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VIA ELECTRONIC MAIL

Chairman Thomas Heaslip
Town/Village of Harrison Planning Board
One Heineman Place
Harrison, NY 10528

RE: Draft Scoping Document - Trinity Church
Comments From PEPA

Dear Honorable Heaslip and Members of the Planning Board,

As you are aware, Harris Beach, PLLC represents the Purchase Environmental Protective Association ("PEPA"). Together with PEPA's consulting firm, The Louis Berger Group, Inc. ("Louis Berger"), we are submitting the following comments highlighting areas/issues that must be considered as part of your Board's review of Trinity Presbyterian Church's ("TPC") draft scoping document prepared under the New York State Environmental Quality Review Act ("SEQRA"). The purpose of this submission is to provide the Planning Board with PEPA's comments on the draft scoping document and to ensure that all of the appropriate studies are conducted as part of the draft environmental impact statement ("DEIS") prior to advancing this application to the next stage.

TPC is seeking a Special Exception Use and Site Plan approval from the Planning Board in order to convert an existing residence into a worshiping space, administrative offices, religious instruction and other support space. As part of the application, TPC is proposing to add 19,200 square feet onto the existing residence. TPC's proposed expansion is along the highly traveled Anderson Hill Road in the midst of several other large projects. Considered collectively, the cumulative traffic impacts associated in this area must be studied very carefully.

As mentioned during the prior meetings, there are several significant environmental impacts that need to be studied that are associated with other pending projects. The Planning Board, as lead agency under SEQRA, must require the appropriate studies to be included with other recently approved projects, proposed projects, and the upgrading of existing facilities (PepsiCo). As set forth below, the Planning Board must ensure that all environmental issues are properly mitigated and that the environmental impacts of other projects are evaluated in conjunction with TPC's application.

Manhattanville College

As an initial matter, TPC's application should be put on hold pending a full vetting of the proposed improvements to Manhattanville College. As set forth below and as alluded to publicly on January 28, 2014 during the public comment period, Manhattanville College is proposing significant improvements to its existing field space and the Kennedy Gymnasium to provide for a practice facility for a new Major League Soccer NYC – FC team ("MLS").

On February 25, 2014, the Planning Board will be considering an application submitted by Manhattanville College for an amended site plan and steep slope permit (the "Manhattanville Application") to renovate the Kennedy Gymnasium building and improve the athletic fields (including the creating of more field space where current tennis courts exist) to create a practice facility for MLS. At the outset, although the Manhattanville Application does not propose any "new" buildings, the traffic impacts associated with this new use more intense use will be exacerbated. At the very least, traffic studies and intersection functionality should analyzed as part of the DEIS for the TPC application for the proposed use by the soccer players, coaches, administrative staff and spectators. Further, analysis should include any other potential uses for the new practice facility, including for example, soccer camps and other activities.

Some additional information that the Planning Board must have as part of its review of TPC's Application includes, but is not limited to, the following:

- Although the proposal is for use as a practice facility only, there is no mention of how long the facility is anticipated to be used as a "practice" facility.
- There is no mention of the number of scrimmages or other pre-season practice games (and the possible spectator attendance at such events).
- Confirmation in written form that the players, coaches and administrative staff will be required to use the entrance off of Manhattanville Road. In addition, an enforcement plan that ensures that any spectators or other visitors during MLS events use the Manhattanville Road entrance should be developed.
- An analysis of the traffic and pedestrian impacts associated with weekday and weekend soccer tournaments, camps, or other training exercises used by the community and other public groups/associations.
- The Statement in Support of the Manhattanville Application indicates that the College hopes to hold soccer clinics, camps and similar activities. Traffic impacts associated with after-school and summer camps/clinics/tournaments must also be considered when evaluating the cumulative impacts associated with the TPC's application. Indeed, it would be fair to assume that many of the soccer tournaments would be taking place on the weekends at the same time TPC would be holding worship.

- The parking requirements focus on only needing 35 spaces for the MLS players, coaches, etc. However, the parking needs for the other proposed programs must be considered. Although this is a “temporary” practice facility, the use of the facilities will continue to be used by the college and community for new camps, tournaments, games, etc. As a result, the proposed future impact of the continued use of the new facilities must be considered.

Manhattanville is asking that the Planning Board declare itself lead agent on February 25, 2014 and set a public hearing on March 25, 2014 to consider the site plan and slope permit. A public hearing at this junction is premature as many of the above questions must be answered prior to any public hearing being established and prior to a significance determination under SEQRA is made.

It is respectfully requested that this Board look carefully at the environmental impacts of the Manhattanville Application as part of the impacts associated with TPC’s application.

Other Nearby/Proposed Projects

- SUNY Purchase – the impacts associated with the proposed large senior learning facility (“SLF”) on the 40.05 acre parcel of property, including 385 living units. The initial lease term is for 40 years. All traffic impacts associated with the construction of this facility as well as the use of the SLF must be considered as part of the analysis of the TPC’s application.
- SUNY Purchase – new dormitory – Additional traffic impacts associated with the new dormitory at SUNY Purchase must be included in the DEIS. Data should include the number of students and the proposed number of cars. Indeed, with hundreds of new students living on campus, said students will be driving on the streets of Purchase and along Anderson Hill Road. The dormitory will result in significant increases in traffic that must be studied as part of TPC’s application.
- Recent subdivision development in Rye Brook. The increase in traffic associated with the recent approval of residential subdivisions in Rye Brook.
- Re-opening of PepsiCo’s facility. Specifically, the increase in number of workers will result in a significant increase in the traffic along Anderson Hill Road and Purchase Street. The traffic analysis must include the predicted increase in traffic at the peak times once this facility reopens.

Traffic/Pedestrian Safety/Emergency Access

A number of additional intersections need to be studied as part of the DEIS. For example, the following specific intersections and traffic patterns should be including in the Scoping document:

- 1) Anderson Hill Road and the entrance/exit to Hutchinson River Parkway.
- 2) Anderson Hill Road and Lincoln Avenue.
- 3) Purchase Street and Entrance/Exit to SUNY Purchase and PepsiCo. This analysis should include traffic associated with the new dorm and SLC at SUNY Purchase and the increase in workers at PepsiCo upon reopening.
- 4) Manhattanville Road and Purchase Street.
- 5) Purchase Street and King Street.

In addition, the traffic impacts/rerouting that occurs due to community events (various charity walks, athletic events, etc.) that use Anderson Hill Road or Purchase Street should be considered. Emergency access to/from the TPC site as well as other residences and buildings along Anderson Hill Road should also be studied during the peak travel times in this area.

Site Distance/Entrance/Exits off of Anderson Hill Road

As the Planning Board members are aware, the ability to safely exit the proposed TPC site is very difficult and dangerous. TPC is proposing to widen one entrance/exit and create a second entrance/exit off of Anderson Hill Road. The rock and brush outcroppings at the existing curb cut significantly reduce a driver's ability to see on-coming traffic. In addition, the existing grade of Anderson Hill Road near the site creates a hazard and should be carefully analyzed to ensure that there is proper site distance.

Special Events/Growth of Church

A description of any special events (marriages, other religious milestones, etc.) and the number of same that are expected each year. In addition, the estimated parking needed for any special events must be included in the Scoping documents.

An analysis of the current members and the expected growth of the congregation. Where do the members live, will they be traveling a far distance or are they local? Will bus service be used?

Education/Religious School and Extracurricular activities

A full curriculum of the number and time of classes must be included as part of the DEIS and any traffic impacts associated with same. In addition, any camps or other summer/seasonal activities must be considered and analyzed as part of the DEIS.

Noise

The noise associated with the services and any outdoor activities that may generate noise must also be considered.

Mormon Temple

Several years ago, your Board diligently reviewed the potential environmental impacts associated with the Mormon Temple (for approximately 6 years)(the “Mormon Temple”). After a careful review and substantial mitigation required to be implemented, this Board approved the construction of the Mormon Temple. We are asking you to undertake a similar review with respect to TPC’s application to that engaged by this Board relative to the Mormon Temple application to ensure that all environmental issues are properly analyzed and that mitigation be implemented by TPC should this site be determined to be a site which can handle the proposed use(s).

Below is a comparison of the Mormon Temple application (approved) and Trinity Presbyterian Church application (pending).

	Mormon Temple	Trinity Presbyterian
Site Acreage	<u>24 acres</u>	<u>2.95 acres</u>
Building Size	<u>28,400 sq. foot</u>	<u>22,000 sq. ft.</u>
Seats	<u>100</u>	<u>420</u>
Parking Spots	<u>100</u>	<u>168</u>

A comparison of the size and area calculations of the Mormon Temple application as compared to TPC application highlights the need to carefully study the TPC application to ensure that all environmental impacts are properly studied and mitigated. As you are aware, this Board approved the Mormon Temple which was substantially decreased in size and scope and which also reduced the number of parking spaces. Further, the Mormon Temple agreed not to build any addition for 15 years after the temple opens and agreed to reduce the height of the temple and install a traffic signal.

The Planning Board should require TPC to consider similar reductions in the overall scope of the TPC project and consider possible alternatives (smaller building, etc.) as part of the alternative analysis in the DEIS. It is noted that the TPC application proposes much more intense use(s) on a much smaller site than the Mormon Temple project and, as a result, this

Board should consider alternates to the proposed large 420 seat church (and other uses) on a difficult site along Anderson Hill Road. Some examples of mitigation for this Board to consider relative to the TPC application as part of the SEQRA process include: (1) studying potential infrastructure improvements (roadway and sidewalk improvements, traffic signal); (2) alternative sizes and scope of the church and related uses; (3) alternative site locations to the proposed site; (4) alternative layouts; and (5) limiting the site to a single use.

Conclusion

We thank you for your time and attention to this matter and as set forth herein, it remains clear that the TPC's application must be carefully and diligently reviewed in conjunction with the proposed improvements to Manhattanville College, the re-opening of the PepsiCo facility, the two additional projects at SUNY Purchase and the recent subdivision in Rye Brook.

Respectfully submitted,

s/

Kristen Kelley Wilson

KKW

cc: Darius P. Chafizadeh, Esq. (via email)
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