



**Louis Berger**

September 27, 2016

Planning Board Chairman  
Members of the Planning Board  
Town/Village of Harrison  
Alfred F. Sulla, Jr. Municipal Building  
1 Heineman Place  
Harrison, NY 10528

RE: Trinity Presbyterian Church  
526—530 Anderson Hill Road  
Harrison, New York  
Site Plan and Special Exception Use Permit

Dear Chairman and Members of the Board,

The Louis Berger Group, Inc., serves as consultant to Purchase Environmental Protective Association and submits the following comments on the proposed Site Plan and Special Exception Use Permit. Given concerns not adequately addressed through the EIS process, we are summarizing and reiterating our comments in the hope that they are addressed through the Planning Board's review of the Special Exception Use Permit.

### **Traffic and Parking**

According to the December 2015 SEQRA Finding Statement for the Proposed Action, it is the opinion of the Applicant that 140 parking spaces are necessary to accommodate both typical and special events that would be held at the Trinity Presbyterian Church project site.

To meet this parking demand for typical and special events, the Church would provide 119 off-street parking spaces to meet the zoning requirement for the proposed use. The church would also provide a "reinforced grass area" where overflow parking beyond the 119 spaces could be accommodated. There is no mention in the project's FEIS of the occurrence of "typical" events that would require 140 parking spaces. Moreover, the anticipated demand for 140 parking spaces calls into question the project's peak trip generation of 72 arriving trips during the Sunday AM peak hour, as disclosed and analyzed in the EIS.

The applicant should provide an evaluation of the typical event, and special event, traffic volumes and parking demand and identify any required mitigation—such as a binding limitation that these events be held outside of the local traffic network’s peak weekday and peak weekend hours, or use of shared parking with the Purchase School as required in the Final Scope of work for the DEIS but never provided. Such an analysis could result in site plan modifications that result in retention of mature trees and less new impervious surfaces than currently proposed.

**Special-Status Species**

According to the USFWS, the northern long-eared bat can occur in Westchester County and its preferred habitat includes mature trees and trees down to 3 inches in diameter. The FEIS does not discuss any potential impacts to this species due to tree removal. The FEIS also does not disclose potential impacts to common species due to loss of fragmentation of habitat, species displacement, stormwater runoff, and increased roadway traffic and associated noise.

**Visual Impacts**

We continue to request that a visual impact analysis be provided for residences adjoining the project site. This analysis would be more sensitive to the project’s visual effects than the analysis provided from the vantage of Anderson Hill Road, and this analysis would provide a thorough review of the project’s impacts on community character, which the SEQRA Workbook defines as “all the manmade and natural features of the area.” The project would entail tree removal and construction of a large surface parking lot, both of which are visual character concerns of the Purchase Community.

**Conclusion**

Without the analyses I’ve just described, approval of the Site Plan and Special Exception Use Permit could result in impacts to traffic, special-status species, and visual resources that were not disclosed in the FEIS. We urge the Planning Board to thoroughly consider these potential environmental effects prior to permit approval.

Sincerely,

LOUIS BERGER U.S., INC.



Niek Veraart, AICP  
Vice President