



The League of Women Voters of New Castle
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LEAGUE COMMENTS ON CHAPPAQUA CROSSING DEIS PUBLIC HEARING – JULY 28, 2009

My name is Sheila Crespi, and I'm speaking on behalf of the League of Women Voters of New Castle. The League's Local Planning Committee, and its Environment Committee chaired by Joanne Knight, have been reviewing the DEIS for Chappaqua Crossing. The League submitted initial comments at the first public hearing on June 23rd; you can find them on our website at www.lwnnewcastle.org. Tonight we want to expand on our initial remarks, starting with:

AGE RESTRICTIONS AND ENFORCEABILITY

Of the 278 residential units proposed for Chappaqua Crossing, 222 will be market-rate age-restricted apartments and townhouses, anticipated to be offered at prices ranging from \$700,000 to \$1.2 million. As a benchmark, the market study in the DEIS provides an overview of comparable age-restricted developments in the area. Among these comps we note that Christie Place in Scarsdale has 42 units; Glassbury Court at Hunterbrook in Yorktown has 64 units; Sutton Manor in Mount Kisco has 47 units; and Woodcrest at Jacob's Hill in Cortlandt has 50 market-rate units. Trump Park Residences in Yorktown, which has been forced to request relief from its age restriction, has 141 units. The market study is dated October 2008, and thus there aren't current figures in the DEIS on the percentage of units still to be sold at some of these developments. With 222 high-end units to sell, we question whether Chappaqua Crossing will be able to achieve and maintain the 80% threshold of 55+ households needed to render the age restriction legal and enforceable under HOPA regulations.

INCOME AND TARGET MARKET

The DEIS provides annual income requirements for 55+ households to afford purchasing a unit at Chappaqua Crossing. Beginning in 2010, necessary annual income is estimated between \$150,000 and \$200,000; and rises to \$200,000 to \$250,000 a year in 2014. The DEIS provides aggregate figures for the number of 55+ households that meet these income levels in New Castle and other Northern Westchester towns comprising the study area, but we do not find a breakdown to show how these numbers were derived. The Final EIS should provide a comprehensive breakdown of households by age and income bracket in New Castle and the study area. Further, there should be an updated analysis of household income in 55+ age groups to consider the impact of the current recession, which has destroyed so much of the underlying savings on which retirement income depends. The Final EIS should evaluate the effects of the

recession – and its impact on the 55+ population, housing sales, and the market for high-end age-restricted housing.

STORMWATER

The League is concerned about the 5 additional acres of impervious surfaces and the 9.4 acres of steep slopes that will be created by the proposed development. Stormwater runoff is the greatest threat to water quality, and impervious surfaces are the major contributor to this runoff pollution. Chappaqua Crossing is located in the New York City Water Supply Watershed. For several years all of the towns within the watershed have been working to reduce stormwater runoff. Many options are available; e.g. green roofs, rain gardens, and pervious walks, streets, and parking lots. To protect our drinking water, Chappaqua Crossing must demonstrate that increased runoff from impervious surfaces and steep slopes will be mitigated to conform to the standards of the Northern Westchester Watershed Committee.

SEWER

The League questions the assumption that Chappaqua Crossing will be admitted into the Saw Mill Sanitary Sewer District (SMSSD). For the past seven years New Castle has petitioned Westchester County for an extension of this district in order to replace failing septic systems in the northern part of town. To date the county has not granted an expansion of the county sewer district for this project. The reasons appear to be political since the Sewer District has continually accepted additional septage from communities in southern Westchester. However, this pending application should get first priority for expansion of the district.

Should there be no expansion of the Sewer District for Chappaqua Crossing, what are the alternatives for sewage treatment? The New York City Department of Environmental Protection (NYC DEP) is not allowing new treatment plants to be built in the watershed. Will the site support septic systems? This issue needs to be addressed.

DEMOGRAPHICS AND STATISTICAL ANALYSIS

There's an overwhelming amount of demographic and statistical material in the DEIS. It shows, for example, that between 1990 and 2007, New Castle's population in the 5- to 19-year-old age groups grew by a remarkable 1,570 children – an increase of over 41% in these age groups combined. The League wonders what this past growth in New Castle tells us about future demographics for the town.

The DEIS also shows that in 2007, New Castle's population in the 0 - 19 age groups was greater than the same population in neighboring towns in the study area, as well as in Westchester County as a whole and New York State as a whole. Figures from 2000 show New Castle with

the highest percentage of households with children in the study area. These percentages are also higher than those for Westchester County overall and the state overall.

What these figures demonstrate is that New Castle is very attractive to families with school-aged children. Although the DEIS predicts some growth in the town's 55+ population in the next several years, we question whether that will have any significant impact on the town's draw as a place to raise a family and educate children.

Given New Castle's strong appeal to families with children, we also question whether generation rates from multi-family developments in surrounding towns offer a reliable basis for estimating school-aged children at Chappaqua Crossing, if the age restrictions were to become unenforceable.

PARKING IN THE BUSINESS DISTRICT

Chappaqua Crossing proposes 1,300 parking spaces for 520,000 square feet of office space. In the proposed multi-tenancy scenario, the DEIS estimates 1,658 full-time employees on-site, including approximately 800 people now employed at Reader's Digest. This is an estimate and not a maximum number of employees, and does not include visitors to the site such as clients and patients. The League questions whether parking is adequately provided for the office space.

COMPLIANCE IF DEVELOPMENT RIGHTS ARE SOLD

The Final EIS should include a more detailed discussion of how the Town of New Castle would ensure compliance if Summit/Greenfield, subsequent to the granting of any zoning change, were to sell the development rights to Chappaqua Crossing.

The League has covered a lot of ground in the DEIS, but we need more time to complete our review of this complex and weighty document. We still need to focus on such areas as HOPA compliance, LEED compliance, demand for town services, and other multi-family housing in the area. We are also eager to see independent analyses from the Town and from the Chappaqua Central School District on traffic, tax and school impacts, as requested in our previous comments. We feel the community should have access to this critical information while the public comment period for the DEIS is still open. The League also feels that closing the public hearing during the summer would represent an undue hardship to town residents, many of whom are away, or will shortly be leaving on vacation. For these reasons the League requests the Town Board to extend the public hearing into the fall.

Thank you.