

3.10 TRAFFIC AND TRANSPORTATION COMMENTS AND RESPONSES

Comment 3.10-1 (Daniel Kiely, Public Hearing, May 9, 2005; Letter 24, Bob and Marcia Altabet, May 19, 2005, Letter 21, Frank Genova, May 23, 2005): The DEIS Traffic Study traffic counts were conducted on August 12th when traffic conditions would have been light and people would have been on vacation. Studying traffic in August rather than during the school year does not adequately represent traffic conditions. A period when traffic conditions are more typical should have been analyzed. The estimated impact off traffic on Gay Ridge and other roads in the area based on a traffic survey conducted during one of the lightest traffic periods of the entire year is disingenuous at best. The traffic impact does not appear to include the 5, 6 or 7 school buses that will be entering and leaving the project during the morning rush hours.

***Response 3.10-1:** Normally, traffic counts in this region are not seasonally adjusted since seasonal fluctuation in traffic in this area is relatively minor. The traffic counts were not conducted on a holiday and are considered to be an accurate reflection of typical peak period traffic conditions in the project area.*

The New York State Department of Transportation maintains continuous count stations according to Federal traffic monitor guidelines. These stations count traffic 24 hours a day every day of the year. The latest available data (2003-2005) and historical data indicate that daily traffic volumes are actually highest in July and August. The traffic study has not reduced traffic volumes to reflect counts taken during one of the busiest times for travel in the year.

Comment 3.10-2 (Letter 22, Allen Elliott, May 18, 2005; Letter 6, Scott Marrone, May 20, 2005; Letter 18, Marie and Richard Panella, May 22, 2005): Traffic problems on Route 6 should be addressed before Yorktown Farms is allowed to be built. Traffic conditions on Route 6 must be addressed and resolved before allowing the Yorktown Farms subdivision. . . . The project would add 70-100 cars to the traffic flow during rush hour to an area of Route 6 that is already a "parking lot." Traffic on Route 6 is bumper to bumper on the stretch between Curry Street and Baldwin Place. Until the last couple of years, traffic proceeding east bound on route 6 was only seriously backed-up at Mahopac Avenue during the pre-holiday period after Thanksgiving. It is now routinely backed-up one-half mile and more every day. We cannot afford to add any more cars to this already overloaded road.

***Response 3.10-2:** As described in Chapter 3.10 of the DEIS, even with the greater number of homes originally planned (34 lots) and their project-generated trips (33 trips in the a.m. peak hour and 41 trips in the p.m. peak hour), the surrounding intersections that were evaluated in the traffic analysis were projected to remain at acceptable levels of service using the methodology that is accepted by NYSDOT. The Applicant's Revised Plan reduces the project density by 35 percent (12 lots less), resulting in a 24 percent reduction in the amount of a.m. peak hour trips and 34 percent reduction in the amount of p.m. peak hour trips generated by the project, most of which will use Route 6.*

Comment 3.10-3 (Letter 22, Allen Elliott, May 18, 2005; Letter 14, Joseph and Patricia Plitnick, May 22, 2005): Weekend traffic on Route 6 is already a severe problem and the addition of project-related traffic including trips associated with the proposed soccer field would be unacceptable.

Response 3.10-3: *Weekday commuting period traffic is used in the traffic analysis to represent the worst case condition for site-generated traffic since site traffic is most concentrated during the weekday peak hours as opposed to weekends when drivers typically have more flexibility in when they can travel. For this reason, the analysis of traffic for residential development typically analyzes weekday a.m and p.m. peak hour traffic, as called for in the Scoping Document for the DEIS.*

The recreation fields have been eliminated from the Revised Plan for Yorktown Farms.

Comment 3.10-4 (Letter 22, Allen Elliott, May 18, 2005): The traffic light at the intersection of Route 6 and Mahopac Avenue will be jammed up with the additional project-generated traffic. That intersection should be considered even though it is not within the Town of Yorktown.

Response 3.10-4: *Most of the site-generated traffic is projected to head south using the Taconic State Parkway, or west to Peekskill in the opposite direction of the Mahopac Avenue/Route 6 intersection. Due to the distribution of project-generated traffic, no significant adverse impacts on this intersection are anticipated to result from the proposed project.*

Comment 3.10-5 (Letter 23, John and Joanne Guaghan, May 18, 2005): The Yorktown Farms Subdivision could be better served by locating egress in two different areas of the subdivision. Jefferson Court (away from the Route 6 corridor) would definitely be more accessible for families attending soccer games who are traveling from southern and other parts of Yorktown. Traffic is already backed up on Curry Street from the light on Route 6 up to Gomer Street at certain times of the day, i.e., when Thomas Jefferson School is letting out, at the beginning and end of services at Grace Lutheran Church, and when there is congestion on Route 6. Providing egress from Route 6 and egress from Jefferson Court would be better for the present and future users of Curry Street, Gomer Street, and Route 6.

Response 3.10-5: *The DEIS presented an alternative access to Jefferson Court (see DEIS Connection of Gay Ridge Road to Jefferson Court Alternative, Sketch Plan R5), although there are several drawbacks to this plan. This scheme would require acquisition of privately owned land to the south and, while the owner of that land was contacted by the Applicant for this purpose, no agreement has been made to allow making this connection at this time. Development of the alternative Jefferson Court access would result in the greatest amount of site disturbance of all of the alternatives examined, including construction disturbance and associated loss of wooded land. Additionally, with access from Jefferson Court, most traffic exiting Jefferson Court would pass by the Gomer Street intersection with Curry Street, while most Gay Ridge Road traffic associated with the project would avoid passing Gomer Street and Jefferson Court.*

It is again noted that recreation fields have been eliminated from the Revised Plan for Yorktown Farms.

Comment 3.10-6 (Letter 22, Allen Elliott, May 18, 2005): Increasing traffic in this area may impact the ability of emergency service providers to respond and adequately serve the public.

Response 3.10-6: *The project plans establish transportation infrastructure that will improve access in the vicinity of the project site for emergency service providers. As requested by the Planning Board, dual means of access for emergency service*

providers via both Route 6 and Gay Ridge Road is expected to increase the ability of the Police and Fire Departments to access the site area in the event of an emergency. This would provide additional emergency accessibility to existing homes on Gay Ridge Road by providing another access point from the east. The traffic study contained in the DEIS indicates that traffic from the proposed project will not result in adverse impacts on emergency service providers in terms of their ability to travel on surrounding roadways.

Comment 3.10-7 (Letter 24, Bob and Marcia Altabet, May 19, 2005): The additional traffic through quiet residential streets is a problem that should be evaluated through a full traffic simulation study.

Response 3.10-7: Gay Ridge Road and other area streets are projected to have adequate capacity to support project-generated traffic. Highway Capacity Software was utilized for the DEIS to model local intersections in accordance with customary NYSDOT methods. The traffic simulation study suggested by the commentor would be beyond the scope of reasonable inquiry necessary for SEQRA.

The Traffic Sensitivity Analysis presented in Chapter 4.0 of the DEIS indicates access points to the project from various local roads on Curry Street would continue to operate at level of service B or better. Therefore, the anticipated increase in traffic on Gay Ridge Road is not expected to overwhelm this neighborhood.

Comment 3.10-8 (Letter 24, Bob and Marcia Altabet, May 19, 2005): We do understand the need for a second access route for safety planning, but we believe that alternatives for a second Route 6 access point have not been adequately considered. Minor re-routing of the Yorktown Farms road currently planned to connect with Gay Ridge Road to a Route 6 terminus could easily be managed, based on the topography, eliminating the traffic concerns, with no environmental issues or community character issues.

Response 3.10-8: Constructing a secondary means of access to the project site on Route 6 would require substantial wetland and wetland buffer disturbances. Such a plan would also conflict with the State's Arterial Access Management strategy, which includes limiting access points on Route 6. The NYSDOT has indicated its preference that Route 6 access be provided for emergency vehicles only (see Response 3.10-2).

Comment 3.10-9 (Letter 20, Enid Lang, May 23, 2005): The project will increase the already busy traffic on Route 6 between Curry Street and the Somers area near the Stop n Shop area.

Response 3.10-9: The DEIS traffic analysis shows that the Yorktown Farms project (as originally proposed with 34 homes) would increase traffic on Route 6 between Curry Street and a point east of the project site by approximately one percent from existing conditions (13 site-generated vehicles added to approximately 1368 existing vehicles in the AM and 16 vehicles added to approximately 1550 existing vehicles in the PM). These numbers are taken from DEIS Figures 3.10-2 and -3 and 3.10-7 and -8. The project's effect on Route 6 traffic during the peak hours, and the rest of the day, can be expected to be less than one percent given that there are now 22 homes proposed in the Revised Plan.

Comment 3.10-10 (Letter 13, Vera Peitrianiello, May 22, 2005): Combine the project with the new building which is almost ready for occupancy at Route 6 and Navajo Street and you have a potential traffic and quality of life nightmare.

Response 3.10-10: *The DEIS traffic analysis considers the Navajo project (referred to as the Tonndorf proposal) in its "No Build" condition and includes its anticipated level of traffic on the roadway network when calculating "Build" traffic impacts of the Yorktown Farms project. Even with the traffic generated by the Tonndorf proposal and other future projects considered in the No-Build condition, the estimated 33 a.m. peak hour vehicular trips and 41 p.m. peak hour vehicular trips generated by the Yorktown Farms project (with 34 homes proposed in the DEIS) are not expected to overwhelm the surrounding roadway network, including US Route 6.*

Comment 3.10-11 (Letter 13, Vera Peitraniello, May 22, 2005; Letter 15, Ann B. De Felice, May 22, 2005; Letter 10, Lawrence and Georgia Armstrong, May 22, 2005): Residents living on Gay Ridge Road, including those with young children, would experience an increased risk to their well being as a result of the development. We are against the proposed project, which would turn Gay Ridge Road into a thoroughfare accessing the proposed subdivision and its soccer field, including access by delivery vehicles.

Response 3.10-11: *It can be generally stated that residents on any residential street may experience increased traffic safety risks as traffic increases. As a traffic safety matter, however, the NYSDOT has requested that Route 6 not be used as a full access point for Yorktown Farms, but only be used for emergency access. The Town of Yorktown Town Board has endorsed this plan (emergency access only on Route 6) as a condition in its approval of the Applicant's requested zoning change for the project site. Further, the Revised Plan now proposed no longer includes residential access from Route 6, thereby precluding any use of Gay Ridge Road as a short cut to Route 6.*

It is noted that Gay Ridge Road currently terminates in a stub end at the property line of the Yorktown Farms site rather than a cul-de-sac, indicating its original design to potentially provide future access to the subject site.

It is again noted that recreation fields have been eliminated from the Revised Plan for Yorktown Farms, thereby reducing the nonresident traffic to and from the project.

Comment 3.10-12 (Letter 13, Vera Peitraniello, May 22, 2005): We are concerned about construction vehicles that will use Gay Ridge Road on a daily basis to access the site for the several years that it would take to complete the project.

Response 3.10-12: *The Applicant proposes that the construction access be directly from Route 6, subject to NYSDOT approval. Construction vehicle access to the site will be a temporary condition. Many construction vehicles will remain on-site as houses are under construction. Construction traffic typically occurs prior to the peak hours of traffic of the roadway network.*

Comment 3.10-13 (Letter 13, Vera Peitraniello, May 22, 2005; Letter 14, Joseph and Patricia Plitnick, May 22, 2005; Letter 4, Han-Lei Ling, May 20, 2005; Letter 5, William and Laura Fox, May 20, 2005; Letter 16, Alice Kiely, May 22, 2005; Letter 17, Allison Lichtenberg, May 22, 2005; Letter 7, Suzanne and Jeffrey Steimel, May 20, 2005; Letter 8, Frances and George Davis, May 20, 2005): Through traffic on streets that now end at or near the project site will present a threat to the safety of area residents, including young children. There are small children constantly at play on nearby streets. People will be coming for ball games who are not aware of the small children, and who may be too preoccupied with their upcoming game to think to look for them.

Response 3.10-13: *The proposed Revised Plan for Yorktown Farms Subdivision includes no connection to adjacent dead-end streets other than the connection to Gay Ridge Road. Thus, no traffic from the project would be expected on the dead-end streets. It is important to note that the function of streets is to provide for the transportation of vehicles and pedestrians, and not to provide a play area for children.*

It is noted that the recreation fields have been eliminated from the Revised Plan for Yorktown Farms.

Comment 3.10-14 (Letter 15, Ann B. De Felice, May 22, 2005): Gay Ridge Road will become a thoroughfare for people trying to avoid the horrendous traffic going to Mahopac Avenue on Route 6.

Response 3.10-14: *The Revised Plan no longer includes residential access from Route 6, thereby precluding any use of Gay Ridge Road as a short cut between Curry Street and Route 6. The proposed plan includes no road connection to adjacent land to the east or south as potential future road connections toward Mahopac Avenue.*

Comment 3.10-15 (Letter 4, Han-Lei Ling, May 20, 2005): Speeding is a problem on Curry Street. We can foresee that the traffic that this project will generate will add to our existing problems.

Response 3.10-15: *Most site-generated traffic would be using Curry Street between Gay Ridge Road and US Route 6. This distance along Curry Street is sufficiently short as to prevent speeding of traffic associated with the project site. In fact the minor increase in traffic on Curry Street generated by the project may reduce the inclination of drivers to speed in this area.*

Comment 3.10-16 (Letter 19, Daniel Kiely, May 22, 2005; Letter 9, Ottavio and Margaret Saraceno, May 21, 2005): The traffic impact analysis does not appear to include the 20 to 30 cars that will be entering the subdivision for soccer practices during the evening rush hours. The obvious negative aspect of this project is the soccer field, which will draw too many participants, creating a thoroughfare for passenger and commercial vehicles.

Response 3.10-16: *The recreation fields have been eliminated from the Revised Plan for Yorktown Farms.*

Comment 3.10-17 (Letter 19, Daniel Kiely, May 22, 2005) With a field of this size, there can be two teams practicing on it at the same time. With typically 15 players per team and 1 or 2 officials per game, the 28 spot soccer field parking lot will not be sufficient to handle the arrival of players and officials for the subsequent game. If on-street parking is not available, the field utility will be severely compromised.

Response 3.10-17: *The recreation fields have been eliminated from the Revised Plan for Yorktown Farms.*

Comment 3.10-18 (Letter 19, Daniel Kiely, May 22, 2005): The DEIS cites *Patterns for Westchester*, a 1995 study based on 1990 census data, as support for adding to the already overwhelmed traffic infrastructure. They point to Jefferson Valley as an intermediate center, which is on par with the Cross County Shopping Center in Yonkers, Mount Kisco, Peekskill, and the Villages of Ossining and Tarrytown. Only the cities of New Rochelle, Mount Vernon,

White Plains and downtown Yonkers are considered to be more important than Jefferson Valley. According to the DEIS, the project's location near Jefferson Valley and on a major corridor, Route 6, are ideal reasons to build the subdivision. Route 6, as a major corridor, is deemed to be able to handle the traffic. *Patterns* also suggests that 202/35 is another major corridor that should be the focus of development through Yorktown. Considering the present difficulties in moving traffic along the 202/35 corridor, the value of *Patterns* as a planning document for Yorktown is minimal.

Response 3.10-18: *Comment noted. Patterns for Westchester has in part been replaced by the Sustainable Development Study, which continues to identify US Route 6 and US Route 202 & NYS Route 35 as major corridors. Both studies evaluated improvements along these corridors in association with future development potential of lands in the corridors.*

Comment 3.10-19 (Letter 19, Daniel Kiely, May 22, 2005) The DEIS uses equation rates from *Trip Generation*, 7th edition. The DEIS implies a great deal of precision, i.e. to the 1,000th percent, Table 3.10-9. While I did not have access to the 7th edition, I did review the 6th edition of *Trip Generation*. The projects in the 6th edition, the average size of the single-family housing projects used for the development of the equations were substantially larger. They were also not adjusted for income levels. Demographics were not considered either. Again, unless the 7th edition has single-family projects with the appropriate income and demographic levels to the proposed project, the statistical validity of this approach is questionable.

Response 3.10-19: *The level of accuracy of the data referred to is consistent with standard methods for analyzing traffic. It provides for an appropriate technical review and allows the data to be more easily followed. It also minimizes errors that could be aggregated through numerous computations. The reporting requirements are generally higher than the actual precision of the data. For instance, within the single family housing category there is no adjustment for income or demographics. The greater New York Metro area, including the Town of Yorktown, has a relatively wider period of peak traffic, with some of the longest commuting times in the country. As a result, the peak hour traffic from residential developments is generally lower than that found in the ITE Trip Generation manual. Thus, the ITE Trip Generation manual tends to overstate peak hour residential traffic. However, the ITE Trip Generation manual is the accepted standard for use for residential traffic analyses by the New York State Department of Transportation.*

Comment 3.10-20 (Letter 19, Daniel Kiely, May 22, 2005) The statement that the soccer field will only be used on weekends does not seem to conform to the field uses in Yorktown. Most, if not all fields, are used for practices during the week.

Response 3.10-20: *The recreation fields have been eliminated from the Revised Plan for Yorktown Farms.*

Comment 3.10-21 (Letter 19, Daniel Kiely, May 22, 2005) With a field of this size, there can be two teams practicing on it at the same time. With an average of 15 team members per team and two teams on the field, there will be 20 to 25 cars involved. Many players will be dropped off and the number of trips from this one source will double during the evening rush. The teams that practice here will be Yorktown teams with most if not all players coming from the south and west of the site. As there are already accidents at the lighted intersection of Curry Street and Route 6, there will undoubtedly be accidents at the unlighted exit unto Route 6. Cars will quickly adopt the

local street as a means of accessing the comparative safety of the lighted intersection at Curry/Route 6.

Response 3.10-21: The recreation fields have been eliminated from the Revised Plan for Yorktown Farms.

Comment 3.10-22 (Letter 19, Daniel Kiely, May 22, 2005) Cars will quickly adopt the local street as a means of accessing the comparative safety of the lighted intersection at Curry/Route 6. The local street will see the same speeds as are presently along Curry Street and these unfortunately frequently exceed the speed limit of 30 mph. (The 25 mph noted in the DEIS only applies to the Willow Park area.) As the much wider Curry Street can barely handle these speeds, the local streets cannot be able to handle them and the results will be tragic.

Response 3.10-22: The traffic analysis assumed use of the Curry Street/Route 6 traffic light by project-generated traffic, and included a Sensitivity Analysis that showed that local roads have adequate capacity to handle all project-generated traffic without significant changes to levels of service. This is now the case, with primary access to Yorktown Farms from Gay Ridge Road in the Revised Plan. The Town's 30 mph speed limit applies to Gay Ridge Road and its extension, and is enforceable by the Town.

Comment 3.10-23 (Letter 19, Daniel Kiely, May 22, 2005): The DEIS for the project indicates that it will increase demand for goods and services that will have a steady multiplier effect in the project area. As there is no effective public transportation servicing the project area, the only means by which the demands for goods and services can be met is through increased traffic in the project area. As noted under the response to section 3.10, traffic along Route 6 is routinely backed up west for 0.5 miles from the light at Mahopac Avenue even during non-rush hours. As the east/west routes 202/35 is already heavily overloaded, we cannot afford to have the only other east/west route through the northern part of Yorktown turned into our version of the Long Island Expressway.

Response 3.10-23: While the proposed project will add vehicles onto the local road network, the traffic analysis demonstrates that no significant change in traffic conditions is projected to result from this minor increase.

Comment 3.10-24 (Letter 1, Yorktown Planning Department, June 13, 2005): The Tonndorf proposal needs to be included in the Traffic Study in the DEIS.

Response 3.10-24: The DEIS traffic analysis considers the Tonndorf proposal in its "No Build" condition. See Response 3.10-10.

Comment 3.10-25 (Letter 1, Yorktown Planning Department, June 13, 2005): Eastbound traffic of Route 6 merges from two lanes to one lane near the proposed entrance to the site. Existing road conditions on Route 6 need to be indicated, along with their role in traffic flow on Route 6 at the new curb cut.

Response 3.10-25: The existing merge from two lanes to one for eastbound traffic tends to slow traffic down in the vicinity of the project site, as does the traffic signal at Curry Street for both eastbound and westbound traffic. The merge from two lanes to one also creates traffic safety concerns if there was to be a new curb cut in the vicinity of the merge section. For this and other reasons, NYSDOT has recommended that project access be gained from a local street if possible. As noted

above, the currently proposed Revised Plan would route site-generated traffic through the Curry Street signal, and only provides for emergency access directly onto Route 6.

Comment 3.10-26 (Letter 1, Yorktown Planning Department, June 13, 2005): A letter from the NYSDOT dated September 23, 2002 states that no new access on Route 6 will be granted unless access can not be obtained from two existing cul de sacs off Curry Street. Is there any more recent correspondence from NYSDOT?

Response 3.10-26: *The 2002 letter from NYSDOT indicated that Route 6 access would be supported by NYSDOT only if two alternative access points from local roads could not be found. The only feasible local roadway connection is from Gay Ridge Road, which resulted in the project layout described in the DEIS having both Route 6 and Gay Ridge Road access. Subsequent letters from NYSDOT restate its position that primary project access should be from a local road (see NYSDOT letters dated June 27, 2005 and November 22, 2006 in Appendix A).*

A meeting held between NYSDOT and staff from Tim Miller Associates, Inc., on July 12, 2005 indicated that NYSDOT would only support emergency access from Route 6, regardless of whether one or two access points on local roads are feasible. This is consistent with NYSDOT Arterial Management practices. As a result of the meeting with NYSDOT and its position regarding Route 6 access, the Revised Plan for the proposed project provides primary access via Gay Ridge Road and only emergency access from Route 6.

Comment 3.10-27 (Letter 1, Yorktown Planning Department, June 13, 2005): Estimates of usage and traffic generated by the proposed soccer field should be obtained from the Parks and Recreation Department.

Response 3.10-27: *The recreation fields have been eliminated from the Revised Plan for Yorktown Farms.*

Comment 3.10-28 (Letter 1, Yorktown Planning Department, June 13, 2005): Page 1-2, Para. 3 of the Executive Summary refers to Gay Ridge Road as a cul-de-sac. No cul-de-sac exists on Gay Ridge Road.

Response 3.10-28: *Comment noted. Gay Ridge Road ends without a turnaround at the property line of the project site.*

Comment 3.10-29 (Letter 1, Yorktown Planning Department, June 13, 2005): The DEIS claims the draft Comprehensive Plan's argument of "development stress" does not apply to this parcel as it relates to a zoning density reduction, since the area is not a large lot context and traffic has not shown to be a problem. It is well known from collective experience and also from data supplied from both regional studies and individual site specific studies that traffic is problematic from a factual, operational standpoint, and also a source of concern among the residents of the area. Studies such as the Sustainable Development Study (SDS) have found numerous traffic difficulties along Rte. 6 and identify the root problem as regional traffic patterns and development. Clearly this parcel will add traffic to an already burdened system. The Comprehensive Plan, along with the SDS, recognize that reductions in density from the existing development pattern is necessary and desirable to achieve reduced stress on the traffic system and maintain a high quality of life.

Response 3.10-29: *The traffic analysis in the DEIS demonstrates that the project-generated traffic (based on 34 lots) will not result in adverse impacts to the surrounding roadway network. However, the Applicant's Revised Plan reduces the project density by 35 percent (12 lots less), resulting in a 24 percent reduction in the amount of a.m. peak hour trips and 34 percent reduction in the amount of p.m. peak hour trips generated by the project.*

Comment 3.10-30 (Letter 1, Yorktown Planning Department, June 13, 2005): The DEIS (ref. Page 3.1-4) continues to state it has no access to adequate highways when it analyzes its potential as an office complex, yet, at the beginning of the chapter it describes the parcel as fronting on “a major inter-regional highway that connects western Connecticut in the Danbury area to southeastern New York State, including the New York State Thruway at Harriman.” It also fails to state that it lies 1-2 miles from the Taconic State Parkway, no more than 2-5 minutes trip by car. The passage goes on to complain that “it does not appear rational or fair to treat the subject site differently from other large contiguous parcels zoned for residential development” and that “unlike the three other parcels being considered for OB zoning, [it] is not located in either an existing center or office complex, or in close proximity to highways”. Here it fails to state that these three (3) parcels, while located near to the TSP, have no frontage on Rte. 6 and would face great challenges of access not experienced by the subject parcel, and that their gradient and lay of the land would present even further challenges, also not experienced by the subject parcel. It is for these reasons that the subject parcel continues to be under consideration for OB and is, contrary to the documents’ claims, a quite rational and fair treatment.

Response 3.10-30: *Since the preparation of the DEIS, the project site has been rezoned to a lower residential density rather than rezoned for an office complex. The currently proposed Revised Plan reflects the desired zoning designation of the Town.*

Comment 3.10-31 (Letter 1, Yorktown Planning Department, June 13, 2005): The DEIS shows the proposed action’s traffic impacts as having a minimal impact on Gay Ridge Road, while the proposed Rte. 6 access operates at LOS E or F. Under what conditions can it be reasonably assumed that traffic will not divert to Gay Ridge under those conditions?

Response 3.10-31: *The project proposal has been revised since the DEIS with only emergency access from Route 6 now proposed. As described in Responses 3.10-2 and 3.10-7 and demonstrated in the Traffic Sensitivity Analysis found in DEIS Chapter 4.0, no significant adverse traffic impacts to local roads such as Gay Ridge Road are expected as result of this change.*

Comment 3.10-32 (Letter 1, Yorktown Planning Department, June 13, 2005): An additional traffic analysis should be performed so a comparison can be made with the previous study performed in the month of August. Weekend traffic count numbers should also be obtained.

Response 3.10-32: *Traffic volumes were counted at the Curry Street/NYS Route 6N/US Route 6 intersection on Saturday June 18, 2005. This count indicated higher traffic volumes than the p.m. peak hour. The total entering volume for the p.m. peak hour was 1927 vehicles and for Saturday peak hour 2244 vehicles. The higher volumes result in higher intersection delay by about four seconds per vehicle, although still within the level of service B range. It is expected that delay for the Build condition would rise three to four seconds per vehicle, keeping the intersection at a level of service C in the Saturday peak hour. The full analysis of the Saturday traffic with higher US Route 6 volumes*

would reaffirm the difficulty of direct access to US Route 6 from the site and the desirability of access via Gay Ridge Road and the Curry Street/NYS Route 6N/US Route 6 traffic signal.

The elimination of the athletic field and reduction in residential units in the Revised Plan would benefit potential weekend traffic.

Comment 3.10-33 (Letter 1, Yorktown Planning Department, June 13, 2005): The Applicant should incorporate the Tonndorf site plan proposal into the discussion regarding the development of neighboring properties. The proposed driveway on Route 6 for the Tonndorf site plan should also be shown on the subdivision map. The traffic study should also include this proposal.

Response 3.10-33: *The 18-acre Tonndorf site is located across Route 6 from the Yorktown Farms project site. The Tonndorf proposal is currently before the Planning Board for Site Plan and Subdivision approval and includes development of a three-lot, mixed-use, commercial subdivision. Four commercial buildings are proposed containing a total of 106,000 square feet of floor area.*

Access to the Tonndorf site had originally been proposed via a new curb cut from Route 6, presenting the possibility of having driveway access directly across from a Route 6 entrance for Yorktown Farms, as had originally been proposed in the February 2004 Yorktown Farms DEIS. However, residential access from Route 6 is no longer proposed for Yorktown Farms due to arterial management concerns expressed by the NYSDOT. A change in the location of access to the Tonndorf development has also been proposed due to wetland constraints on that site, to a location on Navajo Road to the west. As with the Yorktown Farms proposal, an open space buffer is proposed for the Route 6 frontage. The proposed Route 6 buffers will screen the proposed Tonndorf commercial use from the Yorktown Farms project site.