



Site Planning	Environmental Studies
Civil Engineering	Entitlements
Landscape Architecture	Construction Services
Land Surveying	3D Visualization
Transportation Engineering	Laser Scanning

January 21, 2020

Mr. Anthony Russo
AKRF
34 South Broadway, Suite 401
White Plains, NY 10601

RE: JMC Project 14012
Commercial Campus at Fields Corner
NY 312 & Pugsley Road
Town of Southeast, NY

Dear Anthony:

We have prepared this response letter and revised the accompanying section of the FEIS to address the outstanding FEIS completeness comments included in the AKRF review memorandums dated 12/6/2019 and 12/9/2019, as well as a question raised by the Planning Board on 12/9/2019. Previous comments included in the AKRF memorandum dated 8/30/2019 that have been fully addressed are not included herein, thus the numbering of comments reflects the outstanding comments only.

A. GENERAL FEIS COMMENTS

Comment No. 1

Comment partially addressed. Impact criteria has been added as footnotes to the LOS and Queue tables, however, the language in the footnotes should be expanded for greater clarity (e.g., “LOS D or better to LOS E or F, LOS E to LOS F, or an increase in delay greater than 10% where a LOS F was previously identified under No Build Conditions” and “queue length exceeding the storage length uniquely under Build Conditions”.

Response No. 1

The language in the footnotes on the referenced tables has been expanded as suggested.

Comment No. 2

Comment partially addressed. While the tables have been modified to more clearly identify impacts, the FEIS text only identifies locations that experience an increase in delay or queue, rather than clearly identifying impacts. For each intersection, movements that experience impacts should be provided in a bullet list along with the corresponding peak hour, analysis scenario, and basis of the identified impact (e.g., LOS/Delay, Queue). Selected pages from Tables 4-11A, 4-12A, 4-13A, 4-14A, and 4-16A are included in Attachment A and have been denoted to identify impacted locations and whether those impacts have been mitigated or require mitigation. These notes are provided for the 2023 Build Alternative without Crossroads

312 scenario as this is the most probable Build scenario. As indicated in the notes, there are several locations with unmitigated impacts that must be mitigated. Similarly, identification of all impacts should be provided for all other analysis scenarios and mitigation provided accordingly. Based on a review of the LOS, Delay, and Queue data for all scenarios, impacts that were omitted from the LOS/Delay and Queue tables are highlighted in orange and should be identified as impacts and mitigation provided accordingly.

Response No. 2

The requested bullet lists have been added to the FEIS under Response 4-5 within Section III.4 "Traffic". While the previously requested tables clearly show the negative and positive impacts of the FEIS Preferred Alternative Plan (Preferred Alternative), the bullet list has been prepared for the text as requested, both with and without the Crossroads 312 development. The few impacts that were inadvertently omitted and highlighted in orange in the AKRF memorandum have been highlighted in the revised tables.

The comment discusses that unmitigated impacts must be mitigated. The comment does not acknowledge that many of the analyzed locations improve with the proposed mitigation improvements. As shown on the attached Tables 4-10A and 4-10B, which are also included in the revised FEIS, the Preferred Alternative will have a net negative impact at only one percent of the various lane groups, approaches and overall intersections that have been evaluated in the FEIS based on the conservative analyses required by the Town. Thus, a net of nine-nine percent (99%) of the lane groups, approaches and overall intersections would not be significantly adversely impacted or would be mitigated even under the conservative analysis required by the Town. In addition, the Applicant has proposed substantial roadway improvements that are not specifically reflected on the intersection operations (LOS) tables and the queue tables, including widening Route 312 from two lanes to a minimum of four lanes between Pugsley Road and the I-84 eastbound ramps/Independent Way, as well as reconstructing and improving nearly a mile of Pugsley Road, a Town road, from Route 312 to Barrett Road. Thus, the Applicant believes that the previously proposed improvements sufficiently mitigate the overall net Project impacts.

As suggested by AKRF in their 12/9/2019 memorandum, the Applicant met with the Town representatives and NYSDOT on 1/7/2020 to review the Preferred Alternative and the associated mitigation improvements. As a result of the meeting, while peak hour delays would be experienced with or without the Project, the Applicant is willing to additionally provide fifteen-thousand dollars (\$15,000.00), in escrow or as a bond, to fund a post construction Traffic Signal Warrant Analysis of the Route 312/Prospect Hill Road intersection based on actual future volumes, including a Time of Day traffic signal timing and phasing study, as well as contributing a portion of the cost, up to one-hundred-fifty-thousand dollars (\$150,000.00), for the installation of a traffic signal at the intersection, if warranted and approved by NYSDOT. The signal would be coordinated with the four other existing and proposed signals along Route 312 to Independent Way.

Comment No. 3

Comment partially addressed. While the tables have been modified to more clearly identify impacts, the FEIS text only identifies locations that experience an increase in queue, rather than clearly identifying

impacts. For each intersection, movements that experience impacts should be provided in a bullet list along with the corresponding peak hour, analysis scenario, and basis of the identified impact (e.g., LOS/Delay, Queue). See AKRF Conclusion for Comment 2 above.

Response No. 3

The bullet lists have been provided as requested. Response 2, above, addresses the queuing impacts.

Comment No. 8

The reference to 14.5 feet from AASHTO represents the typical position of the minor-road driver's eye. However, as the stop bar is set back this sight distance assumes vehicles do not adhere to the stop bar. Therefore, the sight distance should be set back 8 feet from the stop bar- given that the stop bar is the desired stopping point and the additional 8 feet represents the distance from the front of the vehicle to the driver's eye per AASHTO guidance. This applies to all sight distance measurements presented in the FEIS and all sight distance measurements on the appropriate drawings must be updated accordingly.

Response No. 8

The sight distance drawings have been revised as requested.

Comment No. 9

As shown in Table 4-17 "Conceptual Highway Improvements" geometric improvements are proposed for the intersection of Route 312 and Independent Way/1-84 Eastbound Ramps intersection for the 2023 Build Alternative without Crossroads 312 scenario (the most probable Build scenario). As shown in the noted tables presented in Attachment A, this intersection experiences impacts for the 2023 Build Alternative without Crossroads 312 scenario. Therefore sight distance diagrams are required for this intersection. This can be addressed during site plan review.

Response No. 9

The proposed intersection improvements involve lane use and traffic signal modifications. No geometric improvements are proposed by the Applicant. NYSDOT is currently improving the intersection and any sight distance improvements would have been incorporated into the NYSDOT improvements if they were necessary, which they were not.

Comment No. 10

The diagram provided shows the driver's eye position of the left-turning vehicle from eastbound 312 beyond the left-turn lane and within the intersection. While left turning vehicles may wait in an intersection, it is recommended that the appropriate sight distance be provided from the stop bar of the left-turn lane for vehicles to make a decision prior to entering the intersection. All sight distance measurements must be updated accordingly.

Response No. 10

The drawing has been revised as requested.

Comment No. 11

Comment partially addressed. See AKRF Conclusion for Comment 2 above.

Response No. 11

See Response 2.

Comment No. 12

Comment partially addressed. The discussion in the FEIS should be expanded to discuss the accidents and potential safety improvements for each of the identified High Accident Locations (HAL) individually: (1) the intersection of Route 6 and Route 312, (2) the Route 312 corridor between Route 6 and Prospect Hill Road, (3) Route 312 and the I-84 Eastbound Ramps/Independent Way, and (4) Route 312 and the I-84 Westbound Ramps.

Response No. 12

The accident information tables included in the DEIS indicate that the vast majority of the accidents were related to driver inattention, driver error, and similar causes, which are not associated with the consideration of potential safety improvements.

Comment No. 20

Comment partially addressed. See AKRF conclusion for Comment 2 above.

Response No. 20

See Response 2.

Comment No. 24

Comment not addressed. The improvements by NYSDOT listed in Table 4-17 for Intersection 4 (Route 312 & Caremount Driveway) for No Build Conditions are not consistent between the between the with and without Crossroads scenarios. See Attachment B. Please verify and correct.

Response No. 24

The description on the table has been corrected.

Comment No. 30

Comment partially addressed. Providing the number of visitors and employees that utilize Metro-North to the project site should be added as Item 8 to the list of TMP items above so that the need for a jitney can be assessed.

Response No. 30

The following has been added to the list of TMP items as Item 8: Provide the number of visitors and employees that utilize Metro-North to the project site so that the need for a jitney can be assessed by the project and/or tenants.

Comment No. 35

Comment partially addressed. The signal warrant analysis based on the lower ITE Trip Generation 10th Edition numbers should also be conducted for the 2023 Build Alternative without Crossroads 312 scenario as this is the most probable Build scenario. A worksheet that shows how the traffic data volumes presented in Table III.B-9 was extrapolated to the off peak hours should also be provided.

Response No. 35

The additional analysis and requested worksheet are included in the FEIS. The Route 312/Pugsley Road intersection traffic signal warrants are not changed as a result of the exclusion of the Crossroads 312 project.

B. AKRF MEMORANDUM, DATED DECEMBER 9, 2019

The 12/9/2019 memorandum suggests that the Applicant meet with the Town and NYSDOT. See Response 2 regarding the meeting with NYSDOT and additional measures proposed by the Applicant.

C. PLANNING BOARD QUESTION, DATED 12/9/2019

The Planning Board questioned whether restaurants will be provided within the proposed buildings for employees and whether the traffic analysis considered employees traveling off-site for lunch. Restaurants are not proposed for the Project, and areas will be provided for employees to eat meals they have brought to work. The ITE trip generation includes employees traveling to and from the site for meals and any other purpose. The peak hours of employee trip generation, as well as the peak hours along Route 312, have been considered in the analysis.

We trust the responses contained herein and the FEIS text and drawing revisions address the comments and look forward to the Planning Board accepting the FEIS as complete. Thank you for your consideration.

Sincerely,

JMC Planning Engineering Landscape Architecture & Land Surveying, PLLC



Richard J. Pearson, PE, PTOE
Senior Associate Principal

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