



***Environmental, Planning, and Engineering Consultants***

34 South Broadway  
Suite 401  
White Plains, NY 10601  
tel: 914 949-7336  
fax: 914 949-7559  
[www.akrf.com](http://www.akrf.com)

## **Memorandum**

---

**To:** Village of Mamaroneck Zoning Board of Appeals  
**From:** Ashley Ley, AICP  
**Date:** February 7, 2020  
**Re:** 416 Waverly Avenue Preliminary DEIS

---

### **A. INTRODUCTION**

The Village of Mamaroneck Zoning Board of Appeals (ZBA) has reviewed the preliminary Draft Environmental Impact Statement (DEIS), received December 30, 2019, for the Mamaroneck Self-Storage Building Addition located at 416 Waverly Avenue in the Village of Mamaroneck, NY (Tax Map #8-111-29-42). This memorandum summarizes the completeness comments raised by the ZBA at its January 21, 2020 and February 6, 2020 meetings. This memorandum, in addition to the AKRF memorandum dated January 17, 2020 and Kellard Sessions memorandum dated February 4, 2020, constitute the written record of the preliminary DEIS's deficiencies in regards to completeness.

### **B. ZBA COMPLETENESS REVIEW COMMENTS**

#### **GENERAL COMMENTS**

The following comments have applicability to each chapter of the DEIS.

1. The DEIS should be more clear about the Build Year date. In particular, Chapter I Executive Summary, Chapter II Project Description, and Chapter IV.J. Building Demolition & Construction should discuss the build year.
2. The list of "No Build" projects considered in the DEIS should be more clearly identified and analyzed. The Applicant should also check with the Village of Mamaroneck Building Department regarding potential No Build projects. In particular, the DEIS should consider the proposed restaurant use at 524 Waverly Avenue.
3. Discussion of potential impacts and benefits should be framed within the context of the subject area being analyzed. For example, the land use section should not discuss traffic or flooding. Also, the green building discussion should be more focused in Chapter II Project Description and Chapter IV.G Utilities.
4. The existing and proposed character of the buildings and surrounding community is subjective. As applicable, discussions should be framed as the "Applicant's opinion." Specifically, terms such as "architecturally distinct," "unsightly," and "catalyst," are subjective. Where feasible, discussion of

community character should be based on adopted community planning documents and the document, including page number, should be cited.

#### **CHAPTER I EXECUTIVE SUMMARY**

5. The Executive Summary should be updated as necessary to address the above “general” comments and the chapter specific comments presented below.

#### **CHAPTER II DESCRIPTION OF THE PROPOSED ACTION**

6. The massing study provided is difficult to interpret and needs more context. Heights and stories of nearby buildings should be provided. In addition, street level views should be provided. A discussion of the building in the context of the neighborhood should be provided.
7. The discussion of building height should include height with the parapet.
8. The Project Description should include more discussion of the proposed height, lot coverage, and other dimensional zoning factors. In addition, it should describe the specific area variances needed.
9. The community solar and green building discussions should be concentrated in the relevant sections of the Project Description and Chapter IV.G Utilities.
10. The proposed hours of operation should be discussed.

#### **CHAPTER IV.A. LAND USE & ZONING**

11. The DEIS should include more discussion of the proposed height, lot coverage, and other dimensional zoning factors. Specifically, the DEIS should expand the discussion of the specific area variances needed.
12. The DEIS should include a discussion of the anticipated demand and need for loading zones on the Project Site.
13. As described, the existing site may not be in compliance with the conditions of the existing variances, in particular in regards to parking. The existing conditions on the site, and the requirements of the prior variance approval, should be more fully discussed.
14. As required by the Scoping Document, this chapter should analyze the Proposed Action’s consistency with each of the current land use plans and policies specified, and compared to existing neighborhood buildings not just the existing storage facility.
15. As required by the Scoping Document, this chapter should analyze the project’s consistency with the proposed “Maker Zone Overlay District” and applicable use and dimensional requirements.
16. The DEIS should address the consistency of the Proposed Project with the Village’s Transit Oriented Development (TOD) planning studies and goals.
17. The DEIS should address the consistency of the Proposed Project with the Village’s Vision Zero Planning initiative.
18. A zoning map with a ¼ mile radius around the Project Site should be provided.

#### **CHAPTER IV.B. NATURAL RESOURCES**

19. Page IV.B-3 should refer to “anticipated” not “no impacts.”
20. The anticipated amount of excavation and fill should be quantified.

#### **CHAPTER IV.C. HAZARDOUS MATERIALS & PUBLIC HEALTH**

21. The DEIS should explain the program for testing for lead and asbestos.
22. A Phase 2 ESA should be provided as required by the Scoping Document.

**CHAPTER IV.D. FLOODING & FLOOD ZONE IMPACTS**

23. It is unclear as to whether or not the Proposed Project would meet the requirements of the flood regulations.
24. The DEIS should more clearly state the base flood elevation and the finished floor elevation.
25. It appears that the proposed interior stairs would be below the base flood elevation. This should be clarified.
26. The location of the building mechanicals identified. Would they all be located above the base flood elevation?
27. The DEIS should include information specific to the Project Site.
28. The DEIS should note whether or not flood insurance is required.
29. The Flood Mitigation Advisory Committee should be added as an Interested Agency.
30. The DEIS should clarify whether or not the existing and proposed buildings have, or would have, basements.
31. The method of flood proofing the buildings should be described.
32. The DEIS should clarify the existing and proposed permeable and impermeable surfaces, and whether or not any of the existing deteriorated asphalt areas should be considered permeable.

**CHAPTER IV.F. VISUAL RESOURCES**

33. The plane of the massing diagrams makes everything appear as if they are at the same elevation and height. The base elevation and height of buildings in the diagram should be provided.
34. The DEIS should include more potential views of the Proposed Project from nearby cross streets. Specifically, a view from Ogden Avenue.
35. The DEIS does not include sufficient discussion of the size of the proposed building in the context of the neighborhood and community. Specifically, the DEIS should include additional discussion of nearby buildings within the industrial area.
36. The DEIS should include a discussion of the potential views of the Proposed Project from off-site locations. The current text seems limited to views from on-site locations.
37. Additional neighborhood context photos should be provided. Buildings across the street or visible from the Project Site.
38. The height of the proposed building should be described in greater detail. In particular, the height of the parapet should be discussed. The proposed height should be discussed in context with neighboring and nearby buildings and cross streets.
39. This Chapter frequently refers to the existing and proposed self-storage building as “architecturally appropriate” and “attractive.” More context/justification should be provided for these statements.

**CHAPTER IV.G. UTILITIES**

40. As required by the Scoping Document, a flow test should be provided and the results reported in the DEIS.
41. The DEIS should include more information on the size and design of the existing and proposed water service lines. Verification from Westchester Joint Water Works on the ability to serve the project should be provided.

**CHAPTER IV.H. TRAFFIC & TRANSPORTATION**

42. The DEIS should include additional discussion and trip generation rates for the existing and proposed Murphy Brothers Contractor use.
43. The DEIS should provide more detail on the existing and proposed parking conditions and demand. Specifically, the DEIS should identify the existing and proposed number of self-storage units, the typical self-storage user, and the frequency that the typical user would be expected to visit the Project Site.
44. The DEIS should more clearly identify the existing versus proposed parking spaces, and the parking and loading variances that were granted previously. The DEIS should identify whether they are seeking a modification of the existing parking variance, or a new parking variance for the entire Project Site.
45. The Vision Zero Committee and Traffic Commission should be included as Interested Agencies.

**CHAPTER IV.I. ECONOMIC & FISCAL ANALYSIS**

46. The DEIS should include a more detailed discussion of the anticipated number of jobs to be lost as a result of the Proposed Project.
47. The DEIS asserts “all 7 businesses would find suitable sites to relocate to in the immediate vicinity of the Project Site.” However, no evidence is provided to support this discussion. Additional context and support should be provided for this statement.
48. The use of “average income” instead of “median income” appears to skew the data.
49. The DEIS should more clearly explain the use of zip code data and why those zip codes were chosen for the analysis.
50. The projected tax revenue does not appear accurate. Existing and proposed taxes should be presented by taxing jurisdiction in a similar manner to the existing tax revenue presented in Table IV.I-1, and should consider all site buildings and features.
51. The DEIS should describe whether or not the loss of existing businesses on the Project Site would affect other businesses (i.e. retail stores, delis, restaurants) that define or substantially contribute to defining the character of the Village of Mamaroneck.
52. The DEIS should address the potential for long term impacts associated with job loss.

**CHAPTER IV.J. BUILDING DEMOLITION & CONSTRUCTION**

53. The DEIS should more affirmatively state what “will” be done to mitigate potential construction and demolition impacts.
54. The DEIS should more specifically state which entity would be responsible for the costs associated with the train lines should they be damaged or impeded.
55. More information on dust management during construction should be provided.

**CHAPTER V. ALTERNATIVES**

56. The Alternatives analysis should more clearly explain why a zoning compliant self-storage facility could not be constructed.

**CHAPTER VI. SIGNIFICANT ADVERSE IMPACTS THAT CANNOT BE AVOIDED**

57. This chapter should be updated as necessary to incorporate the edits requested to the other DEIS chapters.
58. This chapter should be updated to clarify impacts from zoning variances sought.
59. The potential visual impacts seem understated.

60. This chapter should be updated to remove discussions of impacts that are not defined as “significant adverse impacts” elsewhere in the document.



***Environmental, Planning, and Engineering Consultants***

34 South Broadway  
Suite 401  
White Plains, NY 10601  
tel: 914 949-7336  
fax: 914 949-7559  
[www.akrf.com](http://www.akrf.com)

## **Memorandum**

---

**To:** Village of Mamaroneck Zoning Board of Appeals  
**From:** AKRF, Inc. (A. Ley, B. Zieroff, A. Russo, M. Carmody, A. Auld)  
**Date:** January 17, 2020  
**Re:** 416 Waverly Avenue Preliminary DEIS  
**cc:** Cleary Consulting

---

### **A. INTRODUCTION**

AKRF, Inc. has initiated its review of the preliminary Draft Environmental Impact Statement (DEIS), received December 30, 2019, for the Mamaroneck Self-Storage Building Addition located at 416 Waverly Avenue in the Village of Mamaroneck, NY (Tax Map #8-111-29-42). This document has been submitted to the Zoning Board of Appeals (ZBA) for a review of its completeness according to the adopted Scoping Document, dated September 5, 2019. The purpose of this review is to determine whether the DEIS follows the Scoping Document and whether relevant information is presented and analyzed in a complete and understandable format. A determination of completeness does not necessarily indicate that the ZBA concurs with all of the analyses—there may be areas of disagreement or differences in the interpretation of technical issues. The ZBA, the community and interested and involved agencies will have the opportunity to provide additional comment on substantive issues, conclusions reached and proposed mitigation measures during the comment period, which follows the completeness determination. However, to determine the document complete, the ZBA should concur that the facts presented in the DEIS are accurate and clearly described, and the methodologies consistent with those detailed in the Scoping Document or industry standard.

Where the ZBA determines that technical analyses have been omitted or not thoroughly addressed, the ZBA shall request revisions to the DEIS.

### **B. COMPLETENESS REVIEW COMMENTS**

#### **COVER SHEET AND GENERAL INFORMATION**

1. A placeholder for the website/URL where SEQRA documents will be located should be added to the cover sheet.
2. A placeholder for the deadline by which comments on the DEIS are due should be added to the cover sheet.

**CHAPTER I EXECUTIVE SUMMARY**

3. Page I-2 (and first reference in Chapter II), include a footnote that defines “net zero.” Also, please be consistent with either “net zero” or “net-zero” throughout the document.
4. Page I-2 (and first reference in Chapter II), please refer the reader to Appendix L for more information on the “Community Solar Program.”
5. Section I.5, “Alternatives” should include a brief description (two to three sentences) of each of the alternatives to the Proposed Action.
6. Table I-3 should include each of the technical areas analyzed in the DEIS.

**CHAPTER II DESCRIPTION OF THE PROPOSED ACTION**

7. Table I-1 indicates that the Flood Plain Development Permit would be issued by the Building & Engineering Department, but page II-2 indicates that the Planning Board would issue this permit. These two sections should be reconciled.
8. Figures II-1 and II-2 have a large black box that partially covers the title and figure number. This appears to be a printing error as the PDF does not have the same box.
9. Figure II-2 should include a label or legend indicating the project site. Also, Fenimore Rd should be labeled.
10. Figure II-3 should include street names.
11. Page II-4 refers to the Proposed Action as a “tangible improvement.” This subjective statement should be prefaced with, “In the Applicant’s opinion.”
12. Figures II-5, II-10, and II-11 were cut off in the print version, but appear whole in the pdf.
13. Figure II-17, please include street names and label the project site and other prominent buildings for reference.
14. Page II-13, first full paragraph, includes a number of subjective statements regarding the attractiveness of the existing and proposed self-storage buildings. These statements should be prefaced with, “In the Applicant’s opinion.”

**CHAPTER III REQUIRED PERMITS AND APPROVALS, INVOLVED AND INTERESTED AGENCIES**

15. Table III.-1 should be updated in accordance with comment 7 above.

**CHAPTER IV.A. LAND USE & ZONING**

16. Section IV.A.1.a, per the Scoping Document, this section should describe the generalized land use patterns and neighborhood character of the Village of Mamaroneck as a whole.
17. Figures IV.A-1 and IV.A-2 should include street and railroad labels. In addition, the legend should include the ‘light gray’ color. Please also note that the print version was cut off, but the PDF appears whole.
18. Per the Scoping document Section 4.b, the existing conditions section should include a discussion of previous land use approvals for the existing storage facility, and variances and conditions of approval therefor.
19. Section IV.A.1.e, provide a reference to the draft ‘Maker Zone’ text including last revised date.
20. Per the Scoping Document Section 4.f.i and ii, the text should include a description of existing on-site nonconformities with M-1 zoning district dimensional requirements, and existing dimensional nonconformities on nearby properties within the M-1 zoning district.

21. Section IV.A.1.g, per the Scoping Document, this section should include a discussion of any conditions of approval for the variances noted. If no conditions were required, the text should state as such.
22. Page IV.A-19, the DEIS should avoid the use of superlatives. “Will actually reduce” should be revised to state, “is projected to reduce” and refer to the traffic chapter for objective support of this statement. The first full sentence that begins “The building addition will in no way...” should be rephrased or revised to state that this conclusion is “in the Applicant’s opinion”.
23. Page IV.A-19, the second to last sentence that begins, “Parking and loading space code deficiencies...” should be revised to remove prejudicial language regarding the current Zoning Code, or refer to this statement as being the Applicant’s opinion.
24. Page IV.A-20, first full sentence, insert “area” between “floor” and “variance.”
25. Page IV.A-20, third paragraph should include support for the statement that, “the Mamaroneck Self-Storage facility is currently turning away customers.” This could include monthly or annual occupancy rates for the existing self-storage facility. This section should also refer to the Economic & Fiscal Analysis chapter for information on regional demand for self-storage facilities.
26. As required by the Scoping Document, this chapter should analyze the Proposed Action’s consistency with each of the current land use plans and policies specified. While a description of these plans was provided under existing conditions, a complete consistency analysis is missing from the analysis of anticipated impacts of the Proposed Action.
27. As required by the Scoping Document, this chapter should analyze the project’s consistency with the proposed “Maker Zone Overlay District” and applicable use and dimensional requirements.

#### **CHAPTER IV.B. NATURAL RESOURCES**

28. Figures IV.B-1, -2, and -3 have a large black box that partially covers the title and figure number. This appears to be a printing error as the PDF does not have the same box.

##### ***SURFACE WATER***

29. The Village Engineering Consultant will provide comments on this section in regards to stormwater runoff.

##### ***AQUIFERS & GROUNDWATER***

30. The Scoping Document required the identification and analysis of portions of the Project Site where construction will occur, and if groundwater will be encountered during/after construction. The construction plans indicate that excavations up to 4 feet below finished grade are needed to install the proposed foundation elements. The depth to water was reported as being as high as approximately 3 feet below existing grade. In accordance with the Scoping Document, this section should analyze whether groundwater will be encountered during the excavation work, and identify the need for construction-related dewatering.
31. Section IV.B.2(c) does not fully address the potential impacts to groundwater during construction as required by the Scoping Document. As noted above, the construction plans indicate excavations up to 4 feet in depth, which is below the reported groundwater depth. This section should include a discussion of the potential need for dewatering, and should quantify the amount of material to be removed.
32. Section IV.B.2(d) should include a discussion of dewatering, or other mitigation measures required during construction if groundwater is encountered.

##### ***GEOLOGY, SOILS & TOPOGRAPHY***

33. This section indicates the excavation of approximately 550 cubic yards of soil/fill, of which approximately 330 cubic yards would be reused as fill. The construction plans in the Excavation Work



Plan (EWP) indicates a cut of 69.31 cubic yards, and a fill of 127.91 cubic yards. Please clarify the cut and fill estimation.

34. The Scoping Document required a discussion of potential impacts related to soil erosion. This discussion should be included in this section.
35. Fill is a State regulated material that includes specific handling requirements once excavated, and this section indicated that soil boring logs documented the presence of ash and slag within the fill. Measures for characterization of the fill material must be completed in accordance with State approved methods, and identify State requirements and/or limitations for the reuse of fill as on-site backfill. As required by the Scoping Document, this section should identify and analyze proposed sediment and erosion control measures, and describe any site or construction constraints anticipated as a result of the existing conditions' analysis.

#### **CHAPTER IV.C. HAZARDOUS MATERIALS & PUBLIC HEALTH**

36. This Chapter summarizes the Phase I Environmental Site Assessment (ESA) that was reported to be completed in accordance with the American Society of Testing and Materials (ASTM) Standard Practice E 1527-13 to identify any existing recognized environmental conditions (RECs) and/or environmental concerns. To confirm the conclusions presented in the Chapter, the full Phase I ESA report should be provided in the appendices. The Phase I ESA should include the review of Federal, State, and Local databases in accordance with minimum ASTM search radii (Radius Report). The Phase I ESA summary included in Chapter IV.C., should specify items that were identified as Recognized Environmental Conditions (RECs), Historic Recognized Environmental Conditions (HRECSs) Controlled Recognized Environmental Conditions (CRECs), and/or De Minimus Conditions, as defined by ASTM.
37. The Phase I ESA summary included in this Chapter, indicates that nearby properties, including the M. Argueso and Company, Inc. Brownfield Cleanup Program (BCP) site have not affected or impacted the Project Site. Please indicate the methods (i.e. groundwater flow direction, analytical data, and groundwater quality) used to reach this conclusion.
38. In accordance with the Scoping Document, a Phase II ESA was required to determine whether hazardous materials are present in soil and/or fill, groundwater, or soil vapor. This Chapter indicates that a subsurface investigation was conducted by HydroEnvironmental Solutions, Inc. (HES) in April 2019. Figure IV.B-6 depicts the four soil boring locations that were drilled for the identified purpose of field screening, sample collection, and laboratory analysis. Please include a description of the subsurface investigation, the results of any laboratory analysis, and include a copy of the subsurface investigation report, if available.
39. Section IV.B. Geology of the DEIS indicated ash and slag were present in shallow soil identified as fill, which can contain elevated semi volatile organic compounds (SVOCs) and metals, amongst other potential contaminants. The Phase II ESA was to include conclusions related to documented contaminants in soil, groundwater, or soil vapor, to identify any the potential for on-site exposure during soil disturbance, soil handling and soil disposal requirements, and/or the need for any mitigation measures [(i.e., sub-slab depressurization system (SSDS)] to be incorporated into building design. Please provide the environmental status of on-site media (soil, groundwater, soil vapor) as these are necessary to determine whether the measures (work zone monitoring, including action levels and response methods, and screening measures to identify contamination, soil reuse requirements, etc.) are appropriate.
40. The adjacent BCP site was identified as having elevated chlorinate solvent compounds in groundwater. Please provide the means and methods used to determine that the documented contaminated groundwater at this site has not affected groundwater or soil vapor at the Project Site, including the potential for soil vapor intrusion.
41. This section is incomplete without the inclusion of a Phase II ESA.

## **CHAPTER IV.D. FLOODING & FLOOD ZONE IMPACTS**

This chapter is being reviewed by the Village's Engineering Consultant.

## **CHAPTER IV.E. HISTORIC RESOURCES**

42. Page IV.E-2, the last paragraph should direct the reader to the letter and email in Appendix I
43. The correspondence with the Office of Parks Recreation and Historic Preservation (OPRHP) only addresses review under the State Environmental Quality Review (SEQRA). However, this project will require a Stormwater Pollution Prevention Plan (SWPPP) approved by the New York State Department of Environmental Conservation (NYSDEC). As such, the Applicant should submit a new letter to the OPRHP specifically requesting a determination of potential impacts to architectural and archaeological resources in accordance with Section 106 of the National Historic Preservation Act and Section 14.09 of the New York State Parks Recreation and Historic Preservation Law. (See paragraph 2 of the October 15, 2008 letter from OPRHP).

## **CHAPTER IV.F. VISUAL RESOURCES**

44. This Chapter frequently refers to the existing and proposed self-storage building as "architecturally appropriate" and "attractive." More context/justification should be provided for these statements. This discussion could include a description of the building's massing, architectural details, windows and other features to break-up blank walls, and the utilitarian nature of the building and district as a whole. This Chapter could draw further on specific recommendations of the Waverly Avenue Design Study and other Village planning documents.
45. Figure IV.F-1 should be revised to include street names. In addition, the print version has a large black box that partially covers the title and figure number. This appears to be a printing error as the PDF does not have the same box.
46. Each of the viewpoints on pages IV.F-2 to IV.F-9 should include captions that describe the direction of the view and approximate intersection. Alternatively, the street names in the location box should be enlarged to be more legible.
47. Figure IV.F-2 should be revised to label the five existing buildings on the project site.
48. Captions should be provided on Photographs 1 through 10.
49. The Applicant should caption each of the photographs (IV.F-10 to IV.F-14) to describe which buildings are being shown and from which vantage point.
50. Section IV.F.3a, please expand the first paragraph to include the building height and a description of the architectural style, proposed materials, and color scheme.
51. Figure IV.F-4 is missing the "4" in the figure title and there are two viewpoint Roman numeral 5's. In addition, the print version is missing several arrows and location numbers.
52. Page IV.F-17, Section c, the last sentence of this paragraph should be deleted or revised to state that it is in the Applicant's opinion.
53. Section IV.F.3d should further discuss the relationship of the proposed self-storage addition to the surrounding community. The discussion should focus on comparing the heights, architectural character, bulk, and scale to the surrounding area.
54. Figure IV.F-11 should include street names, and should call out the project site and other significant buildings for context. The Figure could include the height and square feet of the other significant buildings.
55. Section IV.F.3e should describe the lighting levels in terms of foot-candles and compliance with § 342-18 "Exterior lighting" of the Village Code. Please provide context to the statement, "these fixtures afford an appropriate level of site lighting without excessive spill beyond the property line".

56. Figure IV.F-12 should include photo metrics.
57. Figure IV.F-17 is mislabeled as an “Existing Condition.”
58. Section IV.F.3e – In cases where the Proposed Action would not be visible from a particular vantage point due to distance, topography, or vegetation, a cross section should be provided for context.
59. This Chapter should address the potential visibility of rooftop facilities such as solar panels, or other uses.

#### **CHAPTER IV.G. UTILITIES**

60. Section IV.G.1(a) includes estimated water supply flow rates. However, flow tests, as required by the Scoping Document, were not provided. Page IV.G-3 indicates that the proposed project would reduce the peak flow rate from existing conditions, and asserts that no flow test is needed. The requirement for the flow test should be reviewed with the Village Engineer.
61. Section IV.G.1(b) should include a discussion of the existing capacity of the Mamaroneck Wastewater Treatment Facility.
62. Sections IV.G.1(d) and IV.G.3(d), regarding solid waste, should also include a discussion of recycling.

#### **CHAPTER IV.H. TRAFFIC & TRANSPORTATION**

63. Section IV.H.3.A.a – While this section provides a description of the anticipated trip generation for the proposed project, it does not include a discussion of vehicular circulation as the section title “Vehicle Circulation” infers. A vehicular circulation discussion is, however, provided within Section IV.H.4 (“Mitigation Measures”) and in the Provident Engineering Traffic & Parking Study and should also be included within this section (Section IV.H.3.A.a) of the DEIS.
64. Section IV.H.3.A.a – An analysis of the Fenimore Road and Railroad Way intersection has not been provided. As required by the Scoping Document, this Section should include a capacity analysis at this intersection for Existing, No Build, and Build conditions.
65. Section IV.H.1.a – The dates and time periods of the collected traffic counts should be provided. The traffic count data should be provided as part of the Traffic & Parking Study backup.
66. Section IV.H.2 – This section does not identify the traffic volumes for the Future Conditions without the Proposed Action (“No Build”), how those volumes would be developed, an analysis for the No Build condition, or the No Build year. The growth factor utilized to develop the future volumes along with a list of No Build projects based on information from the Village should be provided. A figure should be provided that shows the No Build traffic volumes for the study area intersections. Any future roadway improvement projects in the area that could potentially affect travel patterns in the area should be identified and incorporated into the analysis. Discussions and analyses for all other elements examined in Existing and Build conditions (e.g., parking, rail operations, etc.) should also be provided for No Build conditions.
67. Section IV.H.1.B – The discussion on rail transportation should include rail traffic controls (e.g., the railroad crossing on Fenimore Road) as well as times and frequency of CSX rail operations in the Project Site vicinity.
68. Section IV.H.4 – While some potential impacts due to the proposed project’s vicinity to the railroad tracks have been noted in this Section, an assessment of potential impacts to the railroad tracks due to stormwater runoff or drainage, potential conflicts between rail and vehicular traffic, and potential wind, noise, and lighting impacts should also be provided.

In addition to the section-specific completeness comments listed above, the following are general comments that apply to the Traffic and Transportation chapter of the DEIS, as well as the supporting Traffic & Parking Study:

69. A qualitative assessment of vehicular and pedestrian safety on-site and in the study area should be provided in Chapter IV.H. and Traffic & Parking Study.
70. Relevant information provided in Chapter IV.J (“Building Demolition & Construction”) should be referenced or repeated in Chapter IV.H (“Traffic & Transportation”) of the DEIS and the Traffic & Parking Study in order for the DEIS to be in compliance with the Chapter IV.H Scoping Document requirements.
71. Please verify the trip generation numbers provided in Table IV.H-2 (“Trip Generation”). Chapter IV.H states that the self-storage component of the proposed project would provide an additional 321 storage units. However, Section 2.0 of the Traffic & Parking Study states the number of trips that would be generated by an additional 310 storage units, rather than 321 storage units. In addition, a review of the trip generation data provided in the Institute of Transportation Engineers (ITE) Trip Generation Manual 10th Edition shows that the Peak Hour of Generator rates and/or equations provide the more conservative trip generation numbers when compared to those for the Peak Hour of Adjacent Street Traffic rates and/or equations. The most conservative trip generation numbers should be utilized.
72. The trip generation discussion in Section IV.H.3.A.a mentions trip generation numbers for the Weekend peak hour only for the self-storage component of the proposed project. Weekend trip generation numbers are not discussed for the retail component nor are Weekend peak hour trip generation numbers provided in Table IV.H-2. As the provided Weekend peak hour trip generation numbers are higher than both the Weekday AM and Weekday PM peak hours, a Weekend peak hour analysis should also be provided.

#### **CHAPTER IV.I. ECONOMIC & FISCAL ANALYSIS**

73. The sources for the statistics that 10% of households in the United States use self-storage facilities, and that the “industry standard” is 7.0 square feet per person, should be provided in both this chapter and the Chiswell and Associates report in Appendix M.
74. Figure IV.I-1 has a number of printing errors that do not appear on the PDF.
75. Page IV.I-5, the projected taxes presented in Section 3.a should be broken down by taxing jurisdiction in a similar manner to the existing tax revenue presented in Table IV.I-1.

#### **CHAPTER IV.J. BUILDING DEMOLITION & CONSTRUCTION**

76. Page IV.J-2 indicates 400 cubic yards of excavation, but page IV.J-6, indicates 550 cubic yards of excavation of which approximately 330 cubic yards would be reused as fill. Further, the construction plans in the Excavation Work Plan (EWP) indicates a cut of 69.31 cubic yards of excavation, and a fill of 127.91 cubic yards. Please clarify the cut and fill estimations.
77. Page IV.J -8 should include additional detail on how the railroad tracks would be protected during building demolition.
78. Fill is a State regulated material that includes specific handling requirements once excavated, and Section IV.B. Geology of the DEIS indicated that soil boring logs documented the presence of ash and slag within the fill. Measures for characterization of the fill material must be completed in accordance with State approved methods, and identify State requirements and/or limitations for the reuse of fill as on-site backfill. As required by the Scoping Document, this section should identify and analyze proposed sediment and erosion control measures, and describe any site or construction constraints anticipated as a result of the existing conditions’ analysis.

#### **CHAPTER V. ALTERNATIVES**

79. Table V-1, Comparison of Alternatives, should include a summary of each of the technical areas analyzed in the DEIS.

**CHAPTER VI. SIGNIFICANT ADVERSE IMPACTS THAT CANNOT BE AVOIDED**

80. This chapter is complete with regards to the Scoping Document.

**CHAPTER VII. IRREVERSIBLE & IRRETRIEVABLE COMMITMENT OF RESOURCES**

81. This chapter is complete with regards to the Scoping Document.

**CHAPTER VIII. GROWTH INDUCING ASPECTS OF THE PROPOSED ACTION**

82. This chapter is complete with regards to the Scoping Document.

**APPENDICES**

83. Please include the Appendix letter (i.e. A, B, C) on the tab sheets.

**C. RECOMMENDED ACTIONS**

Based on the above comments, AKRF recommends that the DEIS be considered incomplete. At the January 21, 2020 meeting, AKRF recommends the ZBA provide the Applicant with the above written comments, and any additional written comments from the Village Engineering Consultant and Village Attorney.

The meeting will provide the ZBA with the opportunity to comment on the completeness of the document with respect to the Scoping Document. Immediately following the meeting, AKRF will prepare a memo summarizing the comments of the ZBA members to transmit to the Applicant. Per Part 617.9(a)(2)(i) of the State Environmental Quality Review (SEQR) law, all DEIS deficiencies must be identified in writing.

**D. NEXT STEPS**

Following the transmission of the completeness comments, the Applicant will prepare a revised DEIS. Upon receipt of the revised DEIS, the ZBA and its consultants will have 30 days to make a determination of the adequacy of the resubmitted DEIS. That determination must be based solely on the written list of deficiencies provided during the initial completeness review.

Once all of the items have been addressed, the ZBA may declare the DEIS complete for public review and schedule a public hearing.

**RECEIVED**

*By Planning, Zoning, HCZMC at 1:29 pm, Feb 04, 2020*

**MEMORANDUM**

TO: Robin Kramer, Chairperson

CC: Village of Mamaroneck Zoning Board of Appeals  
Betty-Ann Sherer, Village of Mamaroneck Land-Use Coordinator  
Hernane De Almeida, P.E., Village Engineer  
Greg Cutler, Village Planner

FROM: Brian Hildenbrand, P.E. *BH*  
Village Consulting Professional

DATE: February 4, 2020

RE: Mamaroneck Self-Storage Facility Expansion  
416 Waverly Avenue  
Section 8, Block 25, Lot 70

**PROJECT DESCRIPTION**

At the request of the Village of Mamaroneck Engineering Department, Kellard Sessions Consulting has review the Draft Environmental Impact Statement (DEIS) and supporting documents submitted in conjunction with the above-reference application. The property is currently used as a self-storage facility and small industrial uses. The proposal is to demolish the industrial buildings, expand the self-storage facility and include a small retail area. The project also includes parking lot, drainage and landscaping improvements. The property is located in the M-1 Manufacturing Zoning District.

Our review was focused on the general completeness of the Stormwater and Floodplain impacts included in the DEIS.

1. Based on the submitted Stormwater Pollution Prevention Plan (SWPPP), the Applicant has addressed the items in the Scoping Document (D-3f).
2. The definition of the 500-year floodplain on Page I.-11 should be changed to "0.2% chance of flooding".
3. The Flood Storage Volumetric Analysis Figures (Chapter IV.D) for both the existing and proposed conditions shall be revised to remove the buildings from the provided storage volume. If the

**CIVIL ENGINEERING | LANDSCAPE ARCHITECTURE | SITE & ENVIRONMENTAL PLANNING**

Robin Kramer, Chairperson  
February 4, 2020  
Page 2 of 2

existing and proposed buildings provide some sort of flood storage, this should be clarified. The volumetric analysis calculations should be revised accordingly.

4. The DEIS states the building will be a "net-zero" building in order to address Section D-3g of the Scoping Document. Supporting information should be provided to demonstrate what the Net-Zero building will include, and how these features will avoid or reduce the impacts of climate change and rising sea levels.

In order to expedite the review of subsequent submissions, the applicant should provide annotated responses to each of the comments outlined herein.

**REPORT REVIEWED, PREPARED BY CLEARY CONSULTING, DATED DECEMBER, 2019:**

- *Draft Environmental Impact Statement Report & Appendix Report*

BH/dc

T:\Mamaroneck\Correspondence\2020-02-04\_MamZB\_Mamaroneck Self Storage 416 Waverly\_Review Memo.docx