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## Memorandum

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**To:** Village of Mamaroneck ZBA  
**From:** AKRF, Inc.  
**Date:** August 23, 2022  
**Re:** 416 Waverly Avenue Revised FEIS – AKRF Completeness Comments  
**cc:** Charles Gottlieb

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AKRF, Inc. has initiated its review of the revised Final Environmental Impact Statement (FEIS), received July 2022, for the Mamaroneck Self-Storage Building Addition located at 416 Waverly Avenue in the Village of Mamaroneck, NY (Tax Map #8-111-29-42).

It is important to note that the FEIS is the Lead Agency's document, which in this case is the Village of Mamaroneck Zoning Board of Appeals (ZBA). As such, the document should be written in the voice of the ZBA and should reflect the majority's opinion.

It is standard practice for the preliminary draft of a FEIS to be prepared by the Applicant, and then reviewed by the Lead Agency and its consultants. The purpose of this review is to determine whether the FEIS provides substantial responses to the public's comments, and whether all relevant information is presented and analyzed in a complete and understandable format. The comments that the Lead Agency concurs with should be integrated into the FEIS. Where issues have been left out or have not been addressed thoroughly, in the opinion of the ZBA, the Applicant should be requested to revise the FEIS and resubmit the document to the ZBA for further review.

AKRF's October 6, 2021 and June 9, 2022 comments are recited below in *italics*. New and follow up comments are in **bold**.

### COVER SHEET AND GENERAL INFORMATION

*No comments on this section.*

### CHAPTER I INTRODUCTION & DESCRIPTION OF THE PROPOSED ACTION

- Page I-3 states the Floor Area Ratio (FAR) will be reduced from 2.43 to 2.11. However, Table I-3 states the proposed FEIS FAR is 1.91 and that a variance of 0.91 would be required. Table I-4 also states the proposed FEIS FAR is 1.91. Page I-9 states the FAR would be reduced from 2.43 to 2.11. The proposed FEIS FAR needs to be clarified and corrected where necessary.*

*6/9/22 conclusion: Comment addressed.*

2. *On Page I-3 in the second paragraph, the first line should be revised to clarify that the height of portions of the building addition have been reduced.*

*6/9/22 conclusion: Comment addressed.*

3. *Table I-2 lists the gross floor area of the FEIS plan as 84,812 square feet. This number is incorrect and should be corrected to state 84,432 square feet, as is correctly noted in Table I-3.*

*6/9/22 conclusion: Comment addressed.*

4. *Table I-2 lists the DEIS Plan impervious area as 40,675 square feet and the FEIS Plan impervious area as 39,235 square feet. Table I-3 lists the FEIS Plan impervious area as 40,383 square feet, which is the impervious area listed in Tables I-2, I-3, and II-1 of the DEIS. Page I-7 of the FEIS states "The overall amount of impervious area will actually be slightly decreased from 40,675 square feet under the DEIS Plan, to 40,383 square feet under the FEIS Plan." The DEIS and FEIS impervious areas should be corrected as necessary in FEIS Tables I-2 and I-3 and on FEIS page I-7.*

*6/9/22 conclusion: Comment not addressed. Table I-2 still lists the FEIS Plan impervious area as 39,235 square feet, which is inconsistent with the other mentions of FEIS Plan impervious area.*

**8/23/22 conclusion: Comment addressed.**

5. *Table I-2 indicates that there would be no change in water usage or wastewater generation between the DEIS and FEIS. The backup calculations should be provided.*

*6/9/22 conclusion: Comment not addressed.*

Hudson - Are there  
"back-up  
calculations?

**8/23/22 conclusion: Although footnotes with further detail have been provided on Table I-2, the appendix containing backup calculations was not provided for review. It is unclear what the footnote refers to by the phrase "there will be 2-shifts of 5-employees at the facility." Based on the discussions of the number of employees for each use throughout the FEIS, it appears there would be 16 employees on-site simultaneously across all proposed uses (3 for the storage facility, 4 for the Murphy Brothers office, 3 for the woodworking shop, and 6 for the incubator offices).**

Murphy Bros -  
Please clarify the  
employee numbers

6. *The peak hour traffic row in Table I-2 should be revised to read "8 AM trips," "10 PM trips," etc. for clarity.*

*6/9/22 conclusion: Comment addressed.*

7. *The Project Description should include a figure that shows the DEIS layout versus the FEIS layout.*

*6/9/22 conclusion: Comment addressed.*

8. *The Project Description on page I-4 should state the number of office spaces to be provided within the 2,008-square foot incubator office space.*

*6/9/22 conclusion: Comment addressed.*

9. *The following updates/corrections should be made on Figure I-1:*

- a. *Figure I-1 states the gross floor area of the proposed addition is 44,320 square feet. However, Table I-1 indicates the proposed addition would be 43,940 square feet. These areas should be corrected as necessary.*

*6/9/22 conclusion: Comment not addressed.*

**8/23/22 conclusion: Comment addressed.**

- b. *Street names should be added.*

*6/9/22 conclusion: Comment not addressed.*

**8/23/22 conclusion: Comment not addressed.**

- c. *The proposed setback from Fenimore Road should be labeled.*

*6/9/22 conclusion: Comment addressed.*

10. *Figure I-2, First Floor Plan, shows a different parking and loading layout along the front of the building and should be corrected to be consistent with what is shown on Figure I-1.*

*6/9/22 conclusion: Comment not addressed.*

**8/23/22 conclusion: Comment addressed.**

11. *Figure I-3, Second Floor Plan, should list the square footage of the Murphy Brothers Contracting Offices for consistency with the other drawings.*

*6/9/22 conclusion: Comment not addressed.*

**8/23/22 conclusion: Comment addressed.**

12. *On Figure I-4, the square footage of the co-working offices is given as 2,157 square feet. Per Table I-1, this should be corrected to state 2,008 square feet.*

*6/9/22 conclusion: Comment addressed.*

13. *On Figure I-5, Fourth Floor Plan, the drawing and labeling of proposed storage units should be corrected. It appears that 34 or 35 units are drawn on the fourth floor and the labels of the number of units are not correct. Based on Figures I-2 through I-4, there are a total of 127 storage units on the first three floors. Given that 160 new units are proposed, this implies that 33 units should be shown on Figure I-5 on the fourth floor.*

*6/9/22 conclusion: Comment not addressed.*

**8/23/22 conclusion: Comment addressed. The drawing and labeling of proposed storage units on the fourth floor has been adjusted; 34 units are now shown. The total number of units shown on the four floors is 160 units.**

14. *Figures I-6 and I-7 do not show the additional two loading areas parallel to the front of the building that are depicted on Figure I-1 and should be corrected for consistency.*

*6/9/22: Comment not addressed.*

**8/23/22: Comment not addressed. In Response F-13, the Applicant indicates that these two loading spaces were not intended to be striped but could be if required. AKRF recommends that all three loading spaces be striped.**

This is a site plan  
issue - not sure  
why this is an FEIS  
completeness  
issue.

15. *The number of required parking spaces for the FEIS plan is inconsistent between Table I-3 and Table I-4. Table I-4 should be corrected to state 137 parking spaces are required.*

*6/9/22 conclusion: Comment addressed.*

Nevertheless - Kim  
- can we revise the  
site plan?

16. *The text on page I-7 states "As noted, the building coverage, FAR and gross floor area variances have been reduced, the height and off-street parking variances remain unchanged and the off-street parking variance is increased by 2 spaces." This sentence should be corrected to state "As noted, the building coverage, FAR and gross floor area variances have been reduced, the height remains unchanged, the off-street parking variance has been decreased by one space, and the off-street loading variance has been increased by one space."*

*6/9/22 conclusion: Comment addressed.*

17. *Page I-8 states excavation will require "150 cubic yards of cut and 69.9 cubic yards of fill, resulting in a net cut of 81.1 cubic yards." Table I-2 also indicates a net cut of 81.1 cubic yards.*

*However, subtracting 69.9 cubic yards from 150 cubic yards results in a net cut of 80.1 cubic yards. The volumes should be corrected as necessary.*

*6/9/22 conclusion: Comment addressed.*

18. *Page I-8 should clarify that the discussion of chlorinated VOCs is regarding groundwater samples.*

*6/9/22 conclusion: Comment not addressed.*

**8/23/22 conclusion: Comment addressed.**

19. *Table I-3 indicates 137 off-street parking spaces are required and the variance being requested is 111 parking spaces. However, Table I-4 states 121 off-street parking spaces are required. Page I-10 also states 121 spaces would be required. Table III.A-1 again states 137 spaces required with a variance of 111 requested. All incorrect mentions of the required number of parking spaces should be corrected.*

*6/9/22 conclusion: Comment not addressed. The text within Section H currently on page I-11 still mentions 121 required parking spaces. The number of required parking spaces broken down by use should be provided.*

Clearly to revise.

**8/23/22 conclusion: Comment partially addressed. Information from the Village Code on the required number of spaces per given square footage was provided in Response H-6 within Chapter 3. However, Response H-6 incorrectly states the parking requirement for office space is 1 space per 350 square feet. Response A-33 correctly states the office parking requirement is 1 space per 250 square feet. Response H-6 does not discuss the total spaces required for the Project per use; this information is now included in Response A-33. Therefore, Response H-6 should cross-reference Response A-33. This information should be included in Section I.H of the FEIS.**

20. *On page I-9, the discussion of flood storage volume should clarify whether the 34,538 cubic feet mentioned represents the incremental storage, rather than the cumulative storage. The revised flood storage analysis should be included as an appendix to the FEIS.*

*6/9/22 conclusion: Comment addressed. The revised flood storage analysis is included as Figure I-11.*

21. *The discussion of parking spaces on page I-10 should be augmented with the information presented in Response H-6 from page III.H.-3 through III.H.-4.*

*6/9/22 conclusion: Comment addressed.*

## CHAPTER II INDEX OF DEIS COMMENTS

*No comments on this section.*

## CHAPTER III RESPONSES TO DEIS COMMENTS

### III.A – ZONING AND LAND USE

Is it necessary to provide the full 2018 submissions? Can we just change the footnote to reference the approvals only?

22. *A footnote to Response A-1 on page III.A.-1 says "See June 20, 2018 submission to the ZBA for a comprehensive procedural history of prior self-storage proposals on the Site." If this was not included in the DEIS, it should be included as an Appendix to the FEIS.*

*6/9/22 conclusion: Comment not addressed.*

**8/23/22 conclusion: Comment partially addressed. The revised Table of Contents indicates that the site plan approval, certificate of occupancy, and floodplain permit for the original self-storage building is now included as an appendix. However, the appendices were not provided for review. It appears that only the approvals, and not the submissions, have been included.**

23. On page III.A.-3, the third paragraph refers to a proposed 56,328-square foot addition of self-storage space. This text is referring to the revised design for the FEIS, which proposes a 33,896-square foot self-storage space addition.

6/9/22 conclusion: Comment not addressed. This text is now on page III.A-2 and still states 56,328-square feet.

**8/23/22 conclusion: Comment addressed.**

24. Page III.A.-5 again refers to the FEIS design but states 56,328 square feet of additional storage space. This needs to be corrected to state 33,896 square feet.

6/9/22 conclusion: Comment addressed. This text is now on page III.A-3

**8/23/22 conclusion: Comment addressed.**

25. Page III.A.-8 states "The uses proposed for the MAKER zone are clearly aspirational..." This statement should be revised to state "The uses proposed for the MAKER zone reflect the future land use goals of the Village of Mamaroneck and do not reflect existing land use characteristics of the area. While those uses may in time be drawn to the district, the current pattern of land use will likely remain prevalent for the foreseeable future."

6/9/22 conclusion: Comment addressed.

26. On page III.A.-9, the response to Comment A-3 does not discuss the visual impact changes from the revised FEIS design. This should be added to the response, which would more directly address the commenter's concern regarding the mass, height, and urban nature of the building proposed in the DEIS.

6/9/22 conclusion: Comment addressed.

27. Response A-7 on page III.A.-12 states 15,604 square feet of existing old, non-conforming buildings will be razed. This square footage is from the DEIS Plan and needs to be updated to the FEIS Plan of 18,589 square feet, consistent with page I-2.

6/9/22 conclusion: Comment addressed.

28. The following updates should be made to Response A-9 on page III.A.-13

- a. State that the existing FAR was presented in the DEIS in Table I.-2 on page I.-7. FEIS Response A-9.
- b. FEIS Table III.A-1 should be corrected to state the FEIS Plan proposed FAR is 2.11 and the variance required is 1.11.

6/9/22 conclusion: Comment addressed.

29. Response A-11 on page III.A.-14 should be augmented with the parking information presented in Response H-6 from page III.H.-3 through III.H.-4.

6/9/22 conclusion: Comment addressed.

30. Response A-16 should provide a response regarding the Commenter's mention of a flooding report. The response should indicate that the Hudson Engineering Flood Storage Analysis was included as Figures IV.D-3 and IV.D-5 and Appendix D to the DEIS. The response should also discuss the updated flood storage volume associated with the FEIS Plan.

6/9/22 conclusion: Comment not fully addressed.

- a. The wording in the response that states "...in an earlier comment D-9" should be revised to state "...in comment D-9."

**8/23/22 conclusion: Comment addressed.**

- b. *The appendix call that was added should include the appendix letter and clarify that it is an appendix to the DEIS. The response should also indicate that the Hudson Engineering Flood Storage Analysis was included as Figures IV.D-3 and IV.D-5 in the DEIS.*

**8/23/22 conclusion: Comment addressed.**

31. *Response A-18 on page III.A.-19 should be revised to include information on proposed lighting. This is not currently indicated on any drawings included with the FEIS.*

*6/9/22 conclusion: Comment not addressed.*

**8/23/22 conclusion: Comment addressed. A lighting plan drawing has been added as Figure III.A-2.**

32. *In the first sentence of the second paragraph of Response A-21 on page III.A.-21, it should be clarified that the height of portions of the building addition have been reduced.*

*6/9/22 conclusion: Comment addressed.*

33. *Response A-22 on page III.A.-21 should be expanded to include a discussion of the revised FEIS Plan in terms of reduced visual impact, additional streetscape improvements, and additional uses currently being proposed.*

*6/9/22 conclusion: Comment partially addressed. The response should also discuss the proposed uses.*

**8/23/22 conclusion: Comment addressed.**

34. *Response A-23 on page III.A.-22 should also include a cross-reference to the response to comment A-12.*

*6/9/22 conclusion: Comment addressed.*

35. *The duplication of Table III.A-1 within Response A-9 needs the following corrections:*

- a. *"red" should be deleted from the cell providing the existing area.*
- b. *The proposed FAR should be updated from 1.91 to 2.11.*
- c. *The FAR variance required should be updated from 0.91 to 1.11.*

*6/9/22 conclusion: Comment addressed.*

36. *Comment A-26 on page III.A.-24 requested that the zoning analysis be broken out to clarify whether the proposed zoning variances were associated with the existing corner building, the proposed addition, or the existing storage building. The response clarifies that the existing corner buildings would be removed, but it does not clarify what variances for the existing self-storage building would remain. This should be updated.*

*6/9/22 conclusion: Comment partially addressed. The content that responds to a portion of this comment is now included in response A-30. Therefore, response A-26 should cross-reference response A-30.*

**8/23/22 conclusion: Comment addressed.**

37. *Response A-29 should be augmented to include text indicating how the Net-Zero building features will avoid or reduce the impacts of climate change and rising sea levels should be added. For example, at a minimum, the following text from the DEIS could be added:*

- a. *As an all-electric, "net-zero" building, the building will effectively have no carbon footprint. This is perhaps the most definitive measure the Applicant can take to minimize the overall impact on climate change, including sea level rise and flooding.*

6/9/22 conclusion: Comment addressed.

38. Response A-33 should state the total number of parking spaces that would be required for the manufacturing (woodworking shop) use and the office uses, before considering shared parking. This response should also refer to the updated Traffic and Parking Study, which should be include as an appendix to the FEIS.

**8/23/22 conclusion: Comment addressed. The updated Traffic and Parking Study appendix has not been provided for review.**

39. The numbering on the response to comment A-37 currently states A-36 and should be updated to A-37.

**8/23/22 conclusion: Comment addressed.**

### III.B – NATURAL RESOURCES

No comments on this section.

### III.C – HAZARDOUS MATERIALS & PUBLIC HEALTH

40. Response C-3 should include a discussion of the protocols for encountering an unexpected underground tank or other environmental concern during construction.

6/9/22 conclusion: Comment not addressed.

**8/23/22 conclusion: Comment addressed.**

41. In Comment C-7, it is possible the Commenter was referring to groundwater. Therefore, the response should be augmented to discuss potential groundwater impacts and the proposed vapor barrier/sub-slab depressurization system.

6/9/22 conclusion: Comment not addressed.

**8/23/22 conclusion: Comment addressed.**

42. Response C-9 on page III.C.-5 should be augmented with a discussion of groundwater results.

6/9/22 conclusion: Comment not addressed.

**8/23/22 conclusion: Comment addressed.**

- Unclear what this and comment 45 mean. Both comments have been responded to by Bill. Is the response "wrong" in some way? Do these comment just relate to the re-numbering?
43. Response C-12 should also mention inclusion of the sub-slab depressurization system and vapor barrier.

6/9/22 conclusion: Comment not addressed.

**8/23/22 conclusion: Comment addressed.**

44. Response C-14 should be expanded to address the commenter's concern regarding PCBs and VOCs, including whether VOCs results were reported to NYSDEC. Cross-references to Responses C-12 and C-13 should be added. The following two statements from the DEIS could be incorporated:

**8/23/22 conclusion: Comment not addressed. This is now Response C-15.**

- a. The results of soil sampling for VOCs, SVOCs, TAL metals and PCBs indicate that no petroleum hydrocarbon constituents, metals or PCBs were detected above NYSDEC-RUSCOs for Commercial properties at any of the boring locations where these constituents were tested.

**8/23/22 conclusion: Comment not addressed.**

- b. *The findings of the Phase I Environmental Assessment recommends that given the likely presence of asbestos, lead paint and PCBs, proper sampling and abatement should be undertaken prior to any future renovations, repairs or demolition.*

**8/23/22 conclusion: Comment not addressed.**

45. *Response C-15 needs to be expanded to address the following components from the comment:*

- a. *What fail-safes will be put in place to ensure structural integrity of all surrounding buildings, including the roads and Railroad Way?*

**8/23/22 conclusion: Comment not addressed. This is now Response C-16.**

- b. *How will excavation on property line impact Railroad Way?*

**8/23/22 conclusion: Comment not addressed. This is now Response C-16.**

- c. *Is there any way to remediate the existing soil?*

**8/23/22 conclusion: Comment not addressed. This is now Response C-16.**

### III.D – FLOODING & FLOOD ZONE IMPACTS

46. *Responses D-1 and D-2 on pages III.D.-1 and III.D.-2 should both discuss the updated increase in flood storage volume on the site associated with the FEIS Plan.*

6/9/22 conclusion: *Comment addressed.*

47. *Responses D-3 and D-4 should also discuss the further reduction in impervious area and the increase in flood storage volume associated with the FEIS Plan. In addition, the Stormwater Control Facility Maintenance Agreement included as Appendix E to the DEIS could be referenced in these responses.*

6/9/22 conclusion: *Comment addressed.*

48. *Response D-6 should be expanded to state that compliance with the building standards under Chapter 186 Flood Damage Prevention of the Village of Mamaroneck Code will be enforced through inspections associated with the Floodplain Development Permit.*

6/9/22 conclusion: *Comment mostly addressed. The wording "Flood Damage Protection Permit" should be changed to "Floodplain Development Permit."*

**8/23/22 conclusion: Comment addressed.**

49. *Response to Comment D-7 on page III.D.-4 should address the question of whether or not the existing storage building is flood zone compliant. The DEIS states on page IV.D-3 "The existing building is not floodproofed and therefore does in fact flood during major rainfall events. Additionally, the proposed building is outfitted with flood vents (as required since it is located in the flood zone) and will also flood during major rainfall events." The responses should clarify the difference between "floodproofed," "flood zone compliant," and "wet flood-proofed buildings" (see Response D-2). It is not clear from these responses whether or not ground floor storage units would flood during heavy rainfall events.*

6/9/22 conclusion: *Comment addressed. The appendix call should include an appendix letter.*

**8/23/22 conclusion: The appendix letter should be added to the appendix call; it is presumed the referenced appendix is FEIS Appendix E.**

50. *Response D-8 on page III.D.-5 should also note the increase in flood storage volume associated with the FEIS Plan.*

6/9/22 conclusion: *Comment addressed.*

Cleary will add  
appendix  
reference



51. Response D-9 on page III.D.-5 should clarify whether this is referring to the Hudson Engineering Flood Storage Analysis (Appendix D from the DEIS). If this appendix was in fact updated, the updated version should be included with the FEIS. The response should indicate the date it was provided to the Village Engineer for review.

6/9/22 conclusion: Comment addressed. The appendix call should include an appendix letter.

Can  
Hudson  
clarify?

**8/23/22 conclusion: Based on the revised FEIS Table of Contents, it does not appear that a revised flood storage analysis appendix is included with the FEIS. If there is a revised flood storage analysis beyond what is included as FEIS Figure I-11, then it should be added as an FEIS appendix. If not, then Response D-9 should be revised to remove the reference to an appendix and instead reference FEIS Figure I-11.**

52. Response D-10 indicates the Hudson Engineering Flood Storage Analysis (Appendix D from the DEIS) was revised. The revised appendix should be included with the FEIS and cross-referenced in this response.

6/9/22 conclusion: Comment addressed. The appendix call should include an appendix letter.

**8/23/22 conclusion: See conclusion above regarding revised flood storage analysis appendix in comment 51.**

53. Response D-11 on page III.D.-6 refers to text from the DEIS having been corrected: "The text on Page I-11 defining the 500-year floodplain was revised to "0.2% chance of flooding". The text that this response refers to does not exist in the FEIS, the response should be reworded to say "The text on Page 11-1 defining the 500-year floodplain should have read "0.2% chance of flooding.""

6/9/22 conclusion: Comment addressed.

54. Response D-12 should also cross-reference the revised flood storage analysis, which should be included as an appendix to the FEIS.

6/9/22 conclusion: Comment addressed. The appendix call should include an appendix letter.

**8/23/22 conclusion: See conclusion above regarding revised flood storage analysis appendix in comment 51.**

55. Responses D-3, D-9, and D-15 through D-17 reference the Kellard Sessions October 1, 2021 memorandum. This should be included in an appendix to the FEIS.

**8/23/22 conclusion: Comment addressed.**

56. In Response D-13, footnotes 3 and 4 citing the DEIS and FEIS need to be switched.

**8/23/22 conclusion: Comment addressed.**

57. Response D-18 should include an appendix call for the cited documents.

**8/23/22 conclusion: Comment addressed.**

### III.E – HISTORIC RESOURCES

No comments on this section.

### III.F – VISUAL RESOURCES

58. Response F-3 on page III.F.-3 should also discuss the changes in design associated with the FEIS Plan.

6/9/22 conclusion: Comment not addressed.

**8/23/22 conclusion: Comment addressed.**

59. *In the first sentence of the third paragraph of Response F-4 on page III.F.-4 and Response F-6 on page III.F.-6, it should be clarified that the height of portions of the building addition have been reduced.*

*6/9/22 conclusion: Comment partially addressed. Response F-4 was revised but Response F-6 has not yet been revised.*

**8/23/22 conclusion: Comment addressed.**

60. *Response F-5 on page III.F.-5 refers the reader to the Site Plan for lighting that will illuminate Railroad Way. However, the Site Plan included as Figure I-1 to the FEIS does not include any lighting information. Proposed lighting should be added to Figure I-1 or a separate lighting figure should be included.*

*6/9/22 conclusion: Comment addressed. The response should be revised to refer the reader to Figures III.F-1 and III.F-3 of the FEIS.*

Clearly to add  
cross-reference

**8/23/22 conclusion: Response F-5 should be revised to include a cross reference to the lighting plan provided as Figure III.A-2. Cross references to Figures III.F-1 and III.F-3 could also be included.**

61. *The response to Comment F-7 on page III.F.-6 should also discuss the revised architecture associated with the FEIS Plan.*

*6/9/22 conclusion: Comment not addressed.*

**8/23/22 conclusion: Comment addressed.**

62. *Response F-8 on pages III.F.-8 through III.F.-9 should be augmented to include a discussion of the visual impacts of the alternatives evaluated and how those alternatives relate to the currently proposed FEIS Plan.*

*6/9/22 conclusion: Comment addressed.*

63. *Response F-9 on page III.F.-9 should discuss the architectural changes associated with the FEIS Plan.*

*6/9/22 conclusion: Comment not addressed.*

**8/23/22 conclusion: Comment addressed.**

64. *Response F-10 on page III.F.-10 should cross-reference another response that discusses the current architectural plan. In addition, this response should discuss (or cross-reference other responses that discuss) the currently proposed mix of uses and increased pedestrian circulation/traffic.*

*6/9/22 conclusion: Comment addressed.*

65. *The response to Comment F-11 refers to additional viewpoints from the train tracks and I-95 and refers the reader to Response F-10 in parentheses. Although it may be appropriate to cross-reference Response F-10 within this response, the parenthetical after the additional viewpoints should refer the reader to Figures III.F-2 through III.F-5 of the FEIS.*

**8/23/22 conclusion: Comment not addressed.**

### III.G - UTILITIES

66. *Although Response G-1 on page III.G.-1 indicates that the correct references for sewage calculations in DEIS Section IV.G and Appendix N should have been NYSDEC's Design Standards for Intermediate Sized Wastewater Treatment Systems (2014), it is unclear whether the calculations prepared for the DEIS relied upon the NYSDEC 1988 Design Standards for Wastewater Treatment Works. This should be clarified in the response. Also, the Response G-1*

*mentions DEIS text having been revised, but a revised DEIS has not been provided. A corrected Appendix N should be provided as an appendix to the FEIS and the response revised to note its inclusion.*

*6/9/22 conclusion: Comment not addressed.*

**8/23/22 conclusion: Comment addressed.**

### **III.H – TRAFFIC & TRANSPORTATION**

67. *Response to Comment H-4 on page III.H.-3 should be revised to describe how the revised plan would function, including the proposed number of loading spaces (3) and the number near a door (1).*

*6/9/22 conclusion: Comment not addressed.*

**8/23/22 conclusion: Comment addressed.**

68. *Response to Comment H-5 on page III.H.-3 should be revised to include the proposed loading space width.*

*6/9/22 conclusion: Comment not addressed.*

**8/23/22 conclusion: Comment addressed.**

69. *Response H-7 on page III.H.-4 states that a truck turning path movement analysis is provided and refers to Figure IV-H-1. There does not appear to be a turning path movement figure included anywhere within the FEIS or its appendices. This should be included, and the figure reference in the response should be corrected.*

*6/9/22 conclusion: Comment not addressed.*

Included in the  
Appendix

**8/23/22 conclusion: Comment not addressed. The FEIS traffic appendix was not provided so it is unknown if this figure is contained there.**

70. *Response H-9 should include an appendix letter with the appendix call.*

**8/23/22 conclusion: Comment not addressed.**

71. *The table in Response H-10 should be revised to also indicate the number of parking spaces that would be required by the Zoning Code for each use, not just the projected number of spaces needed.*

Cleary  
will revise  
the table

**8/23/22 conclusion: Comment not addressed. The required numbers are discussed in Response A-33 and should be added to Table H-1.**

72. *Responses H-12 and H-13 should include an appendix call.*

**8/23/22 conclusion: Comment not addressed.**

### **III.I – ECONOMIC & FISCAL ANALYSIS**

73. *Response I-3 on page III.I-4 should cross-reference the segmentation discussion from Response A-1.*

*6/9/22 conclusion: Comment not addressed.*

**8/23/22 conclusion: Comment addressed.**

74. *Response I-4 on page III.I-4 through III.I-5 should be augmented to include a discussion of the other uses currently proposed in the FEIS Plan and how those uses would serve the residents/community.*

*6/9/22 conclusion: Comment not addressed.*

**8/23/22 conclusion: Comment addressed.**

75. *Response I-5 on page III.I.-5 should also mention the currently proposed vest-pocket park.*

*6/9/22 conclusion: Comment not addressed.*

**8/23/22 conclusion: Comment addressed.**

### **III.J – BUILDING DEMOLITION & CONSTRUCTION**

76. *Response J-1 on page III.J.-1 should also note that the FEIS Plan now involves demolition of all existing buildings with the exception of the current self-storage building.*

*6/9/22 conclusion: Comment not addressed.*

**8/23/22 conclusion: Comment addressed.**

### **III.K – MISCELLANEOUS**

77. *The cross-reference in Response K-4 should be corrected to reference Response K-3, not Response A-3.*

**8/23/22 conclusion: Comment addressed.**

78. *The comment and response numbering needs to be corrected beyond Comment K-5.*

**8/23/22 conclusion: Comment addressed.**

79. *The response to Comment K-5 should point the reader to where the topographic survey is included in the DEIS and/or FEIS.*

**8/23/22 conclusion: Comment partially addressed. The revised response indicates the topographic survey is included in the full size plan set accompanying the FEIS submission. However, AKRF did not receive the updated drawing set in digital or hard copy.**

80. *The site plan approval and Certificate of Occupancy for the existing building should be included in an appendix to the FEIS.*

**8/23/22 conclusion: Comment addressed. The revised FEIS Table of Contents indicates these files are included as FEIS Appendix E, although they were not provided for review.**

## **CHAPTER IV APPENDIX**

81. *Pages 9 through 10 of the May 6, 2021 public hearing transcript marked a box of text in green and indicated this comment was labeled as Comment K-2. However, this comment was not included anywhere in FEIS Chapter III. This comment should be added to Section III.K.*

*6/9/22 conclusion: Comment not addressed. However, since the text marked on the pages noted did not contain a substantive comment that requested further information, no further action is needed.*

82. *Page 19 of the May 6, 2021 public hearing transcript contains an additional comment from Mr. Neufeld that is not included in Chapter III of the FEIS: "Were the findings here, were they supposed to be reported to the DEC, I'm not sure. I haven't asked that of the consultant but I'm not sure were they supposed to be because sometimes you have to report." This comment should be added to Section III.C and a response should be provided.*

*6/9/22 conclusion: Comment not addressed.*

**8/23/22 conclusion: Comment addressed.**

83. *The revised flood storage analysis should be included within the appendices to the FEIS.*

*6/9/22 conclusion: Comment not addressed.*

Will be  
included  
with full  
submission

Hudson to  
clarify - see  
#51

**8/23/22 conclusion: Comment not addressed. See conclusion regarding revised flood storage analysis appendix in comment 51 above.**

### ADDITIONAL COMMENTS

AKRF also reviewed the revised FEIS for completeness in regards to the changes requested by the ZBA at the April 26, 2022 work session as summarized in the AKRF memorandum dated June 9, 2022. The previous comments are presented in italics, new and follow-up comments are presented in bold.

1. *The completeness comments from the November 16, 2021, work session were included in the revised FEIS and we recommend that they be removed. The substantive information that was requested by the ZBA should be incorporated into Chapters 1 and 2, and a cover letter indicating how and where those comments were addressed should be provided.*

**Comment not addressed.**

2. *The FEIS is the ZBA's document, and the tone of the responses should reflect that. Many of the responses are dismissive of the substantive information that was requested by the ZBA.*

**Comment not addressed.**

3. *The ZBA's comments from the November 16, 2021, meeting were primarily related to the following substantive issues and concerns:*

- a. *Segmentation. Several ZBA members raised the concern that the proposed project was segmented from the existing self-storage project, as the Applicant previously contemplated a larger self-storage facility. This comment is sufficiently responded to in the FEIS. The preparation of the DEIS/FEIS for the proposed project cured issues related to the segmentation of the prior project.*

**Comment addressed.**

- b. *Flooding. The FEIS inadequately responds to the substantive questions raised by the ZBA with regards to the extent of the flooding that occurred on the Project Site during Hurricane Ida. The ZBA's questions have relevance to the Proposed Project because they speak to establishing an appropriate Base Flood Elevation for the Proposed Project and other flood mitigation measures. Specifically, the FEIS should include the following information within Chapter 2:*

- i. *Height of flood water within the parking lot and the existing buildings during Hurricane Ida.*

**Comment partially addressed. Some Hurricane Ida info is included in Response D-14 on page III.D-8, but the details asked for here in i. through v. are not provided.**

- ii. *Whether or not flood water entered the existing self-storage building during Hurricane Ida. If flood water entered the building, the extent of the intrusion should be disclosed.*

**Comment not addressed.**

- iii. *Proposed flood mitigation measures that exceed the base requirements of the law.*

**Comment partially addressed.**

- iv. *Additional information regarding flooding was provided at the May 31, 2022 worksession. This technical information should be provided in the FEIS.*

Murphy Bros - Was  
this information  
recorded?

iii - Not sure  
what AKRF  
means, or  
wants

How would this be shown on a "site plan"? Was the Ida flooding accurately surveyed and mapped?

**Comment partially addressed. The ZBA specially asked for site plans and sections showing the extent of Ida flooding and the BFE of the proposed building. This was not provided.**

- v. *A diagram showing the 100-year and Ida flood levels in relation to the proposed building elevations should be provided.*

**Comment not addressed.**

Clearly to revise

- c. *Proposed Woodworking Use. The ZBA noted that the proposed new use had different parking requirements and requested that this be further described in the FEIS. The information included in Response A-33 should be integrated into Chapter 2.*

**Comment not addressed.**

Included in Appendix

- d. *Hazardous Materials. The ZBA questioned whether or not the Phase I and Phase II studies, as well as proposed mitigation measures, were adequate to address the conditions observed on the site. As discussed at the April 26, 2022, work session, AKRF has reviewed the documentation and proposed mitigation measures and finds that with the proposed mitigation measures in place, the recognized environmental conditions would be adequately addressed. The additional detail provided in the new responses in Section III.C should be integrated into Chapter 2. The transcript from the April 26, 2022 worksession should be included in the FEIS appendices.*

**Comment not addressed. The revised appendices was not provided for review.**

Are the backgrounds incorrect?? Or is this ZBA misunderstanding?

- e. *Visual Impacts. The ZBA asked for additional information regarding the potential visual impacts of the project. The DEIS included architectural plans, elevations, photography, 3-D renderings and photosimulations. The FEIS includes additional viewpoint analyses from the train tracks and I-95. The analyses in the DEIS met the requirements of the Final Scoping Document, and the applicant provided analyses from the additional requested locations. As discussed at the May 31, 2022 worksession, the several of the figures have incorrect backgrounds and should be replaced with the figures shown at the worksession presentation.*

Kim to address

**Comment not addressed. Figures III.F-2 and III.F-3 still have the incorrect background (they both show tall urban buildings not in Mamaroneck).**

Clearly to revise

- f. *Parking. There were inconsistencies in the document with regards to the number of parking spaces and parking ratios. These were identified in AKRF's completeness review memorandum dated October 26, 2021, and similar questions were raised by the ZBA members. Some of the corrections were made in the current document, however we noted a few places where the corrections were not picked up. These will be noted in AKRF's comments on the current draft FEIS.*

**Comment partially addressed (see above comments).**