



May 20, 2026

Mr. Rob Leggio
Carmel Riverside, LLC
78 Main Street,
Dobbs Ferry, NY 10522

**Re: Professional Transportation Engineering Services
425 S Riverside Avenue
Village of Croton-on-Hudson, New York**

Dear Mr. Leggio,

As detailed herein, the proposal to replace the existing gym, equipment-company and auto-repair shop uses on the subject property with a 49-unit multifamily residential development, will generate only 18 more trips than the current uses in the AM peak hour and will actually generate 24 fewer trips than the current uses in the PM peak hour. This is consistent with industry data, which indicates that, were the Project not to proceed and different, general-retail tenants to occupy the existing space, the 49-unit multifamily residential building would generate 10 more trips in the AM peak hour and 17 fewer trips in the PM peak hour. These changes are very modest and unlikely to have any impact on area traffic operating conditions.

Furthermore, the proposed action was the subject of an extensive evaluation of potential traffic impacts when it was recently rezoned for residential use¹. At that time, it was contemplated that the property might be developed with 70 apartments, not the currently proposed 49. As a result, the proposed development is projected to generate 12 fewer trips during the AM peak hour when it was evaluated for the rezoning and 17 fewer during the PM peak hour.

The rezoning traffic study evaluated the development of 470 residential units and almost 22,000 sf of commercial space at studied 5 intersections through the year 2042. The nearest intersection studied was that of S. Riverside Avenue with Croton Point Avenue where the study concluded that all of the potential development from the recent rezoning, as well as the general increase in traffic volumes over 20 years, would not have any significant adverse impact at this intersection, and that the intersection would continue to experience Level of Service B or better conditions (with an average delay per vehicle of 11 seconds or less during the peak hours).

Based on these findings, it is clear that the potential traffic impacts of the proposed smaller residential development on the 425 S. Riverside Drive property have already been given the requisite "hard look" under SEQRA (State Environmental and Quality Review Act) and that no additional traffic analysis is required.

¹ 2022 AKRF Traffic Impact Study

Project History

In 2022, AKRF prepared a Traffic Impact Study (TIS) for the Village of Croton on Hudson related to the theoretical maximum buildout projected under the proposed Harmon/South Riverside Gateway (HSRG) Overlay and Light Industrial (LI) District zoning amendments. That study provided projections for residential units for both the HSRG overlay parcels and LI district parcels.

Summary of 2022 AKRF TIS Projections

1. HSRG Overlay Parcels:
 - Residential Units: 383
2. LI District Parcels:
 - Residential Units: 87
 - Ground Floor Commercial Space: 21,831 square feet

The traffic study evaluated future traffic operating conditions at 5 key intersections, the closest of which to the subject project was the intersection of S. Riverside Avenue with Croton Point Avenue. The study projected future traffic volume out to the year 2042 by increasing the existing intersection traffic volumes by 22% and adding as many as 390 trips during the busiest hour (PM) from the properties that were the subject of the rezoning (41 of which trips would have been from the development of 70 residential units on the subject property)².

The traffic study concluded that the potential traffic impacts would be modest, would occur at intersections somewhat further away from the subject property, and that there were relatively simple improvements that could mitigate for those impacts. At the nearest intersection studied (S. Riverside Avenue at Croton Point Avenue), the traffic study concluded that average peak-hour delays would increase by only 1.3 seconds (from 9.7 seconds per vehicle to 11.0 seconds per vehicle).

Project Description

The subject property is located at 425 S. Riverside Avenue on the east side of S. Riverside Avenue, in the Village of Croton-on-Hudson, NY. The site is part of the recently expanded Harmon/South Riverside Gateway District Overlay. It is currently developed with a 12,480-sf building that is shared by Straddles Gymnastics, a retail space (now or formerly ET Equipment Company) and the M&J Auto repair shop.

It is proposed to replace the current uses with a 49-unit multifamily residential building with amenity space and on-site parking. Access to the proposed property will be provided primarily via two (2) driveways:

- One (1) driveway/driveway 1 on the west side of the property accessed via S. Riverside Avenue

² This continues to trend from the recent approval for 1-3 Croton Point Avenue which was projected to generate 79 trips in the busiest hours according to 2022 AKRF Traffic Study, however now it is projected to generate only 35 trips.

- One (1) driveway/driveway 2 on the south-east side of the property accessed via S. Riverside Avenue

Existing Traffic Activity

Kimley-Horn conducted vehicle turning movement counts at the sites three existing driveways from 7:00 a.m. to 10:00 a.m. and from 4:00 p.m. to 6:00 p.m. on Thursday, December 12, 2024. The data indicated that the peak hours of traffic activity on S. Riverside Avenue at the site occurred from 9:00 to 10:00 a.m. in the morning and from 4:45 to 5:45 p.m. in the afternoon and that six (6) vehicles entered or exited the subject property during the morning peak hour, while 48 vehicles entered or exited the property during the afternoon peak hour.

By comparison, the 2022 AKRF Traffic Impact Study indicated that, if the subject property were developed with 70 apartments, it could be expected to generate 36 trips in the AM peak hour and 41 trips in the PM peak hour (so 30 more trips in the AM and 7 fewer in the PM than the current development on the property generates).

Should the proposal to develop 49 apartments on the property not move forward, it is possible (and likely) that the tenant mix would change over time. Kimley-Horn used industry data³ to determine how much traffic the site would envelope if half of the building were converted to a hardware store (Land Use Code 816) and the balance to a health club (Land Use Code 492)⁴. The data indicated that such a re-tenanting of the building would generate 14 trips in the AM peak hour and 41 trips in the PM peak hour (so similar to the buildings current trip generation but 8 more trips in the AM peak hour and 7 fewer in the PM peak hour).

Traffic Impact Analysis

Carmel Riverside, LLC, is proposing to redevelop the property with a 49-unit multifamily residential building (which is 21 units fewer, or 30% less than was contemplated in the 2022 AKRF rezoning traffic study). Using the exact same methodology as used in the 2022 Traffic Impact Study, Kimley-Horn calculated how many trips the 49-unit development is expected to generate. This information is Summarized in **Table 1**, below (along with the trip projections from the other existing and potential uses of the property, as described above)

As indicated in **Table 1**, the proposed 49 residential units are projected to add a total of just 24 trips to the surrounding roadways during the AM peak hour and just 24 trips during the PM peak hour. This is 12 fewer than what was evaluated in the 2022 traffic study during the AM peak hour and 17 fewer in the PM peak hour. It is also 24 fewer than that the property currently generates during the PM peak hour (or 17 fewer that it would likely generate if re-tenanted). Only in the AM peak hour is the proposed development projected to generate more traffic than the current use (18 more trips) or possible future use of the property, if re-tenanted (10 more trips).

³ Institute of Transportation Engineers' (ITE) Trips Generation Manual, 12th Edition.

⁴ Considered to be middle-of-the-road uses, from a trip generation perspective.

It is noted that, during the AM peak hour (when the project will generate slightly more trips than the current use of the property) the 2022 AKRF Traffic Impact Study indicates that the closest intersection (S. Riverside Avenue with Croton Point Avenue) is projected to experience better overall operating conditions in the future (with an average delay of 7.5 seconds per vehicle), as compared to the PM peak hour operations (an average delay of 11.0 seconds per vehicle) when what the Applicant is proposing will actual reduce area traffic volumes.

Table 1
Peak-hour Trip Generation Comparison

Data Source	Land Use Description	ITE Land Use		Size	Weekday AM Peak			Weekday PM Peak		
		Code #	Land Use		In	Out	Total	In	Out	Total
Proposed Land Use (ITE)	Multifamily Housing	220	Multifamily Housing (Low Rise) - Not Close to Rail Transit	49	7	23	30	19	12	31
Internal Trip Credit ⁵					-1	-2	-3	-2	-1	-3
(Remainder)					6	21	27	17	11	28
Mass Transit Credit ⁶					0	-3	-3	-2	-2	-4
Total Projected Trip Generation for 49 Apartments					6	18	24	15	9	24
Existing Site Use	Gym and Retail	NA	NA	12,480 sq ft	1	5	6	23	25	48
Existing Land Use (ITE)	Commercial Retail	816	Hardware/Paint Store	6,240 sq ft	3	3	6	9	10	19
		492	Health Club	6,240 sq ft	4	4	8	13	9	22
Total ITE Trips					7	7	14	21	20	41
HSRG Study by AKRF 2022 Total Trip Generation				70	9	27	36	26	15	41
Net New Trips (Compared to existing trips)					5	13	18	-8	-16	-24
Net New Trips (Compared to ITE trips)					-1	11	10	-6	-11	-17
Net New Trips (Compared to AKRF 2022 Study)					-3	-9	-12	-11	-6	-17
Note: XX is yielded from the ITE equation.										
AM: T=0.35(x) + 12.93 (24% entering and 76% exiting)										
PM: T=0.43(x) + 20.55 (62% entering and 38% exiting)										
⁵ Internal Trips calculated utilizing an internal trip cerdit of 10%.										
⁶ Mass Transit credit calculated utilizing a 10% mass transit credit.										

Conclusions

As detailed herein, the proposed 49-unit development is projected to generate 30% less traffic than previously evaluated and will actually generate less traffic than the current uses on the property during the busiest (PM) peak hour while, during the less-busy AM peak hour, traffic volumes emanating from the site will be only 18 vehicles more than the current uses (or 1 vehicle approx. every three minutes).

A detailed traffic study has already been conducted that considered the redevelopment of the subject property at a density that was 42% greater than is currently proposed. That study concluded that the overall potential traffic impacts of the proposed rezoning would be modest, would occur at intersections somewhat further away from the subject property, and that there were relatively simple improvements that could mitigate for those impacts. At the nearest intersection, the traffic study concluded that average peak-hour delays would increase by only 1.3 seconds (from 9.7 seconds per vehicle to 11.0 seconds per vehicle) in the PM peak hour (and that AM peak-hour delays would be even lower).

Based on these findings, it is clear that the potential traffic impacts of the proposed smaller residential development on the 425 S. Riverside Drive property have already been given the requisite "hard look" under SEQRA and that no additional traffic analysis is required.

Please contact me if you have any questions.

Very truly yours,

KIMLEY-HORN Engineering and Landscape Architecture of New York, P.C.



By: John Canning, P.E.

Associate