	41.74	-	-	-	37.40	112%	12%
Mean	29.60				-	76%	-24%
Std. Dev.	8.66				-	23%	23%

Note: Fitted Curve Equation for Apartments: $\ln(T) = 0.63\ln(x) + 6.23$, where T = average vehicle trip ends and x = 1000 square feet gross leasable area.

Table A1-7: Saturday Trip Rates for Town Centers

	Sunday TC Veh. Trip Rate	Average ITE Rate			Regression ITE Rate		
		ITE Rate	TC Rate as % of ITE Rate	% point difference from ITE Rate	ITE Rate	TC Rate as % of ITE Rate	% point difference from ITE Rate
Town Centers							
TC2	23.56	-	-	-	20.31	116%	16%
TC4	12.95	-	-	-	19.57	66%	-34%
TC3	11.53	-	-	-	19.53	59%	-41%
TC1	28.20	-	-	-	19.29	146%	46%
Mean	19.06				-	97%	-3%
Std. Dev.	7.03				-	36%	36%

Note: Fitted Curve Equation for Apartments: $T = 15.63x + 4214.46$, where T = average vehicle trip ends and x = 1000 square feet gross leasable area.

Table A1-8: Sunday Trip Rates for Town Centers

Age-Restricted Housings	Average ARH Trip Rates			
	AM Peak Adj. St.	PM Peak Adj. St.	AM Peak Generator	PM Peak Generator
Studied Developments	0.24	0.27	0.31	0.35
ITE Manual	0.08	0.11	0.06	0.11

Table A1-9: Trip Rate Comparison for Age-Restricted Housings

Shopping Centers	Average TC Trip Rates						
	Weekday	AM Peak Adj. St.	PM Peak Adj. St.	Saturday	Saturday Peak	Sunday	Sunday Peak
Studied Developments	24.74	1.59	2.34	29.60	2.68	19.06	2.02
ITE Manual	42.94	1.03	3.75	49.97	4.97	25.24	3.12

Table A1-10: Trip Rate Comparison for Shopping Centers

APPENDIX 2
TRANSIT SURVEY RESULTS

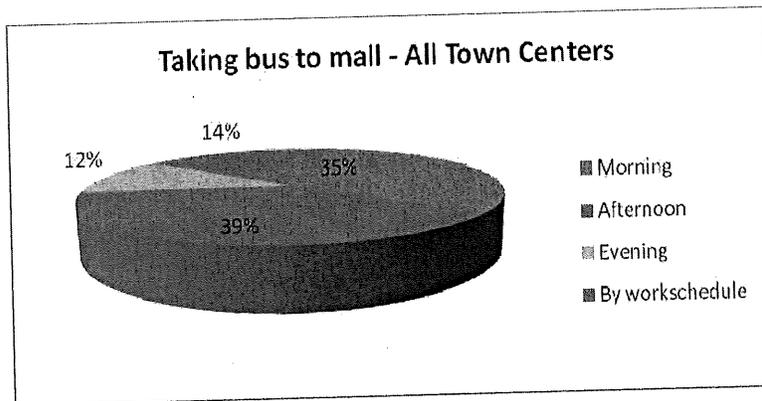


Figure A2-1: Time of Bus Ridership to Town Centers

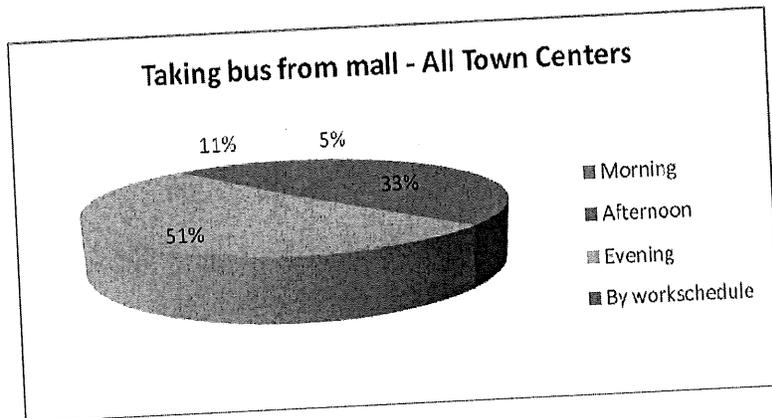


Figure A2-2: Time of Bus Ridership from Town Centers

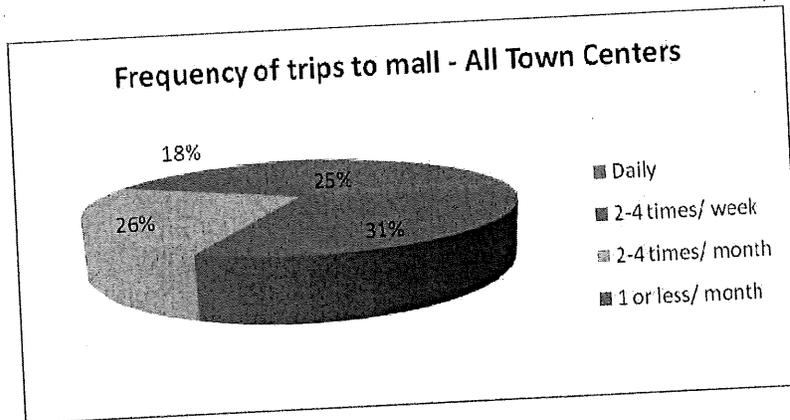


Figure A2-3: Frequency of Trips to Town Centers

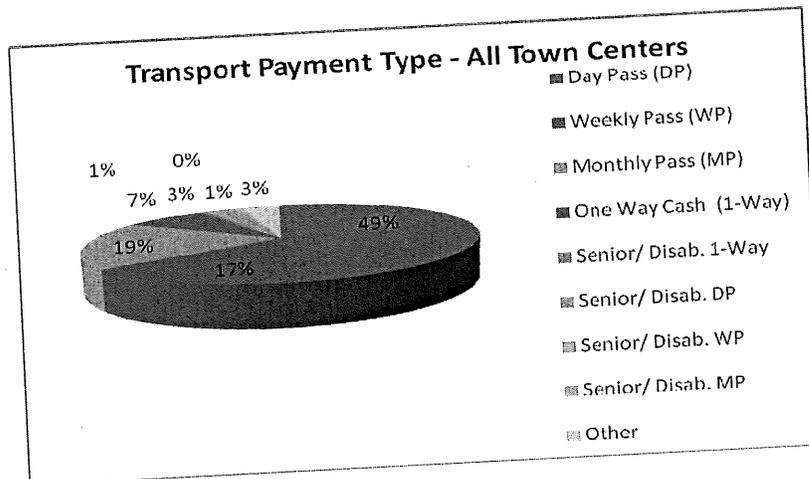


Figure A2-4: Type of Transport Payment to Town Centers

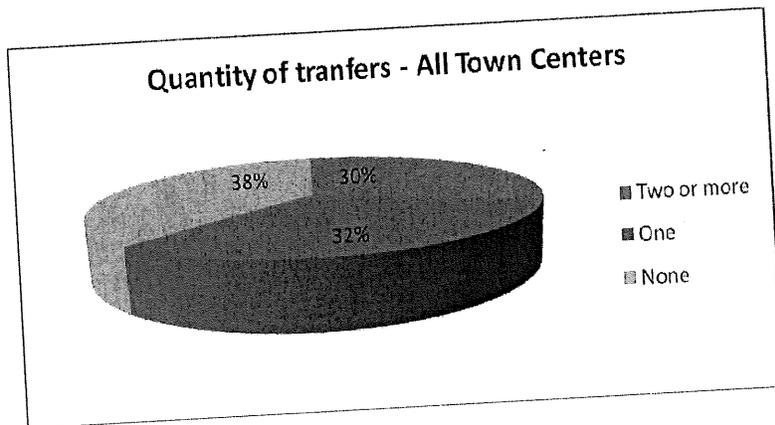


Figure A2-5: Number of Bus Transfers During Trip to Town Centers

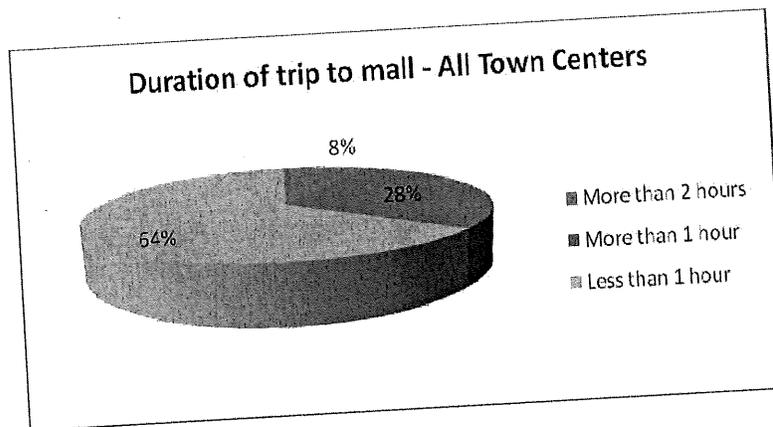


Figure A2-6: Duration of Bus Ride to Town Centers

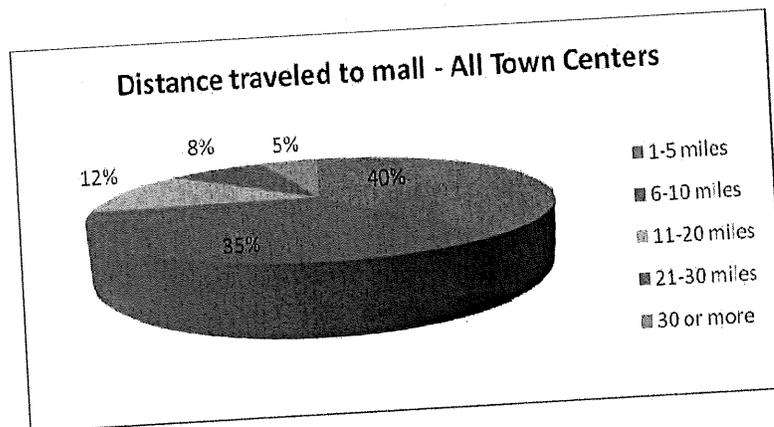


Figure A2-7: Distance Traveled to Town Centers

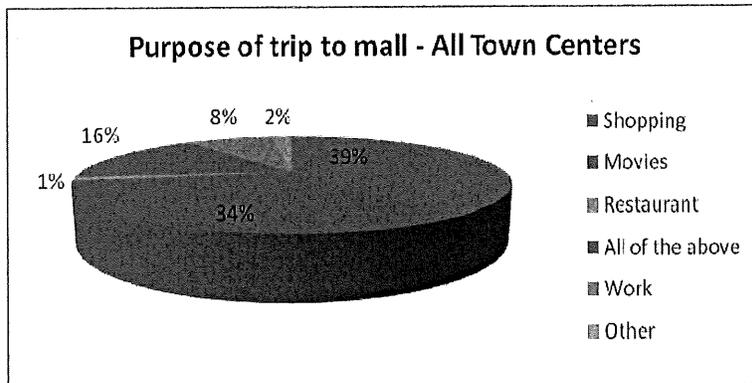


Figure A2-8: Purpose of Trip to Town Centers

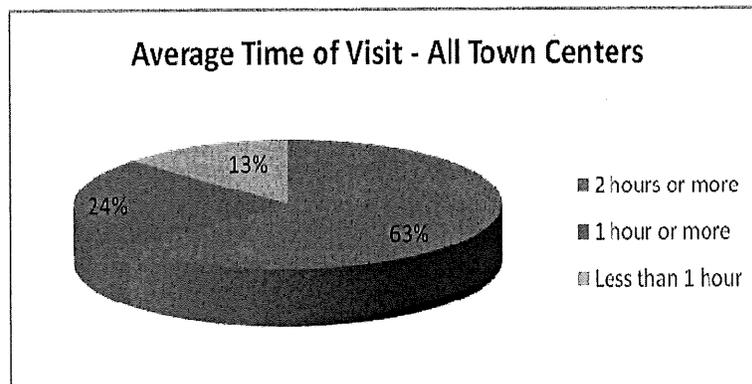


Figure A2-9: Average Length of Visit to Town Centers

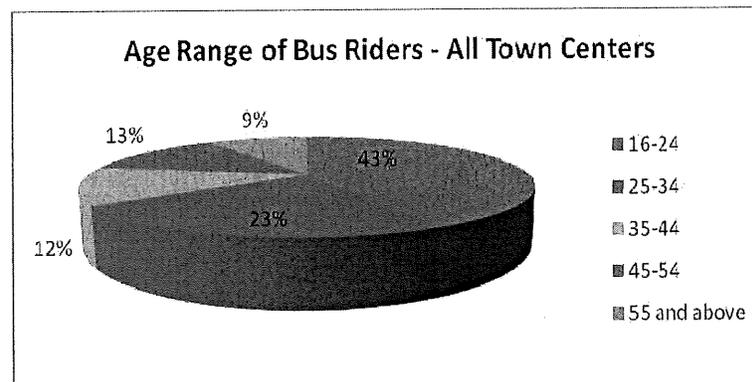
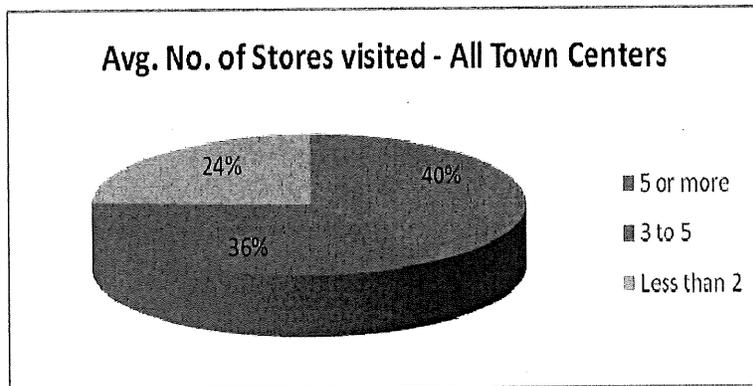


Figure A2-10: Age Range of Bus Riders to Town Centers



Appendix 2A-11: Average Number of Stores Visited at Town Centers

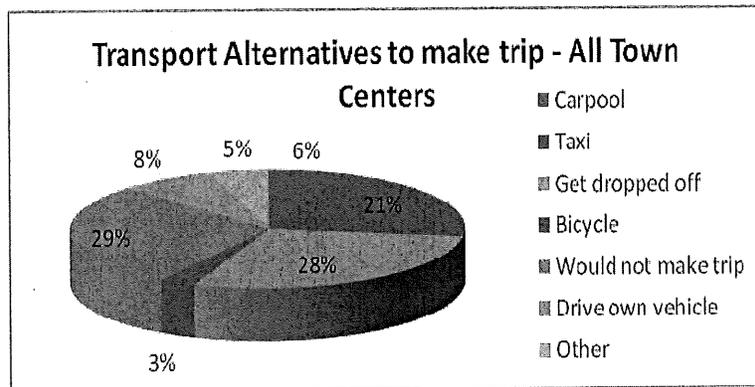
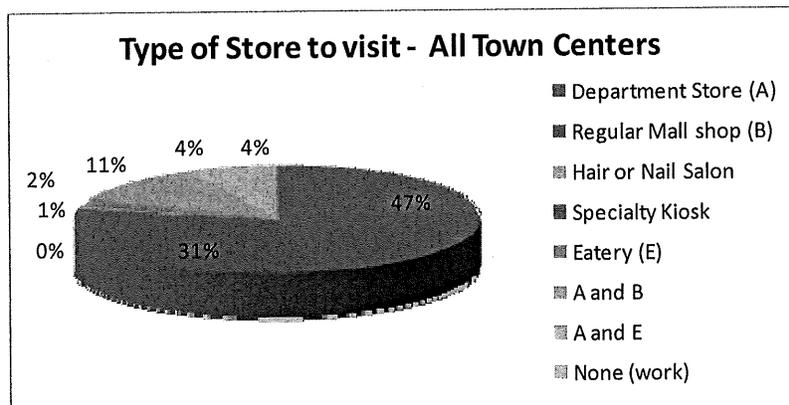
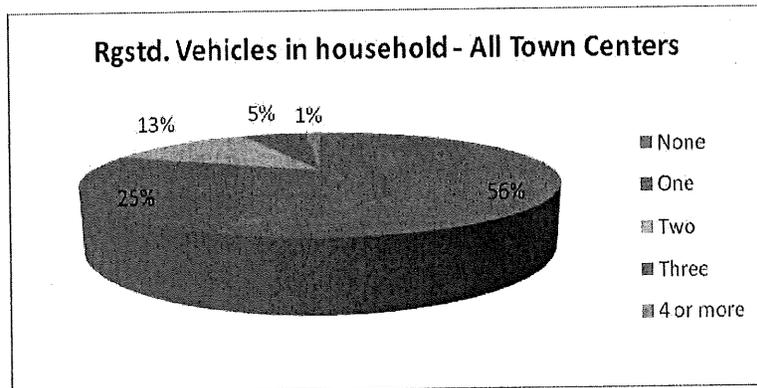


Figure A2-12: Transportation Alternatives for Bus Riders



Appendix A2-13: Type of Stores Visited at Town Centers



Appendix A2-14: Number of Registered Vehicles in Bus Rider's Household

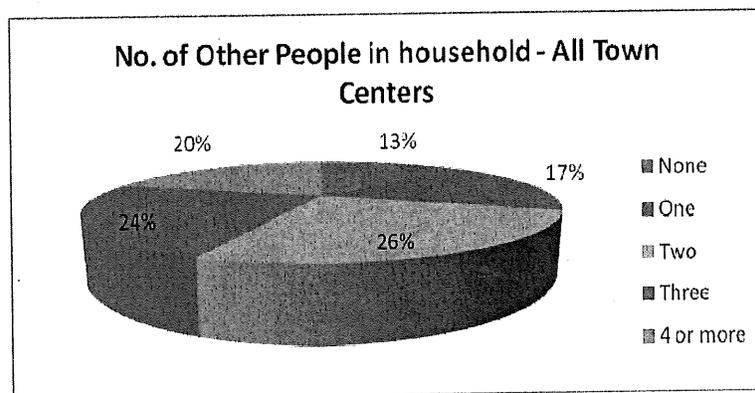


Figure A2-15: Number of Other People in Bus Rider's Household

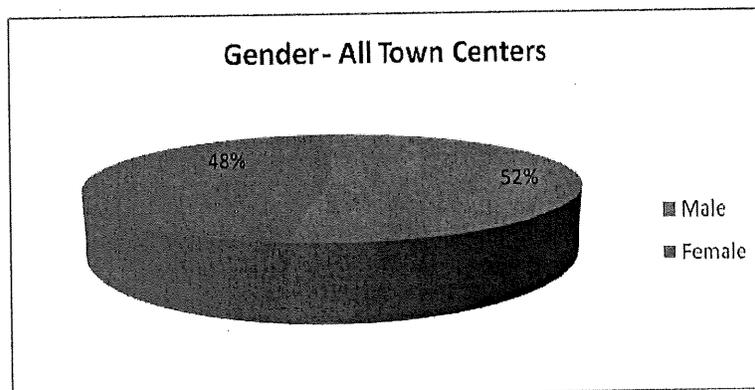


Figure A2-16: Gender of Bus Riders

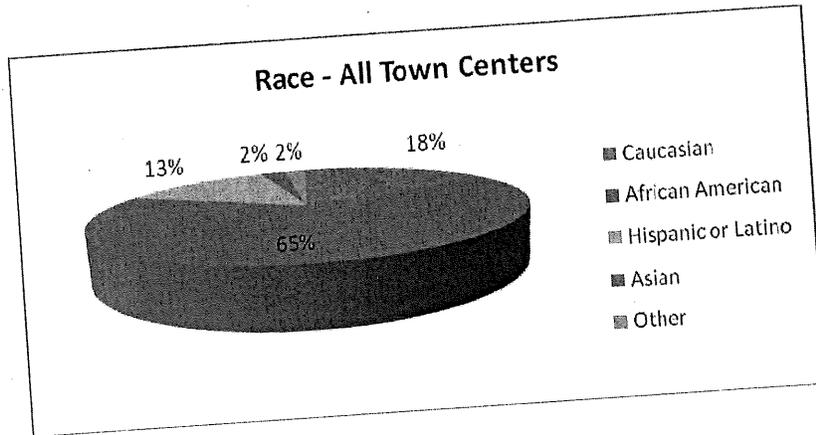


Figure A2-17: Race of Bus Riders

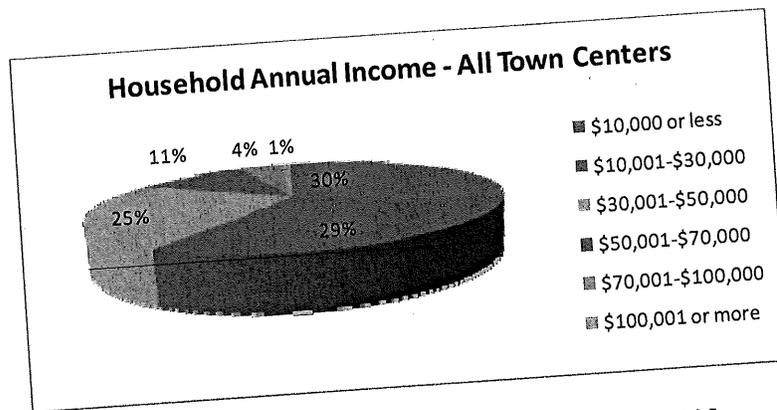


Figure A2-18: Annual Household Income of Bus Riders

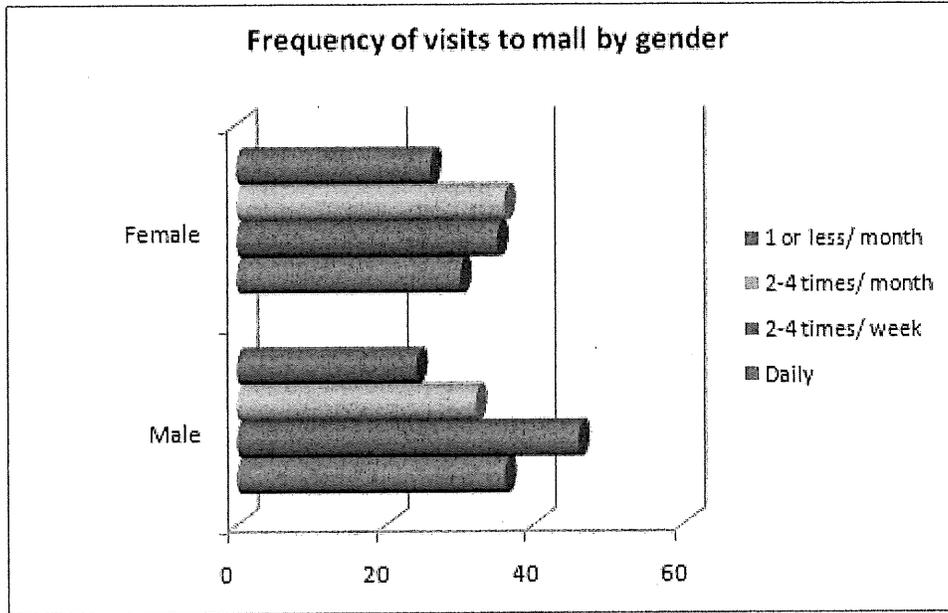


Figure A2-19: Frequency of Mall Visits by Gender

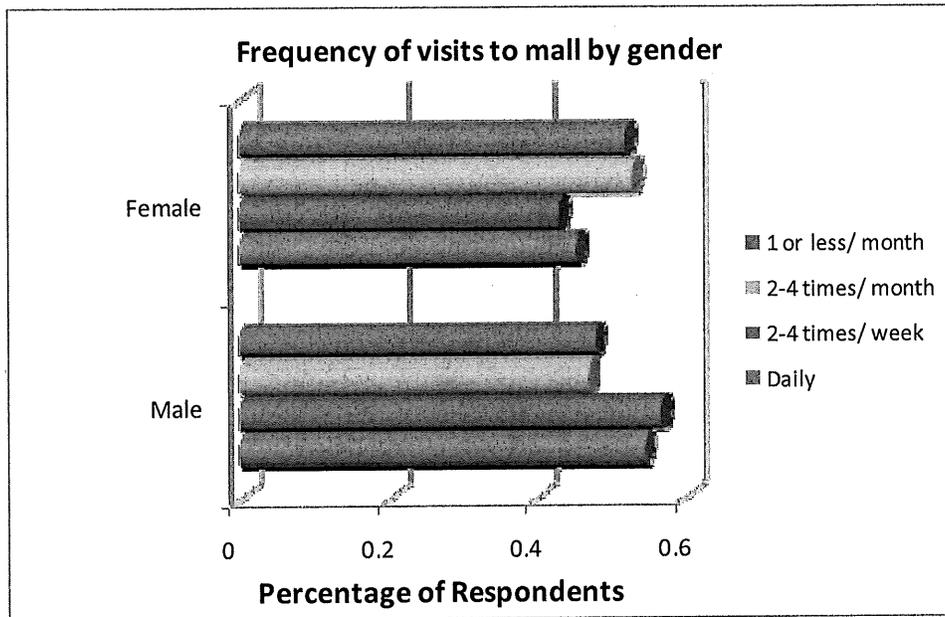


Figure A2-20: Frequency of Mall Visit by Gender

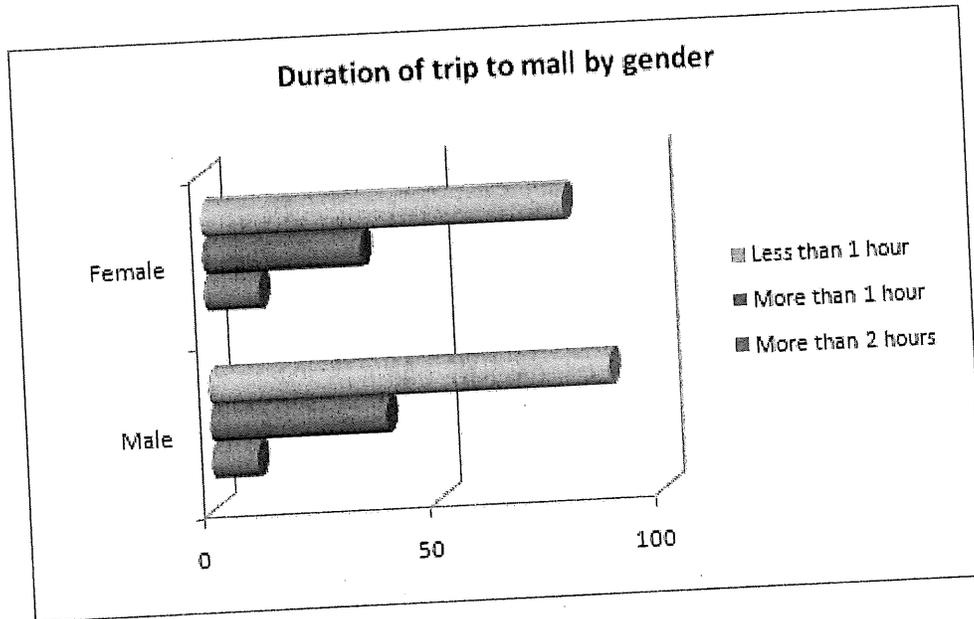


Figure A2-21: Duration of Mall Visit by Gender

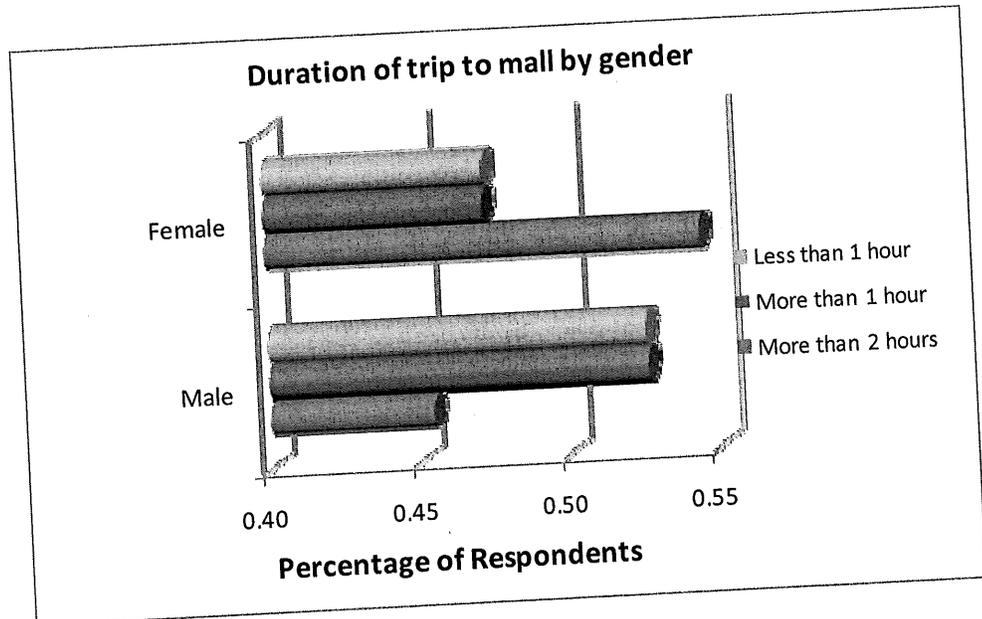


Figure A2-22: Duration of Mall Visit by Gender

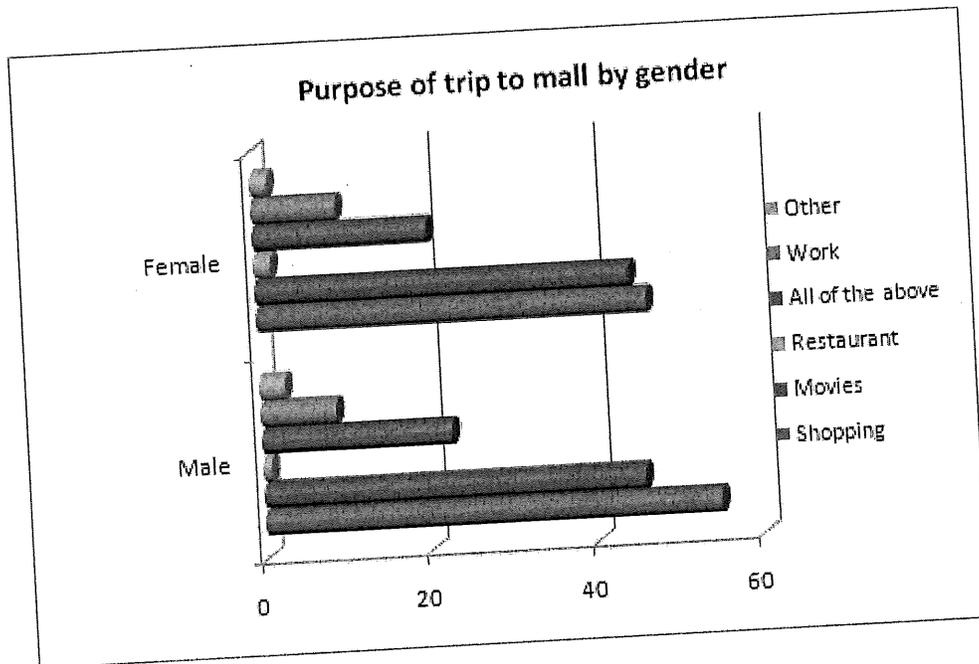


Figure A2-23: Purpose of Mall Trip by Gender

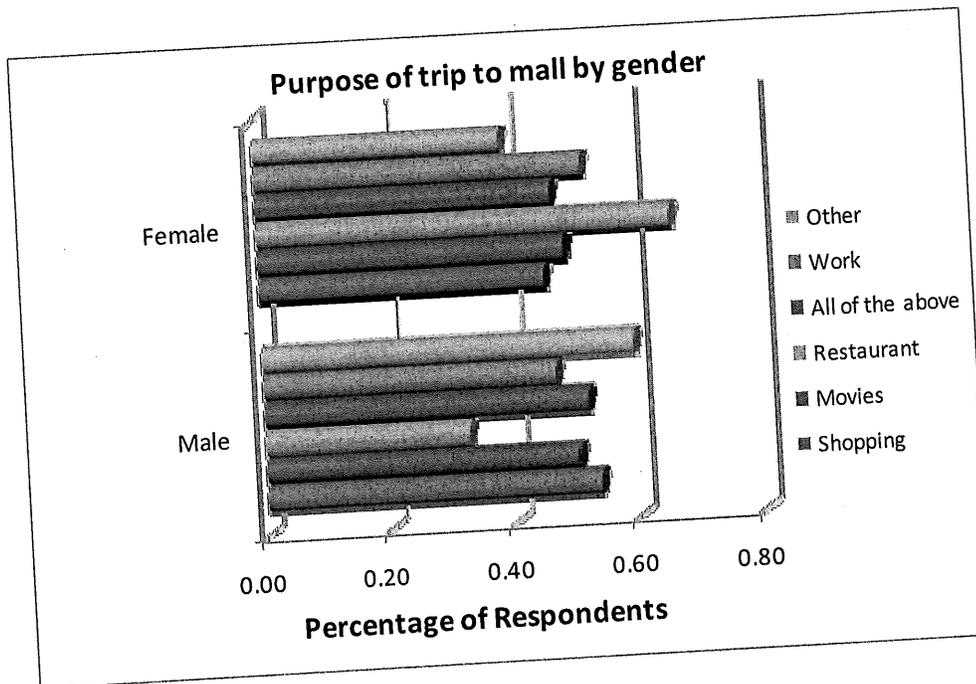


Figure A2-24: Purpose of Mall Trip by Gender

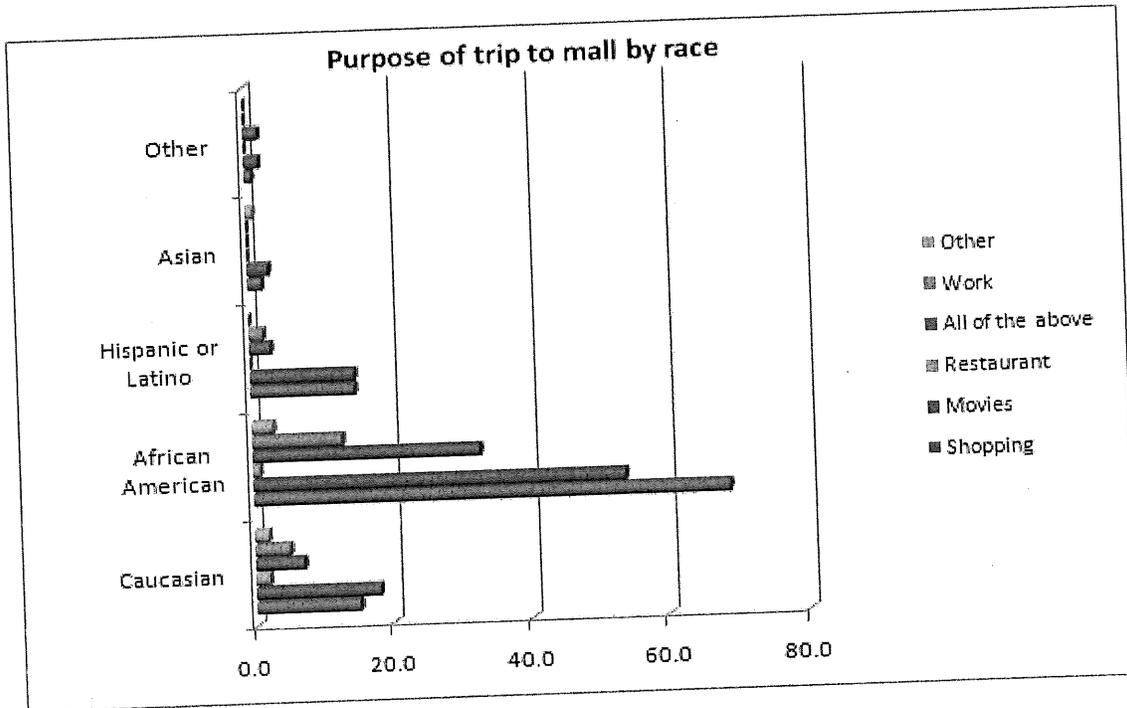


Figure A2-25: Purpose of Mall Trip by Race

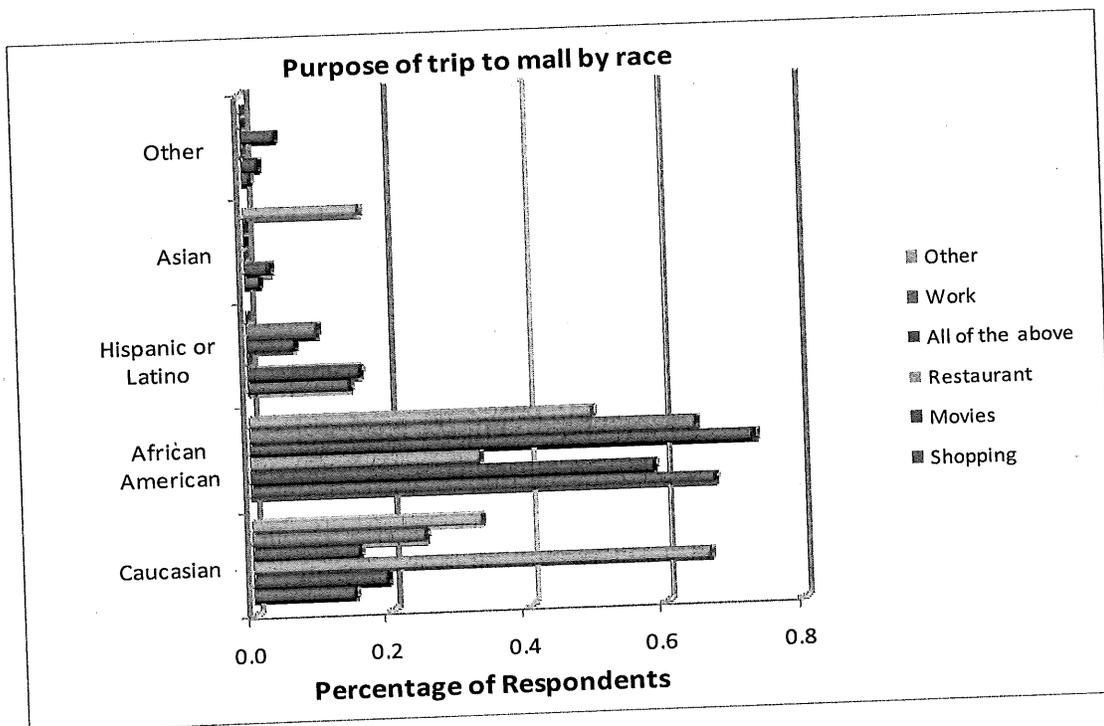


Figure A2-26: Purpose of Mall Trip by Race

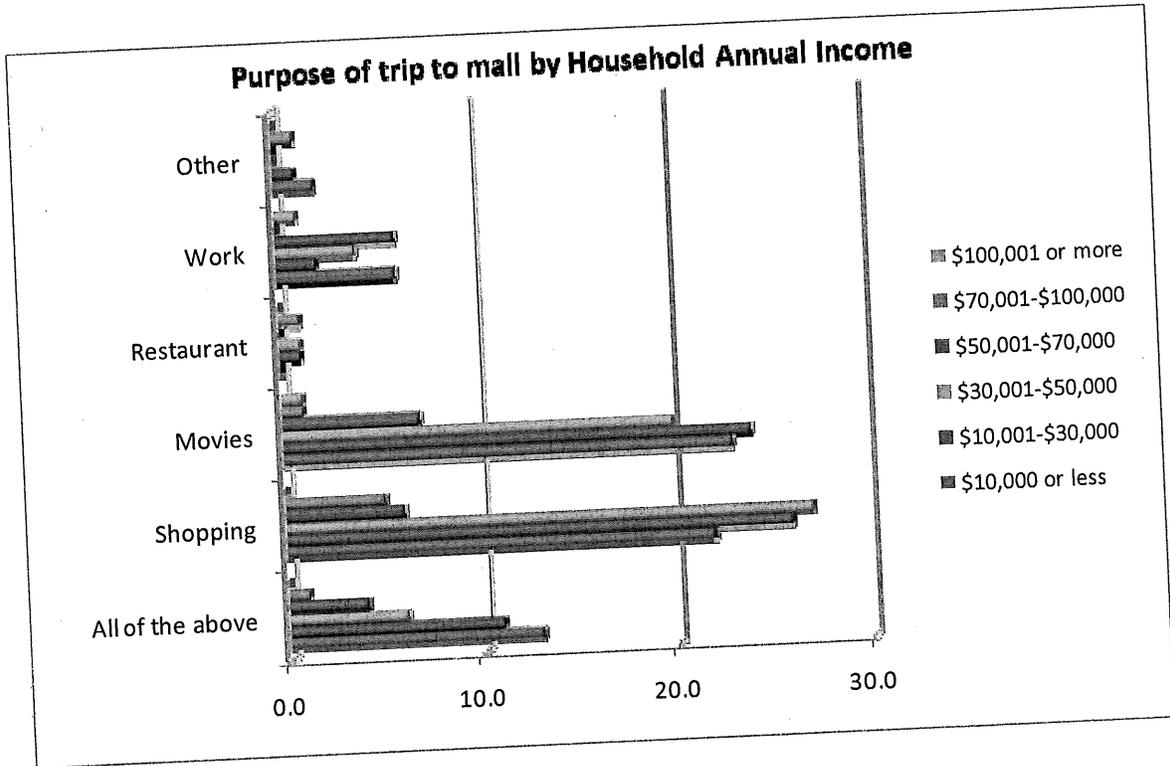


Figure A2-27: Purpose of Mall Trip by Annual Household Income

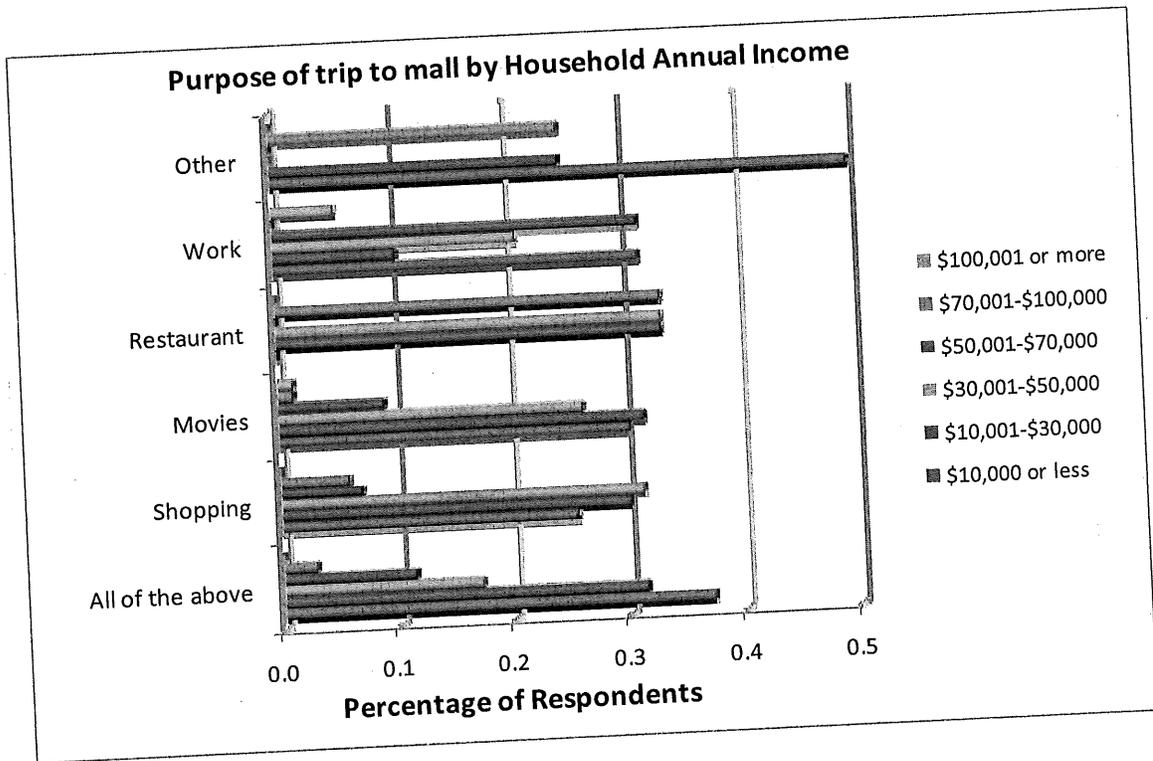


Figure A2-28: Purpose of Mall Trip by Annual Household Income

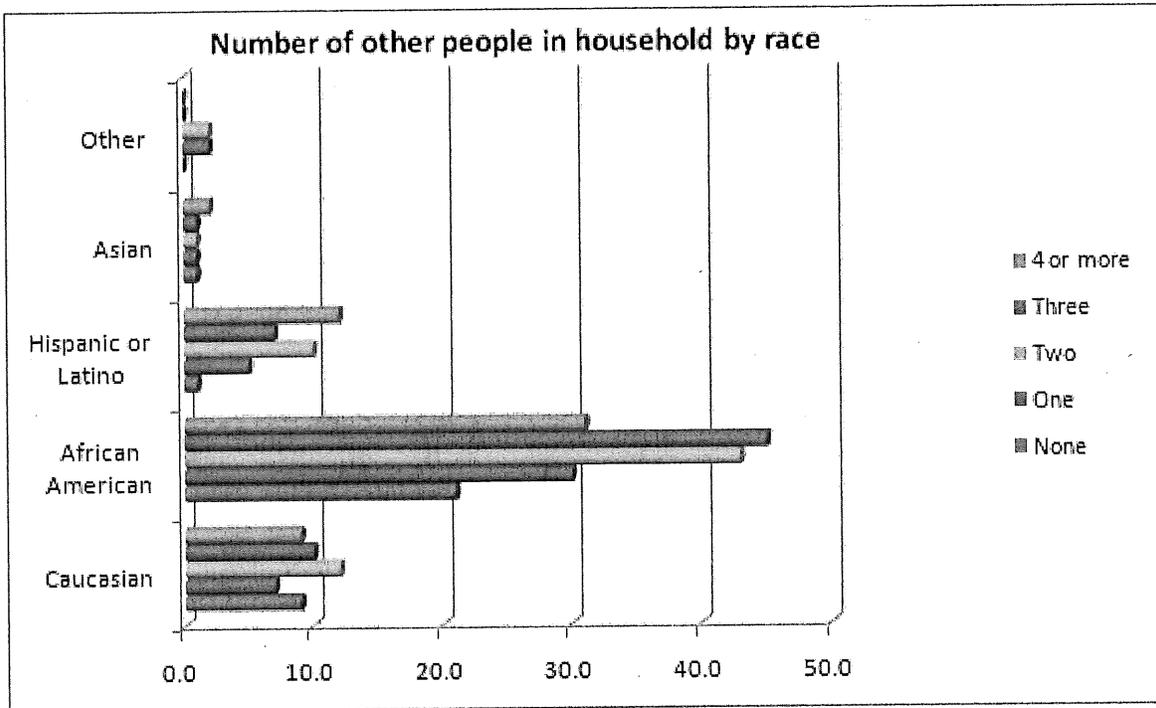


Figure A2-29: Number of Other People in Household by Race

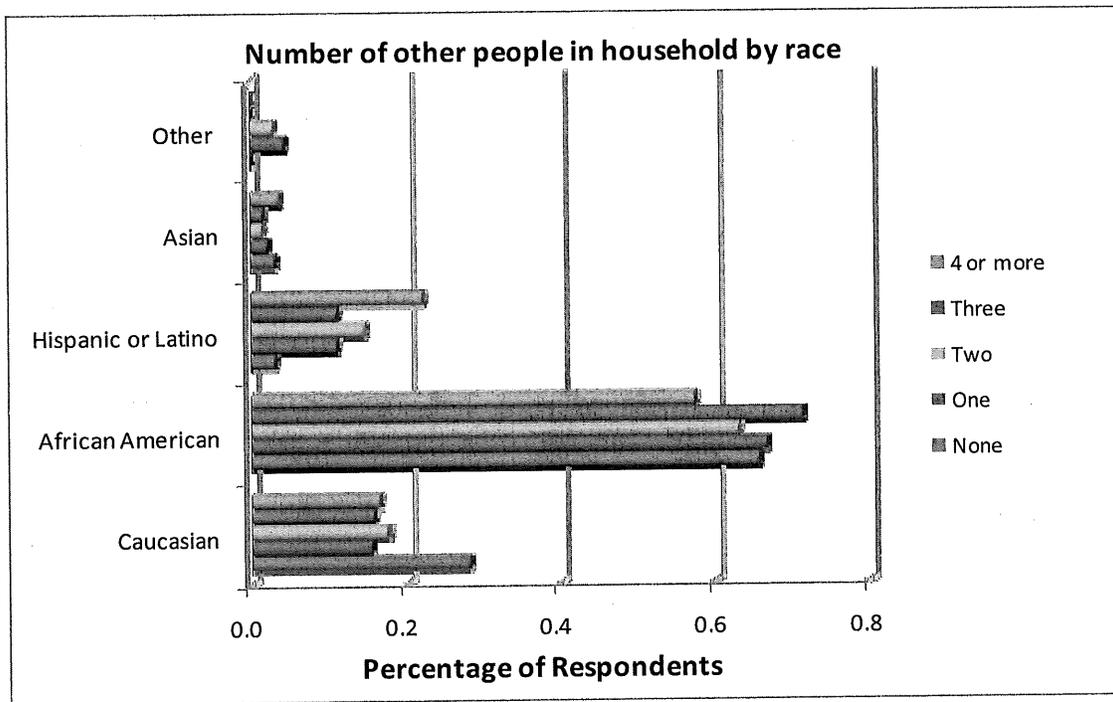


Figure A2-30: Number of Other People in Household by Race

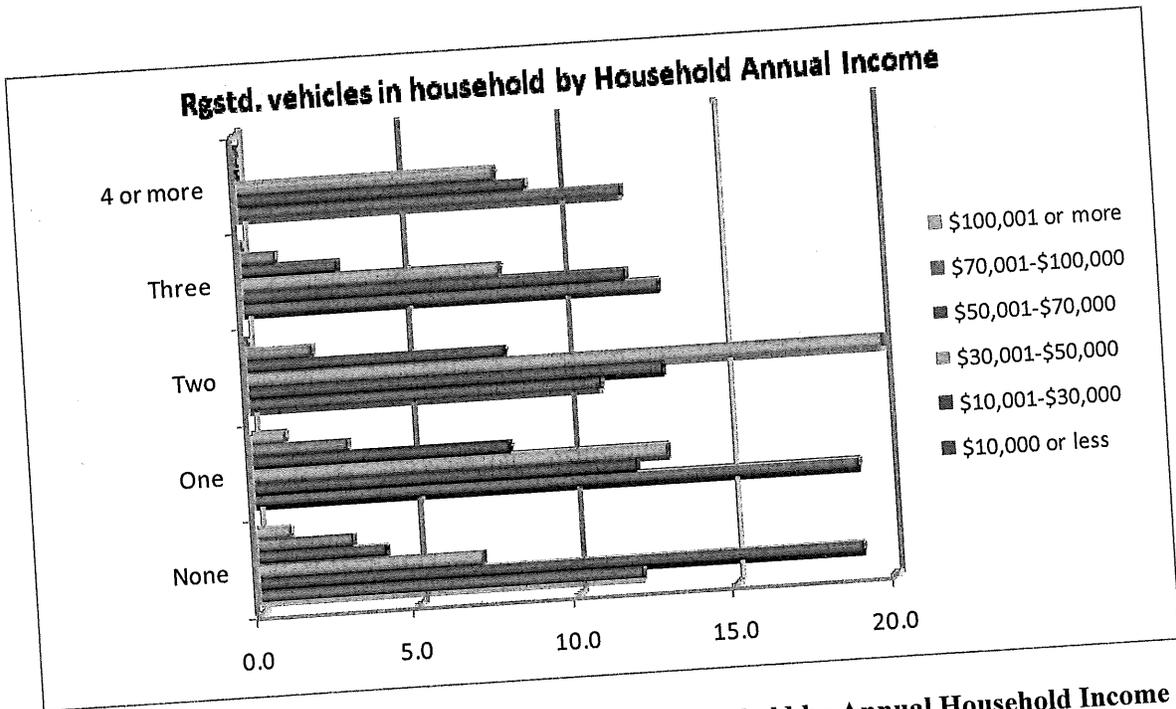


Figure A2-31: Number of Registered Vehicles in Household by Annual Household Income

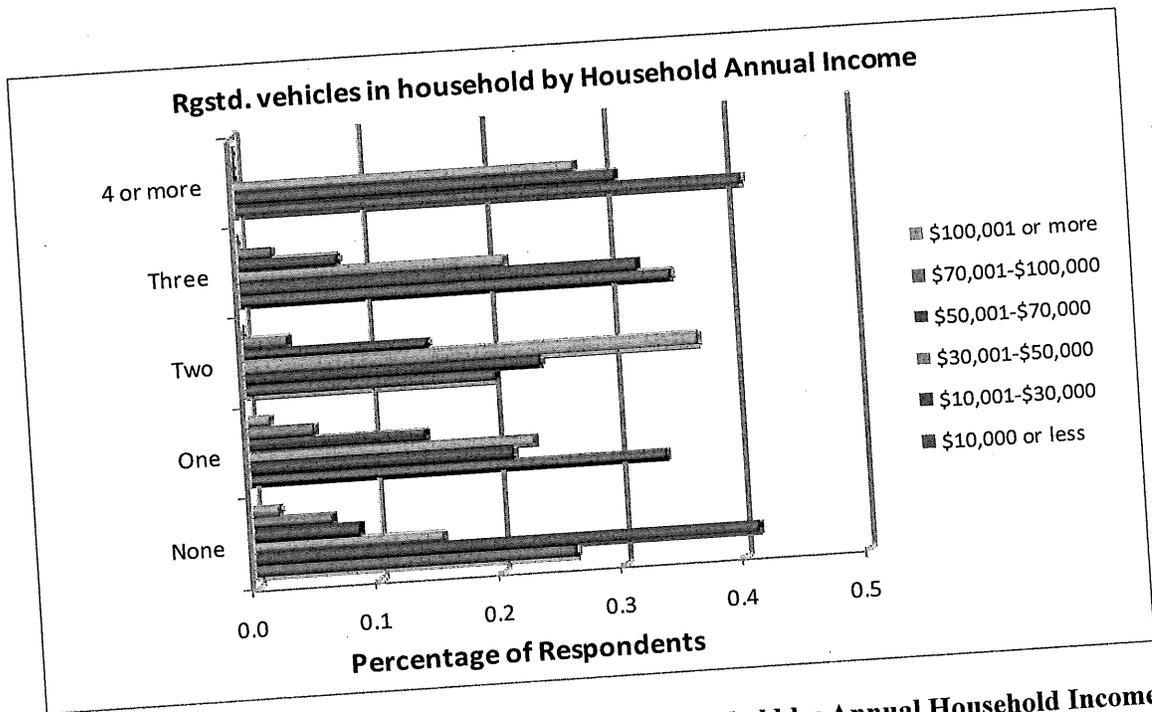


Figure A2-32: Number of Registered Vehicles in Household by Annual Household Income

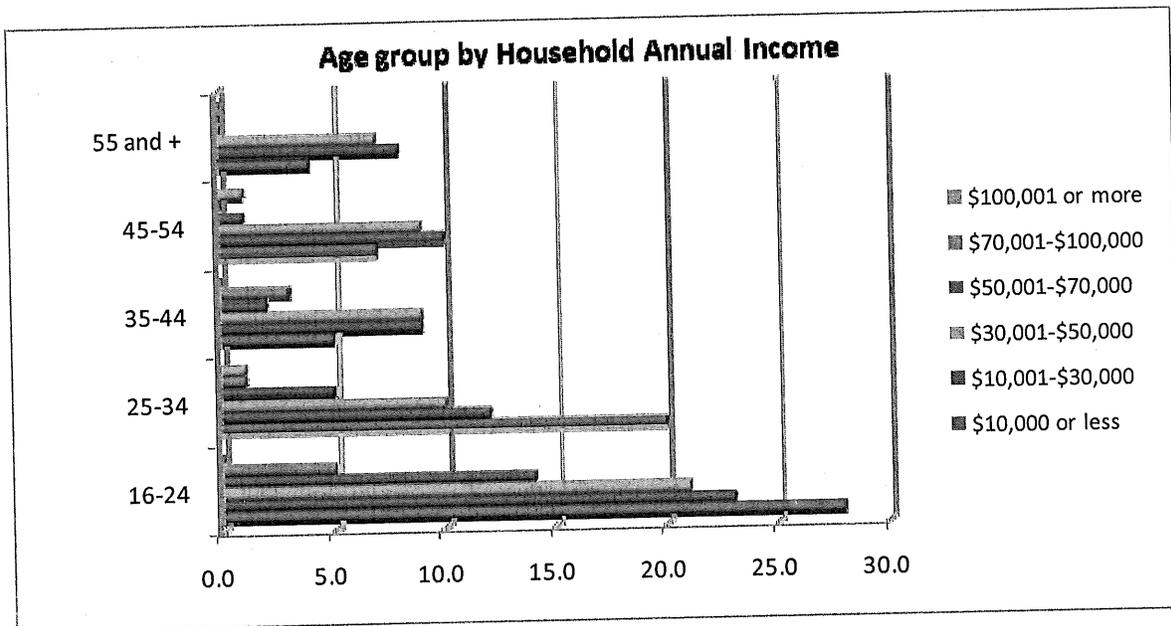


Figure A2-33: Age Group by Household Annual Income

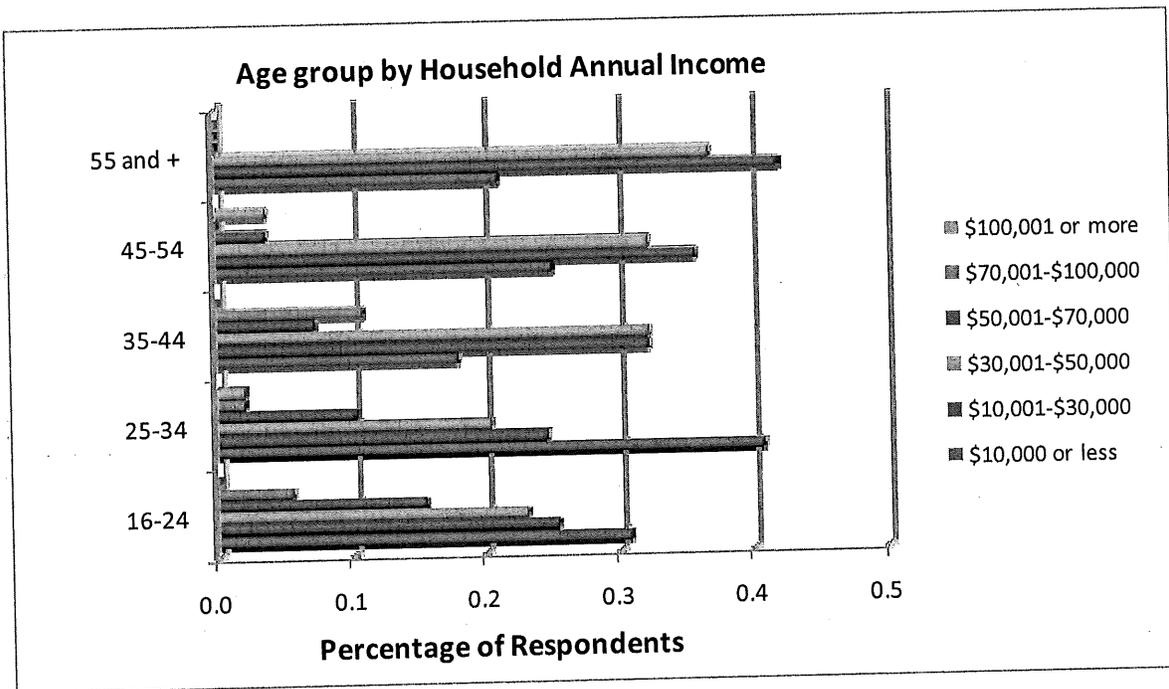


Figure A2-34: Age Group by Household Annual Income

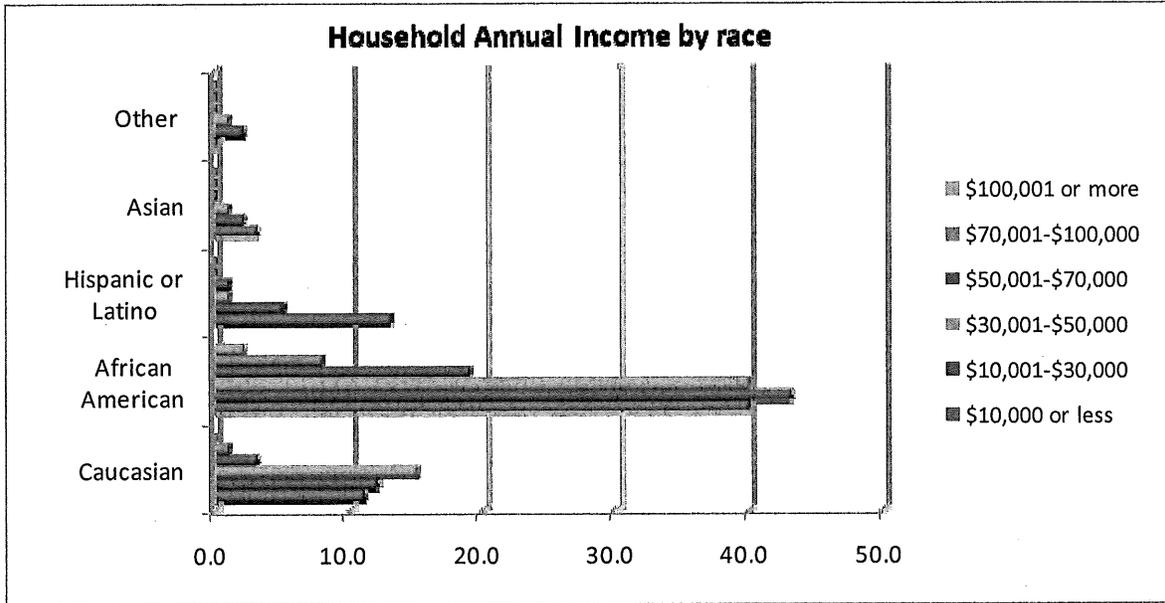


Figure A2-35: Annual Household Income by Race

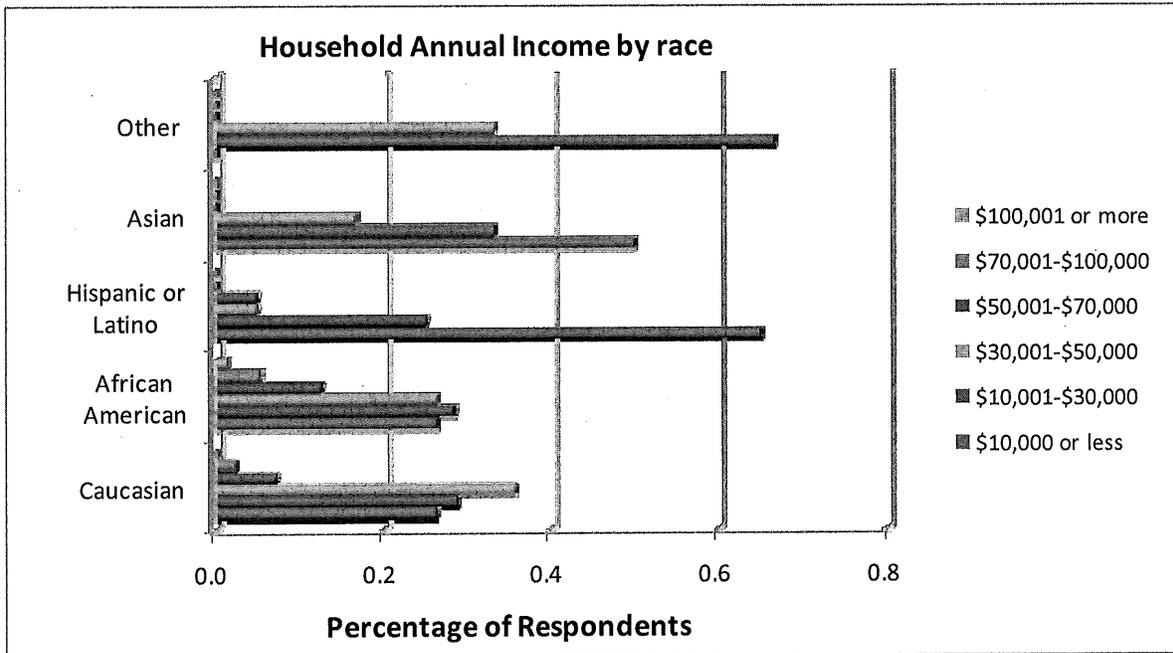


Figure A2-36: Annual Household Income by Race

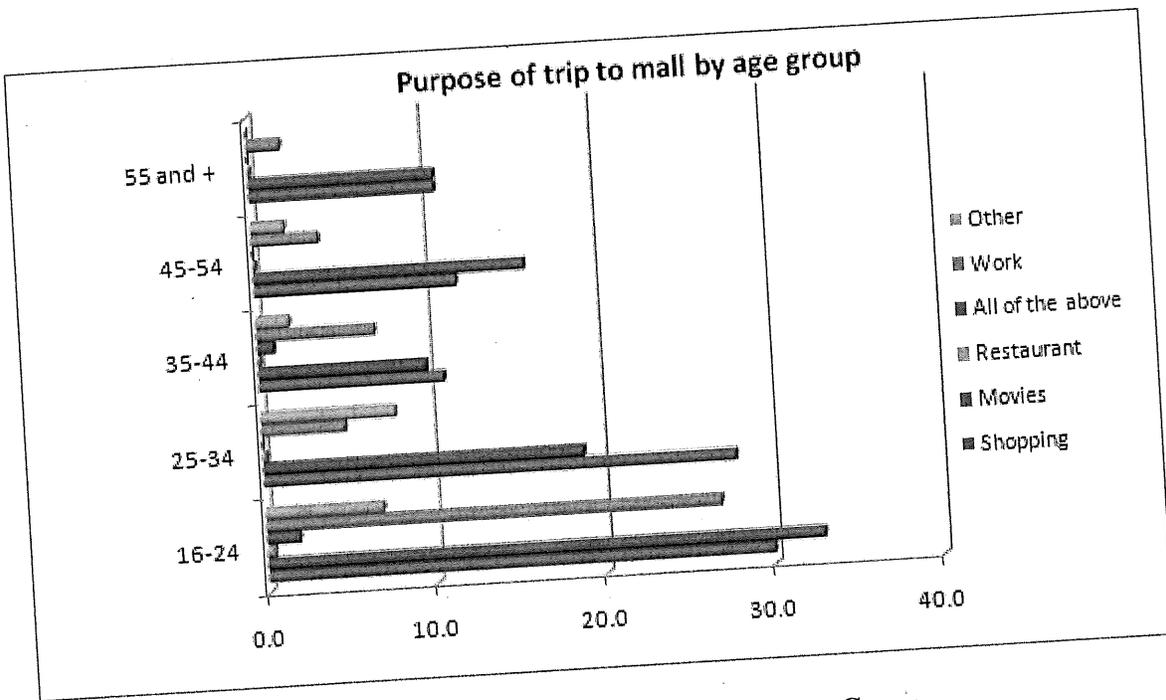


Figure A2-37: Purpose of Mall Trip by Age Group

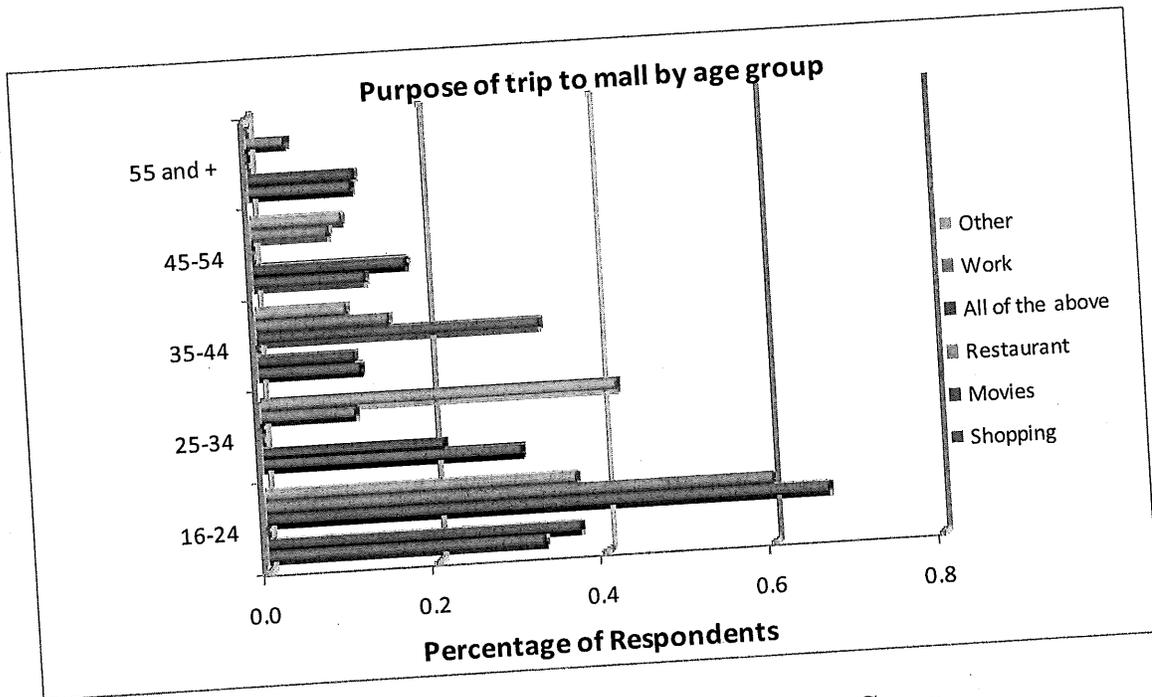


Figure A2-38: Purpose of Mall Trip by Age Group

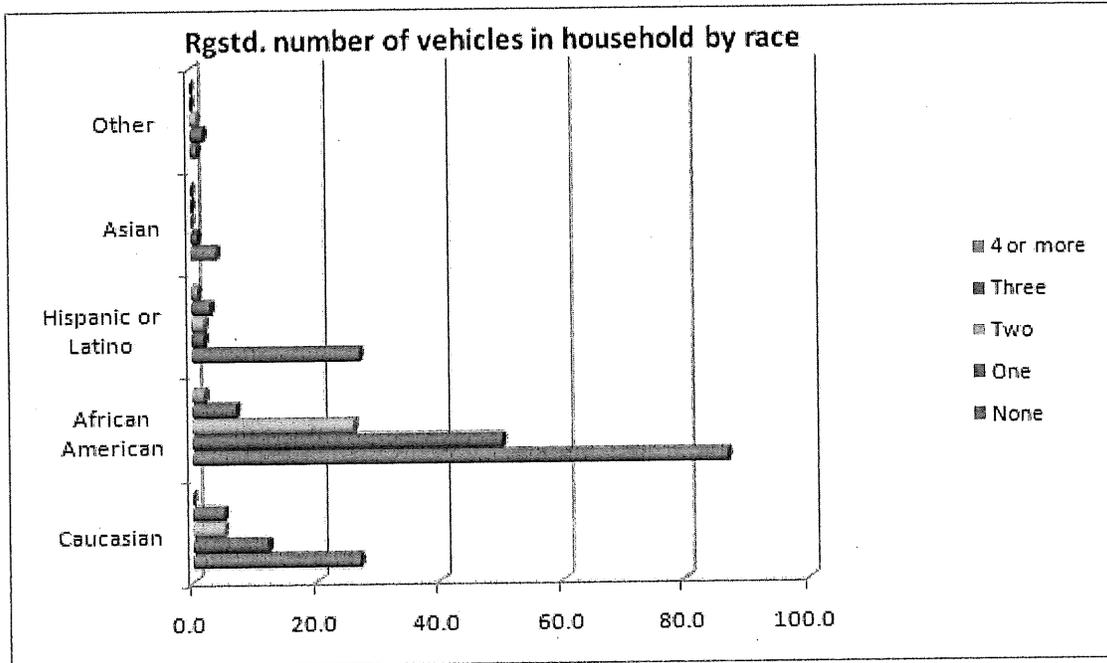


Figure A2-39: Number of Registered Vehicles in Household by Race

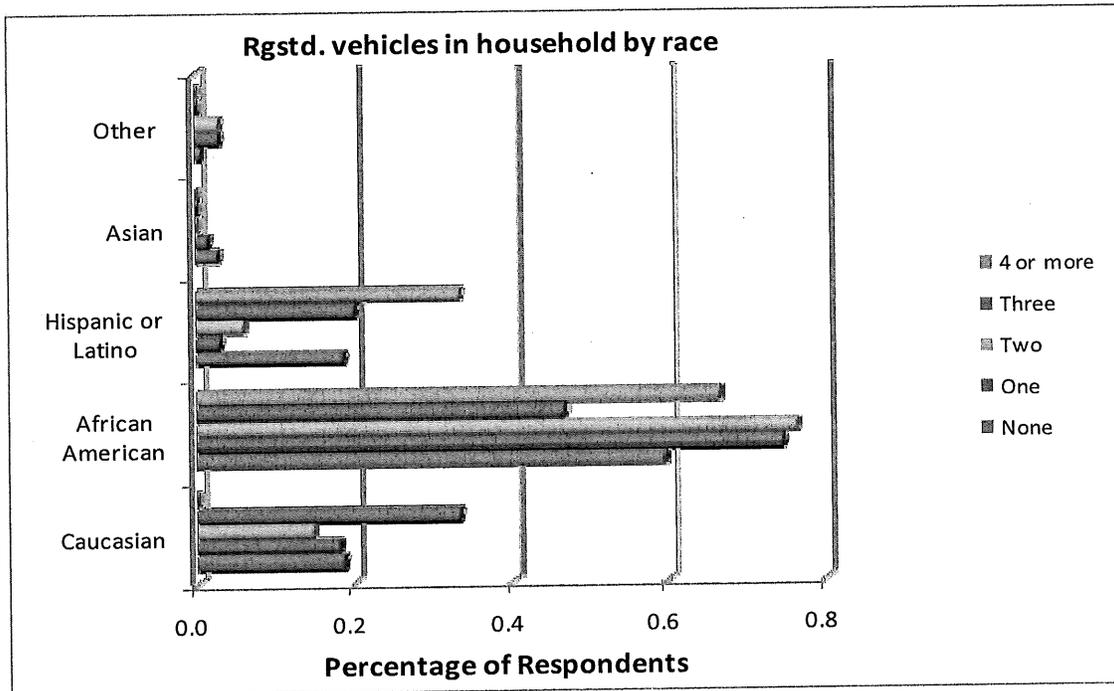
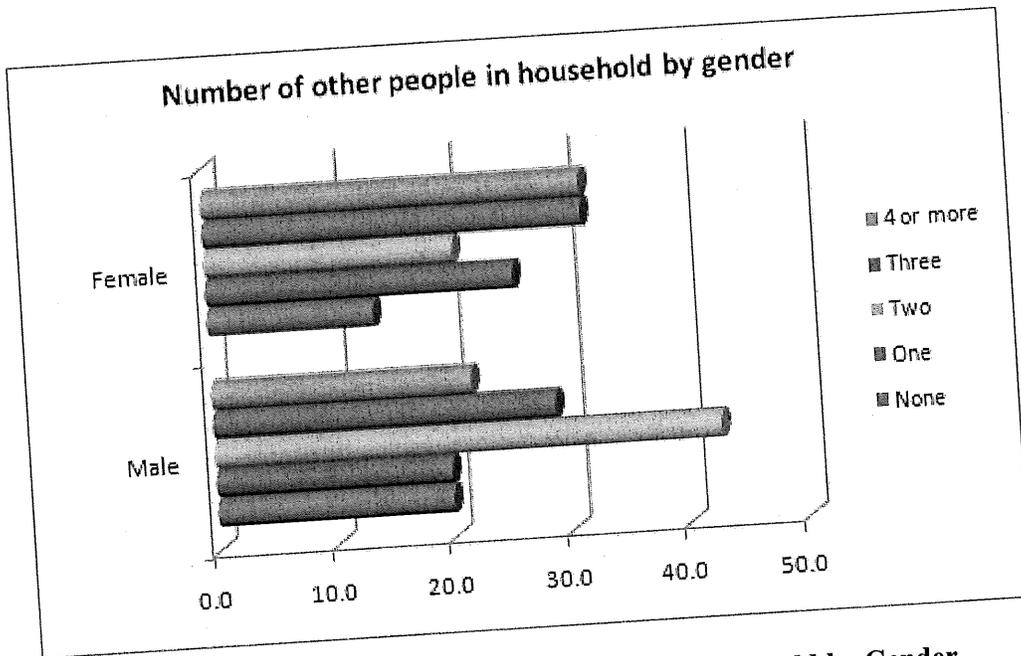
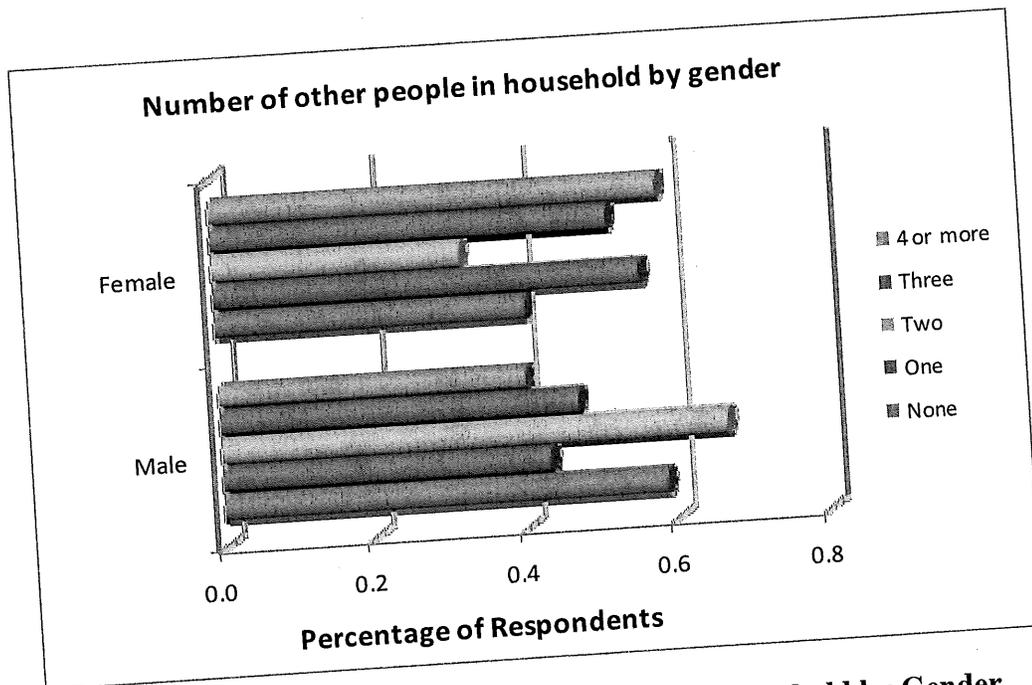


Figure A2-40: Number of Registered Vehicles in Household by Race



Appendix A2-41: Number of Other People in Household by Gender



Appendix A2-42: Number of Other People in Household by Gender

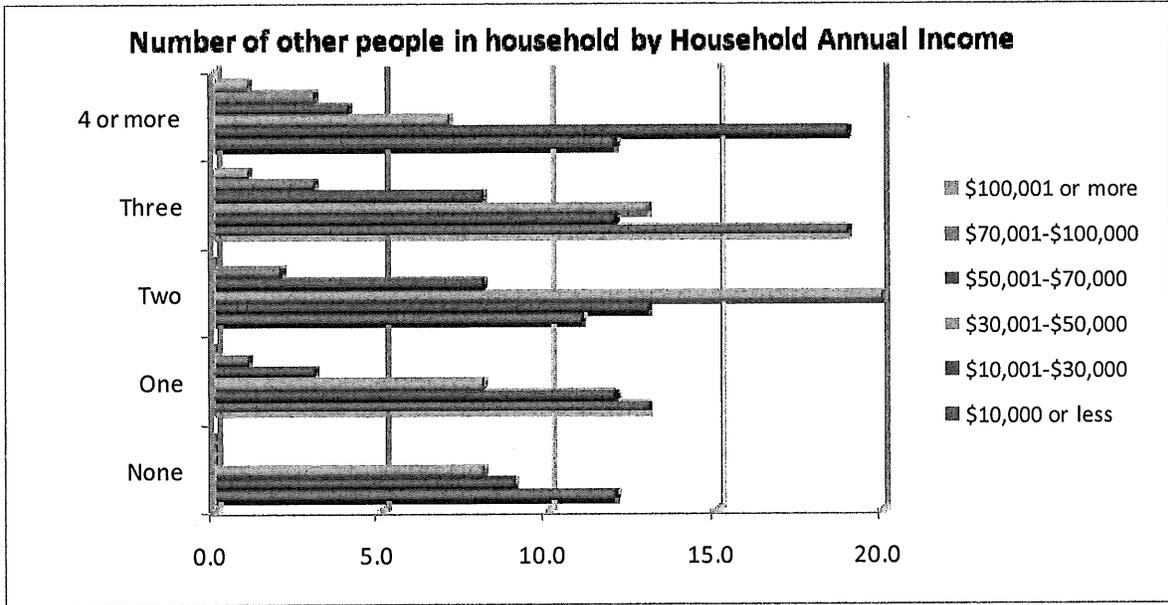


Figure A2-43: Number of Other People in Household by Annual Household Income

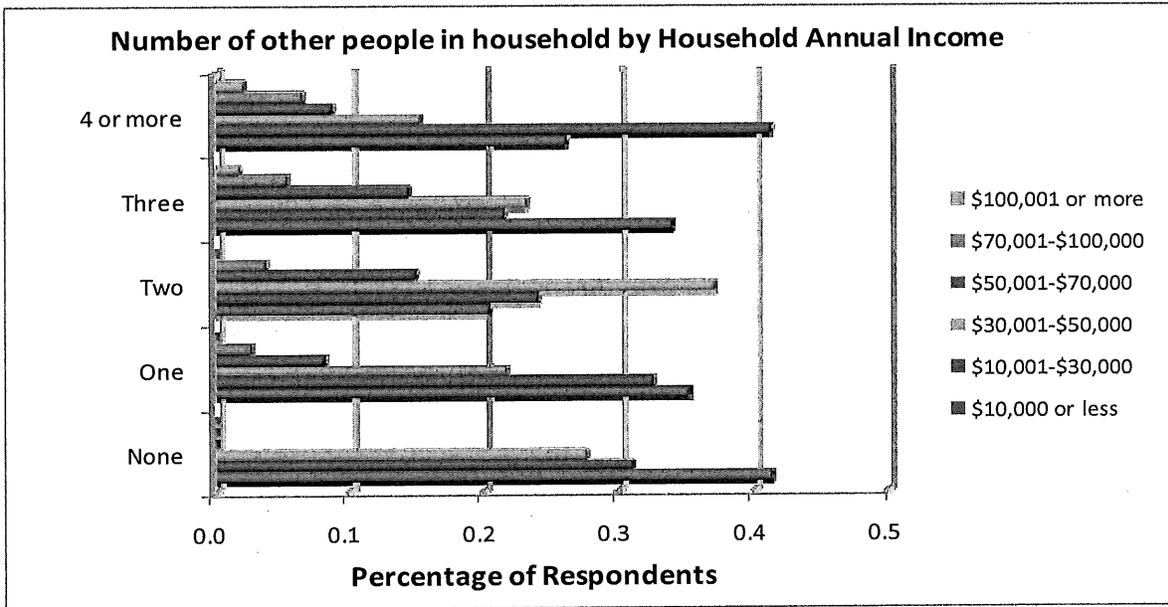


Figure A2-44: Number of Other People in Household by Annual Household Income

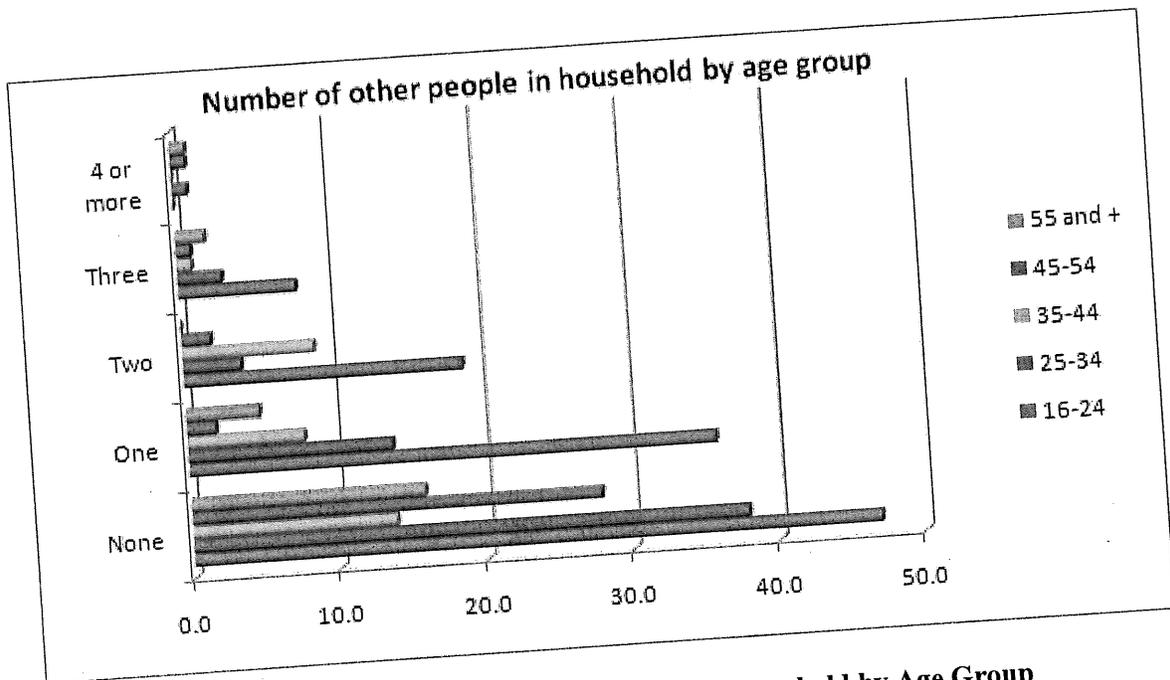


Figure A2-45: Number of Other People in Household by Age Group

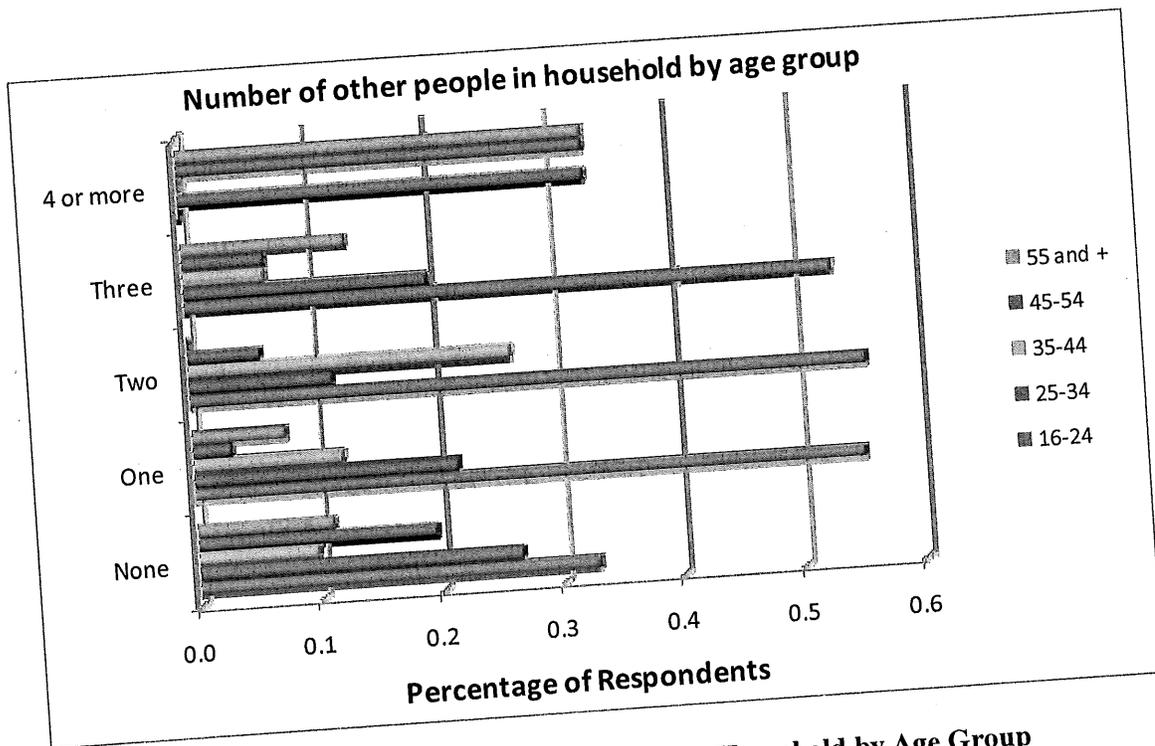


Figure A2-46: Number of Other People in Household by Age Group

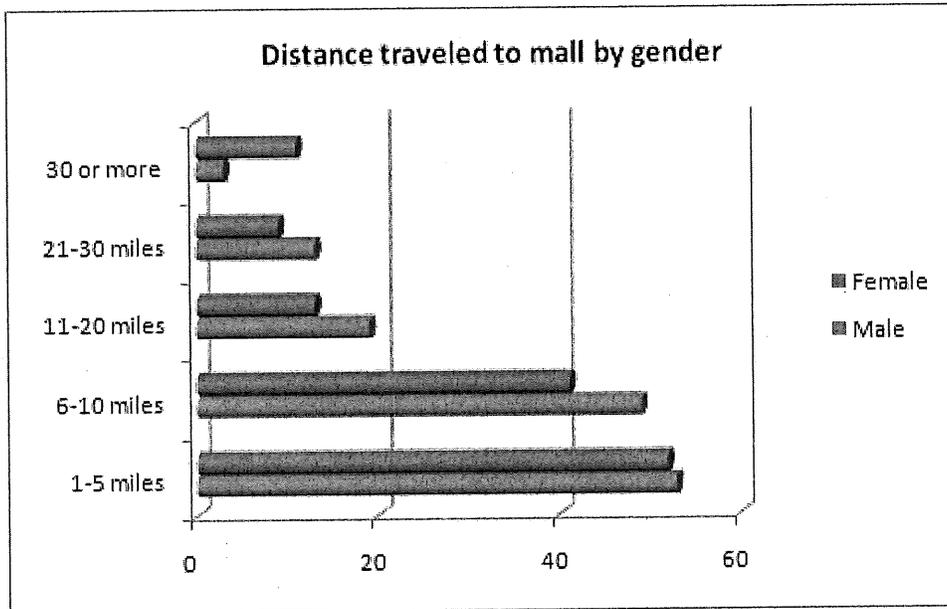
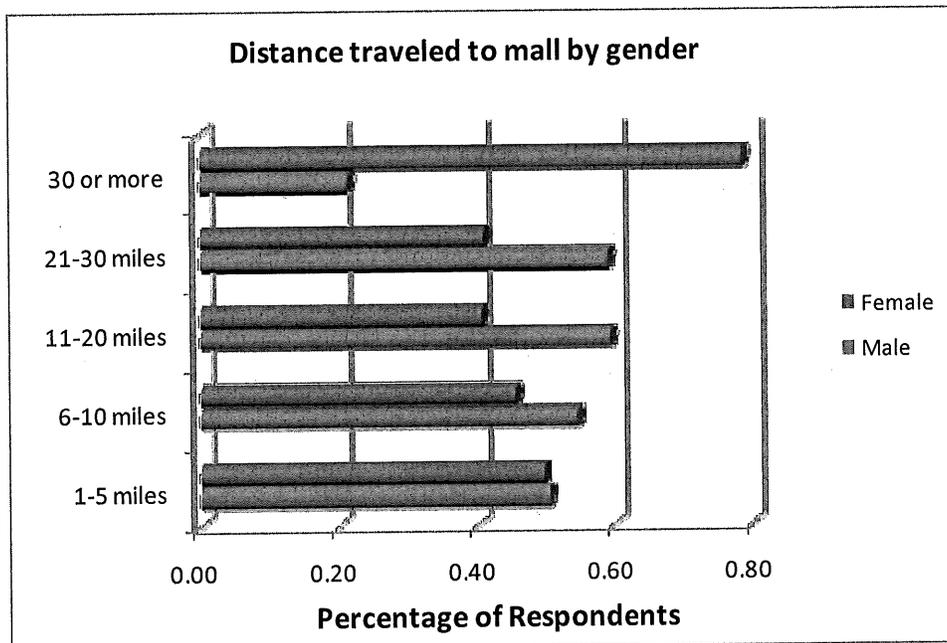


Figure A2-47: Distance Traveled to Mall by Gender



Appendix A2-48: Distance Traveled to Mall by Gender

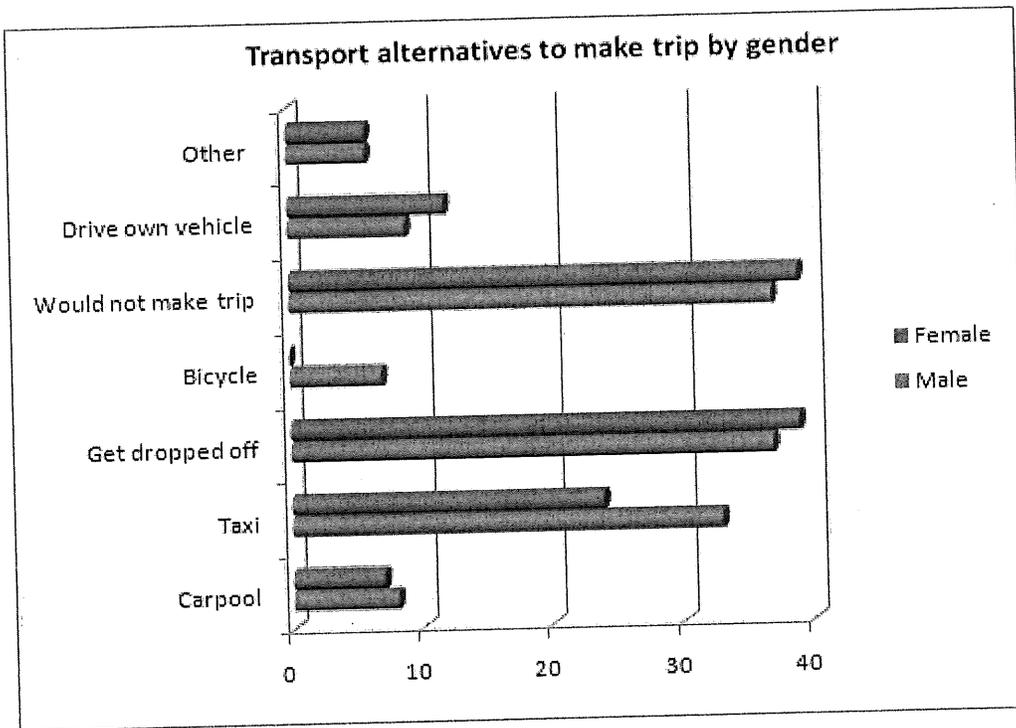


Figure A2-49: Transport Alternatives to Make Trip by Gender

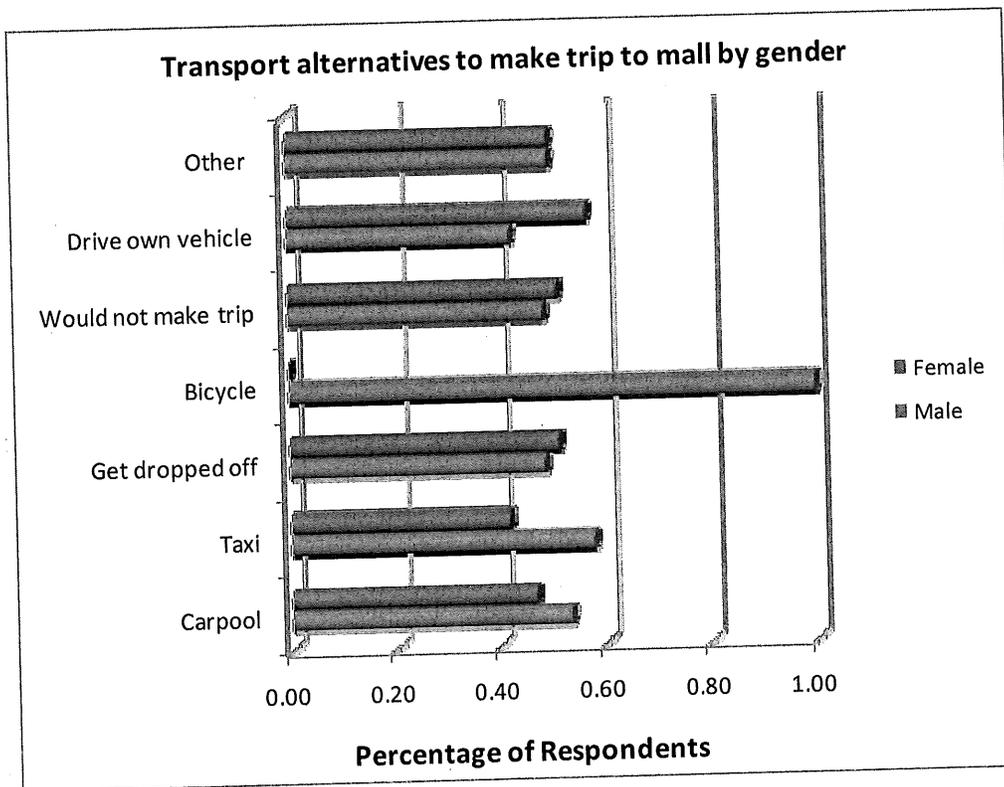


Figure A2-50: Transport Alternatives to Make Trip by Gender

APPENDIX 3

TOWN CENTER STORE LISTS

Apparel, accessories and shoes	Art, books and special retails	Services
Accessory Planet	American Greetings	XOHM
Aeropostale	As Seen On TV	A Thousand Words Photography
American Eagle Outfitters	Borders Express	Accessory Planet
Beauty Trend	Dollar Ocean	As Seen On TV
Body Central	Hallmark Gold Crown	Cartoon Cuts
Casual Gear	Oriental Treasures	Glamour Nails
Class Act	Rocky Run Restaurant	Hair 2002
Forever 21	Ruby Tuesday	Hakky Instant Shoe Repair
Frederick's of Hollywood	Spencer Gifts	LensCrafters
Gold Palace	Things Remembered	M&T Bank
Hollister Co.	Yankee Candle	Marley Tailoring
Hot Topic	Home and furnishing	MW Tux
Icing by Claire's	Select Comfort	Nail Trix
Journeys	Jewelry	Radio Shack
Kid's Footlocker	As Seen On TV	Regis Salons
Lady Foot Locker	Claire's	Ritz Camera
LensCrafters	Fred Meyer Jewelers	Sprint Nextel
Lids	Gold Palace	The Barber Shop
Memento Store	Gordon's Jewelers	T-Mobile
NASCAR Racewear	Kay Jewelers	Verizon Wireless
New Age Accessories.	Littman Jewelers	Wonderful Signature Salon
New York & Company	Monica Jewelers	Dinning and grocery
Oriental Treasures	Royal Jewelers	Auntie Anne's Pretzels
PacSun	Shaw's Jewelers	Boardwalk Fries
Piercing Pagoda	Whitehall Co. Jewellers	Caffe Euro
Radio Shack	Zales Jewelers	Chick-fil-A
Rainbow	Entertainment	China Bowl
Rave	fye - For Your Entertainment	Cinnabon
Signature Sports	Game Stop	Funnel Fare
Spencer Gifts	Regal Cinemas	GNC
The Sports Page	Ritz Camera	Godiva Chocolatier
Things Remembered	Sprint Nextel	Hershey's Ice Cream
Victoria's Secret	Health and lifestyle	Pretzel Time
Victoria's Secret Beauty	As Seen On TV	Rita's Italian Ice
Vivace	Bath & Body Works	Rocky Run Restaurant
Yankee Candle	Beauty Trend	Ruby Tuesday
Department store	Cartoon Cuts	Sbarro
JCPenney	Claire's	Subway
Macy's	Fragrances Unlimited	Taco Bell
Sears	Glamour Nails	Children
Athletic and sporting goods	GNC	Children's Place
Kid's Footlocker	Gold's Gym	Icing by Claire's
Champs Sports	Hair 2002	Kid's Footlocker
Finish Line	Regis Salons	Limited Too
Foot Locker	Trade Secret	Oriental Treasures
Journeys	Victoria's Secret	Rainbow
Lady Foot Locker	Victoria's Secret Beauty	Stride Rite Shoes
Lids	Wonderful Signature Salon	
Signature Sports		
The Sports Page		

Table A3-1: Shopping, Entertainment, and Service Alternatives at TC4

Apparel, accessories and shoes	Apparel, accessories and shoes	Dinning and grocery	Home and furnishing
Aeropostale	Torrid	Arby's	Kids' Quarters
Aldo	VANS	Auntie Anne's	Kirkland's
American Eagle Outfitters	Victoria's Secret	Bistro Sensations	Sleep Number by Select Comfort
Bags, Beads and Beyond	Wet Seal	Buffalo Wild Wings	Thomas Kinkade Gallery
Bakers	Zumiez	Burger King	Technology
Beauty Outlet	Athletic and sporting goods	Cajun Gourmet	AT&T Wireless
Christopher & Banks	Dollar Tree	Chicken King/Boardwalk Fries	Best Buy Mobile
Bostonian	Driving Impressions	Chick-fil-A	Beyond Electronics
Claire's	General Nutrition Center	Cinnabon	GameStop Lower Level
Downtown Locker Room	Lids	Dairy Queen/Orange Julius Treat Center	GameStop Upper Level
Dressbarn	Life Uniform	Friendly's	Mobile Solutions
Easy Spirit	Motherhood Maternity	Fuddruckers	Radio Shack
Express	Oriental Concepts	G'Lato d' Italia	Ritz Camera Center
Express Men	News Stand	Great Cookie, The	Sprint
Finish Line	Picture People, The	Great Steak & Potato Co.	T-Mobile
Foot Locker	Savvi	Lin's China Buffet	Services
Footaction USA	Starbucks	Mamma Ilardo's Pizzeria	7-Eleven/Citgo
Forever21	Sunglass Hut	Olive Garden Restaurant	ATM Chevy Chase
Gap	Sweet Factory	Oriental Express	Cartoon Cuts
Gossip	Time Factory	P.F. Chang's	Customer Service
H&M	White Marsh Pet Center	Ruby Tuesday	Elite Spa
Hollister	Health and lifestyle	Sarku Japan	Fast-Fix Jewelry & Watch Repairs
Hot Topic	Bath & Body Works	Subway	Hakky Shoe Repair
Icing, The	Beauty Outlet	Wendy's Restaurant	Heakin Research
Journeys	Body Shop, The	Wockenfuss Candies	Lenscrafters
Journeys Kidz	Cartoon Cuts	Jewelry	London Tailors
Jump Sportsware	Elite Spa	Fast-Fix Jewelry & Watch Repairs	MasterCuts
Kids Foot Locker	MasterCuts	Fire & Ice	Meridian Health
Kids Shoe Adventure	Meridian Health	Helzberg Diamonds	Nail Elite
Lady Foot Locker	Merle Norman	Jared The Galleria of Jewelry	News Stand
Lane Bryant	Nail Elite	Kay Jewelers	Pearle Vision
Last Stop	Perfume Galaxy	Littman Jewelers	Picture People, The
Limited, The	Regis Hairstylists	Piercing Pagoda	Regis Hairstylists
Men's Wearhouse	Trade Secret	Reeds Jewelers	Ritz Camera Center
New York & Company	Victoria's Secret Beauty	Shaw's Jewelers	Trade Secret
PacSun	Children	Whitehall Co. Jewellers	Art, books and special retails
Payless ShoeSource	babyGap	Zales Jewelers	Borders Express
Pretty Woman	Children's Place, The	Department store	Carlton Cards
Rockport Shoes	Disney Store, The	IKEA	Hallmark Gold Crown
rue21	Disney Store, The	JCPenney	Spencer Gifts
Savvi	GapKids	Macy's	Suncoast Motion Picture Company
Shoe Dept., The	Gymboree	Macy's Home Store	Things Remembered
Shoe Haven	Justice	Sears	
Sunglass Hut	KB Toys		
Time Factory	Kids Shoe Adventure		

Table A3-2: Shopping, Entertainment, and Service Alternatives at TC1

Apparel, accessories and shoes	Art, books and special retails	Services
Aeropostale	AMC Owings Mills 17	Convenience Corner
American Eagle Outfitters	Borders Express	Glamour World
Ashley Stewart Women	Brookstone	Hakky Cobblers & Tailors
Athlete's Foot	Carnival Delights	JCPenney Optical/ Photo
Claire's Accessories	General Nutrition Center	Lenscrafters
Deb Shop	Hallmark Gold Crown	MasterCuts
Downtown Locker Room	Kre8ing Your Ideas	Ritz Camera Center
Estillo Shoes	Oriental Treasures	T-Mobile
Express	Spencer's Gifts	Trade Secret
Finish Line	Things Remembered	Jewelry
Foot Locker	Yankee Candle Company	Claire's Accessories
Forever 21	Athletic and sporting	Crown Jewelry & Repair
H&M	Chizel It	Icing
Hats N More	Shenk & Tittle	Kay Jewelers
Hot Topic	Department store	Littman Jewelers
Hyatt & Company	JCPenney	Piercing Pagoda
Icing	Macy's	Reeds Jewelers
Lady Foot Locker	Dinning and grocery	Time & Time Again
Lane Bryant	A & D Buffalo's	Zales Jewelers
Men's Wearhouse and Tux	Bourbon Street Café	Technology
Milano	Cheese Steak Grill	Cellairis
Motherhood Maternity	Chick-fil-A	Game Stop
My Bag	Don Pablo's Mexican	Mobile Solutions
Naturalizer	Dragon House Express	Radio Shack
New York & Company	Jasmine Bubble Pearl Tea	Sprint
Nine West	Mamma Ilardo's Pizzeria	Verizon Wireless
Orange	Mrs. Field's Cookies	Wireless Expert
Payless ShoeSource	Nan's Gourmet Ice Cream	Health and lifestyle
Rave	Red Lobster	Angel Nails
Shenk & Tittle	Red Robin	Bath & Body Works
Shingar	Ruby Tuesday	Beauti's
Shoe Department	Salads, Wraps & More	MasterCuts
Step It Up	Sarku Japan	Nail Trix & Spa
Stride Rite	Subway	Perfumery
Underground Station	Tony Roma's	Rafet's Hairmasters
Victoria's Secret	Children	Trade Secret
Wet Seal	Children's Place	Home and furnishing
	Gymboree	International Furniture Liquidators (IFL)
		Oriental Home Decor

Table A3-3: Shopping, Entertainment, and Service Alternatives at TC3

Apparel, accessories and shoes	Art, books and special retails
Ann Taylor Loft Capitol Luggage and Leather Coldwater Creek Filene's Basement Olly Shoes Box of Rain Chico's Dick's Clothing & Sporting Goods Jos. A. Bank Clothier The Wardrobe Ladies & Maternity & Baby Burlington Coat Factory Claire's DSW Shoe Warehouse New York & Company Wavedancer White House Black Market	Butler Gallery Tomlinson Craft Collection Greetings & Readings Ritz Camera
	Athletic and sporting goods
	Dick's Clothing & Sporting Goods Soccertowne
	Department store
	Sears
	Dinning and grocery
	California Pizza Kitchen Carmine's New York Pizzeria Chipotle Mexican Grill Greystone Grill Outback Steakhouse Sakura Calvert Wine & Spirits Carraba's Italian Grill Damon's Grill Jesse Wong's Kitchen Carvel Ice Cream Gelato Factory Noodles and Company Quiznos Sub Wegmans Food Market
Entertainment	Health and lifestyle
EB Games Regal Cinemas Soccertowne	Spa in the Valley, a Salon by Debbie Ulta Salon
Home and furnishing	
Brandon Home Furnishings Butler Gallery Plow & Hearth	
Services	
Cingular Wireless Sun Trust Bank M&T Bank Pearle Vison	

Table A3-4: Shopping, Entertainment, and Service Alternatives at TC2

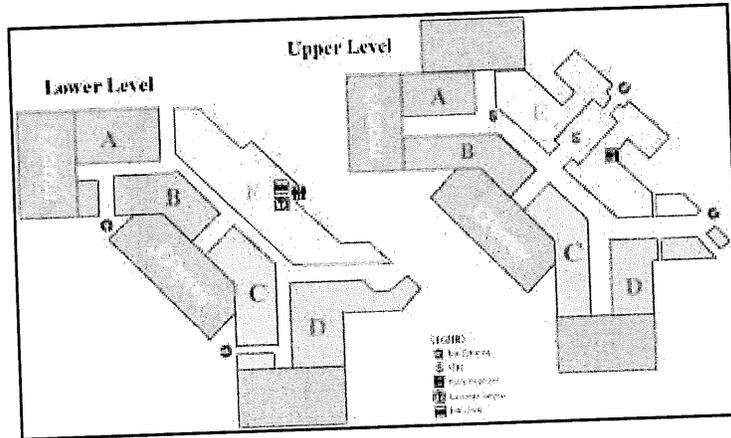


Table A3-5: Store Directory for TC3

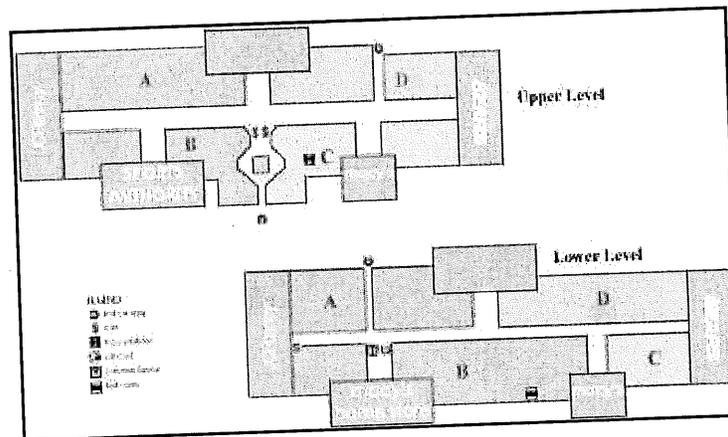


Table A3-6: Store Directory for TC1

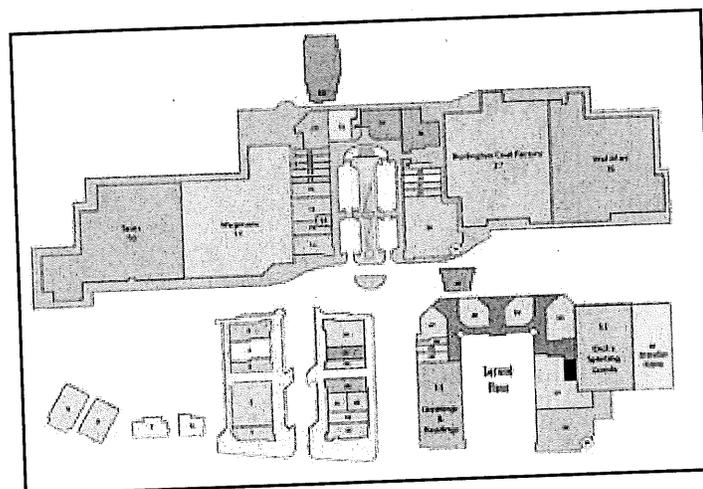


Table A3-7: Store Directory for TC2

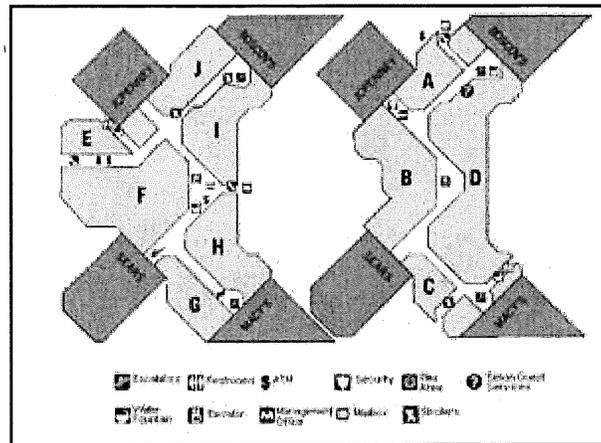


Table A3-8: Store Directory for TC4

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14. *Trip Generation Report 2001*, Evansville Urban Transportation Study, 2001.
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17. *Heber City Town Center*, Traffic Impact Study, Horrocks Engineers, January 2008.

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19. *Enhancing Internal Trip Capture Estimation for Mixed-Use Development* (Draft, Phase I Report), Brian Bochner, Texas Transportation Institute, January 2006.

Thomas Varian
120 North Broadway, Apt. 22B
Irvington, N.Y. 10533

Larry Schopfer
Village Administrator
Village of Irvington, N.Y.

Dear Mr. Schopfer,

Please be advised that I am the Vice President of the Board of Directors of the 120 North Broadway Tenants Corporation, and I represent 88 Families that reside in Irvington Gardens, 120 North Broadway, Irvington. We have many real and substantial concerns about the proposed construction of a VERY large Senior Housing Complex on the property just south of our development.

With reference to the DEIS that Brightview development has proposed we take considerable issue with several things that are under consideration. The following is a list of issues of concern we have;

1. The DEIS does not accurately depict our views as noted in the DEIS. The photos, #J8 and J9 were taken approx. 10' from each other and represent only a view from a parking lot. There are literally 24 families that will directly be affected by a change of view by placing the building 125' closer to Broadway. Actually photo's #J10 thru #J13 accurately represents the views from our property.
2. During the period of the traffic study I know that our President, Rick Rasulo, questioned that the sensors on the ground in front of our complex was, for most of the first two weeks of the study not being actuated as the rubber hoses were sitting along the double yellow lines. Also the dates listed on the DEIS were not compatible with the actual dates as it was on the May 18th BOT meeting that He complained about it and the sensors were still there for a week afterward. Was the test restarted as requested, and are we sure we have an accurate record of traffic during that time?
3. We are very concerned about the significant amount of blasting that Brightview has said will be necessary and the extremely high number of trucks that will be travelling back and forth at the site. Will there be an inspection of our entire property and all buildings that will be a basis of which we can compare with any damage that will certainly ensue? Who will pay for that study?
4. We are equally concerned about the "rock crushing plant" that Brightview has said they will bring onto the property so they can reduce the size of the rocks before transporting to another site. We are against this as it will only create additional noise at the site which will put further stress on our residents. Can this rock crushing be done off site?
5. We are very concerned about light pollution coming from the Brightview property. The very nature of the safe environment that Brightview intends to build will call for enough lighting to keep their residents and staff safe. While we understand that, we are also concerned that the lighting will spill over onto our property. Is there a lighting plan that has been created by professionals who have taken this into account?
6. The loading dock and service areas are directly opposite our property. There are visual as well as noise issues associated with this fact. Is there a plan in place to address these issues? What time will deliveries be made. What time will refuse pick-ups be made? Will there be Village or private trash pick-ups as we know we have very little recourse with private haulers as opposed to Village trash pick-ups.

Thank You for the ability to comment on the DEIS.

Sincerely,
Thomas Varian, VP
120 North Broadway Tenants Corp.

Architectural Review Board
Village of Irvington

Re: Brightview Senior Living Facility – Comments to DEIS

This letter provides the comments of the Architectural Review Board (“ARB”) of the Village of Irvington (“Village”) on the Draft Environmental Impact Statement (“DEIS”) for the Brightview Senior Living facility, proposed to be located at 88-94 North Broadway, Irvington (Project 14128) (“Project”), as submitted by Shelter Development, LLC (the “Sponsor”) and prepared by JMC Planning Engineering Landscape Architecture & Land Surveying, PLLC, (the “Consultant”), dated and accepted by the Board of Trustees (“BOT”) of the Village on November 16, 2015.

Brief Overview of the Project

As described in the DEIS, the Project is to be located at 88-94 North Broadway in Irvington (the “Site”) and is to consist of a residential assisted and independent living facility. (DEIS I-1). The present three story office building located on the Site is to be demolished and one four story main building is to be constructed to include a mix of 150 units - 85 independent living, 39 assisted living, and 26 memory care units (175 bedrooms) - as well as indoor and outdoor amenities for the residents, along with parking and service areas (the “Main Building”). The Main Building is designed to be four stories high, with a footprint of approximately 65,775 square feet, and will contain an internal courtyard entrance area, as well as associated amenities such as recreational space, outdoor dining terrace, dining areas, a library, theater, craft room, fitness area and beauty salon. (I-1). Underneath the first floor of the Main Building will be a parking garage. (I-7). 114 parking spaces are provided in the current plan, 60 of which would be contained within the indoor garage. (I-19).

In addition, the Site presently includes three existing stone outbuildings which the Sponsor proposes to preserve, remain and be adaptively re-used and renovated to create six (6) rental apartments, all of which will be affordable housing units (the “Stone Outbuildings”). (I-2). Parking for the Stone Outbuildings will be in existing lots adjacent to those structures. (I-19).

The footprint of the proposed Main Building and its relationship of size to the existing Stone Outbuildings can be found in Figure II-4 “Illustrative Plan” of the DEIS.

Brief Overview of the Site

The Site consists of approximately 8 acres and was most likely farmed during the 18th century and developed into an estate during the mid-19th century. (II-2 and IV I-3). Entrance to the Site is from North Broadway where there is approximately 438 feet of frontage. (II-2). The Site slopes up from the front of the property towards the rear with an elevation change of approximately 166 feet. (II-2).

The original estate stone mansion was built in 1860 but was lost to a fire in 1878. Another mansion was built in the same location in the first decade of the 1900's and after another fire in 1965, the main house was rebuilt as a brick building. In 1980, it was converted from a residence into a three (3)-story office building 33,000 sf in size. (IV-I4).

The three Stone Outbuildings on the Site vary in size - 850 sf; 1,025 sf and 4,200 sf - and are presently used as either residences or office space. (II-4)). One of the Stone Outbuildings was originally used as the gatehouse and constructed in 1860. Another served as a two-story carriage house and was also built in 1860. The other was constructed in the late 1800's. (IV I-3). The exterior of the three Stone Outbuildings are good examples of 19th century Hudson River outbuildings and even though new windows and doors have been installed over the years, they are potentially eligible for the National Register of Historic Places, which we recommend for nomination and inclusion. The Old Croton Aqueduct trail is located less than 500 feet from the property, on the west side of Broadway. (I-3).

The footprint of the existing buildings and the relationship of size to each other can be found in Figure II-3 "Existing Conditions" of the DEIS.

ARB Comments & Questions

Under Section 9 of the Village Code, the ARB is responsible for and charged with reviewing the exterior appearances of buildings and other structures in the Village and asked to ensure the continuous harmonious development of the Village. (Section (9a-c) of the Village Code).

It is therefore incumbent upon us to ensure that the design for the Project will protect the Site's overall value and maintain the visual, aesthetic, architectural and historic characteristics of our Village. By providing comments and questions to the DEIS at this juncture, we hope that we can identify those issues with regard to the siting of the proposed Main Building, the exterior design elements, and the proposed hard and soft landscape designs that may have negative visual impacts.

The Sponsor claims to have designed the Project in three important ways:

- (1) **Incorporating exterior design elements into the Main Building that will be in context with the neighborhood and emulate the character of the Village;**
- (2) **Using the existing topography to integrate the slope into the Project, including providing parking under the Main Building, and installing stone retaining walls and landscaping; and**
- (3) **Building the new Main Building in the same vicinity as the existing office building and leaving the three Stone Outbuildings as is.**

Our comments address these assertions and are limited to those sections of the DEIS that address them and its impact on the Village, as follows.

1. Architectural design and details of the Main Building “intended to emulate the character of the Village”

The Sponsor claims to have minimized the design impacts by incorporating architectural design and details of the Main Building in order “to maintain the existing character of the Village.” (IV.A-11). As indicated in greater detail below, we disagree with the Sponsor’s following claims as to design and request that each assertion be addressed and supported with further detail and discussed:

1. The design is a “contemporary interpretation of a colonial revival Hudson River Valley mansion with a nod to the Italianate buildings which are currently on the site.” (I-23).
2. The “siting enables the ‘built scale’ and ‘historic character’ of the community” [to be] maintained. (IV.B-5).
3. “[A]rchitecture in the area is varied” (IVJ-9), however, argues that the design of the Main Building’s “early classical revival colonial architecture is monumental in its presence.” (IV.J-11).
4. The Stone Outbuildings “are predominately Italianate in style and although the proposed [M]ain [B]uilding is not, it is designed to respect the scale and proportion of the existing buildings.” (IV.J-11)
5. The “architecture is designed as a series of houses which are not all the same, as a way to emulate a residential street front.” (IV.J-11).
6. The “front façade of the proposed main building, facing North Broadway, is a modern-day interpretation of traditional colonial, early classical revival, style.” (IV.J-10). It intentionally included “a single story porch, one and two-story bay windows, and some smaller scaled windows.” (I.J-11).
7. The “form created by a gabled front and wings is common in colonial architecture.” (IV.J-10). Further, the “central block historically may have either a full height entry porch (portico under pediment) or a smaller one story porch. Here, the architecture uses the single story entry as it is not the true entry.” (I.J-10).
8. “Flanking the center gable front is a two story porch ... [which] creates a lovely porch overlooking the Hudson River.” (IVJ-10).
9. “Classical details” in the design have been incorporated: denticulated pediment; wood/brick/stucco/stone materials; a band belt separating the cultured stone base from the siding above; “classical style” fenestration; window in a blind arch; and elliptical fanlights along the front porch. (IV.J-10)(IV.J-13).

10. "The courtyard continues a traditional form of the continuous cornices at the gables but also begins to introduce a box eave return which begins to break that strong horizontal cornice." (IV.J-11).

ARB Response as to Architectural Design and Details

The proposed project is located in a suburban neighborhood comprised of single-family homes and multifamily residential buildings. The houses are unified by certain architectural styles, as well as similar scale, massing, materials and setbacks. The history of the Site and planning concepts of the late 19th/early 20th century suggest that a lot of this size would have had a country-like and private estate on it, with a substantial setback (and lack of sidewalks), a tree lined winding driveway, surrounded by a stone wall, especially along Broadway.

The Sponsor claims to have designed the Main Building as a "colonial revival Hudson River Valley mansion," compatible with and complementary to existing residences in the Village. This terminology is inchoate and inaccurate. The Colonial style of architecture, roughly introduced in the 18th/early 19th century and primarily seen in New England, incorporated simple proportions. Typical materials in the two story symmetrical structures included wood clapboard siding and brick. The Hudson Valley mansions, on the other hand, primarily were built in the third quarter of the 19th century and with few exceptions, are Italianate, Victorian, or Gothic in design, with a few Arts and Craft models. Their mass was broken up into more distinct volumes and they were not symmetrical. Roofs or roofs-scapes against the sky were grand or marked by chimneys, a sign of wealth at the time. Examples of such mansions, Lyndhurst, Sunnyside and Biddle, surround the Site.

We find that rather than contribute to the overall harmony of the neighborhood that the proposed design does not invoke a New York Hudson Valley style but rather feels massive, "bulky", institutional, and detracts from the Village's historic texture, scale and materiality. The new Main Building should establish a related-ness to surrounding properties in terms of the primary visual aspects of bulk, height, massing, detail and scale. By virtue of its height and four stories, the Sponsor faces the challenge of maintaining the architectural integrity and creative design of the Site. It does not, however, achieve this order and balance. Because of the mass of the building, the decorative elements and features seem over-detailed, over-used and repetitive, lessening the character.

The massing of the building is the greatest concern. A device used in formal manses of the time period is to change floor heights and create room hierarchy, with the ground floor having a higher height and the top floor visibly lower. Perhaps to break up the presently designed "square donut", the courtyard in the middle should be broken up and redesigned. The courtyard could be opened to the south to allow more light. Or a bridge-like structure could be designed without a fourth floor. Alternatively, more shielding could be added. In either event, the four story vertical impact of the Main Building's design requires more variation and detail and the scale and hierarchy needs to be established.

Presently, the Main Building does not include balanced and harmonious fenestration typically found in estates in this area. Windows are critical elements in the design. They add depth to the façade and provide visual interest. As presently designed, the number, type, proportion and shape of the windows are not appropriate for a building of this scale. The clamshell detail over the windows, typically found in New England buildings, is repetitive and it loses its strength and value. Nor is the design of a New York character. The windows need to be more varied, grander and larger. To make the windows more in keeping with the Village, they should be classic New York windows of the time - "2 over 1" or "2 over 2" - which add more texture and create more variety.

Likewise, the hip dormers are "forced" and never would have been found in residences of this time period. They are almost flat, not carefully designed and positioned to be in scale. The roofline, an aesthetic and functional design element, is not in keeping with the architectural style or character of the neighborhood. The roof is a straight continuous line and more of a Mansard than a gable and thus, reinforces the bulk of the building. It is not as architecturally consistent with the goal of breaking down the mass, nor is it attractive. Although attempting to be an estate, it feels institutional and "box-like" because it does not have appropriate scale or pitch.

Because of the size of the building, the quality and variety of the materials are more important and must have an authentic feel. The design of the front porch is important. It should be continuous across the front (more like a hotel) and should be unbroken and wrap around the building as opposed to flank the center gable. The two-story porch is the type of depth and relief that breaks up the mass of a four-story building; however smaller balconies that fill the volume encumber the volume of space. Eliminating key elements of design and substituting other stylistic attempts are inappropriate to the Site's history and location and thus, visually disruptive. Presently the design of the front façade of the proposed Main Building, facing North Broadway, is not ideal and contrary to the Sponsor's claim. It is not a modern-day interpretation of traditional colonial, early classical revival, and style residence.

In summary, the design of the Main Building does not emulate the character of the Village. We find the scale and massing of the proposed Main Building out of character with the neighborhood. As indicated above, the Project creates visual, aesthetic and neighborhood impacts and we recommend that the Sponsor bring down the scale of the Main Building and create more depth and massing variation. As presently designed, it is neither accurate nor fair to describe the proposed Main Building as a "colonial revival Hudson River Valley mansion" and the Sponsor should provide a more accurate, appropriate and complete design. Each of the concerns identified above should be discussed and addressed.

2. Use of Topography in the Design - Landscape Design

The Sponsor claims that an important design consideration is "the use of the topography to integrate the slope into the structure." (IVJ-16). "The building is designed to step into the existing topography to minimize site impacts; with building height being the highest (4 story) in the front (west) side of the building, and the rear (east) having a lower building elevation (2 story), which is more in scale with the existing stone buildings that will remain on the site as

residential structures.” (II-13). In addition, the Sponsor proposes to provide parking under the Main Building to minimize the need for surface parking lots. (I-23). It will be contained in approximately half of the first floor level. (II-14).

Demolition and construction at the Site will result in approximately 5 acres (60 percent) of the 8 acres to be disturbed, (I-8). As indicated in the DEIS, there will be removal of rocks, trees, bushes, grasses, ground cover and shrubs. 75 trees will be removed, as indicated in Figure IV.D-1, “Tree Removal.” The Sponsor will redesign the hard and soft landscape and has included a Preliminary Landscape Plan to re-vegetate the Site. (I-11). Almost 3 acres will become impervious surface, an increase of approximately 1.20 acres. (I-8). Also, to address the grade and “to prevent a larger area of disturbance” (I-9; II-17), three parallel retaining walls 2,746 feet in length and ranging in height from 6-13 feet are to be built and located around the Main Building. In between the retaining walls, the design calls for terraces 8 feet wide. (II-17). Exhibit II-10. The Sponsor added additional landscaping to provide additional screening from adjacent properties as well as the view shed from North Broadway. (II-20). The plan proposes evergreen buffers to the north and south where it encroaches closer to property lines. (I-23). The proposed landscape plan is “intended to compliment the architecture and Site design.” (I-11).

ARB Response as to Topography Design

Contrary to the Sponsor’s claim that its proposed landscape plan “compliments the architecture and Site design,” we find that it is not in keeping with the landscape design of estates of the time and does not add to the harmonious development of the neighborhood. While the Preliminary Landscape Plan includes plant vegetation and landscape buffers, one noticeable design feature absent and recommend is re-construction of the stone wall along North Broadway. It most likely existed at one time and it would be ideal to incorporate it in the design again, using the same type of grey large-scale stones found in the existing wall. The design should incorporate taking down some of the existing old stone walls and reuse and rebuild them in the scale of the other walls along Broadway - as a sign that one has arrived in the Village. Ideally, the existing entry should be reused, too, if only for an additional entrance or exit. Similarly, estates in the area had shielded drives, not open, visually long and winding entrances. An appropriate entrance would suggest a larger grove of planted trees above a restored stonewall along Broadway. A procession of trees leading to the front entry would be more in keeping with estates of the time.

With disruption of nearly 5 acres, or 60 percent of the Site, appropriate landscaping is critical. While the landscaping is well designed on the north side of the property, the front western facing lawns need better design in keeping with estates of the time. We recommend more plantings to mimic meadows with paths, rather than a manicured front lawn. More alternatives to grass should be incorporated. A working vegetable and herb garden for the residents and the neighbors would be ideal. A rose garden, reflecting pool, or even a lily pond would be more in keeping with the Village and local estates in the area, especially Halsey Pond and the Rose Garden at Lyndhurst. The loss of 75 trees on the Site is significant and each must be identified by type, age and height. A total of 194 trees were identified on the Site and included in a Tree Survey (Table IV.D-1). The significant increase of impervious surfaces - approximately 1.20 acres – necessitates more thoughtful and sensitive landscaping. We recommend that the Sponsor

provide more detail as to each of these design elements and impacts, including the proposed three parallel retaining walls and the terraces in between.

In addition, greenhouses were very popular at the time and are an appropriate element given that many of the large local estates had working greenhouses. Indeed, the noted greenhouse manufacturer, Lord & Burnham, was headquartered at the waterfront in Irvington in the 1800s & 1900s. It constructed the first steel-framed curvilinear greenhouse at nearby Lyndhurst and thus, building a greenhouse at this Site would invoke a local feel. Likewise, larger and broader front terrace porches would also give the Site a feel of an estate and create locations for residents and visitors to sit and overlook the Hudson River.

The Sponsor should discuss and provide more detail as requested above. Each of these concerns should be addressed and supported with further detail.

3. Siting - landscaped front yard setback from North Broadway and the Three Stone Outbuildings

The Sponsor argues, “The primary design consideration is the siting of the building [in that it is] in approximately [the same] vicinity of the existing building.” (IV.J-16) To mitigate potential impacts, the Sponsor proposes to provide a large landscaped and open front yard setback (minimum 300 feet) from North Broadway. (IV A-10). The Site Layout Plan is at Figure II-5.

To minimize impact, the Sponsor also plans to maintain, preserve, and re-use the three Stone Outbuildings. No changes are proposed to the exterior of any of the Stone Outbuildings. (II-14).

ARB Response as to Siting:

As to the siting of the Main Building, the proposed Project will be visible from North Broadway. It will be set back 300 feet from the road. This is closer than the existing office building, which is 440 feet from North Broadway. (IV J-6). We do not object to the location and our concerns about the entrance and landscaped front lawn are noted above.

While we understand that there is no historical significance to the Main Building, it is critical to the character and history of the Village that the three Stone Outbuildings on the property be preserved and appropriately integrated into the project development. When they are adapted and updated for residences, a closer examination should be made as to how they will be heated and cooled, so it can be determined, what equipment, if any, will be visible from the exterior. All mechanical elements should be shielded so as to respect the historical design of the buildings. Likewise, should the windows be replaced, window selection should be appropriate to the period of design (“2 over 2 division with “real” mullions). All original trim and detail should be preserved. The Sponsor should discuss and provide more detail as to how each of these concerns will be addressed.

4. Question About Other Design Issues

There are other design concerns about which further information would be appreciated:

- a. As to heating, cooling and lighting of the proposed Project, what green initiatives, if any, have been incorporated in the design of the Project? Solar energy? Geothermal energy?
- b. As to lighting, the Sponsor indicates that the aim of the lighting design is to “promote safety of residents and visitors while retaining the community’s character and reducing light pollution both in the night sky and on to neighboring properties.” (I-20). Further details are required. Will a lighting consultant regarding light pollution be retained? Will there be a computer modeled photometric analysis? Do lower levels of garage have architectural screening to confine light within the structure? Is there architectural lighting on the buildings and if so, what style? Other than the following mitigation measures, what is incorporated in the design of lighting for parking lots, front porch, patios, porte-cochere, egress doors and along sidewalks to reduce light pollution: directing light downward; adding architectural screening to help confine lighting to limit the view outside the Site; or reducing light levels during off hours in low use areas?
- c. As to signage, will signage be illuminated and if so, how? As to the proposed signage and ingress/egress to the Project, we recommend including any and all signs into the new proposed retaining wall along North Broadway. A wood posted sign should be eliminated from the design, as it is not architecturally appropriate for the Site. Lighting of any sign for the Project on North Broadway should be low and subtle.
- d. As to all roof top elements, including, elevator overruns, stair bulkheads, mechanical goosenecks, the Sponsor needs to detail how they will be shielded. The roof of the Main Building will be seen from above and in profile from many locations in our Village.

Conclusion

In conclusion, before the Sponsor proceeds to preparation and submission of a Final Environmental Impact Statement, we ask that the comments and questions of the ARB pertaining to the design of the Project be addressed, responded to and taken into consideration by the Village. The Sponsor should be required to address each of our concerns and answer how each of the design suggestions identified above can or cannot be incorporated in the design of the Project.

Sincerely,

The Architectural Review Board
Rocco Rasulo (Acting Chair), Heather Bancroft, Deborah Hargraves, Andrew Kotchen, Kenneth Lewis, and Gail Weiler

Dated: January 15, 2016