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## Memorandum

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**To:** Bryan Healy, Village Manager, Village of Croton-on-Hudson  
Mayor Brian Pugh, Village of Croton-on-Hudson  
Village of Croton-on-Hudson Board of Trustees

**From:** AKRF, Inc. (Aaron Werner, AICP)

**Date:** August 19, 2024

**Re:** **WBP Development LLC - 1 Croton Point (aka Lot A)**  
Jason Mencher, AICP (AKRF)

**cc:** WBP Development LLC; KSCJ Consulting; Insite Engineering (Applicant Team)  
Linda Whitehead (Village Attorney)  
Dan O'Connor, P.E. (Village Engineer)

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AKRF, Inc. has reviewed the following documents and plans for the above referenced application:

- Cover Letter, from WBP Development LLC, dated July 11, 2024
- Village Board Special Permit Application, submitted by WBP Development LLC, dated July 10, 2024
- Full Environmental Assessment Form, Part 1, prepared by KSCJ Consulting, dated July 16, 2024
- Site Plan Set (7 sheets), prepared by Insite Engineering, Surveying, & Landscape Architecture, P.C., dated July 11, 2024
- Architectural Plan Set (6 sheets), prepared by Arketekcher, dated July 17, 2024
- Preliminary Water Engineering Report, prepared by Insite Engineering, Surveying, & Landscape Architecture, P.C., dated July 11, 2024
- Preliminary Wastewater Engineering Report, prepared by Insite Engineering, Surveying, & Landscape Architecture, P.C., dated July 11, 2024
- Preliminary Stormwater Pollution Prevention Plan (SWPPP), prepared by Insite Engineering, Surveying, & Landscape Architecture, P.C., dated July 11, 2024

## **A. BACKGROUND / PROJECT DESCRIPTION**

The Applicant, WBP Development, LLC, is seeking special use permit approval from the Village of Croton-on-Hudson (the “Village”) Board of Trustees to construct a proposed 5-story, 100-unit affordable homeownership project with amenity space and on-site parking (the “proposed project”) at the intersection of Croton Point Avenue and Veterans Plaza. The proposed project involves an assemblage of three existing tax parcels totaling approximately 1.76 acres (the “project site”): 79-17-1-3 (aka Lot 3), 79-17-1-4 (aka Lot 4) and 79-17-1-5 (aka Lot 5). Village-owned Lot 5, fronting on Croton Point Avenue, was most recently utilized as a parking lot for the Metro-North Railroad (MNR) Croton-Harmon station (commonly referred to as the “parking lot A”). Lot 4 is currently owned by Croton Point Realty, Inc., has frontage along Croton Point Avenue and contains portions of a two-story commercial building currently occupied by a law office. Village-owned Lot 3 is located to the rear of Lot 4 and contains portions of the two-story commercial building noted above, and a parking lot. The owner of Lot 4, Croton Point Realty, Inc. has had a long-term land lease with the Village for the uses on Village-owned Lot 3. The Applicant has been selected by the Village as the purchaser of Lots 3 and 5 currently owned by the Village, and is in contract to purchase Lot 4 from Croton Point Realty, Inc.

In November 2022, the Village adopted Local Law No. 14 of 2022 to amend the provisions of the Zoning Code to allow for transit-oriented mixed-use and multifamily residential buildings in a specific portion of the LI zoning district including the project site. Local Law No. 14 of 2022 was considered simultaneously with Local Law No. 13 of 2022, which amended provisions of the Zoning Code to expand the area of, and modify the zoning regulations for and related to, the Harmon/South Riverside Gateway Area located generally to the northeast of the project site. Local Law No. 14 of 2022 permits the project site to be redeveloped (through issuance of a special permit from the Village Board of Trustees) with transit-oriented multifamily housing or multifamily housing over ground floor commercial uses at a maximum Floor Area Ratio (FAR) of 1.2, a maximum height of up to 5-stories, and a parking ratio of 1 space per residential unit and 1 space per 400 square feet of commercial floor area. Following the adoption of Local Law 14 of 2022, the Village released a Request for Proposals (RFP) for Village-owned Lot 5, which in addition to requesting mixed-use development proposals with affordable housing solely for Lot 5, indicated that the Village was also willing to review alternative schemes that assume a larger land assemblage by incorporating adjacent lots 3 and 4.

The proposed project is a 5-story building with cellar level for parking below grade. It offers 100 residential units consisting of 46 one-bedroom and 54 two-bedroom units; the proposed FAR is 1.10, where 1.20 is the maximum allowed. The design includes 103 parking spaces (approx. 1 space per unit), provided via a combination of surface and below-building parking. No ground floor commercial space is proposed. Amenities within the building include a community room, fitness center, coworking lounge, bike storage room, and a rooftop deck. According to the Applicant, the exterior façade combines brick and metal panels for cladding. Sustainable building design features include full electrification, solar readiness, high efficiency HVAC equipment (cold climate air source heat pumps) and appliances (Energy Star Multifamily New Construction Program), Level 2 EV charging stations (1 per 20 parking spaces) and low-flow water fixtures.

In addition to approval of a special permit from the Village Board of Trustees, other local approvals for the proposed project include site plan approval from the Village Planning Board, Local Waterfront Revitalization Program (LWRP) consistency review by the Village Waterfront Advisory Committee, and visual/aesthetics review and comment by the Village Advisory Board on Visual Environment (following a referral by the Planning Board). The Village Board of Trustees is serving as the Lead Agency for the proposed project’s environmental review pursuant to the State Environmental Quality Review Act (SEQRA).

## B. COMMENTS

### 1. PREVIOUS PLANNING FRAMEWORK

1. Prior to the adoption of both Local Laws 13 and 14 of 2022, the Village retained AKRF to conduct a theoretical buildout analysis for all of the tax parcels (including the project site) to be affected by both Local Laws, pursuant to the FAR, height, and other development requirements under consideration. AKRF completed a Full Environmental Assessment Form (FEAF) with supplemental studies to satisfy the requirements of the State Environmental Quality Review Act (SEQRA) specifically for the rezoning (the “2022 FEAF”). As noted in the Village’s RFP for the project site, the selected developer is required to conduct a new site/project-specific environmental review pursuant to SEQRA due to the discretionary actions before the Village. The Applicant has submitted a project-specific FEAF Part 1 with accompanying narrative. As evident in their submission, the Applicant is relying on AKRF’s prior analyses and conclusions to the extent possible for certain potential environmental impacts from the 2022 FEAF. To assist the Village in considering if additional studies beyond those completed for the rezoning are warranted, summaries of the analyses and conclusions related to traffic, public schools, and visual impacts completed in the 2022 FEAF are provided below. Additional comments related to the Applicant’s submitted project-specific FEAF and site plan are provided later in this memorandum.

#### *Traffic – 2022 FEAF*

2. A traffic impact study (TIS) was completed by AKRF to assess the potential traffic and transportation impacts related to the theoretical maximum buildout projected under both Local Laws 13 and 14 of 2022, a buildout which was conservatively estimated to be up to 470 residential units, 21,831 sf of commercial floor area, and 725 off-street parking spaces within the overall rezoning area. The analysis year assumed for the theoretical buildout was 2042. **Of this total buildout, a mixed-use/TOD scenario containing a total of 87 residential units, 21,831 square feet of ground floor commercial space, and 142 off-street parking spaces was attributed to the involved parcels at the intersection of Croton Point Avenue and Veterans Plaza (identified as parcels 48, 49, and 50), which included the three tax lots comprising the project site as well as the lot opposite the project site on the south side of Croton Point Avenue.**

The 2022 FEAF also noted that parcels 48, 49, and 50 could be redeveloped with multifamily residential buildings containing no ground floor commercial space. Applying the same parameters for an all-residential scenario on the three parcels (maximum FAR of 1.2 and maximum height of 5-stories) yielded estimated net increases of 21 residential units and 21 residential parking spaces (from 87 units/87 parking spaces to **108 units/108 parking spaces**); and net decreases of 21,831 square feet of ground floor commercial space and 55 commercial parking spaces. However, for purposes of conservative environmental review under SEQRA, particularly with regard to potential traffic impacts, the Village preferred to assume the mixed-use/TOD scenario described above for these parcels in the buildout calculations. **By comparison, the proposed project consists of 100 units with 100 parking spaces, and no ground floor commercial space. The net difference between the TIS assumption for the affected area and the proposed project is +13 units and -21,831 sf of commercial space.**

Following a preliminary screening, the following five signalized intersections were ultimately selected for quantified analysis in the 2022 TIS:

- Croton Point Ave. and Veterans Plaza (signalized)
- Croton Point Ave. and Rt. 9/9A Southbound Ramps (signalized)
- Croton Point Ave. and Rt. 9/9A Northbound Ramps (signalized)
- Croton Point Ave. and S. Riverside Ave. (signalized)
- S. Riverside Ave. and Benedict Blvd (signalized)

Turning Movement Counts (TMCs) and Vehicle Classification Counts (VCC) were collected at the above intersections for the weekday AM (6:30 to 9:30 AM) and PM (4:00 to 6:00 PM) periods in April 2022.

For the 2022 TIS, it was conservatively assumed that the future design year (i.e., the future year by which the full theoretical buildout from the rezoning would occur) would be 2042 (2022 + 20 years).

Future 2042 grown traffic volumes were developed by increasing the Existing 2022 traffic volumes in the study area by a 1 percent per year compounded growth rate. This growth rate reflected increases in background traffic growth that would be expected to occur with or without the rezoning. 2042 Future Build traffic volumes were developed by adding the trips estimated to be generated by the rezoning to the 2042 grown traffic volumes.

Potential impacts of the adoption of both Local Laws were analyzed using methodologies based on the Highway Capacity Manual, 6th Edition (HCM 6) methodology (Synchro 11 software) to calculate existing and future traffic operating conditions (Level of Service (“LOS”) and total delay) at each of the intersections studied. LOS is based on a grading scale of “A” through “F” with “A” representing optimum traffic conditions and “F” representing poor traffic conditions (LOS D or better is typically considered acceptable operating conditions).

Under the 2042 Build condition, absent any additional improvements, the 2022 TIS concluded there would be impacts expected at the following locations:

- Croton Point Avenue and Veterans Plaza—the southbound approach would deteriorate from LOS E to LOS F during the Weekday AM peak hour and within LOS F during the Weekday PM peak hour.
- Croton Point Avenue and Route 9/9A Northbound<sup>1</sup> Ramps—the northbound approach would deteriorate within LOS F during the Weekday AM and PM peak hours.
- South Riverside Avenue and Benedict Boulevard—the westbound approach would deteriorate from LOS D to LOS E during the Weekday PM peak hour. The southbound approach would deteriorate within LOS F during the Weekday AM and PM peak hours.

For the potentially impacted locations described above, potential mitigation measures were identified, as follows:

- Croton Point Avenue and Veterans Plaza—Signal timing adjustments
- Croton Point Avenue and Route 9/9A Northbound Ramps—Signal timing adjustments
- South Riverside Avenue and Benedict Boulevard—Signal timing adjustments and pavement/lane restriping and/or narrowing of the median of Benedict Boulevard to provide two lanes at each approach to South Riverside Avenue.

It is AKRF’s opinion that the 2022 TIS was a comparable and conservative analysis that can be relied upon for the proposed project’s assessment of potential traffic impacts and recommended mitigation under SEQRA, for the following reasons:

- The traffic counts were completed within the last three years, which is acceptable to NYS DOT.

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<sup>1</sup> The 2022 TIS referenced Croton Point Avenue and the Route 9/9A “Southbound” Ramps as the potentially impacted intersection, which has since been identified as a typo in the report. The Route 9/9A Northbound Ramps is where the potential impact was identified with Croton Point Avenue as reported in the supporting tables of the report and capacity analysis results. As noted in the report’s tables and capacity analysis, the northbound approach at this intersection would deteriorate within LOS F during the Weekday AM and PM peak hours.

- AKRF's impact assessment on the full buildout of the rezoning area utilized a 2042 build year (20-year timeframe), which reflected continued background traffic growth over a 20-year period.
- The buildout for the three LI TOD parcels assumed ground floor commercial space, and the proposed project (to be constructed on two of those three parcels) does not propose any commercial space.

In addition, the recommended mitigation measures identified in the 2022 TIS for South Riverside Avenue and Benedict Boulevard should not be necessary solely as a result of this proposed project, since that potential mitigation was driven by the increased volumes attributable to the theoretical buildout resulting from the HSRG zoning amendments, which assumed new multifamily residential uses on several parcels along the South Riverside Avenue corridor (a considerable distance from the project site). AKRF recommends that the signal timing adjustments for the two affected intersections on Croton Point Avenue be coordinated among the Applicant and NYSDOT to mitigate the potential for traffic impacts at these intersections. The specific details of the signal timing adjustments proposed should be provided to the Village and AKRF for review.

While the traffic counts utilized in the 2022 TIS were collected within the most recent three-year timeframe acceptable to NYSDOT, the Village has expressed concerns about increases in traffic to and from the Croton-Harmon Train Station over the course of the pandemic recovery since 2022. **It is AKRF's position that the 2022 TIS provided a conservative analysis which included 20 years of background growth. However, to address the concern identified above and to ensure appropriate signal timings are being developed as part of the signal timing mitigation, we recommend that updated traffic counts be conducted for the two signalized intersections to be mitigated as part of this project, Croton Point Avenue and Veterans Plaza and Croton Point Avenue and Route 9/9A Northbound Ramps, as well as the Croton Point Avenue and Route 9/9A Southbound ramps given its proximity to the two other signals. The counts should be collected during the fall while schools are in session.**

#### *Visual Impacts of 5-Story Buildings on Lot A – 2022 FEAF*

3. As part of its review of the 2022 zoning changes, the potential visual impacts of constructing a 1.2 FAR, 5-story building on each of the three LI TOD parcels (including the project site) were evaluated using computer software to construct three-dimensional models to simulate the general massing of a theoretical mixed-use building on each parcel. The model was then superimposed on a series of photographs taken from a total of six publicly accessible viewpoints during both leaf-on (summer) and leaf-off (winter) conditions. In the absence of actual development plans for these parcels, the conceptual massing was highly generalized, and therefore, conservative. The conceptually modeled massing for the LI TOD parcels (including the project site) was most visible during leaf-off conditions from Croton Point Avenue (from the site extending eastward to the vicinity of the Route 9 overpass) and from Veterans Plaza looking north. However, the analysis demonstrated that from these vantage points, a five-story building would not overwhelm the observer nor block the views of pedestrians or motorists toward any aesthetically prominent features. The Village Board, in the Negative Declaration adopted as part of the rezoning process, concluded that no significant adverse impacts visual or aesthetic impacts were anticipated from the potential placement of 1.2 FAR, 5-story mixed-use buildings on the three proposed LI TOD parcels.

The Village can request more detailed renderings of the proposed project when viewed from Croton Point Avenue and Veterans Plaza to confirm the prior assessment. In addition to the proposed building, renderings should include proposed landscaping, lighting, and parking areas, as well as existing adjacent conditions that are expected to remain for context (e.g., other structures, street trees, utility wires, etc.). Renderings should also include a key/legend identifying the vantage point of the rendering.

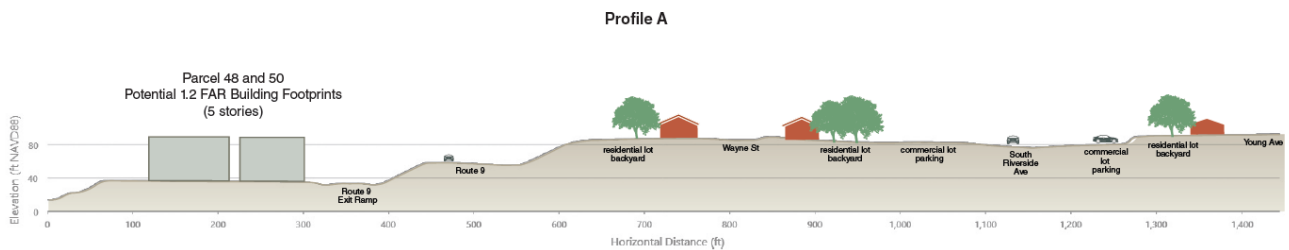
4. As a supplement to the photo simulations, which focused on publicly accessible viewpoints, as part of the 2022 zoning review, two cross-sectional profiles (one covering Parcels 48 and 50 and another covering Parcel 49) were developed using ESRI ArcGIS Pro to illustrate the intervening topography

and land cover between the three parcels and private residences along Young Avenue and Wayne Street (the residential neighborhoods closest to the three parcels).

The key map from the 2022 FEAF illustrating the two profile lines (profiles A and B) extending southwest from Young Avenue through Parcels 48-50 is shown below.



Cross-sectional views of profiles A and B are shown below. The two cross sections illustrate the topographic relationship and potential visibility of a 5-story building on Parcels 48-50 from private residential properties along Young Avenue and Wayne Street. The horizontal distance covered by profiles A and B is approximately 1,200 feet, and labels are provided for intervening properties, structures, and roadways covered within each profile (shown at a representative scale).



As shown above, the difference in existing grade elevation between the three LI/TOD parcels analyzed and residences to the northeast along Young Avenue and Wayne Street is approximately 40 feet, which would place a 5-story building on each parcel below and outside of the direct line of sight from these residences. In the absence of actual development plans for these parcels, including grading plans with finished floor elevations, the conceptual 5-story massing shown in each profile was highly generalized, and therefore conservative. Based on this analysis, that includes a mathematically modeled representation of the topographic profile between each location, it was concluded that the construction of 1.2 FAR mixed-use buildings with a roof height of 5-stories and approximately 50 feet above grade in this area of the Village would not present a significant adverse visual impact when viewed from the upland residential neighborhoods.

The Village can request more detailed renderings of the proposed project when viewed from the upland residential neighborhoods as well as from the vicinity of Croton Point Avenue and Veterans Plaza to confirm the prior assessment. In addition to the proposed building, renderings from the vicinity of Croton Point Avenue and Veterans Plaza should include proposed landscaping, lighting, and parking areas, as well as existing adjacent conditions (expected to remain) for context (other structures, street trees, utility wires, etc.). Renderings should also include a key/legend identifying the vantage point of the rendering.

#### *School-aged Children – 2022 FEAF*

5. Using the 2006 Rutgers University Center for Urban Policy Research (CUPR) multipliers<sup>2</sup>, the 2022 FEAF conservatively estimated 29 to 45 public school aged children (PSAC) could result from the net increase in residential density permitted by the two local laws. This analysis was based on two scenarios: one where all units were one-bedroom, and one where half of the units were one-bedroom and half were two-bedroom. In addition, 10 percent of the units in each scenario were assumed to be affordable units.

A case study approach was also conducted to provide a supplemental level of analysis for PSAC. The case study relied on data from the Croton-Harmon Union Free School District (CHUFSD) with respect to the number of PSAC from the following developments/addresses:

- Mount Airy Woods (12 units): All apartment numbers listed from the following street addresses: 21, 23, and 25 Mount Airy Woods, Croton-on-Hudson, NY 10520;
- Bari Manor Apartment Homes (82 units): All apartment numbers with an address including “Bari Manor,” “Bari Manor Apartments,” or a street address of 31 or 31A Old Post Road South, Croton-on-Hudson, NY 10520;
- 94 Grand Street (31 units): All apartment numbers listed for the address of 94 Grand Street, Croton-on-Hudson, NY 10520.

The highest recorded combined enrollment from these three properties (28 PSAC from the 2019–2020 school year) resulted in a conservatively derived multiplier of 0.22 PSAC per residential unit. It is also noted that the developments for which data was available contain larger unit sizes (i.e., some 3-bedroom units). Applying the 0.22 PSAC per unit multiplier to the incremental build out of both local laws resulted in an estimated increase of approximately 71 PSAC (K-12) at full build-out.

The 2022 FEAF identified a trend of declining enrollment in the district. An increase of up to 71 PSAC over the 2022–2023 projected enrollment of 1,536 students, in addition to other background growth to occur over several years, would result in enrollment well below the District’s peak enrollment of 1,752 students in the 2009–2010 school year. Furthermore, the estimated additional students would not be introduced all at once, but rather be incrementally introduced and distributed across the district’s three schools (13 grades).

Refer to Comments #8 and #9 under “Project Specific Environmental Review Considerations” below for recommendations on addressing potential impacts to the school district from the proposed project.

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<sup>2</sup> As part of the 2022 FEAF, AKRF reviewed the Rutgers CUPR November 2018 report titled “Updated New Jersey Demographic Multipliers – The Profile of Occupants of Residential Development in New Jersey” and it was determined that the 2006 CUPR multipliers yielded PSAC estimates that were higher than those derived from the 2018 updates. Therefore, to ensure conservative analysis the 2006 CUPR multipliers were used in the 2022 FEAF.

## 2. PROPOSED SITE PLAN / CODE COMPLIANCE

1. The following bulk and area requirements were added to the Village Zoning Code for the TOD/LI overlay through Local Law 14 of 2022 (assessment of the Applicant's proposal provided in *italics* beneath each):
  - a. Minimum lot area: 10,000 square feet  
*The project site measures approximately 1.76 acres*
  - b. Setbacks: As determined by the Village Board during review of the Special Permit  
*To be determined by the Village Board*
  - c. Off-street parking per residential unit: 1 space per unit  
*The proposed project provides 103 spaces for 100 units*
  - d. Floor area ratio: 1.20  
*The proposed project's FAR is 1.10*
  - e. Building height (stories): 5  
*The proposed project is 5 stories*
  - f. Bedrooms: Studio, 1- and 2-bedroom units only  
*The building is currently proposing 46 one-bedroom units and 54 two-bedroom units.*
2. The following design/development requirements for the project site were outlined in the RFP issued by the Village Board (assessment of the Applicant's proposal provided in *italics* beneath each):
  - a. Access and circulation: the existing curb cut at the signalized intersection of Croton Point Avenue and Veterans Plaza must be retained in a manner such that the entrance and exit is controlled by the existing traffic light.  
*The proposed project's main entrance utilizes the existing curb cut and aligns with the existing signalized intersection of Croton Point Avenue and Veterans Plaza. Additional comments on access are provided later in this memorandum.*
  - b. Affordable housing: A minimum of 20 percent of the residential units proposed must be reserved as affordable housing. The Village is looking for a mix of income requirements for the affordable units; an example of a breakdown could be 40% of units at 30% AMI, 40% of units at 60% AMI and 20% of units at 80% AMI. Other requirements of Section 230-48 of the Village Code must also be met.  
*The Applicant is currently proposing for all 100 units to be affordable homeownership units funded through NYSHCR's Affordable Homeownership Opportunity Program (AHOP).*
  - c. Amenities: Public benefits and amenities should be part of any new development, including outdoor greenspace and an attached or separate indoor facility for community and recreational use by all Croton residents.  
*Amenities proposed within the building include a community room, fitness center, coworking lounge, bike storage room, and a rooftop deck. The Applicant should clarify if any of these amenities are intended for use by the general public, and further explain/identify the public benefits and public amenities being included in the Proposed Project (it should be noted that the RFP for the project required public benefits and amenities).*
  - d. Sustainability: Use of sustainable energy sources (EV charging stations, solar panels, etc.). The Village has adopted the NYStretch Energy Code-2020.

*Sustainable building design features proposed include full electrification, solar readiness, high efficiency HVAC equipment (cold climate air source heat pumps) and appliances (Energy Star Multifamily New Construction Program), Level 2 EV charging stations (1 per 20 parking spaces) and low-flow water fixtures.*

- e. Noise attenuation: Use of noise-attenuating construction materials to address rail noise from the nearby MNR station.

*According to the Applicant, the exterior façade combines brick and metal panels for cladding. Additional information on existing ambient noise conditions at the site will be required in order to ensure that the proposed façade construction provide acceptable interior noise levels for residential uses (see comments below).*

3. AKRF defers to the Village Engineer for review of the Applicant’s water and wastewater engineering reports, SWPPP, and other aspects of the site/building design required by the Zoning Code. It is also noted that the Westchester County Department of Environmental Facilities (WCDEF) will need to review and approve the engineering reports and the proposed connection to the sanitary sewer system on Croton Point Avenue.

### **3. PROPOSED PROJECT - LWRP CONSISTENCY REVIEW**

1. The project site is located within the boundaries of the Village’s amended Local Waterfront Revitalization Program (LWRP), adopted by the Village Board of Trustees on August 14, 2023 and approved by the New York State Department of State on March 26, 2024.<sup>3</sup> The Applicant completed and submitted the Village’s Coastal Assessment Form (CAF) as an attachment to the FEAF Part 1. The submitted CAF appears to be the CAF completed by AKRF for the 2022 rezoning (which had some notations added that are not applicable to this action). The Applicant should download and complete a clean version of the CAF and re-submit it to the Village.
2. **Attachment B** to this memorandum contains the LWRP policy review worksheet utilized by the Village’s Waterfront Advisory Committee (WAC). The Applicant should review the worksheet as a guide to preparing a draft assessment of the project’s consistency with the applicable policies, utilizing information on the proposed project’s design and construction. The draft assessment should be submitted for review by AKRF and Village staff. The draft assessment will assist the Village Board and the WAC on reviewing the proposed project against the LWRP policies. AKRF defers to the Village Board of Trustees for the final determination of consistency.

### **4. PROJECT-SPECIFIC ENVIRONMENTAL REVIEW (SEQRA) CONSIDERATIONS**

1. *FEAF Part 1 comments:*
  - a. In Section A, revise footnote to reflect that the owner of Tax Lot 3 is the Village; Tax Lot 4 is owned by Croton Point Realty, Inc. AKRF understands that Croton Point Realty, Inc. has had a long-term land lease with the Village for the uses on Village-owned Lot 3.
  - b. Section D.2.c.iii. It is noted that potential extension of the Wayne Street water main to Croton Point Avenue could be completed to serve the project. Additional information should be provided in the narrative accompanying FEAF Part I, based on feedback from the Village Engineer.
  - c. Section E.1.d. Revise response to “Yes” and identify Happy Hearts Take Two, 365 S Riverside Ave, Croton-On-Hudson, NY 10520 (approximately 0.3-miles from the project site).
2. Noise: The project site is within close proximity to the MNR Croton-Harmon station and associated rail yards. The Applicant should submit a noise study with readings taken over a 24-hour weekday

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<sup>3</sup> [croton\\_on\\_hudson\\_lwrp\\_amdmt\\_and\\_app\\_a-e\\_sos\\_approved.pdf \(crotononhudson-ny.gov\)](https://www.crotononhudson-ny.gov/croton_on_hudson_lwrp_amdmt_and_app_a-e_sos_approved.pdf)

period to provide information on existing ambient noise conditions at the project site, in order to determine the appropriate level of building facade (window-wall) attenuation necessary to maintain an interior noise level of 45 A-weighted decibels (dBA). One on-site noise monitoring location should be sufficient, ideally closer to the rail line. If the anticipated funding from NYSHCR will include HUD sources of funding, it is advisable that the noise study include information from HUD's DNL calculator in addition to noise readings, for comparative purposes.

3. Hazardous Materials: Given the location of the project site within an industrially zoned area, its land use history and surrounding uses, the Applicant should submit a recent Phase I Environmental Site Assessment (ESA) and any additional Phase II subsurface sampling reports for review.
4. Visual/Aesthetics: The submitted Architecture Plan Set (Sheet T-001.00) includes a rendering of the proposed building. The Village can request more detailed renderings of the proposed project when viewed from Croton Point Avenue and Veterans Plaza. In addition to the proposed building, renderings should include proposed landscaping, lighting, and parking areas, as well as existing adjacent conditions expected to remain for context (e.g., other structures, street trees, utility wires, etc.). Renderings should also include a key/legend identifying the vantage point of the rendering.
5. Historic Resources: The submitted FEAF Part 1, which was generated using the NYSDEC EAF Mapper, indicates that the project site is in an area sensitive for archaeological resources. The proposed project would result in disturbance of over 1 acre. Even though the site has been previously disturbed and developed, the Applicant should consult with the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP) for an impact determination on the project to satisfy the Village's obligations under SEQRA. Consultations through OPRHP's Cultural Resource Information System (CRIS) take approximately 30 days for a response.
6. Threatened/Endangered Species: The submitted FEAF Part 1, which was generated using the NYSDEC EAF Mapper, indicates that habitat for the northern harrier, bald eagle, Atlantic sturgeon and shortnose sturgeon may be present at the site. Since the project site is located inland from the Hudson River shoreline, contains a paved parking lot, a commercial structure, sparse vegetation and is framed on either side by active transportation and industrial uses, it is not considered suitable habitat for these species and no further assessment is required.
7. Traffic: In addition to the recommendations provided in the conclusions of Comment #2 under "Previous Planning Framework" above, the following items should be updated in the submitted FEAF Part 1 narrative: (1) the second bullet on page 5 should be changed to "Croton Point Avenue and Route 9/9A Northbound ramps", (2) the ITE Land Use code and respective trip generation numbers should be revised so they are based on the ITE data for ITE Land Use 221 "Multifamily Housing (Mid-Rise)".

In order to improve vehicular, pedestrian, and bicycle safety, it is recommended that the Applicant eliminate the eastern one-way site driveway along Croton Point Avenue. For internal vehicle circulation safety, it is recommended that the Applicant consider relocating the proposed tree at the southeast corner of the building to improve sight lines from the adjacent parking spaces. The location of the surface parking lot space adjacent to the garage entrance (on the east side of the building) provides limited sight distance between a vehicle backing out to leave that parking space and any vehicle coming from under the building. It is recommended that this parking space is relocated to another location on the site to maintain the total number of required parking spaces on site. A set of truck turning path analysis ("AutoTURN") drawings should be provided to demonstrate how the largest anticipated fire, garbage, and delivery vehicles would enter, exit, and navigate the project site. The drawings should also identify the proposed location of the trash receptacle(s) that would be accessed by the garbage trucks. See **Attachment A** for additional references/depictions of the comments listed above.

8. Fiscal / Economic Analysis: The Village should request a quantified assessment of the project's potential effects on the fiscal health of the Village, the Croton Harmon School District, and other directly affected taxing jurisdictions. The assessment should include: 1) identification of all applicable taxing jurisdictions; 2) quantification of property taxes generated from the project site in the existing

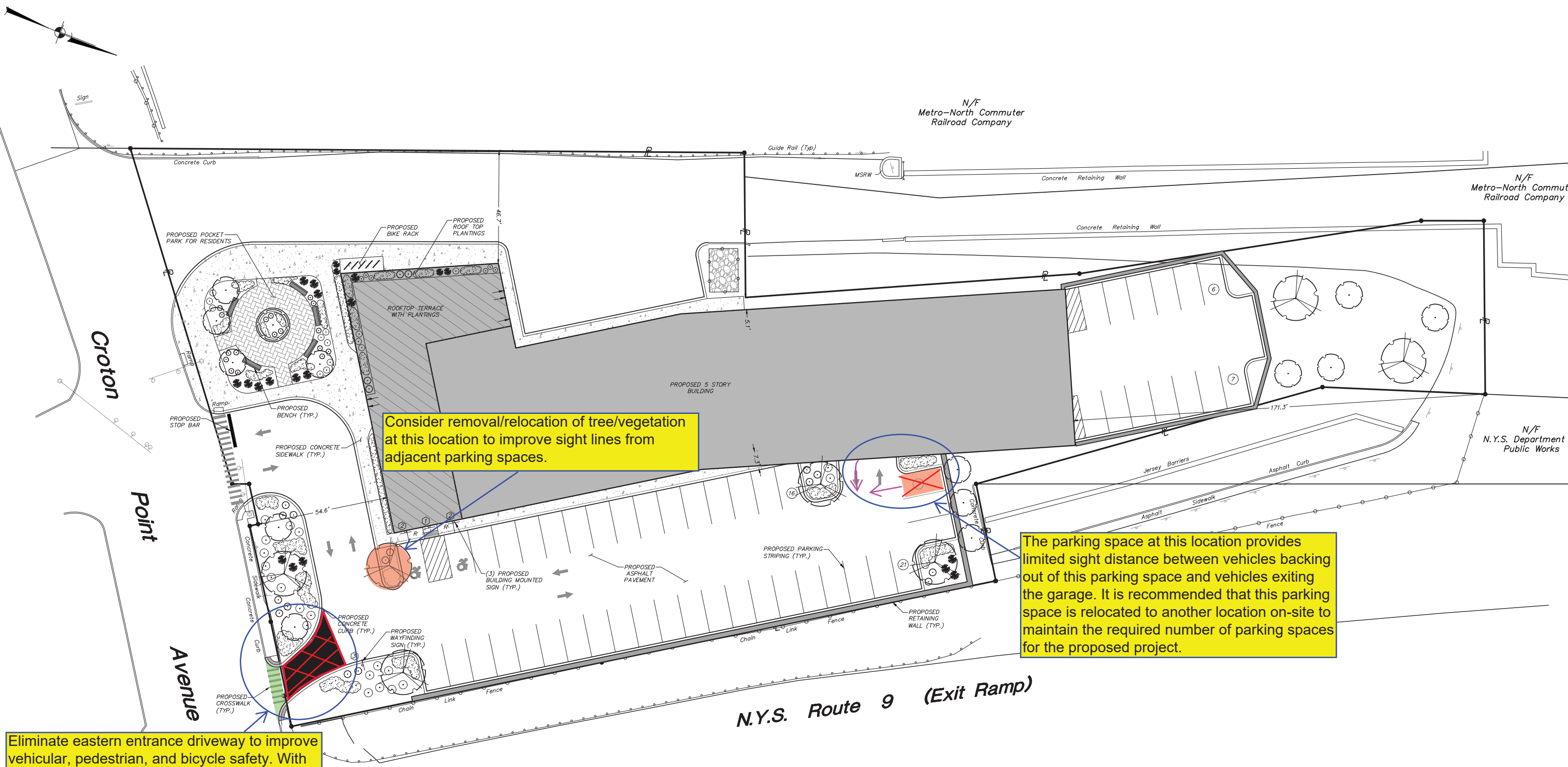
conditions; 3) estimated changes in tax revenue with the project, including new property tax revenues generated by the project's built improvements as well as any reduction in property tax revenues associated with the displacement of the existing built improvement(s); 4) estimated number of project residents and estimate per capita and total costs to the applicable taxing jurisdictions as a result of the project. For the Croton-Harmon School District, estimate a per-pupil cost for existing students, and apply that cost to projected school-aged children associated with the project (see #9 below). The assessment should describe the approach used to derive the project's assessed value and per-unit costs and note key assumptions.

9. **Public Schools:** Based on the 0.22 public school-aged children (PSAC) per dwelling unit ratio from Table 9 of the 2022 FEAF (based on Village apartment building-level data), the proposed project would include households with an estimated 22 PSAC. The Applicant should supplement this estimate using the 2018 Rutgers Study "Who Lives in New Jersey Housing," to derive alternative estimates under the following two scenarios: 1) 100% affordable home ownership; and 2) a rental scenario that has 80% market rate units and 20% affordable units. For the rental scenario, provide assumptions related to unit size (e.g., 1BR, 2BR) for both market rate and affordable units. The Applicant should also estimate the per-pupil cost for existing Croton-Harmon School District students and apply that cost to the estimated PSAC associated with the project. Finally, the applicant should speak to regional demographic trends and enrollment trends in the Croton-Harmon School District, to the extent the data is available.

### **C. RECOMMENDATIONS**

At the August 21, 2024 Village Board meeting and/or August 28, 2024 Village Board workshop, AKRF recommends that the Village Board declare itself as Lead Agency for the coordinated review under SEQRA, and discuss the application and the comments / requests for additional information contained in this initial memorandum.

**ATTACHMENT A**



Consider removal/relocation of tree/vegetation at this location to improve sight lines from adjacent parking spaces.

The parking space at this location provides limited sight distance between vehicles backing out of this parking space and vehicles exiting the garage. It is recommended that this parking space is relocated to another location on-site to maintain the required number of parking spaces for the proposed project.

Eliminate eastern entrance driveway to improve vehicular, pedestrian, and bicycle safety. With this removal, the sidewalk and bike lane along Croton Point Avenue can remain contiguous and a crosswalk would no longer be necessary.

**Figure A-1  
Site Plan Comments - Traffic**

Project:

Address:

Policy	<u>LWRP POLICIES</u>	WAC	WAC	Lead Agency	Lead Agency	<u>COMMENTS</u>
		Applicable	Consistent	Applicable	Consistent	
		yes/no	yes/no	yes/no	yes/no	
	<u>DEVELOPMENT POLICIES</u>					
1	Restore, revitalize, and redevelop deteriorated and underutilized waterfront areas for commercial, industrial, cultural, recreational and other compatible uses					
1A	Encourage integrated development of Village property to assure fulfillment of requirements relating to parking and accessory uses of Metro-North train station, while facilitating public access to the bay area and recreational use.					
1B	Encourage restoration of deteriorating structures related to railroad use and assure appropriate maintenance and screening to reduce visual impact.					
1C	Encourage the appropriate re-use of the old sewage treatment plant site at the intersection of Route 9A and Municipal Place.					
2	Facilitate the siting of water dependent uses and facilities on or adjacent to coastal waters					
2A	Encourage water-enhanced commercial uses where such uses complement water dependent uses and do not result in displacement of such uses.					
3	Further develop the State's existing major ports of Albany, Buffalo, New York, Ogdensburg and Oswego as centers of commerce and industry, and encourage the siting, in these port areas, including those under the jurisdiction of State public authorities, of land use and development which is essential to, or in support of, waterborne transportation of cargo and people.					
4	Strengthen the economic base of smaller harbor areas by encouraging the development and enhancement of those traditional uses and activities which have provided such areas with their unique maritime identity.					
5	Encourage the location of development in areas where public services and facilities essential to such development are adequate.					

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Project:

Address:

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		Applicable	Consistent	Applicable	Consistent	
		yes/no	yes/no	yes/no	yes/no	
5A	When feasible, development within the Village should be directed within the current service area of existing water and sewer facilities or in close proximity to areas where distribution lines currently exist.					
6	Expedite permit procedures in order to facilitate the siting of development activities at suitable locations					
	<b><u>FISH &amp; WILDLIFE POLICIES</u></b>					
7	Significant coastal fish and wildlife habitats will be protected, preserved, and, where practical, restored so as to maintain their viability as habitats					
7A	The quality of the Croton River and Bay Significant Coastal Fish and Wildlife Habitat and Haverstraw Bay Significant Fish and Wildlife Habitat shall be protected and improved for conservation, economic, aesthetic, recreational, and other public uses and values. Its resources shall be protected from the threat of pollution, misuse, and mismanagement.					
7B	Materials that can degrade water quality and degrade or destroy the ecological system of the Croton River and Bay Significant Fish and Wildlife Habitat and the Haverstraw Bay Significant Fish and Wildlife Habitat shall not be disposed of or allowed to drain in, or on land within, the area of influence in the significant fish and wildlife habitats					
7C	Storage of materials that can degrade water quality and degrade or destroy the ecological system of the Croton River and Bay Significant Fish and Wildlife Habitat or Haverstraw Bay Significant Fish and Wildlife Habitat shall not be permitted within the area of influence of the habitat unless best available technology is used to prevent adverse impacts to the habitat					
7D	Restoration of degraded ecological elements of the Croton River and Bay and Haverstraw Bay Significant Fish and Wildlife Habitats and shorelands shall be included in any programs for cleanup of any adjacent toxic and hazardous waste sites					

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		Applicable	Consistent	Applicable	Consistent	
		yes/no	yes/no	yes/no	yes/no	
7E	Runoff from public and private parking lots and from storm sewer overflows shall be effectively managed so as to prevent oil, grease, and other contaminants from polluting surface and ground water and impact to the significant fish and wildlife habitats.					
7F	Construction activity of any kind must not cause a measurable increase in erosion or flooding at the site of such activity, or impact other locations. Construction activity in the Croton River and Hudson River spawning areas shall be timed so that spawning of anadromous fish species and shellfish will not be adversely affected.					
7G	Construction activity of any kind must not cause significant degradation of water quality or impact identified significant fish and wildlife habitats.					
7H	Habitat-related policies identified in the Indian Brook-Croton Gorge Watershed Conservation Action Plan will be considered in actions proposed for these areas (see Appendix C).					
8	Protect fish and wildlife resources in the coastal area from the introduction of hazardous wastes and other pollutants which bio-accumulate in the food chain, or which cause significant sub-lethal or lethal effect on those resources.					
9	Expand recreational use of fish and wildlife resources in coastal areas by increasing access to existing resources, supplementing existing stocks, and developing new resources.					
9A	Ensure continued recreational use and public access to the rivers through Village-owned land adjacent to the railroad parking lot, at Croton Point Park, at Senasqua and Croton Landing Parks, along the Croton River, and at the Croton Yacht Club. Efforts should be made to increase opportunities for public access and enjoyment in these areas.					

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		Applicable	Consistent	Applicable	Consistent	
		yes/no	yes/no	yes/no	yes/no	
9B	Encourage passive recreational enjoyment of the wildlife in the designated significant fish and wildlife habitats, on the Audubon Society sanctuaries, Jane Lytle Arboretum, Gouveia Park and on other public or private lands within the Village where wildlife habitats are located, as well as the protection of such resources					
10	Further develop commercial finfish, shellfish and crustacean resources in the coastal area by encouraging the construction of new, or improvement of existing on-shore commercial fishing facilities, increasing marketing of the State's seafood products, maintaining adequate stocks and expanding aquaculture facilities.					
	<b><u>FLOODING &amp; EROSION POLICIES</u></b>					
11	Buildings and other structures will be sited in the coastal area so as to minimize damage to property and the endangering of human lives caused by flooding and					
12	Activities or development in the coastal area will be undertaken so as to minimize damage to natural resources and property from flooding and erosion by protecting natural protective features including beaches, dunes, barrier islands and bluffs.					
12A	Every effort should be made to protect Croton Point, a natural protective barrier to Croton Bay from activities or development that would increase erosion of or flooding of the point.					
13	The construction or reconstruction of erosion protection structures shall be undertaken only if they have a reasonable probability of controlling erosion for at least thirty years as demonstrated in design and construction standards and/or assured maintenance or replacement programs.					
14	Activities and development, including the construction or reconstruction of erosion protection structures, shall be undertaken so that there will be no measurable increase in erosion or flooding at the site of such activities or development, or at other locations					

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Address: \_\_\_\_\_

Policy	<u><b>LWRP POLICIES</b></u>	WAC	WAC	Lead Agency	Lead Agency	<u><b>COMMENTS</b></u>
		Applicable	Consistent	Applicable	Consistent	
		yes/no	yes/no	yes/no	yes/no	
15	Mining, excavation or dredging in coastal waters shall not significantly interfere with the natural coastal processes which supply beach materials to land adjacent to such waters and shall be undertaken in a manner which will not cause an increase in erosion of such land.					
16	Public funds shall only be used for erosion protective structures where necessary to protect human life, and new development which requires a location within or adjacent to an erosion hazard area to be able to function, or existing development; and only where the public benefits outweigh the long term monetary and other costs including the potential for increasing erosion and adverse effects on natural protective features.					
17	Non-structural measures to minimize damage to natural resources and property from flooding and erosion shall be used whenever possible.					
17A	Efforts to control erosion along the rivers and on the steep slopes inland shall be of a non-structural nature, wherever possible, to minimize the visual impact of structural measures.					
	<u><b>GENERAL POLICY</b></u>					
18	To safeguard the vital economic, social, and environmental interests of the State and of its citizens, proposed major actions in the coastal area must give full consideration to those interests, and to the safeguards which the State has established to protect					
	<u><b>PUBLIC ACCESS POLICIES</b></u>					
19	Encourage the linkage of open space from upland areas to and along the Hudson and Croton Rivers in the form of a trail or walkway system.					

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		Applicable	Consistent	Applicable	Consistent	
		yes/no	yes/no	yes/no	yes/no	
19A	Encourage the linkage of open space from upland areas to and along the Hudson and Croton Rivers in the form of a trail or walkway system.					
19B	Increase public access to areas that offer physical and visual connection to the Hudson River or Croton River and Bay					
19C	Encourage the improvement of public transportation, when feasible, where water dependent and water-enhanced recreation activities are located.					
19D	Improve and maintain access to Croton River and Bay at the Village-owned Echo Canoe Launch south of the Village parking lots at the Croton-Harmon Station.					
20	Access to the publicly owned foreshore and to lands immediately adjacent to the foreshore or the water's edge that are publicly-owned shall be provided and it should be provided in a manner compatible with adjoining uses.					
21	Water dependent and water enhanced recreation will be encouraged and facilitated, and will be given priority over non-water related uses along the coast.					
21A	Boating and fishing activities should be encouraged provided that they do not restrict other water-related recreational opportunities and are undertaken in a manner compatible with existing water-dependent uses.					
22	Development when located adjacent to the shore will provide for water-related recreation whenever such use is compatible with reasonably anticipated demand for such activities and is compatible with the primary purpose of the development.					
	<u><b>HISTORIC AND SCENIC QUALITY POLICIES</b></u>					
23	Protect, enhance, and restore structures, districts, areas, or sites that are of significance in the history, architecture, archaeology or culture of the State, its communities, or the Nation.					

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		Applicable	Consistent	Applicable	Consistent	
		yes/no	yes/no	yes/no	yes/no	
24	Prevent impairment of scenic resources of statewide significance. <i>(The nearest scenic area of statewide significance (SASS) is the Bear Mountain Park subunit of the Hudson Highlands SASS which is north of the Village)</i>					
25	Protect, restore, or enhance natural and man-made resources which are not identified as being of statewide significance, but which contribute to the overall scenic quality of the coastal area. <i>(The following scenic areas were noted in the LWRP as having local and regional significance: (1) Distinctive and scenic views of Croton Point, (2) Views of the Hudson River from South Riverside Ave and Route 9 corridor, and (3) Vegetated slopes and undisturbed ridgelines particularly those in the viewsheds in the Croton Gorge, River, and Bay areas.)</i>					
25A	Establish and protect identified public viewsheds of the Hudson River, including but not limited to the public views of the Hudson River from the western shoreline of the Village, and of the Croton River and Gorge. <i>(The following scenic areas were noted in the LWRP as having local and regional significance: (1) Distinctive and scenic views of Croton Point, (2) Views of the Hudson River from South Riverside Ave and Route 9 corridor, and (3) Vegetated slopes and undisturbed ridgelines particularly those in the viewsheds in the Croton Gorge, River, and Bay areas.)</i>					
26	Conserve and protect agricultural lands in the State's coastal area.					
	<b><u>ENERGY AND ICE MANAGEMENT POLICIES</u></b>					
27	Decisions on the siting and construction of major energy facilities in the coastal area will be based on public energy needs, compatibility of such facilities with the environment, and the facility's need for a shorefront location.					
28	Ice management practices shall not interfere with the production of hydroelectric power, damage significant coastal fish and wildlife and their habitats, or increase shoreline erosion or flooding.					

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		Applicable	Consistent	Applicable	Consistent	
		yes/no	yes/no	yes/no	yes/no	
29	The development of offshore uses and resources, including renewable energy resources, shall accommodate New York’s long-standing ocean and Great Lakes industries, such as commercial and recreational fishing and maritime commerce, and the ecological functions of habitats important to New York.					
	<u><b>WATER AND AIR RESOURCES POLICIES</b></u>					
30	Municipal, industrial, and commercial discharge of pollutants, including but not limited to, toxic and hazardous substances, into coastal waters will conform to State and National water quality standards.					
30A	Existing rail services and transportation-related facilities shall not dispose of any regulated materials in coastal waters until all such regulated materials have been tested by the State for conformance with water quality standards.					
31	State coastal area policies and management objectives of approved local waterfront revitalization programs will be considered while reviewing coastal water classifications and while modifying water quality standards; however, those waters already overburdened with contaminants will be recognized as being a development constraint.					
32	Encourage the use of alternative or innovative sanitary waste systems in small communities where the costs of conventional facilities are unreasonably high, given the size of the existing tax base of these communities.					
33	Best Management Practices will be used to ensure the control of stormwater runoff and combined sewer overflows draining into coastal waters.					
33A	The flow of stormwater discharge shall be controlled to limit the flow of pollutants from street and parking areas, etc. directly into the rivers and water bodies.					

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		Applicable	Consistent	Applicable	Consistent	
		yes/no	yes/no	yes/no	yes/no	
34	Discharge of waste materials into coastal waters from vessels subject to State jurisdiction will be limited so as to protect significant fish and wildlife habitats, recreational areas and water supply areas.					
34A	Moored structures or marine vessels shall not discharge ballast water or other releases into the waterway.					
35	Dredging and filling in coastal waters and disposal of dredged material will be undertaken in a manner that meets existing State permit requirements, and protects significant fish and wildlife habitats, scenic resources, natural protective features, important agricultural lands, and wetlands.					
36	Activities related to the shipment and storage of petroleum and other hazardous materials will be conducted in a manner that will prevent or at least minimize spills into coastal waters; all practicable efforts will be undertaken to expedite the cleanup of such discharges; and restitution for damages will be required when these spills occur.					
37	Best management practices will be utilized to minimize the non-point discharge of excess nutrients, organics and eroded soils into coastal waters.					
37A	Control of the development of hilltops, and steep slopes should be exerted in order to prevent erosion and minimize runoff and flooding from new construction.					
38	The quality and quantity of surface water and ground water supplies will be conserved and protected, particularly where such waters constitute the primary or sole source of water supply.					
39	The transport, storage, treatment and disposal of solid wastes, particularly hazardous wastes, within coastal areas will be conducted in such a manner so as to protect groundwater and surface water supplies, significant fish and wildlife habitats, recreation areas, important agricultural lands and scenic resources.					

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		Applicable	Consistent	Applicable	Consistent	
		yes/no	yes/no	yes/no	yes/no	
40	Effluent discharged from major steam electric generating and industrial facilities into coastal waters will not be unduly injurious to fish and wildlife and shall conform to State water quality standards.					
41	Land use or development in the coastal area will not cause national or State air quality standards to be violated.					
42	Coastal management policies will be considered if the State reclassifies land areas pursuant to the prevention of significant deterioration regulations of the Federal Clean Air Act.					
43	Land use or development in the coastal area must not cause the generation of significant amounts of the acid rain precursors: nitrates and sulfates.					
	<b><u>WETLAND POLICY</u></b>					
44	Preserve and protect tidal and freshwater wetlands and preserve the benefits derived from these areas.					
44A	Wetlands, water bodies and watercourses shall be protected by preventing damage from erosion or siltation, minimizing disturbance, preserving natural habitats and protecting against flood and pollution.					

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Policy	<b><u>LWRP SECTION IV</u></b> <b><u>PROPOSED LAND USES AND PROJECTS</u></b>	Completed	Action Required	As per section 225-6 (e): The lead agency which is making a determination of consistency for direct actions must also review consistency with Section IV of the LWRP, in making its consistency determination.
		yes/no	yes/no	
	<b>CROTON RIVER BASIN PROJECTS</b>			
1	<b>ENSURE MAINTENANCE OF NEW CROTON DAM CONSERVATION FLOW.</b> Maintaining natural river flows below water supply reservoirs is inherently complicated, and requires a difficult balance between human demands and sustainable flows to conserve a river's ecological health.			
2	<b>ADDRESS DRAINAGE SYSTEMS THAT LEAD TO EROSION ON STEEP SLOPES.</b> The objective of this project is to promote activities that will control soil erosion and sedimentation caused by stormwater runoff. These issues are most significant along the steep banks of the Croton River Gorge.			
3	<b>FACILITATE UPGRADES TO CATCH BASINS AND OUTFALLS TO ADDRESS FLOATABLES IN CROTON BAY.</b> The intent of this project is to control stormwater runoff discharges and other pollutants from entering Croton Bay. Protecting the ecological health of Croton Bay and River is a priority for the Village.			
4	<b>FACILITATE UPGRADES TO CROTON-HARMON PARKING LOT TO ADDRESS FLOATABLES IN CROTON BAY.</b> The parking facility is currently overwhelmed by asphalt paving with rows of cars. There is minimal landscaping or greenery, and in certain areas, parking directly abuts wetland areas in the Croton Bay. The Village should consider implementing green infrastructure within the parking lot in order to capture runoff onsite and reduce sewer overflows.			
5	<b>IMPROVE ECHO CANOE LAUNCH AND VILLAGE-OWNED LAND AT THE SOUTHERN END OF THE TRAIN STATION PARKING LOT.</b> This project supports the continued improvement of this recreational area to enhance public access to the Croton River and Bay and the Hudson River.			
6	<b>RELOCATE VILLAGE DPW FACILITY, SALT SHED AND MATERIAL STORAGE AREA.</b> The DPW operates a salt storage shed at the southern end of the Croton-Harmon parking lot. There is also an uncovered storage area near the salt shed for rocks and other construction materials which can leach directly into Croton Bay from the facility.			

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	<b>HUDSON RIVERFRONT PROJECTS</b>			
7	<p><b>FACILITATE ACCESS TO THE HUDSON RIVER WATERFRONT</b>                  A recurring comment from public input during this LWRP process and prior plans was the need to improve access to the Hudson River waterfront for vehicles, pedestrians, and bicyclists. Although there have been some improvements such as the Brook Street pedestrian bridge, in general, access to the waterfront is limited, and difficult in some locations.</p>			
8	<p><b>FACILITATE CROTON YACHT CLUB/CROTON LANDING IMPROVEMENTS.</b>                  The concept of a waterfront restaurant, or another use at the southern end of Croton Landing Park, adjacent to the Croton Yacht Club, has been discussed by the Village for years.                  Parking is also an issue as there is already insufficient on-site parking at Croton Landing Park to satisfy demand during busy hours.</p>			
9	<p><b>IMPLEMENT SEGMENT OF RIVERWALK TRAIL FROM CROTON LANDING PARK TO OSCAWANA COUNTY PARK.</b>                  According to the Hudson River Trailway Plan (2003), Westchester County has proposed a 1-mile trail along the Hudson River that would connect Croton Landing Park with Oscawana County Park in Cortlandt. This trail would fill a gap between the RiverWalk trails at these two parks.</p>			
	<b>VILLAGE -WIDE PROJECTS</b>			
10	<p><b>UNDERTAKE MANAGEMENT AND CAPITAL IMPROVEMENT PLAN FOR VILLAGE PARKS, TRAILS, OPEN SPACES AND MEMORIALS.</b>                  This project supports the creation of a Parks Maintenance and Capital Improvement Plan to address ongoing care and protection of existing parks, open spaces, and trails. The goal would be to provide an action plan for regular maintenance and targeted capital improvements when needed.</p>			
11	<p><b>DEVELOP PLAN FOR FUTURE USE OF GOUVEIA PARK</b>                  The purpose of this project is for the Village to create a conceptual plan that will examine how to best utilize the Gouveia Park, a 15.63-acre site acquired by the Village.</p>			