

Memorandum

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.

Date: September 23, 2024

Re: **WBP Development LLC - 1 Croton Point (aka Lot A)**
WBP Development LLC (Applicant)

cc: Linda Whitehead (Village Attorney)
Dan O'Connor, P.E. (Village Engineer)

As requested, AKRF, Inc. has reviewed the following newly submitted documents and plans for the above referenced application. This memorandum provides our comments on those materials. We look forward to discussing these comments with the Board at its September 25, 2024 meeting.

- Environmental Noise Study and Façade Glazing Requirements report (and backup data) prepared by Trinity Consultants, Cerami, and Longman Lindsey (TCLL), dated July 30, 2024.
- Memorandum from TCCL responding to comments on the Noise Study raised during the 8/21/24 Village Board of Trustees meeting, dated September 10, 2024.
- Draft Phase I Environmental Site Assessments prepared by SESI Consulting Engineers, dated July 2024.
- Draft Phase II Environmental Site Assessment Report prepared by SESI Consulting Engineers, dated July 2024.
- Memorandum on Public School-Aged children (PSAC) Analysis prepared by KSCJ Consulting, dated September 16, 2024.
- Memorandum on Fiscal Analysis prepared by KSCJ Consulting, dated September 16, 2024.
- Response memorandum on traffic and parking comments prepared by Kimley Horn, dated September 16, 2024.
- Visual Analysis (leaf-on and leaf-off simulations) prepared by Arketekcher, dated September 6, 2024.
- Visual Analysis (site cross sections) prepared by Insite Engineering, dated September 5, 2024.
- Updated Architectural Renderings prepared by Arketekcher, dated September 13, 2024.
- Letter from the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP) dated September 3, 2024.
- Revised EAF Part 1 prepared by KSCJ Consulting, dated September 17, 2024.
- Revised Coastal Assessment Form prepared by KSCJ Consulting, dated September 17, 2024.
- Local Waterfront Revitalization Program (LWRP) Consistency Assessment prepared by KSCJ Consulting, dated September 17, 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 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 105 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

The newly submitted material was reviewed in the context of our August 19, 2024 memorandum to the Village Board of Trustees. Comments shown in *italicized text* are recited from AKRF’s 8/19/24 memorandum. Any new or follow-up comments are presented in **bold text** with the corresponding review date.

LWRP CONSISTENCY REVIEW

1. 8/19/24: *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, 2024.¹ 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.*

9/20/24: Comment addressed.

2. 8/19/24: *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.*

9/20/24: AKRF has reviewed the LWRP Consistency Assessment documentation submitted in response to the above comment and offers the following comments:

Response 5A: The response notes that “the proposed building will connect to available public water and sewer services.” Has the Applicant examined the existing infrastructure and confirmed capacity through those public systems?

Response 18: Please identify the source of statement regarding consistency “with the State goals to provide owner occupied affordable housing.”

Response 30: Will the project use pesticides or chemicals for landscaping purposes?

PROJECT-SPECIFIC ENVIRONMENTAL REVIEW (SEQRA) CONSIDERATIONS

1. 8/19/24: *FEAF Part 1 comments:*
 - a. 8/19/24: *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.*

9/20/24: Comment addressed.

- b. 8/19/24: *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.*

9/20/24: Comment partially addressed. The Applicant should provide additional detail (based on feedback from the Village Engineer) on the “potential extension of the Wayne Street water main to serve the project.”

- c. 8/19/24: *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).*

9/20/24: Comment addressed.

¹ croton_on_hudson_lwrp_amdmt_and_app_a-e_sos_approved.pdf (crotononhudson-ny.gov)

2. 8/19/24: 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 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.

9/20/24: AKRF's acoustics team has reviewed the July 2024 Noise Study submitted by the Applicant, and the backup prepared by TCCL, along with the TCCL letter dated September 10, 2024 responding to comments raised during and after the August 21, 2024 meeting of the Village Board of Trustees.

In AKRF's professional opinion, the Noise Study and supporting information meets the appropriate standard for evaluation of potential noise impacts under SEQR for planned residential uses.

The Applicant's commitment to designing the building's façade construction to attenuate down to an interior L_{dn} no greater than 40 dBA is more stringent than the industry standard (and HUD's criterion) of interior L_{dn} of 45 dBA. If achieved, this level would avoid potential significant adverse noise impacts to residents.

Based on the loudest L_{dn} of 70.8, the façade of the building would need to provide 31 dBA of composite window-wall attenuation to result in an interior level of 40 dBA.

As part of the SEQR record, the Village Board may include the Applicant's commitment to 31 dBA of window-wall attenuation as a measure to be taken as part of the project to address potential noise impacts to future building occupants, and require it be a condition of any future Site Plan review and approval undertaken by the Planning Board. The Planning Board, as part of Site Plan review, can request the documented sound transmission ratings of the proposed windows and façade materials, as well as composite calculations by the architect of record to demonstrate that the 31 dBA attenuation requirement will be met.

AKRF has also reviewed the concerns raised (and TCCL's responses) regarding longer train idling times at the MNR yard in winter months (as compared to June when the measurements occurred), resulting in louder conditions at the site warranting higher attenuation requirements. As noted above, the Applicant has already committed to attenuating down to 40 dBA for apartment interiors rather than the standard 45 dBA. In AKRF's professional opinion, a tripling of idling time would need to occur to result in 5 dBA more than what was measured.

3. 8/19/24: 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.

9/20/24: AKRF's site assessment and remediation staff has reviewed the following reports provided by the Applicant:

- Draft Phase I Environmental Site Assessment - For: Proposed Mixed-Use Development, 79.17-1-4, Croton-on-Hudson, Westchester County, NY – Prepared by SESI Consulting Engineers, July 2024;
- Draft Phase I Environmental Site Assessment - For: Proposed Mixed-Use Development, (79.17-1-3 and 79.17-1-5), Croton-on-Hudson, Westchester County, NY – Prepared by SESI Consulting Engineers, July 2024;
- Draft Phase II Environmental Site Assessment Report - For: Proposed Mixed-Use Development, 79.17-1-3, 79.17-1-4 and 79.17-1-5, Croton-on-Hudson, Westchester County, NY – Prepared by SESI Consulting Engineers, July 2024.

Based on review of the above reports and laboratory data, AKRF has the following comments:

- The results of the Phase II ESA did not identify a release of contamination or indicate the potential for a possible contamination hot spot. Based on the data, AKRF agrees with the Applicant's assessment that it would be difficult for the Project Site to be accepted into the NYSDEC Brownfield Cleanup Program (BCP). The contaminants identified during the Phase II, including semi-volatile organic compounds (SVOCs) and metals, are consistent with urban areas with historical industrial uses.
- Due to the history of auto repair, the results of the Phase II ESA, including low level solvent and petroleum volatile organic compounds (VOCs) in soil vapor, and the potential to encounter unknown tanks or isolated contamination hot spots during site excavation, AKRF recommends the following:
 - The preparation of a soil management plan (SMP) to detail soil handling requirements for on-Site reuse or off-Site soil disposal, and contingency plans to address unknown tanks or areas of contamination encountered during Site excavation activities. The measures to address soil handling, soil disposal, tank closure, and contaminated soil removal should be consistent with all prevailing local and state regulations, including the need for any NYSDEC Spill reporting.
 - Either: 1) Inclusion of a vapor barrier as part of the foundation design to limit soil vapor intrusion, or 2) Complete post construction soil vapor/indoor air sampling to confirm site conditions meet New York State Department of Health (NYSDOH) soil vapor intrusion guidance.

The Applicant should review the above recommendations and describe in the EAF the measures by which the Project's construction would avoid potential adverse impacts related to soil handling and disposal, as well as soil vapor, including preparation of the recommended SMP. Should the Village Board grant the requested special permit, it can include these measures as a condition of any future site plan review and approval undertaken by the Planning Board.

4. *8/19/24: 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.*

9/20/24: The Applicant has provided the requested renderings, and the Applicant's architect has also submitted leaf-on/leaf-off photo-simulations and visual cross sections of the Proposed Project from the same publicly accessible vantage points that were studied as part of the Village Board's SEQR assessment of the 2022 rezoning.

When reviewing these documents, NYSDEC guidance states that an "aesthetic impact" is considered the consequence of a visual impact on the public's use and enjoyment of the appearance or qualities of a listed resource. NYSDEC Program Policy DEP-00-2 is intended to address places or locations that have been officially designated for their aesthetic qualities and that are accessible to the *public at large* as opposed to places that may have individual or private importance only (i.e. views from private residences cannot be considered, but views from parks or public roadways can be). Furthermore, the NYSDEC guidance states that "mere visibility of a project should not be a threshold for decision making. Instead, a project, by virtue of its visibility, must clearly interfere with or reduce the public's enjoyment or appreciation of the appearance of a significant place or structure."

AKRF has reviewed the materials submitted in response to the above comment, within the context of NYSDEC's guidance and offers the following comments:

- Similar to the more generic assessment undertaken for the rezoning, the Applicant's refined viewpoint simulations illustrate that, from the six publicly accessible vantage points studied, which all look toward the direction of the Hudson River, introduction of the proposed 5-story building (as designed, including rooftop features) would not constitute a significant adverse impact.
 - The simulations for Viewpoints 4 and 5 show the Proposed Project would minimally visible, if at all, from these areas.
 - Viewpoints 1, 3 and 6 will have partial views of the Proposed Project above the treetops when leaves are on the trees, with additional portions of the building visible when the leaves are off the trees. Viewpoint 2, the view north from Veteran's Plaza, would be the only view of the Proposed Project that would not be screened by buildings or vegetation. Changes to the views from these viewpoints, as well as Viewpoint 5, are not considered significant adverse impacts, as there are no views of significant places or structures that have the potential to be impacted.
 - Of the six viewpoints analyzed, only Viewpoint 4 has a view of what can be considered a local aesthetic resource, with a distant view of Croton Point Park. The simulations provided show the view of Croton Point Park would not be impacted by the Proposed Project.
 - The Applicant has provided a cross section that shows that potential viewpoints uphill, from public rights of way, such as the Wayne Street and Young Avenue, would not be anticipated to have views of the Proposed Project because they would be screened by vegetation, existing buildings, and because the topography flattens out. Even though the established NYSDEC guidance does not consider private views when making a final impact determination, the cross section also shows that minimal views are anticipated from private property due to vegetation and the topography.
 - The architectural renderings show the proposed building lighting; however, they lack lighting fixture details, parking lot lighting, and a lighting plan, which are typically developed during site plan review. These renderings indicate that building lighting would not result in a significant adverse impact. The specific lighting plan, including fixture details, would be reviewed and finalized during the Planning Board's site plan approval in accordance with Village regulations. The Village should consider requiring that fixtures be dark sky compliant and that no lighting spill past the property lines.
5. *8/19/24: 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.*
- 9/20/24: The Applicant has provided a letter from OPRHP dated September 3, 2024 indicating that "no properties, including archaeological and/or historic resources, listed in or eligible for the New York State and National Registers of Historic Places will be impacted by this project." AKRF has no further comments related to historic resources.**
6. *8/19/24: 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.*

9/20/24: No further comment.

7. 8/19/24: Traffic: To ensure appropriate signal timings are being developed as part of the signal timing mitigation identified through the 2022 rezoning, AKRF recommends 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.

In addition to the updated traffic counts, 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.

9/20/24: AKRF is reserving further comment on traffic and parking until the requested updated vehicle counts and in-process traffic report are provided by the Applicant.

It should be noted that the recommended modifications to the site plan (last paragraph in comment above) do not appear to have been addressed through the latest submission.

8. 8/19/24: 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.

9/20/24: AKRF has reviewed the Fiscal Analysis memorandum prepared by the Applicant (dated September 17, 2024) and offers the following comments:

- a. **Existing Tax Revenue –Existing tax revenue tables incorrectly cite the 2023 equalization rate of 1.22 equalization rate for town, county, county refuse, Ossining sanitary, school, and library when the calculations in the tables are based on the correct 2024 equalization rate of 1.18. While this change does not materially affect the analysis, the table should be updated for the record.**
- b. **Existing Tax Revenue - The estimated market value used in “existing tax revenue – 79.17-1-4” should be corrected to reflect the most recently assessed market value found in the 2024 tax rolls. This table should also be double checked to ensure calculations are correct.**

- c. **Anticipated Tax Revenue –** The calculations throughout the anticipated revenue section utilized the 2023 equalization rate of 1.22 and should be updated to reflect the 2024 equalization rate of 1.18. The anticipated tax revenue estimates will need to be recalculated along with the net increase in tax revenue for both the ownership and rental scenarios. While this change does not materially affect the analysis, the tables should be updated for the record.
 - d. **Fiscal Impact on CHUFSD -** The Applicant should provide additional explanation as to why the existing average instructional cost per pupil is higher than an incremental cost per pupil associated with students of project families. For example, the Applicant could estimate the marginal cost of project students and compare that estimate against school tax revenues from the project. This could lend additional support to the Applicant’s statement that “the added tax revenue generated by the project is expected to cover the projected increase in [costs associated with] public school children of between 1-22 students.”
 - e. **Fiscal Impacts on Village, Town, County –** The Applicant states that “the proposed development is not expected to result in a negative fiscal impact to any of the taxing jurisdictions as municipal services to the development will be limited.” The Applicant supports this statement by explaining that the development would include infrastructure and utilities maintained by the Applicant at no cost to the Village, Town or County government. Does this statement include solid waste management? The assessment goes on to state that all per capita cost evaluations are conservative because they are based on 100% project occupancy. The Applicant could also note that the per capita (resident) cost estimate is conservative because its calculation includes costs associated with non-residential uses, which also generate demand for Village, Town and County services.
 - f. **Property Values –** The analysis should provide sourcing for the studies referenced and provide a slightly more fulsome discussion of findings based on literature review. The A-Mark Foundation has performed literature review on this issue and cites a number of relevant studies in the following document: [What Impact Low Income Housing Property Values.pdf \(amarkfoundation.org\)](#)
 - g. **The Applicant should provide an update to the Board on the outcome of any recent correspondence and/or meetings held with emergency service providers (police, fire, EMS). The Applicant had indicated after the 8/21/24 Village Board meeting that such outreach was planned.**
9. *8/19/24: 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.*
- 9/20/24: AKRF has reviewed the PSAC memorandum prepared by the Applicant (dated September 17, 2024) and offers the following comments:**
- a. **The PSAC multiplier obtained from the 2023-2025 CHUFSD Local Multifamily Study incorporates information from the Maple Commons development which AKRF understands is not fully tenanted at this time. The incorporation of Maple Commons assuming full tenancy results in an artificially low PSAC multiplier of 0.20. The Applicant should remove the Maple Commons development from the study and**

recalculate the PSAC multiplier, as Maple Commons cannot serve as a reliable comparative at this time. Based on AKRF's review, removing the 33 units of Maple Commons should result in a multiplier comparable to the 0.22 multiplier developed from the data obtained in 2022 from the CHUFSD during the SEQR process for the rezoning.

- b. The Applicant should provide source information for the unit counts used in the study.
- c. If possible, the Applicant should examine one of their previously completed multifamily projects within a desirable school district and provide the number of school-aged children residing in that building.

C. RECOMMENDATIONS

At the September 25, 2024 Village Board Work Session, AKRF recommends that the Village Board discuss the latest materials submitted, the comments / requests for additional information contained in this memorandum, and begin the process of deliberating on EAF Part II for select areas of analysis.