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January 10, 2019

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Hon. Loretta Taylor, Chairperson
and Members of the Planning Board
Town Hall
1 Heady Street
Cortlandt Manor, NY 10567

Re: Hudson Ridge Wellness Center, Inc.

Dear Chairperson Taylor and Members of the Board:

We are in receipt of the letter submitted to the Board by Zarin & Steinmetz on behalf of the "Citizens Group", dated January 3, 2019, requesting that the Board issue a "Positive Declaration" under SEQRA with respect to our client's application.

At the outset, we reiterate our respectful request that Mr. Steinmetz advise the Board and the Applicant of those individuals his firm is actually retained by and representing. Otherwise, by acting under the auspices of the "Citizens Group", it may appear the number of people represented is larger than is actually the case.

Notwithstanding, Zarin & Steinmetz made the same request for a Positive Declaration in 2017 when the application was under active consideration by the Zoning Board. In response to that request, as part of its April 10, 2017 Addendum to its Comprehensive Expanded Environmental Assessment Report, dated October 6, 2016, the Applicant submitted as Appendix I thereto, its memorandum entitled, "Support for a SEQRA Negative Declaration for the Proposed Specialty Hospital", which addressed in detail each of the criteria for determining significance as enumerated in the SEQRA Regulations, thereby demonstrating that the proposed action will have no potential significant adverse environmental impacts. A copy of Appendix I was re-submitted to the Planning Board, via Mr. Kehoe, Deputy Director of Planning, on January 7, 2019.

As the application has been significantly further refined since the submission of Appendix I in April, 2017, an updated version of Appendix I, prepared by the Applicant's planning consultants, JMC, is submitted herewith. This updated analysis serves to support even more strongly the Board's issuance of a Negative Declaration, at such time as such a determination is appropriate, on the basis that record before the Board demonstrates, that given all of the mitigative measures incorporated in the application, no significant adverse impacts may reasonably be expected. Notably, it bears reiterating that **there will be no new building**

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construction, with little disturbance to already improved areas, and no impact on open space or sensitive environmental features – other than the positive impact of ensuring their preservation. As the Board knows, it has reviewed much larger and far more impactful projects without issuing a Positive Declaration.

While the aforesaid updated submission fully addresses and refutes the generalized comments of Zarin & Steinmetz in support of their request for a Positive Declaration, some of their inaccurate characterizations of the comprehensive review process conducted by the Board, its professional staff, and its expert consultants to date, bear brief response.

In critiquing the long and painstaking process engaged in by the Applicant and Town representatives to date to modify and augment the application to eliminate any potential for significant adverse impacts, the Zarin & Steinmetz request for a Positive Declaration at this juncture exemplifies the aphorism that “no good deed goes unpunished”.

The review process to date has not constituted a “piecemeal” approach, as claimed by counsel, but an in-depth focus on the most relevant, important issues raised by the application, particularly, possible impacts on neighboring wells and traffic, which also relate to the general matter of any adverse impact on neighborhood character, in order to improve the application by being responsive to and fully addressing concerns raised at great length by Town representatives and the public to date. The intention is not to avoid public scrutiny and participation – there has already been substantial public scrutiny and participation – but to preemptively address and reduce potential significant issues for purposes of further public review and comment, and to make that public review and comment simpler and less expansive, not more difficult.

Since this application first came before the Town in August 2015, counsel and the public have had ample opportunity, which they have taken at length, to appear and speak at televised public meetings, whether public hearings or not, and to make written submissions. All of the Applicant’s submissions have been fully available public record and, upon information and belief, have regularly been provided to counsel for neighbors. As a result, the Applicant, as well as the Town representatives, have been responsive to the numerous comments to date of Zarin & Steinmetz, the neighbors, and their consultants. As reflected in the Applicant’s comprehensive submissions to date, the Applicant has engaged in a methodical, well-considered, focused effort to address the key relevant issues project opponents have raised and will continue to do so. There will be public hearings forthcoming, at which counsel and neighbors will be heard yet again.

There have been no “contradictory” submissions by the Applicant, as stated by counsel, and none are specifically cited. There *have* been modifications throughout, as is standard in such a thorough review process, in response to the concerns of the Town and the public. Parenthetically, we note that Zarin & Steinmetz “contradict” the actual application, by referring to a “96-bed” hospital, rather than actual 92-bed specialty hospital, which has been proposed

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from the outset. Nor has the Applicant merely “purported” to address issues, such as hydrogeological matters relating to potential well impacts, as claimed by counsel, but has *actually* addressed those issues in great depth, in accordance with the requirements of the Town professional staff and its experts. As to hydrogeological matters, in particular, the neighbors’ hydrogeological expert has been heavily involved and has indicated to a large extent his satisfaction with the efforts of the Applicant and Town, who substantially incorporated his recommendations. Likewise, the Town’s traffic expert has been involved throughout, his comments have been thoroughly addressed, and he has not raised any significant adverse traffic impacts.

In short, notwithstanding counsel’s comments to the contrary, the Planning Board, its professional staff and its experts have engaged with the Applicant and public in diligently following the regulatory conditions precedent for making the Board’s ultimate determination of significance, as set forth in § 617.7(b) of the SEQRA Regulations, which states as follows:

For all Type I and Unlisted Actions the lead agency making a determination of significance must:

- (1) consider the action as defined in §§ 617.2(b) and 617.3(g) of this Part;
- (2) review the EAF, the criteria contained in subdivision (c) of this section and any other supporting information to identify the relevant areas of environmental concern;
- (3) thoroughly analyze the identified relevant areas of environmental concern to determine if the action may have a significant adverse impact on the environment; and
- (4) set forth its determination of significance in a written form containing a reasoned elaboration and providing reference to any supporting documentation.

Based on the examination of the SEQRA criteria in the Applicant’s updated submission herewith, and much anticipated additional information to be provided to the Board in the ongoing review process, the Applicant respectfully submits that the Board will have ample basis to render a Negative Declaration under SEQRA, and conversely, there is no support in the record before the Board for a Positive Declaration pursuant to the criteria in the SEQRA Regulations, § 617.7 as fully explained in the enclosed updated revised Appendix I to the Expanded Environmental Assessment Report. Any such misplaced Positive Declaration at this time would

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seem particularly arbitrary and duplicative, after the Applicant has spent the last 1½ years with this Board alone, working with its staff and consultants as authorized by the Board, to address and mitigate potential adverse impacts.

Under the circumstances, the Applicant suggests that, at most, the Board could reasonably issue a "Conditioned Negative Declaration" under § 617.7(d) of the SEQRA Regulations, which provides in pertinent part that for Unlisted Actions such as this one, the Board may render a "CND", provided, as in this case, there has been a Full Environmental Assessment Form, a coordinated review, and the imposition of conditions that mitigate all significant adverse impacts as supported by the Full EAF and other documentation. Certainly, in this case, the Board has more than ample documentation, including extensive mitigating conditions proposed by the Applicant, to mitigate any potential significant adverse impact and to thereby support the issuance of a Conditioned Negative Declaration.

In any event, the Applicant fully understands the concern of the Board and the public that given the numerous and voluminous submissions to date, there should be an organization and consolidation of the submissions comprising the application and addressing the environmental issues to date to better accommodate the public hearing process and public comment. The Applicant will undertake to do so, thereby rendering a Positive Declaration not only inappropriate, for the reasons set forth herein and the accompanying revised Appendix, but unnecessary to accomplish that particular purpose.

The extensive analysis performed by the Town to date, based on the voluminous environmental submissions of the Applicant, far exceeds the produced and substantive requirements of any typical SEQRA review or Environmental Impact Statement and fully supports a Negative or Conditioned Negative Declaration. The generalized contentions of counsel for neighbors do not change these facts. Merely claiming that there may be a significant adverse environmental impact, despite overwhelming evidence to the contrary, does not make it so.

Very truly yours,



Robert F. Davis

RFD:dds
Enclosure

c: Thomas F. Wood, Esq. (via e-mail)
Chris Kehoe, AICP (via e-mail)
Michael Preziosi, P.E. (via e-mail)

Revised
APPENDIX I
of the Expanded Environmental Assessment (EEA) Addendum dated 04/10/2017
Submitted to the Town

Support for a SEQRA Negative Declaration for the Proposed Specialty Hospital
2016 Quaker Ridge Road
Town of Cortland, NY
04/10/2017
Revised 01/10/2019

The proposed action will have no significant adverse environmental impacts. The criteria for determining significance are enumerated in the SEQRA regulations as set forth below, followed by the specific reasons the proposed action has no potential significant adverse environmental impacts as more fully discussed in the Point II, below, thus justifying a Negative Declaration.

I. Determining Significance (from Section 617.7 of the SEQRA regulations)

Section 617.7

- (a) The lead agency must determine the significance of any Type I or Unlisted action in writing in accordance with this section.
- (1) To require an Environmental Impact Statement (EIS) for a proposed action, the lead agency must determine that the action may include the potential for at least one **significant adverse environmental impact**.
- (2) To determine that an EIS will not be required for an action, the lead agency must determine either that there will be no adverse environmental impacts or that the identified adverse environmental impacts will not be significant.
- (c) Criteria for determining significance.
- (1) To determine whether a proposed Type I or Unlisted action may have a significant adverse impact on the environment, the impacts that may be **reasonably expected to result** from the proposed action must be compared against the criteria in this subdivision. The following list is illustrative, not exhaustive. These criteria are considered indicators of **significant adverse impacts** on the environment:

SEQRA Criteria:

- (i) A **substantial adverse change** in existing air quality, ground or surface water quality or quantity, traffic or noise levels; a **substantial increase** in solid waste production; a **substantial increase** in potential for erosion, flooding, leaching or drainage problems.

This Action will have no such impacts:

The proposed action has no long-term air quality impacts, and no significant adverse impacts from noise (see Section H of this Appendix). There are no

potential significant adverse traffic impacts on the neighborhood , and significant mitigating measures are proposed in the Applicant's Traffic Management Plan, developed in conjunction with the Town's expert traffic consultant (see Section M); no substantial adverse change in existing ground or surface water quality is anticipated (see Sections G and F), based on an additional pump test conducted which included off-site well monitoring, as approved and supervised by the Planning Board and, its professional staff and expert hydrogeology consultant; nor is there any increase in potential for erosion, flooding, leaching or drainage problems (see Section F). No significant quantity of solid waste is being generated (see Section P).

SEQRA Criteria:

- (ii) The removal or destruction of **large quantities** of vegetation or fauna; **substantial interference** with the movement of any resident or migratory fish or wildlife species; impacts on a **significant** habitat area; **substantial** adverse impacts on a threatened or endangered species of animal or plant, or the habitat of such a species; or other **significant** adverse impacts to natural resources.

This Action will have no such impacts:

None of these impact issues are pertinent to the proposed action (see Section I of this Appendix) because no construction is proposed, with no disturbance of areas not already disturbed. The existing 75% open space of the property will be kept intact as will the open space on the adjoining 27.8 acre parcel, owned by an affiliate company.

SEQRA Criteria:

- (iii) The **impairment** of the environmental characteristics of a Critical Environmental Area as designated pursuant to subdivision 617.14(g) of this Part.

This Action will have no such impact:

No impairment of the environmental characteristics of a Critical Environmental Area will occur (see Section L of this Appendix).

SEQRA Criteria:

- (iv) The creation of a **material conflict** with a community's current plans or goals as officially approved or adopted.

This Action will have no such impact:

The proposed action creates no material conflict with Cortlandt's 2004 or 2016 Comprehensive Plans and their goals, including the proposed Medical Oriented District ("MOD") discussed in the 2016 Comprehensive Plan (see Section A of this Appendix). The MOD legislation has not been adopted. The Town is currently drafting the DEIS for the legislation as well as for the site plans for two developers who have projects related to the MOD district. In any case, the proposed legislation makes the MOD an "optional" overlay district designation, for which those property owners wishing to be included must apply to the Town Board for inclusion in the district in the Board's discretion.

SEQRA Criteria:

- (v) The **impairment** of the character or quality of important historical, archeological, architectural, or aesthetic resources or of existing community or neighborhood character.

This Action will have no such impacts:

There is no impairment of the character of any important historical or archeological, architectural, or aesthetic resources, with preservation of the site and its existing buildings (see Sections C and K of this Appendix). Likewise, the existing community and neighborhood character will not be significantly impacted by the proposed action (see Section A).

SEQRA Criteria:

- (vi) A **major change** in the use of either the quantity or type of energy.

This Action will have no such impacts:

No significant change in quantity or type of energy will occur because of the proposed action (see Section O of this Appendix).

SEQRA Criteria:

- (vii) The creation of a **hazard** to human health.

This Action will have no such impact:

No hazard to human health will be created by the proposed action (see Section P of this Appendix).

SEQRA Criteria:

- (viii) A **substantial** change in the use, or intensity of use, of land including agricultural, open space or recreational resources, or in its capacity to support existing uses.

This Action will have no such impacts:

The project preserves all existing open space on two parcels, does not impact recreational resources (see Section K of this Appendix), and there is no impact to agricultural resources (see Section J). There is no substantial change in use or intensity of use because there is no new construction, existing buildings will be used, and the property historically contained hospital and institutional uses for some 60 years with various special permits issued for similar institutional use, including one in 1989 for a hospital (see Section A). The special permits for IBM and Hudson Institute allowed 225 employees on site and the 1989 hospital special permit allowed a combined total of patients and staff of 225. Our maximum occupancy at ultimate full capacity would be only 178 combined patients and staff (92 plus 86), but never at one time. Maximum occupancy at one time would not exceed approximately 129.

SEQRA Criteria:

- (ix) The encouraging or attracting of a **large** number of people to a place or places for more than a few days, compared to the number of people who would come to such place absent the action.

This Action will have no such impact:

There will not be any such "large" numbers of people coming to the adjacent 48.6 acre combined site. The patients on the site will remain on the property for a month or more with no vehicles, and will not leave the site during treatment, and so the number of people on site for more than a few days does not generate any significant adverse environmental impact, including staff, with staggered off-peak hour shifts and use of shuttle vans, and limited vendor traffic, with visitation limited so that patients may have visitors only one day per month, which will take place on a weekend, and only up to 25% of the patients may have visitation on any one weekend. Further, there is no current limitation on the number of people who may come to the site absent the action. Absent this proposed action, there would likely be another action, such as a school or religious use with school which would generate more people.

SEQRA Criteria:

- (x) The creation of a **material** demand for other actions that would result in one of the above consequences.

This Action will have no such impact:

There will be no creation of a material demand for other actions that would result in one of the above consequences since the use is very self-contained.

SEQRA Criteria:

- (xi) Changes in two or more elements of the environment, no one of which has a significant impact on the environment, but when considered together result in a **substantial** adverse impact on the environment.

This Action will have no such impact:

There are no changes in two or more elements of the environment, no one of which has a significant impact on the environment, but when considered together result in a substantial adverse impact on the environment.

SEQRA Criteria:

- (xii) Two or more related actions undertaken, funded or approved by an agency, none of which has or would have a significant impact on the environment, but when considered cumulatively would meet one or more of the criteria in this subdivision.

This Action will have no such impact:

There are no two or more related actions undertaken, funded or approved by an agency, none of which has or would have a significant impact on the environment,

but when considered cumulatively would meet one or more of the criteria in this subdivision.

II. The Proposed Action has no potential significant adverse environmental impacts based on the reasons stated below:

A. The Proposed Action is Consistent with The Town Development Plan and Community Character

1. The Proposed Action is consistent with the 2004 Comprehensive Plan. The Town's 2004 Master Plan makes note of this property in Policy 34, with the property being within the Special Reuse and Conservation Development (SRC) district at that time. Policy 34 recommended that the Town Board eliminate the SRC district from the Zoning Ordinance. The Hudson Institute property (the site) was mentioned in Policy 34 as one of the institutional properties expressly intended to benefit by redevelopment under the SRC zoning because the permitted lot area in that District was 5,000 square feet for single-family, two-family and multifamily dwellings, potentially making the property attractive for denser residential redevelopment than under the R-80 District. However, the Master Plan proposed to eliminate the SRC because of the lack of infrastructure in the area to support the increased housing density permitted thereunder. The Town Board adopted the Master Plan recommendation in amending the Zoning Ordinance to eliminate the SRC, whereby the property reverted to R-80 zoning. Thus, the proposed re-use of the property as a specialty hospital permits the property to be used again and to remain on the tax rolls with no such increase in density, while providing for the specialty hospital's sanitary and water infrastructure needs on-site. The proposed use is therefore consistent with the Town's 2004 Master Plan and Policy 34 in particular.

2. The Proposed Action is consistent with the 2004 Comprehensive Plan's goal of preserving Quaker Ridge Road, and also with the 2016 Comprehensive Plan where the Quaker Ridge Road area is listed on Table 7-1 on page 94 as a scenic resource in the Town, which is consistent with Quaker Ridge Road's recent historic designation. As demonstrated on Table III.C-4 (Appendix K) of the EEA Addendum dated 04/10/2017 and as updated for the attached 01/08/2019 PowerPoint presentation to the Planning Board, the proposed specialty hospital has lower traffic volumes than other uses permitted in the R-80 district with no requirement of access to state roads (such as private schools, places of worship with associated religious school, and governmental buildings). As documented in the EEA Addendum, the Level of Service will not change, and there will be minimal traffic impact. No scenic features of Quaker Ridge Road are proposed to change, because the existing buildings on the property are proposed to be reused, with no new building construction proposed. Landscaping on the property will be enhanced. The existing open space (approximately 75% of the property) will remain intact. The adjacent 27.8 acre adjacent property to the south, owned by an affiliate company, that contains a small, vacant house but is otherwise undeveloped will remain in this condition as a buffer so long as the subject property is used as a hospital.

3. The Town's 2004 Open Space Plan includes the property in its current state under Index E-2 as an "Under-Utilized Parcel, Five Acres or More, Particularly Worthy of Preservation". The proposed re-use of the property as a specialty hospital, with no new buildings proposed and with minimal land disturbance for some additional parking, upgrading of utilities and new septic fields, maintains this property's open space identity in the substantially same condition as it was in 2004, and thereby conforms to the Town's Open Space Plan.
4. The proposed use preserves significant open space, a goal of the 2004 Comprehensive Plan. For example, as noted on page 86 of the 2016 Comprehensive Plan, the property is specifically mentioned in the context of meeting a goal of the 2004 Master Plan as being within "Category 3", which is an "underutilized privately-owned land" that currently provides open space benefits. With no new building development proposed on the property, the Proposed Action conforms to this goal.
5. The Proposed Action is consistent with the 2004 amendments to the Zoning Code to preserve local residential roads, as well as with Quaker Ridge Road as a recently designated Town Historic and Scenic Road with specific protections for pavement width, preservation of stone walls, mature trees and requirements for screening of new developments, as discussed below. The same roads were used for over 60 years for institutional use of the property. A special permit for such a hospital use was issued as late as 1989, when the character of the current neighborhood was already established. Furthermore, as noted previously, the proposed specialty hospital has lower traffic volumes than other uses permitted in the R-80 district with no requirement of access to state roads (such as private schools, places of worship with associated religious school, and a government building). All of these uses would have a greater impact than the proposed specialty hospital on any local residential road. As documented in the EEA Addendum, the Level of Service will not change with the proposed specialty hospital, and there will be minimal traffic impact.

With regard to Quaker Ridge Road as an Historic and Scenic Road, the project proposes no changes to pavement width of Quaker Ridge Road (the proposed driveway improvements will widen the driveway and provide a 90 degree intersection with Quaker Ridge Road yet will not require the widening of the travelled pavement of Quaker Ridge Road), no alteration to any stone walls or mature trees, and evergreen hedge screening has been installed along the property's westerly property line adjacent to Quaker Ridge Road. No changes are proposed to the existing road striping adjacent to the property. An approximately 3 feet by 4 foot sign is proposed at the front gate of the property. Therefore, the project will have no discernable impact to the historic nature of Quaker Ridge Road since the character of the roadway will not be noticeably altered.

6. The Proposed Action is consistent with the Town's 2016 "Envision Cortlandt" Comprehensive Plan. In addition to the property being mentioned, as indicated above, on page 86 with regard to the property providing open space benefits, and on page 94 with regard to the property as a scenic resource in the Town, the 2016 Master Plan provides on page 88 a list of Key Challenges and Opportunities for the Future; the

Proposed Action is in conformance with many of these. For example, how the project responds to the challenge of providing and preserving open space is discussed in #4, above. The project also addresses the key challenge of preserving the Town's biodiversity by protecting significant expanses of land and habitat, with no new building construction proposed and minimal site disturbance (under one acre), preserving the majority of the 20.8 acre site. In addition, the adjacent 27.8 acre adjacent property to the south, owned by an affiliate company, that contains a small, vacant house but is otherwise undeveloped will remain in this condition so long as the subject property is used as a hospital. The project also speaks to the challenge of protecting environmentally sensitive land, with no disturbance proposed to wetlands, wetland buffers, and steep slopes. This also helps to address the additional challenge of encouraging climate resiliency by protecting wetlands and preserving forested areas.

7. The project addresses the 2016 Master Plan challenge on page 88 of preserving water quality and protecting surface and groundwater resources. The two new HEWC wells will pump, on average, 9 gallons per minute. For some perspective, this is approximately the rate of a garden hose. In addition, the well will not run continuously, but will cycle on and off throughout the day, with less use at night. As discussed in the LBG Hydrogeologic Assessment in Appendix H of the EEA Addendum dated 04/10/2017, the data indicate that groundwater withdrawals up to twice the average water demand of the project will not result in storage depletion of the groundwater.

As approved and supervised by the Planning Board and, its professional staff and expert hydrogeology consultant, LBG conducted a 72-hour pumping test in August 2018. The primary goal of the pumping test was to evaluate potential impacts to water levels in nearby offsite potable supply wells while pumping the new water supply at twice the average water demand of the project. To achieve this goal, a simultaneous pumping test was conducted on Well 1 and Well 2 between August 20 and August 23, 2018 with pre- and post-water level monitoring of the offsite wells. The two Hudson Ridge Wellness Center wells were pumped concurrently for three days, each at a pumping rate of 9 gpm (gallons per minute), for a combined yield of 18 gpm or 25,920 gpd (gallons per day). The average water demand for the project is 12,660 gpd (8.8 gpm).

During the pumping test program, water-level measurements were collected from a total of four onsite wells, including two onsite bedrock monitoring wells and the two wells pumped during the testing program (Well 1 and Well 2) and 16 residential wells. Minimal drawdown (less than 0.50 foot) was documented in the two onsite bedrock monitoring wells. Water-level effects related to the pumping test was observed in two adjacent properties located on Quaker Hill Drive with a drawdown of approximately 18.5 and 24.5 feet. Because both wells had a significant amount of available water above their respective pumps at the end of the test, during a test that was conducted to demonstrate extreme conditions that will not occur during the hospital occupancy (72 hours of continuous pumping at a combined rate of double the average water demand), these wells are not expected to be adversely affected by the use of the HRWC wells. Additionally, no discernible water-level impacts were measured in any of the other offsite monitoring locations that were attributed to pumping in Well 1 and

Well 2. The Town's hydrogeology consultant and professional staff agreed with the testing protocol and findings.

Nonetheless, the Applicant has requested via a letter dated October 03, 2018 to the owners of the properties containing the wells affected by the pump test that they consider participating in a long-term offsite well monitoring program, which would start three to six months before the certificate of occupancy for the specialty hospital is issued and continue for up to two years after 75 percent full occupancy occurs. If long-term monitoring were to unexpectedly demonstrate any significant interference on these wells from the Hudson Ridge Wellness Center wells, mitigation options would be explored and implemented.

There will also be a domestic water storage tank to mitigate peak water draw demand, the existence of which was not accounted for in the extreme pumping test.

Additionally, eighty-five percent (85%) or more of the pumped water will be recycled back to the ground due to infiltration from the septic system following treatment, such that there would only be an effective draw of about 1.3 gallons per minute - or approximately 1,900 gallons per day. The contribution to ground water of annual rainfall to the project site is equivalent to about 21 gallons per minute - much more than the intended draw from the ground. This routine analysis also indicates that HEWC would not affect groundwater supplies. In addition, there will be no irrigation systems installed for the site landscaping. Rather, the landscaping will be hand-watered by a manually carried hose as determined by an inspection of the landscaping. Thus, watering will only be conducted should the landscaping require it based upon the conditions at the time, and only that landscaping requiring watering will be watered, and only then by hand using a hose. This will keep landscaping watering to a minimum. Once established, the species planted will not require heavy usage of water. The existing approximately 15,000 gallon emergency fire water storage tank behind building #3 will continue to be used for emergency fire water storage. The emergency fire water storage tank will be refilled from the existing functional wells, which will be dedicated to supplying the fire storage tank and which may not be used for irrigation or any other purpose. Fire storage tank refill water will not be sourced from the two new wells which are only being used to supply domestic water to the facility.

8. Preserving community character is another 2016 Comprehensive Plan challenge on page 88, which the proposed action is addressing. As discussed in the Expanded Environmental Assessment (EEA) dated October 6, 2016, there was similar institutional use of the property from the 20's throughout the 80's, culminating in the issuance of a hospital special permit in 1989 when the neighborhood was fully developed, and the Applicant is using the same buildings that were used for those institutional purposes. In addition, the existence of a specialty hospital on this site in a primarily residential neighborhood is not fundamentally different than any of the other non-residential uses permitted in the neighborhood, such as schools, places of worship with nursery schools, government offices, country clubs and recreation clubs.

9. Limiting the impacts associated with development, including increases in airborne pollutants, traffic, and noise levels is an additional 2016 Comprehensive Plan challenge on page 88, which the proposed action is addressing. The existing buildings on the property are proposed to be reused, with no new building construction proposed. No airborne pollutants are anticipated to be generated by the operation of the use, and any temporary construction impacts such as dust from the less than one acre of proposed disturbance will be mitigated by the sediment and erosion control plan. The proposed specialty hospital has lower traffic volumes than previous existing and approved uses of the site as well as other uses permitted in the R-80 district with no required access to state roads (such as private schools, places of worship with associated religious school, and a governmental building, per Table III.C-4 (Appendix K) of the EEA Addendum dated 04/10/2017 and as updated for the attached 01/08/2019 PowerPoint presentation to the Planning Board, and as documented in the EEA, the Level of Service will not change, and there will be minimal traffic impact. Facility operations are not noise-intensive. During the day, patients may walk on the property for relaxation when they have any free time between sessions/activities. After dark, patients may be walking from their living space to possibly another building on the property for meetings. For example, there is a meditation meeting noted on the current schedule that begins at 9:00 PM. Lights out is at 10:30 PM. Also, there are limited employee arrivals/departures at the start of the night shift at 10:00 PM, with the use of the two shuttle vans. The nearest residence is approximately 300 feet distant and upgradient from the proposed parking lot of the main hospital building, and buffered by a solid 6-foot high fence on the specialty hospital property and by a wooded buffer on the residential property, limiting noise impacts.

10. The proposed use will offer a number of other benefits to the Cortlandt community:

- Because the proposed specialty hospital is to be operated on a for-profit basis, it will not be exempt from local and school property taxes, and thus, unlike some other permitted uses, will remain on the Cortlandt tax rolls.
- The redeveloped property will pay a total of approximately \$571,568 in annual property taxes.
- This is more than a **ten-fold increase** of approximately \$515,000 in annual property taxes to be paid to all taxing jurisdictions following the proposed redevelopment, a very significant increase over existing conditions.
- No school children will be generated by this project. As such, the approximately \$408,126 in school taxes generated will all be to the benefit of the Croton-Harmon School District.
- Because the residents remain on the property and are not permitted to have vehicles, there will be little impact to Town services such as highway and recreation.
- Also, private carters are to be used, so Town taxes will not be used for trash collection.

- No municipal water or sewer service will be utilized.
- The project preserves all existing open space on two large, contiguous parcels:
 - The adjacent 27.8 acre forested parcel to the south in the Town of New Castle containing a small vacant house will remain undeveloped open space;
 - Approximately 75% of the 20.83 acre Site will remain undeveloped open space.
- There is no significant change in use or intensity of use because there is no new construction, existing buildings will be used, and the property historically contained hospital and institutional uses for some 60 years.
- The Town's 2004 Open Space Plan includes the property in its current state under Index E-2 as an "Under-Utilized Parcel, Five Acres or More, Particularly Worthy of Preservation". The proposed re-use of the property as a specialty hospital, with no new buildings proposed and with minimal land disturbance for some additional parking, upgrading of utilities and new septic fields, maintains this property's open space identity in the substantially same condition as it was in 2004.
- Due to the limited nature of the construction, there is no impact to environmental features such as wetlands, wetland buffers, steep slopes, or trees.
- Much less impact than other uses requiring a variance, such as a private or public school, a place of worship with religious school, or a general office building.
- Little disturbance by construction activity, with under one acre of site disturbance.
- Preferences for admission to the facility will be given to residents of Cortlandt, and scholarships will be awarded each year to two Cortlandt residents.
- A number of beds will be reserved for Cortlandt residents and they will be afforded reduced fees on a sliding scale based on income, augmented by their private insurance.
- The Applicant will actively participate in community outreach with relevant community and school programs, such as DARE, by providing expert speakers and programs, and will work with the Town as requested to combat the problem of substance use disorder.
- As part of its community outreach, the Applicant will designate a neighborhood/community liaison on its staff, who will among other duties, invite neighborhood representatives to open meetings no less than twice a year to keep them apprised of its operations and to address any questions or concerns from the neighbors. That person will also be available to call at any time if there was ever a

more immediate matter. The Applicant will also provide appropriate municipal authorities with a staffed 24-hour access line.

11. The proposed use is not appropriate for the Medical Oriented District discussed in the 2016 Comprehensive Plan. The issue of the inappropriateness of the specialty hospital in the MOD is discussed in great length in Appendix R and Appendix S of the EEA. For example, the 2016 "Envision Cortlandt", does not propose to require or envision that the proposed use components of the MOD or all medical uses in general be limited to just the MOD. Indeed, existing residential-oriented medical uses such as nursing homes, assisted living facilities, and group homes for disabled adults are dispersed throughout the Town, many in residential zoning districts such as the proposed specialty hospital. Other non-residential medical uses such as doctors' offices are also dispersed throughout the Town, with some doctors maintaining home offices in residential zones. Page 107 of the 2016 Comprehensive Plan, for example, acknowledges that care for the elderly residents of the Town is provided by several facilities, including the Bethel Nursing Home in Crugers, the Cortlandt Nursing Home on Oregon Road, the Seabury at Field Home in Cortlandt Manor, the NYS Veterans Home at the VA Campus in Montrose, and the Danish Home in Croton-on-Hudson. If all medical uses were intended by "Envision Cortlandt" to be limited to the MOD, all such existing uses and the properties on which they are located would be rendered non-conforming. Clearly, this is not "Envision Cortlandt's" intent. Further, there would be no basis to so distinguish a medical use from other non-residential uses in residential zones, such as educational and religious uses. The proposed specialty hospital has a temporary "residential" component, but is not a long-term residential medical use because clients only stay for a limited period of time.
12. To-date, the MOD zoning district has not been enacted by the Town. The Town is currently drafting the DEIS for the legislation as well as for the site plans for two developers who have projects related to the MOD district. In any case, the proposed legislation makes the MOD an "optional" overlay district designation, for which those property owners wishing to be included must apply to the Town Board for inclusion in the district in the Board's discretion.
13. The envisioned MOD district in the 2016 Comprehensive Plan is depicted as a dense concentration of uses. This is contrary to the generally accepted industry standards for such high-ended "luxury" specialty hospital facilities, which depend on location, privacy, tranquility, and security to provide a recovery buffer from the hustle and bustle of fast-paced, stressful everyday life. This buffer contributes to their success in working with individuals towards recovery and sobriety, and re-entry into normal everyday life. The MOD district, in contrast, does not provide such a location by its very nature of consolidating various medical uses into one location which is expressly envisioned to become a vital economic center of the Town.
14. The proposed MOD differs in other ways from the needs of the proposed specialty hospital:

- The specialty hospital only permits limited visitation. Families will be scheduled for one weekend day every month for family member visitation, family education and group counseling. These family weekend days will be staggered, so as the facility approaches and reaches full capacity, visitation will be limited so that patients may have visitors only one day per month, which will take place on a weekend, and only up to 25% of the patients may have visitation on any one weekend. . Family contact and visits are generally minimized to enable the client to transition from their previous typical routines as well as to separate and distance themselves from those contacts while in the facility for an effective and long lasting treatment. Thus, unlike the goal of the MOD to provide for "boutique hotels, inns and bed & breakfasts", the specialty hospital has no such need and does not share this goal.
- Likewise, the specialty hospital's clients reside elsewhere and have no need for any housing component of the MOD. Further, their demographic will be such that they have no need for any transportation component of the MOD.
- The specialty hospital is not an ambulatory or outpatient use, and so does not require a number of the ancillary/ambulatory/walk-in/urgent care/medical office/social services uses proposed for the MOD.
- The clients of the specialty hospital are not permitted to leave the grounds of the facility, and thus have no need for the MOD's "complimentary and accessory commercial uses". All of the specialty hospital's clients' needs will be provided for on-site.
- In addition, one of the "driving forces" of the MOD according to "Envision Cortlandt" is to offer "a continuum of care (aging in place)", and, "An aging demographic in the region is the driving force behind this growth strategy of moving towards larger and centralized medical facilities that provide a range of services." The proposed specialty hospital has no relationship to an "aging demographic", because it is to serve adults of all ages with a condition that is not age-related. Therefore, there is no need for the types of services that the elderly might require, which is a key rationale by the Town for the establishment of the MOD district. This is another reason why the proposed use is not appropriate for the MOD district.

15. The 2016 Comprehensive Plan states that Quaker Bridge and Quaker Ridge Road are listed under priority capital improvements for 2015-2019, for resurfacing and rebuilding, which will support the proposed use. As documented in the EEA, the Level of Service will not change with the proposed specialty hospital, and there will be minimal traffic impact.

B. The Proposed Action Will Not Have Any Significant Adverse Impacts On Land

16. No disturbance is proposed to Town-regulated steep slopes, wetlands, and wetland buffers.

17. The proposed disturbance is less than one acre and is to occur on the developed portion of the property, and no trees are proposed to be removed. The forested portions of the site are to remain undisturbed. A mixture of shrubs and trees exists along the site's frontage with Quaker Ridge Road and has been supplemented with additional evergreen screening. A total of 80 new trees are depicted on the plan, including spruce, holly, fir and other species, some of which have already been planted.
18. The approximately 27.8 acre property immediately adjacent to the south that is owned by the Applicant's affiliate contains a small, vacant house but is otherwise undeveloped, and will remain as a wooded buffer while the hospital use is in effect.
19. The existing building coverage on the site is only 2%, and is proposed to remain with no construction of new buildings, with less than one acre of site disturbance proposed. The vast majority of the site, some approximately 75%, will remain undeveloped as open space, preserving the character of the neighborhood.

C. The Proposed Action Will Not Have Any Significant Adverse Impacts on Historical, Archeological or Geological Resources

20. The existing buildings on the property are to remain, and no new buildings are proposed to be constructed.
21. Grading and land disturbance will be limited to some additional parking, upgrading of utilities and the installation of the proposed septic fields.
22. No disturbance is proposed to Town-regulated steep slopes.

D. The Proposed Action Will Not Have Any Significant Adverse Impacts on Wetlands

23. No disturbance to wetlands or wetland buffers is proposed.

E. The Proposed Action Will Not Have Any Significant Adverse Impacts on Trees

24. The site vegetation is comprised primarily of mature hardwood trees on the eastern and south-central portion of the site, which will remain undisturbed.
25. A mixture of shrubs and trees exists along the site's frontage with Quaker Ridge Road and has been supplemented with additional evergreen screening. A total of 80 new trees are depicted on the plan, including spruce, holly, fir and other species, some of which have already been planted.
26. Because of the small extent of proposed disturbance (some additional parking, upgrading of utilities and installation of two new septic fields), the limited extent of additional impervious surface, and with only 3 trees currently proposed to be removed to accommodate the new septic field, no significant impact to trees is anticipated.

F. The Proposed Action Will Not Have Any Significant Adverse Impacts on Surface Water or Stormwater

27. The Proposed Action is within the Croton River Basin watershed, which drains to the Hudson River, and a portion of the property is within the Indian Brook Reservoir watershed (Appendix C of the EEA Addendum dated 04/10/2017). Thus, the Proposed Action is not within a New York City watershed, and hence is not regulated by the NYCDEP.
28. The proposed disturbance to the site is under one acre. Erosion and sediment control measures will be designed and implemented in accordance with Section 262-10 of Chapter 262 "Stormwater Management and Erosion and Sediment Control" of the Town of Cortlandt Code, which specifies utilizing the most current version of the Westchester County Soil and Water Conservation District's Best Management Practices Manual for Erosion and Sediment Control and the New York State Guidelines for Urban Erosion and Sediment Control, as amended.

G. The Proposed Action Will Not Have Any Significant Adverse Impacts on Groundwater

29. The two new wells are both at least 200 feet from any potential source of pollution, and are situated within the property by more than 200 feet, in accordance with Health Department requirements.
30. The closest of the two nearest wells on adjoining properties is approximately 300 feet distant and 70 feet lower in elevation. This separation is satisfactory to the Health Department, who has approved the site's wells as a source for the proposed specialty hospital, with neighboring wells very unlikely to be affected in any way.
31. The specialty hospital will use less water than allotted to the property by its hydrology since the daily rainfall recharge to the groundwater is 21 gallons per minute based on the size of the specialty hospital property, while the projected use of groundwater is only approximately 9 gallons per minute (gpm). In addition, the well will not run continuously, but will cycle on and off throughout the day, with less use at night. Further, on an annual basis, approximately 85 percent of water used indoors is returned, or recharged, to the groundwater system by the septic system through treatment and percolation from the leachfield. As a result, the total consumptive use, or water lost from the groundwater system, would be approximately 15 percent of the average water demand, or approximately 1,900 gallons per day (gpd), with a projected use therefore of only approximately 1.3 gallons per minute, which is only about 6% of the daily rainfall recharge.
32. As discussed in the LBG Hydrogeologic Assessment in Appendix H of the EEA Addendum dated 04/10/2017, the HEWC wells were tested simultaneously after they were drilled, each at a constant rate of 9 gpm (totaling 18 gpm which is twice the average water demand of the project of 9 gpm, so each well can independently meet the water demand for the project), for 72 hours. The test results demonstrated stabilized

yield and drawdown in both wells within 48 hours from the start of the test. The wells also reported very good recovery (the water levels in Well 1 and Well 2 recovered 100 percent approximately 1.5 hours and 2.5 hours following the test shut down, respectively). The 72 hour testing of both wells demonstrate that they can independently meet the project water demand. In addition, the data indicate that groundwater withdrawals up to twice the average water demand of the project will not result in storage depletion of the groundwater. This indicates that the hospital's use would have no effect on adjoining water supplies, as further discussed in point #7 based on an additional pump test which included offsite well monitoring.

33. As also discussed in the LBG Hydrogeologic Assessment in Appendix H of the EEA Addendum dated 04/10/2017, the combined 48.6 total acreage of the specialty hospital site and the adjoining property to the south owned by an affiliate company might, based on zoning requirements, be developed with a minimum of 20 and a maximum of 24 single-family homes. The consumptive water demand (after 85% return through the septic systems) would range from 1,650 gpd to 1,980 gpd. This range in consumptive water demand is similar to the projected consumptive water demand (1,900 gpd) of the proposed specialty hospital.
34. There will be no irrigation systems installed for the site landscaping. Rather, the landscaping will be hand-watered by a manually carried hose as determined by an inspection of the landscaping. Thus, watering will only be conducted should the landscaping require it based upon the conditions at the time, and only that landscaping requiring watering will be watered, and only then by hand using a hose. This will keep landscaping watering to a minimum. Once established, the species planted will not require heavy usage of water. An existing approximately 15,000 gallon emergency fire water storage tank behind building #3 will continue to be used for emergency fire water storage. The emergency fire water storage tank will be refilled from the two functional existing wells, and refill water will not be sourced from the two new wells which will only be used to supply domestic water to the facility.
35. As noted in the letter contained in Appendix P of the EEA, the project site is not located over an aquifer, nor is it within an Aquifer Protection District.

H. The Proposed Action Will Not Have Any Significant Adverse Impacts on Noise, Odor or Air Quality

36. Supplemental landscape buffers and fencing have been installed on the property to buffer the adjoining neighbors from any noise, glare, visual impacts or other potential adverse impacts, which are expected to be largely irrelevant to the proposed re-use of the property. Approximately 75% of the site will remain undeveloped open space.
37. Because no new buildings are proposed to be constructed, with minimal site disturbance proposed, dust from construction activities is anticipated to be minimal, and will be mitigated with sediment and erosion control measures.

38. No long-term impacts to air quality are anticipated.

39. Facility operations are not noise-intensive. During the day, patients may walk on the property for relaxation when they have any free time between sessions/activities. After dark, patients may be walking from their living space to possibly another building on the property for meetings. For example, there is a meditation meeting noted on the current schedule that begins at 9:00 PM. Lights out is at 10:30 PM. Also, there are limited employee arrivals/departures at the night shift change at 10:00 PM with the use of the two shuttle vans. The nearest residence is approximately 300 feet distant and upgradient from the proposed parking lot of the main hospital building, and buffered by a solid 6-foot high fence on the specialty hospital property and by a wooded buffer on the residential property.

40. No odors are anticipated from the proposed specialty hospital.

I. The Proposed Action Will Not Have Any Significant Adverse Impacts on Plants or Animals

41. Because of the small extent of proposed disturbance of less than one acre (some additional parking, upgrading of utilities and installation of two new septic fields in already disturbed areas), the limited extent of additional impervious surface, no disturbance to wetlands or wetland buffers, and the adjoining 27.8 acre undeveloped property to the south owned by the Applicant's affiliate which contains a small, vacant house but is otherwise undeveloped and will remain so, no significant impacts are anticipated to the property's habitats and biodiversity.

J. The Proposed Action Will Not Have Any Significant Adverse Impacts on Agricultural Resources

42. There are no agricultural resources in the vicinity of the Property. Any agricultural use of the property ceased in 1920 when Dr. Lamb constructed a substance use disorder treatment hospital on the site.

K. The Proposed Action Will Not Have Any Significant Adverse Impacts On Aesthetic Resources, Open Space or Recreation Areas

43. The properties in the vicinity of the site are primarily residential uses with relatively large parcels. Mature trees exist on most of the neighboring properties along with a variety of other vegetation. However, there are non-residential and institutional uses in the vicinity as well. At least one of the nearby properties, directly across the street, has horse stables and corrals along its Quaker Ridge Road frontage. It is known as Rolling Stone Farm LLC with an address of 99 Quaker Bridge Road. The Danish Home is in the vicinity, and the GE Learning Center is situated at 1 Shady Lane Farm Road. Lakewood House, near the Danish Home and at 2125 Quaker Ridge Road, is a commercially used estate property that is advertised and rented for gatherings such as weddings, family reunions, etc. Regarding the Danish Home, the property will contain a wireless cell tower because a special permit was approved by the Zoning Board of Appeals on

February 15, 2017. Approximately 0.3 miles to the northeast of the Danish Home along Quaker Ridge Road are high tension overhead utility wires within an approximately 350-foot-wide easement, where trees and larger vegetation have been cleared. The Proposed Action is therefore not out of character with the neighborhood.

44. The existing building coverage on the site is only 2%, and is proposed to remain with no construction of new buildings, with proposed site disturbance of less than one acre. Approximately 75% of the site will remain undeveloped open space and remain unchanged from existing conditions, preserving the character of the neighborhood. The existing buildings will be upgraded and repaired, and the property is no longer vacant which led to vandalism and destruction of property, which was a nuisance to the neighborhood.
45. The buildings and use have been screened by substantial additional landscaping and the fencing recently installed on the property, and the adjoining 27.8 acre forested property to the south, owned by a related entity, that contains a small, vacant house but is otherwise undeveloped will remain in this condition to provide a substantial additional buffer while the hospital use is in effect. A mixture of shrubs and trees exists along the site's frontage with Quaker Ridge Road and has been supplemented with additional evergreen screening. A total of 80 new trees are depicted on the plan, including spruce, holly, fir and other species, some of which have already been planted.
46. The Town's 2004 Open Space Plan includes the property in its current state under Index E-2 as an "Under-Utilized Parcel, Five Acres or More, Particularly Worthy of Preservation". The proposed re-use of the property as a specialty hospital, with no new buildings proposed and with minimal land disturbance for some additional parking, upgrading of utilities and new septic fields, maintains this property's open space identity in the substantially same condition as it was in 2004, and thereby conforms to the Town's Open Space Plan.
47. There will be no impact on Town recreation resources because the specialty hospital patients will remain on-site, and there will be no new residents of the Town who would use the Town's recreation resources.
48. Site lighting, where required, will be shielded to prevent lighting impact beyond the property. Lights off is at 10:30 PM for lighting within the patient rooms.

L. The Proposed Action Will Not Have Any Significant Adverse Impacts on Critical Environmental Areas

49. The western, developed portion of the property is not within the Indian Brook Reservoir Critical Environmental Area ("CEA") (Appendix C of the EEA Addendum dated 04/10/2017), or any other CEA, nor is any portion of the property within the New York City watershed, nor over an aquifer protection zone.
50. The eastern, undeveloped portion of the property, which will remain undeveloped, is within the periphery of the Indian Brook Reservoir CEA (Appendix C of the EEA

Addendum dated 04/10/2017). The western portion of the site is within the Croton River watershed, which drains to the Hudson River. The incorporation into the Proposed Action of stormwater best management practices on the existing developed, western portion of the property, which is not in said CEA, in compliance with current law and regulation should prevent any potential adverse impact to the CEA and the Hudson River.

51. There are currently several working septic systems on the HEWC site and these have been in existence since the 1920's. The HEWC plans to completely rebuild the septic systems to modern standards, with only the existing septic system serving Building 2 (to have limited use for offices) continuing to do so. A portion of the new septic system will be within the periphery of the Indian Brook Reservoir watershed but not within the CEA, as was also the case for the old septic system (Appendix C of the EEA Addendum dated 04/10/2017). As such, there will be no impact of the septic system to the CEA. The new HEWC septic system is to be monitored as part of the on-going responsibilities of the hospital's facilities manager, unlike residential septic systems. If a repair is needed to the HEWC system, it would be taken out of service completely until repairs are made. This procedure eliminates any risk of adverse impacts, such that there will be no impact to any downstream areas.

M. The Proposed Action Will Not Have Any Significant Adverse Impacts on Transportation and Traffic

52. The Traffic Studies provided analyzed the neighborhood roadway network, as well as the roadways within the Crotonville area (see Appendix D of the EEA Addendum dated 04/10/2017, and the EEA).
53. The Traffic Studies conclude that the proposed use will not generate any significant traffic volumes and will not have any significant adverse impacts on the neighborhood associated with the proposed specialty hospital with regard to traffic operations or safety. There will be no changes to the peak hour intersection levels of service at the analyzed intersections in the vicinity of the site and in Crotonville, and the intersections will continue to operate with the same minimal delays, operating at the best possible Level of Service A, during all hours of the day.
54. The existing roadway widths are sufficient to accommodate the existing and projected vehicles. Accident reports were requested for accidents which occurred along the area roadways during the past three years from the Cortlandt, New Castle, and Ossining Police Departments. No accidents were reported in the vicinity of the site by the Cortlandt and New Castle Police Departments along the approximately 1,200 feet of Quaker Ridge Road from the frontage of the subject property to Glendale Road, approximately 3,500 feet of Quaker Ridge Road north of the site driveway and along approximately 650 feet of Glendale Road from Quaker Bridge Road to Quaker Ridge Road. Tables AR1 thru AR3 in Appendix D of the EEA Addendum dated 04/10/2017, depict data from the accident reports provided by the Town of Ossining Police Department. One accident was reported along Quaker Bridge Road between Old Albany Post Road and Glendale Road near Riverview Farm Road, located approximately

0.5 miles from the site, which involved a distracted driver. One accident was reported along Shady Lane Farm Road located more than a mile from the site which was caused by an alcohol impaired driver improperly exiting the Route 9A northbound off-ramp. There were 11 reported accidents along Old Albany Post Road between North Highland Avenue (US Route 9) located approximately 1.5 miles from the site and Quaker Bridge Road, the majority of which were in or south of the Crotonville area, approximately one mile or more from the site. Based on the contributing factors shown on the attached tables, the studied roadways experienced accidents resulting primarily from operator error or distraction. Based on the type and infrequency of accidents reported in the vicinity of the site and the low volume of traffic associated with the proposed use which is disseminated as traffic uses various roads farther from the site, the roadway characteristics combined with the relatively low traffic volumes are not expected to significantly impact access for emergency vehicles.

No accidents have been reported in the vicinity of the site during the past three years involving pedestrians or bicyclists. The area roadways are not heavily utilized by vehicular traffic, bicycles or pedestrians and the minor increases in vehicular volumes will not significantly impact the ability of bicycles and pedestrians to share the roadways. The roadway characteristics of Quaker Ridge Road are similar to Furnace Woods Road, the roadway which provides access to the Yeshiva for which the Town previously approved an area variance while acknowledging in the Yeshiva case, unlike this case, that there was substantial pedestrian use of Furnace Woods Road by the students.

55. The site generated traffic, which occurs primarily at shift changes, will be minimized with the utilization of two shuttle vans for the employees. The area roadways would operate at level of service A, the best possible level of service, even without the use of the shuttle vans.
56. The below traffic mitigating measures are part of the application and will be implemented per the Applicant's Transportation Management Plan, and as described in the attached 01/08/2019 PowerPoint presentation to the Planning Board, which is incorporated by reference herein:
 - Patients will not be permitted to have vehicles on site or to use vehicles during their stay.
 - Employee arrival and departure times will be scheduled outside of existing peak traffic hours on area roads.
 - Staffing will consist of four shifts. Two shuttle vans will transport a substantial number of employees from pick-up points outside of the area.
 - The estimated supply deliveries to the hospital are 5-6 per week, weekdays only, as well as once a week garbage and laundry service and daily UPS vehicles.
 - Delivery vehicles will be directed to arrive via Routes 9 and 9A through Crotonville. Tractor trailer trucks will be prohibited.

- The existing security gate will be relocated and remain open during the day. The existing entranceway will be improved to prevent any queuing on Quaker Ridge Road.
 - Visitation for each patient is limited to one weekend day per month, with only 25% of patients having visitation on any weekend.
 - Snow removal and grounds maintenance will be handled on site.
 - There will be more than adequate parking on site, much of which is already existing:
 - The specialty hospital will require much less parking than a general hospital or a nursing home, because it will have far fewer people coming to the site than those uses because:
 - There is no emergency room or outpatient treatment.
 - Visitation is very limited.
 - Many employees will be required as a condition of employment to use the shuttle vans.
 - There will be an on-going parking utilization monitoring program, with required reporting to the Town, with similar reporting on the traffic volumes along Quaker Ridge Road and the site driveway.
57. The lack of traffic impacts is true both for a very conservative traffic analysis (where it was assumed for purposes of the traffic study that the two morning shifts [6:00 AM Shift I and 9:00 AM Shift IA] are combined into one shift, where in reality, these shifts are split and the traffic trips will be fewer than analyzed, as well as although Shift I and Shift 2 do not correspond to the peak AM and PM highway hours, they were assumed to correspond to the peak AM and PM highway hours), as well as for a traffic analysis where realistic traffic operations were utilized.
58. The proposed specialty hospital will generate far less traffic than the excess capacity of Quaker Ridge Road can absorb.
59. The proposed specialty hospital has lower traffic volumes than with prior institutional uses approved for the site by special permit, including IBM, Hudson Institute and the hospital approved in 1989, all of which were permitted up to 225 people on site at one time, as opposed to 129 for the proposed use. 92 of the maximum 129 persons on site at one time are patients, none of whom will have cars, and 37 employees on the maximum shift, many of whom would be shuttled. In addition, other uses permitted in the R-80 district with no requirement of access to state roads (such as private schools, places of worship with associated religious school, and a governmental building), as illustrated on Table III.C-4 (Appendix K) of the EEA Addendum dated 04/10/2017 and as updated for the attached 01/08/2019 PowerPoint presentation to the Planning Board, would generate more traffic than the proposed use.

60. The 2016 Comprehensive Plan states that Quaker Bridge and Quaker Ridge Road are listed under priority capital improvements for 2015-2019, for resurfacing and rebuilding, which would seem to support the proposed use.

N. The Proposed Action Will Not Have Any Significant Adverse Impacts on Parking

61. All parking will be on-site, and there will be no street parking or use of municipal parking facilities. The Town parking requirements for hospitals is one parking space for each patient and one space for each employee on the maximum shift. Based on the Town requirement, a total of 129 spaces are required. However, the actual parking requirements for the proposed specialty hospital will be far less than parking associated with a typical general hospital and will be more like a nursing home. There will be no emergency rooms and no daily visitors. The clients will not have their own vehicles on site, and so the proposed use is more like a nursing home, which requires less parking than a hospital use, or even less because visitation to nursing homes is not restricted. For the specialty hospital use, visitation is limited so that patients may have visitors only one day per month, which will take place on a weekend, and only up to 25% of the patients may have visitation on any one weekend. Accordingly, far fewer spaces than the required 129 will actually be needed or utilized at the site.

65 parking spaces are proposed which will be provided by a combination of resurfacing the existing parking areas and creating new gravel parking areas as depicted on the drawing "Site Plan/Tree Plan/13% Max. Grade", revision dated November 5, 2018, by Ralph G. Mastromonaco, PE, PC. An additional 64 spaces could easily be provided to meet the Town requirement should ever it become necessary in the future to do so. Since the 129 spaces will not be required for the specific use, a parking waiver special permit is being requested from the Town. As discussed in point #56, there will be an on-going parking utilization monitoring program, with required reporting to the Town.

O. The Proposed Action Will Not Have Any Significant Adverse Impacts on Energy

62. The project will increase current electrical usage at the Property, although electricity was used in the past by the institutional uses that previously occupied the site. The facility will be served by Consolidated Edison, which currently services the area. Existing Con Edison facilities will be utilized and the buildings' electrical systems upgraded.
63. Energy efficiency will be emphasized in the restoration and operation of the buildings.
64. The Proposed Action will not have any significant adverse impacts on energy.

P. The Proposed Action Will Not Have Any Significant Adverse Impacts on Sewer or Human Health

65. Two new septic systems will be installed to replace the old existing system.
66. There are currently several working septic systems on the HEWC site and these have been in existence since the 1920's. The HEWC plans to completely rebuild the septic systems to modern standards. The new HEWC septic system is to be monitored as part of the on-going responsibilities of the hospital's facilities manager, unlike residential septic systems. If a repair is needed to the HEWC system, it would be taken out of service completely until repairs are made. This procedure eliminates any risk of adverse impacts, such that there will be no impact to any downstream areas.
67. The Westchester County Department of Health (WCDOH) has witnessed and agreed with all the septic soil testing on the site and the results of the testing. A WCDOH permit for the new septic system is pending and is expected shortly.
68. The property is not within the New York City watershed. Therefore, no septic system reviews and/or approvals are required from the NYCDEP.
69. All medical waste, if any, which will be minimal, will be handled by a private medical waste disposal contractor, and be disposed of in accordance with all pertinent medical waste disposal regulations including a weekly pickup. With this type of level of care, the only medical waste generated by the program will be limited to medical "sharps" including needles for treatment of clients with diabetes and lancets to test client's blood sugar levels, when needed. Any other type of blood or other type of testing would be conducted off-site by a medical testing laboratory. Generally, treatment programs with the number of beds/clients projected at the specialty hospital produce only minimal medical waste in the form of needles and/or lancets. The very small quantity of this type of medical waste that will be generated is such that only a quarterly annual pick-up by the medical waste vendor is anticipated. Thus, due to the limited nature and quantity that will be generated, and use of proper disposal techniques, there should be no significant adverse environmental impact to the character of the neighborhood due to medical waste.
70. Projected non-medical waste generation of approximately 4-5 tons per month is not significant, and will be handled by a private waste disposal contractor.
71. Human health will be improved with the proposed specialty hospital because it will provide a private residential treatment program for individuals who are recovering from chemical dependency.

Quaker Ridge Specialty Hospital

Town of Cortlandt, New York

OVERVIEW

- There will be no potential for any significant adverse traffic impacts on the neighborhood.
- There will be no impacts on historic road character.
- Site generated traffic will be staggered over 4 scheduled off-peak shifts, and two shuttle vans will be provided to transport employees and clients.
- The proposed use would generate less traffic than other uses permitted as of right, such as religious uses, schools, and government office buildings - and would generate traffic similar to that of a 20-24 lot residential subdivision, for which Applicant's and its affiliate's combined 47.83 acres could be developed.
- Even with our ultra-conservative assumptions and analysis, traffic would not cause any discernible delays on area roadways. All area intersections will continue to operate at the current best possible Level of Service A.
- Traffic generated is well below existing excess capacity to absorb it.
- Ample on-site parking will be provided.
- In conjunction with the Town's traffic expert, we have developed a Traffic Management Plan.

Quaker Ridge Road Pavement Width

- There will be no potential for any significant adverse impacts on the neighborhood.
 1. Area traffic volumes are relatively low.
 2. The roadway widths are/will be 20 feet or wider, which is appropriate for the future traffic volumes.
 - New Castle recently removed overburden and resurfaced/widened Quaker Ridge Road.
 - Quaker Ridge Road was surveyed north and south of the driveway, as requested by the Town, and generally has a width of 20 feet or more, which is partially covered by dirt and grass overburden.
 - Vegetation and debris covering existing pavement will be removed along Quaker Ridge Road in the vicinity of the site.
 - 20 foot pavement width can accommodate more than 800 additional daily vehicles, while 120 additional daily vehicles are anticipated.
 - There will be adequate turning radius for fire trucks and other vehicles into the driveway.



Site Traffic Generation

- Site generated traffic will be off-peak and two shuttle vans will be provided.
 1. 27.8 acres of the combined 47.83 acre properties will be kept as open space, and remain undeveloped.
 2. Two 15 passenger vans will transport employees and clients from pick-up points outside of the area, including a park & ride facility and the Croton train station.
 3. Existing peak weekday roadway hours are 7:00 – 8:00 AM & 3:45 – 4:45 PM.
 4. Employee Shift Hours are out of phase with the peak hours of the roadway:
 - Shift 1 (6:00 AM – 2:00 PM)
 - Shift 1A (9:00 AM – 5:00 PM)
 - Shift 2 (2:00 PM – 10:00 PM)
 - Shift 3 (10:00 PM – 6:00 AM)
 5. Visitation for each patient is limited to one weekend day per month, with only 25% of patients having visitation on any weekend.
 6. The patients will not be permitted to have vehicles on site or use vehicles during their stay. There will be no outpatient or emergency services
 7. The estimated supply deliveries to the Hospital are 5-6 per week, weekdays only, as well as once a week garbage and laundry service and daily UPS vehicles.
 8. Delivery vehicles will be directed to arrive via Routes 9 and 9A through Crotonville. Tractor trailer trucks will be prohibited.
 9. Daily site generated traffic volumes will be approximately 60 entering and 60 exiting vehicles, spread over 24 hours with the use of proposed shuttle vans.
 10. 120 Trips versus more than 800 trips surplus capacity.
 11. No impact on historic road character or safety.

Comparative Traffic Volumes

- The proposed use would generate less traffic than other permitted uses such as religious uses, schools, and government office buildings – and would generate traffic similar to that of a 20-24 lot residential subdivision on almost 50 acres controlled by the applicant.

POTENTIAL DEVELOPMENT VOLUMES COMPARISON

LAND USE	PEAK WEEKDAY AM HOUR			PEAK WEEKDAY PM HOUR			REQUIRES ACCESS TO STATE/COUNTY ROAD
	ENTER	EXIT	TOTAL	ENTER	EXIT	TOTAL	
a. Proposed Specialty Hospital (Without Vans)	41 ⁽¹⁾	11 ⁽¹⁾	52 ⁽¹⁾	34 ⁽¹⁾	41 ⁽¹⁾	75 ⁽¹⁾	YES
b. Proposed Specialty Hospital (With Vans)	23 ⁽²⁾	5 ⁽²⁾	28 ⁽²⁾	22 ⁽²⁾	23 ⁽²⁾	45 ⁽²⁾	YES
c. 38,560 sf Private School (K-12) (ITE Code 536)	86	51	137	59	153	212	NO
d. 24,690 sf Place of Worship with Religious School ⁽³⁾⁽⁴⁾	-	-	-	58	117	175	NO
e. 38,560 sf Medical-Dental Office Building (ITE Code 720)	75	21	96	37	96	133	YES
f. 24 Single Family Homes (ITE Code 210)	6	16	22	16	10	26	NO
g. 38,560 sf Hospital (ITE Code 610)	84	43	127	51	99	150	YES
h. Previously Approved 225 Employee Office (ITE Code 710)	71	15	86	17	67	84	NO

Notes:

- Peak hour site generated volumes will be out of phase with peak volumes at the analyzed intersections.
- The proposed Specialty Hospital volumes reflect the anticipated trip reduction resulting from the proposed shuttle vans.
- From the DEIS, accepted as complete on June 7, 2012, for the Upper Westchester Muslim Society Masjid and Islamic Center, Town of New Castle, NY.
- Nursery schools are also permitted along with places of worship and religious instruction, and would generate additional traffic beyond what is depicted in this table.

Quaker Ridge Road Traffic Analysis

- Even with our ultra-conservative assumptions and analysis, traffic would not cause any perceptible delays on area roadways. Levels of Service represent delays from A to F, similar to a report card. All area intersections will continue to operate at the current best possible Level of Service A, with substantial excess capacity to accommodate additional traffic.
 - No credit was taken for shuttle vans
 - Peak site traffic was added to existing peak area road traffic, even though the Applicant has intentionally scheduled its shifts so that peak site traffic will not coincide with existing AM and PM traffic.
 - AM shifts 1 and 1A were combined, although they are actually about 3 hours apart.
 - Traffic from Sunshine Home expansion was included
- 95% of traffic projected to and from the south, and only 5% from the north on Quaker Ridge Road.
- Town of Ossining's traffic consultant's memo states:
 - "It is our opinion that the proposed use of the site in Cortlandt will have an insignificant, if any, impact on the overall operation of roadways and intersection within the Town of Ossining. Results of the analyses indicate that the existing Level of Service would not change, which we agree with based on our review."

Quaker Ridge Traffic Operations

TABLE III.C-2

INTERSECTION OPERATIONS-PEAK WEEKDAY AM HOUR

INTERSECTION	APPROACH	LANE GROUP	2014 EXISTING			2016 NO BUILD			2016 BUILD		
			V/C ₀	DELAY ₀	LOS ₀	V/C ₀	DELAY ₀	LOS ₀	V/C ₀	DELAY ₀	LOS ₀
1. Quaker Ridge Road & Glendale Road (Unsignalized)	EASTBOUND	THRU/RIGHT	0.01	7.5	A	0.01	7.5	A	0.02	7.5	A
	WESTBOUND	LEFT/THRU	-	-	-	-	-	-	-	-	-
	SOUTHBOUND	LEFT/RIGHT	0.03	8.6	A	0.04	8.6	A	0.04	8.6	A
2. Glendale Road & Glendale Road Ext (Unsignalized)	EASTBOUND	LEFT/THRU	0.00	8.1	A	0.00	8.2	A	0.00	8.2	A
	WESTBOUND	THRU/RIGHT	-	-	-	-	-	-	-	-	-
	SOUTHBOUND	LEFT/RIGHT	0.01	8.8	A	0.01	8.9	A	0.02	9.0	A
3. Quaker Ridge Road & Glendale Road Ext (Unsignalized)	EASTBOUND	THRU/RIGHT	-	-	-	-	-	-	-	-	-
	WESTBOUND	LEFT/THRU	0.00	7.2	A	0.01	7.2	A	0.01	7.3	A
	NORTHBOUND	LEFT/RIGHT	0.00	9.1	A	0.01	8.8	A	0.03	8.6	A
4. Quaker Ridge Road & Sola Driveway (Unsignalized)	WESTBOUND	LEFT/RIGHT	-	-	-	-	-	-	0.01	9.0	A
	NORTHBOUND	THRU/RIGHT	-	-	-	-	-	-	-	-	-
	SOUTHBOUND	LEFT/THRU	-	-	-	N/A	N/A	-	-	-	-
								0.00	7.3	A	

TABLE III.C-3

INTERSECTION OPERATIONS-PEAK WEEKDAY PM HOUR

INTERSECTION	APPROACH	LANE GROUP	2014 EXISTING			2016 NO BUILD			2016 BUILD		
			V/C ₀	DELAY ₀	LOS ₀	V/C ₀	DELAY ₀	LOS ₀	V/C ₀	DELAY ₀	LOS ₀
1. Quaker Ridge Road & Glendale Road (Unsignalized)	EASTBOUND	THRU/RIGHT	0.01	7.4	A	0.01	7.4	A	0.02	7.4	A
	WESTBOUND	LEFT/THRU	-	-	-	-	-	-	-	-	-
	SOUTHBOUND	LEFT/RIGHT	0.02	8.5	A	0.02	8.5	A	0.03	8.6	A
2. Glendale Road & Glendale Road Ext (Unsignalized)	EASTBOUND	LEFT/THRU	-	-	-	-	-	-	-	-	-
	WESTBOUND	THRU/RIGHT	-	-	-	-	-	-	-	-	-
	SOUTHBOUND	LEFT/RIGHT	0.01	8.7	A	0.01	8.8	A	0.04	9.0	A
3. Quaker Ridge Road & Glendale Road Ext (Unsignalized)	EASTBOUND	THRU/RIGHT	-	-	-	-	-	-	-	-	-
	WESTBOUND	LEFT/THRU	0.01	7.2	A	0.01	7.2	A	0.03	7.3	A
	NORTHBOUND	LEFT/RIGHT	0.01	8.4	A	0.01	8.4	A	0.03	8.5	A
4. Quaker Ridge Road & Sola Driveway (Unsignalized)	WESTBOUND	LEFT/RIGHT	-	-	-	-	-	-	0.05	9.1	A
	NORTHBOUND	THRU/RIGHT	-	-	-	-	-	-	-	-	-
	SOUTHBOUND	LEFT/THRU	-	-	-	N/A	N/A	-	-	-	-
								0.00	7.3	A	

- (1) V/C represents volume/capacity ratio
- (2) Delay is average seconds delay per vehicle
- (3) LOS represents level of service

Quaker Ridge Traffic Management Plan

- In conjunction with the Town's traffic expert, we have developed a Traffic Management Plan. Project mitigation measures include the following:
 - Patients will not be permitted to have vehicles on site or to use vehicles during their stay.
 - Employee arrival and departure times will be scheduled outside of existing peak traffic hours on area roads.
 - Staffing will consist of four shifts. Two shuttle vans will transport a substantial number of employees from pick-up points outside the area.
 - The estimated supply deliveries to the Hospital are 5-6 per week, weekdays only, as well as once a week garbage and laundry service and daily UPS vehicles.
 - Delivery vehicles will be directed to arrive via Routes 9 and 9A through Crotonville. Tractor trailer trucks will be prohibited.
 - The existing security gate will be relocated and remain open during the day. The existing entrance way will be improved to prevent any queuing on Quaker Ridge Road.
 - Visitation for each patient is limited to one weekend day per month, with only 25% of patients having visitation on any weekend.
 - Snow removal and grounds maintenance will be handled on-site.
 - There will be more than adequate parking on site, much is already existing.
 - The specialty hospital will require much less parking than a general hospital or a nursing home, because it will have much fewer people coming to the site than those uses.
 - ❖ There is no emergency room or outpatient treatment
 - ❖ Visitation is very limited
 - ❖ Many employees will use the shuttle vans.
 - There will be an on-going parking utilization monitoring program, with required reporting to the Town, with similar reporting on traffic along Quaker Ridge Road and the site driveway.

Quaker Ridge Road Quality of Life

- No impact on the historical roadway characteristics.
- No significant adverse impact on vehicular or pedestrian safety.
- No significant accident history.
- Adequate roadway width with proposed clearly of dirt and grass overburden; could accommodate more than 800 additional vehicles.
- No impact on emergency vehicles.
- No large trucks with trailers.