

TG: 21025.00

September 17, 2024

John A. Tegeder, RA
Director of Planning, Town of Yorktown
Albert A. Capellini Community & Cultural Center
1974 Commerce Street
Yorktown Heights, NY 10598

SUBJECT: REVIEW OF TRAFFIC ISSUES OF PROPOSED RECYCLING USE IN I-1

Dear Mr. Tegeder:

As requested, I am writing regarding the traffic issues engendered by the proposed development known as "Atrac Recycling" at 76 Route 6 in Jefferson Valley.

On 9/4/2012 via Local Law No. 13-2012 Yorktown's Town Board revised the set of Manufacturing uses that are permitted in the Planned Light Industry (I-1) zone to add the following use:

A recycling facility, provided that such facility shall be located on a site having the following bulk and area standards:

- (a) Minimum lot area of 40,000 square feet;*
- (b) Minimum lot frontage on a public road of 150 feet;*
- (c) Capable of being serviced by public water and sanitary sewer service;*
- (d) Minimum landscaped or natural buffer around the perimeter of the lot of 10 feet; and*
- (e) Lot located within 500 feet of and having direct access to an arterial road.*
- (f) Accessory outdoor storage or recycling activities may be permitted with a special permit issued by the Planning Board pursuant to Article VII, §§ 300-28 through 300-36, subject to the standards set forth in § 300-81.2.*

I have reviewed the Environmental Assessment Form along with its attachments received on 2/28/24 by the Yorktown Planning Department from Atrac Recycling, which describes the proposed use as: "a 3,600 tons per week Construction & Demolition Debris transfer facility and a 250 tons per day Recyclables Handling and Material Recovery Facility, at a proposed 40,000 square foot building".

I have also reviewed approved minutes for the following meetings:

1. **Town Board:** 10/11/2011, 3/13/12, 9/4/12 (discussion of the proposed addition of the Recycling Center use, as requested by petitioner Brian Amico who sought the zoning amendment in order to "establish a Recycling Center on Navajo Road".)
2. **Planning Board:** 1/22/24, 2/12/24, 3/11/24, 5/6/24, 6/24/24, 7/15/24
3. **Zoning Board of Appeals:** 7/25/24

In response to a question from Planning Board member Lascala, the applicant stated at the 7/15/24 Planning Board meeting that the number of trucks that will access the proposed development will be influenced by the maximum permitted daily capacity, and that the applicant seeks permits for 600 tons/day of "construction debris" and 200 tons/day of

“recycling” (i.e. construction debris 3x the amount of recycling). In the attachment to the 2/28/24 EAF titled “Operation Plan – Recycling Center”, the facility is described on pages 1-2 as having a “Construction Debris side” that is a separate physical area from the facility’s “Recycling Side”.

In the minutes from the three Town Board meetings that I reviewed from the 2011/2012 discussion of the then-proposed zoning amendment, there is no record of the Town Board contemplating that the permitted Recycling Center use would encompass a facility with separate “Recycling” and “Construction Debris” components.

Various aspects of truck-traffic could be expected to vary between trucks transporting recycling vs. construction-debris. These may include, non-exhaustively, the number of trucks, the arrival/departure patterns (including predictability of arrivals), vehicle dimensions/weights, drivers’ knowledge of navigating the site, and idling/queuing/processing activity. In combination with the present application seeking construction-debris capacity of three times as much as recycling capacity, it appears that the proposed use is likely to have more intense truck-traffic generating properties than a Recycling Center as understood by the Town Board when it added this permitted use to the zoning text in 2012.

Additionally, having undertaken an initial review of the EAF and attached materials, I offer the following observations:

1. The Traffic Study assumes that a traffic signal (traffic light) will be in place at Route 6/Navajo St, and did not analyze traffic operations in the absence of one. However, there is presently no traffic signal at Rt 6/Navajo St, and it appears that there is presently no stipulation that one will be in place before the proposed Recycling Center begins operation, if it is approved as-is.
2. Clarifications and further detail are required on the application’s trip generation. Truck and automobile trip-generation should be more clearly tracked separately, and the heavy-vehicle-percentages in the Synchro analysis for the “Build” condition should be adjusted to reflect the new car/truck volumes.
3. Should a new traffic signal be warranted at the Rt 6/Navajo St intersection, it would likely require operation in coordination with the existing traffic signal at Rt 6/Curry St ~500-600’ to the west. In my opinion, the traffic study should analyze coordinated operation of these two signals, rather than analyze operation of the Rt 6/Navajo St intersection in isolation.
4. The Town may wish to request that the applicant use a continuously recording traffic camera to video-record truck arrivals/departures at the existing truck storage facility on which the applicant’s traffic engineer relies to develop the truck-traffic generating potential for the proposed site¹. This is a low-cost measure that ensures that the site-specific traffic data is auditable.
5. The comparable facilities cited in the Appendix of the Traffic Study have characteristics that are not directly comparable to the proposed site. For instance, the sites in Roxbury, NY and Rensselaer, NY are not described as taking in construction debris.
6. I note that unlike automobile traffic, any truck traffic generated by the proposed use would not be permitted on the Taconic Parkway, thus more travel on the surface-street network would be expected.
7. Further analysis is required of the truck-turning movements between Route 6 eastbound/westbound, Navajo Street, and the site driveway. It appears that trucks entering the site would cross the path of outgoing trucks; this conflict point requires further analysis.

I trust this information will be useful to the Town. Should you have any questions or require clarification, please contact me anytime. Thank you.



Scott E. Le Vine, AICP

¹ Page 18 of traffic study, underlining added: “Data provided by the Applicant indicates that between 134 vehicles and 141 vehicles enter or exit the existing storage facility on a weekday (71 vehicles on Saturday and 9 vehicles on Sunday)”