

ENVISION MOUNT VERNON

FALL 2025

10 YEARS FORWARD

For The Jewel of Westchester



ADDITIONAL WRITTEN COMMENTS RECEIVED AFTER PUBLIC HEARING NIGHT 3
HELD ON MONDAY, NOVEMBER 10, 2025 AT 6:00 PM

Click [HERE](#) for the Revised Plan



FERRANDINO & ASSOCIATES INC.
PLANNING AND DEVELOPMENT CONSULTANTS

MEMORANDUM

To: President and Members of the City Council:

From: Vince Ferrandino, AICP

Date: November 10, 2025

Re: Comments Delivered at November 10, 2025 Public Hearing on Amended Draft Comprehensive Plan

President and Members of the City Council:

My name is Vince Ferrandino. I am a professional city planner, a former Mount Vernon planning commissioner, and a City resident.

Given the four (4) minute mandate, my comments tonight will be brief, limiting them to two (2) questions which I would like answered before I sit down:

1) When was this public hearing re-opened by official resolution of this City Council and due notice provided -- can anyone answer that?

2) Where is the required amended Long Form EAF Parts 1&2 that was to be posted on line in advance of this hearing so that people could review and comment upon it -- can anyone answer that?

In order for this to be a legally constituted hearing, and for the public to opine on the amended Draft Comprehensive Plan, the hearing must be legally scheduled, with proper notice, and the Long Form EAF made available in sufficient time for people to comment.

Absent that, this **hearing should be adjourned until such time as both items are in compliance, and a legally constituted public hearing scheduled and posted at that time.**

I will reserve submission of comments on the *Draft Plan* until such time as that occurs.

Thank you.

To: Mount Vernon City Council
From: Michael Justino-ZBA Chair; FNA President; Advisory Committee Member
Date: November 10, 2025
Subject: Comments and Concerns Regarding the *Revised* Comprehensive Plan

Dear Members of the City Council,

This statement is submitted to express significant concerns regarding the revised Comprehensive Plan and its associated procedures. Several substantive and procedural issues still require attention and correction prior to consideration of Plan adoption.

1. SEQRA Classification and GEIS Requirement

As this action constitutes a **Type I action under SEQRA**, a **Generic Environmental Impact Statement (GEIS)** is absolutely required **prior to adoption**. Proceeding without a completed GEIS would be procedurally improper and will expose the City to legal challenges. The GEIS must address cumulative impacts, mitigation strategies, and alternatives in sufficient detail to inform decision-making. **Raised previously and NOT addressed.**

2. Deficiencies in the Long-Form Environmental Assessment Form (EAF)

The current **Long-Form EAF** is **deficient**, with numerous sections left **blank and unsigned**. Any Comprehensive Plan will create significant impacts to the environment. The Part 2 Form submitted has **every category check as NO impact**. This is impossible and undermines the transparency and completeness of the environmental review process and must be rectified prior to any further consideration of plan adoption. **Raised previously and NOT addressed.**

3. Zoning Completion Prior to Adoption

Zoning revisions must be **completed and synchronized** with the comprehensive plan before final adoption. Without finalized zoning, the plan's implementation framework remains uncertain, potentially creating confusion and inconsistency between policy and regulatory intent. **Raised previously and NOT addressed.**

4. Single-Family Zoning Concerns

This issue was one of the few concerns addressed in the revision; however, significant problems remain:

- A **Floor Area Ratio (FAR)** of **0.5–1.0** in low-density single-family zones would dramatically alter neighborhood character, substantially increase density, and likely cause a severe decline in property values.

- The document contains **pervasive language promoting increased density** across all zoning categories, which is inconsistent with the preservation of established single-family neighborhoods.

5. High-Rise Density Between Gramatan Avenue and Westchester Avenue

The proposed high-rise density designations within the corridor between **Gramatan Avenue east to Westchester Avenue** appear excessive and inconsistent with surrounding neighborhood context. **Raised previously and NOT addressed.**

6. Lack of a Retail Plan for the Fleetwood Business District

The **Fleetwood Business District** lacks a coherent retail and economic development plan in the draft. The Fleetwood Business district is currently suffering from vacant store fronts and lack of pedestrian traffic after 6:00 PM. Retail corridors of Mount Vernon Avenue, Sanford Boulevard, South Gramatan Avenue, 4th Avenue and 3rd Street have also been neglected. **Raised previously and NOT addressed.**

7. Insufficient Use of the Advisory Committee

There still has been no outreach to meet with the Advisory Committee to discuss the Phase 2 Plan. **Raised previously and NOT addressed.**

8. Public Hearing and Review Process

It is imperative that the **public hearing remain open** until all new and previous public comments have been thoroughly reviewed by both the **Planning Department** and the **consulting team**. The Planning Department and City Council must respond to all concerns voiced by the public on 10/14, 10/28 and today, 11/10.

Conclusion

Given the concerns outlined above, we strongly recommend that the City Council refrain from adopting the Comprehensive Plan until:

1. The **Long Form EAF, Parts 1 & 2** are fully and accurately completed;
2. The **GEIS** is completed and accepted;
3. Zoning updates are finalized;
4. The public and Advisory Committee have an opportunity to review and respond to all additional revisions.

Respectfully submitted,

Michael Justino
Chairman-Zoning Board of Appeals
President-Fleetwood Neighborhood Association
Member-Comprehensive Plan Advisory Committee

I LIVE AT 331 CLAREMONT AVENUE. (WS)
I am William Sheehan. I am a 45-year resident of Mount Vernon, and am a Registered Architect in the State of New York.

Members of the Council, and members of this Audience:

Regarding housing, the Comprehensive Plan is deeply flawed. Not merely in its details, but in its whole approach.

A big thrust of the Plan is to build additional residential units. Mt Vernon is one of the most densely populated cities in the United States. Mt Vernon has certainly achieved racial diversity. Mt Vernon does not need more residents, particularly since residential properties generally cost cities more in services than they generate in increased tax revenues.

The City already has problems paying its bills. It does not need more expenses.

There are deep concerns regarding the Comprehensive Plan's proposed zoning changes, particularly relating to single-family homes, density, and infrastructure. The single-family zoning districts are the jewels of Mt Vernon and need to be preserved. Likewise, 2-family districts should not be subjected to increased population density.

The Comprehensive Plan proposes, "Eliminate components of the City's zoning that may be considered exclusionary."

The term "exclusionary" is in the eye of the beholder, and any zoning code is essentially a list of thousands of implied exclusions. A big item that some people might choose to consider "exclusionary" is single-family zoning.

(WS)
The Plan's mandate to eliminate so-called "exclusionary" zoning components is too broad-brush, too open to ~~mis~~ misinterpretation, and needs to be removed. The Comprehensive Plan itself says that, "Mount Vernon's zoning is not inherently exclusionary."

Floor Area Ratio and Building Height must not be increased. For example, the suggested Floor Area Ratios of up to 1.0 or 1.5 in Low Density Residential zones undermines the suburban character of our neighborhoods. The Plan offers no direction on setbacks, risking changing our community into a dense urban landscape with homes built virtually wall-to-wall, with microscopic or no backyards.

The Plan's emphasis on increasing residential density ignores the pressing infrastructure and business development challenges we face. Our roads, water systems, and emergency services are already strained.

Critical issues raised at the last public meeting evidently remain unaddressed, among them are:

- A clear capital infrastructure plan.
- An analysis comparing Payment In Lieu Of Taxes vs. full-tax development scenarios.
- A parking standards table by zone, supported by data.
- A completed Generic Environmental Impact Statement (GEIS) and clarification of SEQRA procedures for all proposed zoning amendments.

I urge the Council to delay any decisions until these issues are fully addressed and the public has had sufficient time to review all materials. Our community deserves thoughtful planning, responsible governance, and genuine public engagement.

Comments to City Council Nov. 10, 2025

I am here to oppose adoption of the Comprehensive Plan for Mount Vernon, even with the so-called revisions.

I wonder out loud if it makes sense to come here tonight to voice my opinions and suggestions, since, despite strong opposition by many to the original plan, the Mayor and the Planning Department have ignored about 95% of what concerned citizens have called out. We object to this plan not for political reasons, but because we care about this city we call home.

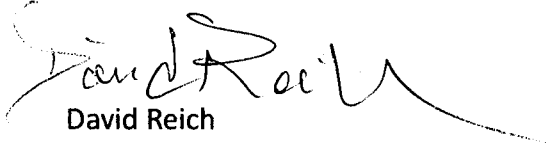
Specifically, I'll start close to home, which for me is Fleetwood. I and many of my neighbors feel strongly that it is a bad mistake to change zoning on the blocks between Gramatan and Westchester Avenues, from Cedar Street to the Cross County Parkway in order to allow multi-use high-rise development. Those blocks now have single-family homes adjacent to older 4 and 5 story apartment buildings set way back from the street. High-rises would destroy the historic character of the neighborhood, adding to congestion, making parking even more difficult and discouraging people from coming to the area to shop and dine. Do not change the zoning in that area.

I am also concerned about density of residential developments that will be allowed in other parts of town. 16 to 21-story residential buildings have no place in Mount Vernon since they will overwhelm the city's infrastructure. And any multi-unit residential development must have provision for adequate on-site parking...certainly more than the totally unrealistic .6 spaces per unit. And none – none – should be financed by PILOT giveaways to any developers. Use PILOT money to attract business into our city, to provide jobs and tax revenues.

Although the plan generally calls for strengthening our tax base with job-creating commercial development, there are no realistic specifics in terms of how this will be accomplished. In this tough economy, especially for retail, it means nothing to simply say we want to attract more quality retail or fine dining or movie theaters into town. Those are empty and possibly unrealistic words. Let's get real. The plan needs to spell out *how* this will be done.

I also have concerns with a major flaw in the Plan, which is the LACK of any environmental documentation or technical studies to support what is being proposed. I don't understand why this process is being rushed, without a General Environmental Impact Statement, or GEIS. The rush makes me and many others wonder -- is it to satisfy developers who've invested tens of thousands of dollars in funding campaigns to get people on this City Council elected?

Let's slow the process down and take all the proper steps so the final plan that gets approved is truly a step forward for the future and not more of the same unchecked and haphazard development...and truly reflective of what the people Of Mount Vernon want. The proposed plan, as it now stands, is not that. I ask the Council to vote NO on this proposal as it now stands and keep the public hearing open for additional comments that will be properly heard and addressed, rather than the window-dressing we've been going through these past several weeks.

A handwritten signature in black ink, appearing to read "David Reich", with a long, sweeping horizontal line extending to the right.

David Reich

112 Ridgeway St.

Mount Vernon NY 10552

Community Concerns & Planning Requirements for the Comprehensive Plan

Mount Vernon's draft comprehensive plan continues to lack clarity on fiscal sustainability, infrastructure readiness, parking policy, business retention, and required environmental reviews.

While the updated comprehensive draft plan has attempted to placate some residents by redefining some of the zoning in single family zones, (and even that is ambiguous) the comprehensive plan still has not addressed numerous questions that I and others posed at the last hearing.

Key Gaps in the Comprehensive Plan

1. Fiscal Stress and PILOTs

- Mount Vernon continues to rely on High Taxes and **Tax Anticipation Notes (TANs)** to meet basic obligations, underscoring fiscal instability.
- The plan promotes **high-density development**, often tied to **PILOT agreements**, which reduce long-term tax revenue. There are several residential projects in the pipeline that will require combined rezoning and potential PILOTs.
- There is **no published fiscal impact analysis** addressing the proposed rezoning. Nor any comparing PILOT vs. full-tax scenarios.

2. Infrastructure: Sewage and Flooding

- The plan acknowledges infrastructure challenges but **does not include a capital improvement schedule or funding strategy** for long-term upgrades.
- Without a clear infrastructure roadmap, new high density development risks compounding existing problems.

3. Parking Policy

- The plan's language—"updating parking requirements based upon geography while maintaining existing parking"—is ambiguous.
- **Other than the .6 parking spaces per unit in the downtown, no detailed parking standards by zone or justification metrics** (e.g., transit proximity, demand studies) have been put forth in the plan.

4. Business Attraction and Retention

- Despite widespread storefront vacancies (e.g., Mount Vernon Avenue, East Third Street, and Fourth Avenue to Gramatan), the plan **lacks a defined strategy** for business recruitment, retention, or corridor revitalization.

Environmental Review Requirements

GEIS

- According to the official NYS website, a **Generic Environmental Impact Statement (GEIS)** is appropriate when a plan defines a broad program of future actions. Accordingly, the comprehensive plan is a type one action.
- Mount Vernon has **not yet published a GEIS**, despite proposing wide-ranging zoning and land use changes. Additionally, there are no technical studies or environmental analysis in the body of the plan. According to NYS, the Comprehensive Plan cannot be adopted without a GEIS statement if zoning and land use changes are part of the plan.

What Must Be Done

- A **fiscal impact analysis** for the proposed rezonings comparing PILOT vs. full-tax development: given the likelihood of these scenarios.
- A **capital infrastructure plan** with funding sources and timelines.
- A **parking standards table** by zone with supporting data.
- A **completed GEIS** and clarification of SEQRA procedures for all zoning amendments.

“This plan cannot move forward without fiscal transparency, infrastructure investment, and environmental compliance. The Mount Vernon community demands that the plan include fiscal, parking, and infrastructure analyses, and complete the GEIS and SEQRA reviews before adoption. Proceeding without these steps risks legal noncompliance and undermines public trust.”

Submitted by: Eileen Justino, in person at the City Council Hearing on 11/10/2025

Re: Updated Comments on the Revised Draft Comprehensive Plan Transmitted to the Mount Vernon City Council by the Planning Department on October 30, 2025/NB

From ferrandino@aol.com <ferrandino@aol.com>

Date Wed 11/12/2025 8:24 PM

To Bonilla, Nicole <nbonilla@mountvernonny.gov>; ferrandino <ferrandino@aol.com>

Cc MayorSPH <mayorsph@mountvernonny.gov>; Morton, Darren <dmorton@mountvernonny.gov>; Browne, Danielle <dbrowne@mountvernonny.gov>; Gleason, Cathlin <cgleason@mountvernonny.gov>; Poteat, Edward <epoteat@mountvernonny.gov>; Boxhill, Jaevon S <jsboxhill@mountvernonny.gov>; Thompson, Derrick <dthompson@mountvernonny.gov>; Anderson, Antoinette <aanderson@mountvernonny.gov>; Johnson, Brian <bjohnson@mountvernonny.gov>; Riullano, Jordan <jriullano@mountvernonny.gov>; Rausse, James <jrausse@mountvernonny.gov>; Molina, Marlon <mmolina@mountvernonny.gov>; Tarlow, Pamela <ptarlow@mountvernonny.gov>; Herbert, Lukas <lherbert@mountvernonny.gov>; Michael Justino <mjustinocmv@gmail.com>; Constance Post Reilly <cgpost914@gmail.com>; Cassandra Hyacinthe <cassandrahyacinthe24@gmail.com>; Tanesia Walters <tanesia.walters@gmail.com>; Blanca Lopez <blopez@westchestercountyny.gov>

 5 attachments (14 MB)

Amended 11.11.25 Comments.pdf; Comp Plan Review_10.12.25.pdf; Comp Plan Comments _11.15.23.pdf; Comp Plan Addendum_12.6.23.pdf; BULLETS_10.12.25 - VJF.pdf;

Greetings Nicole,

Transmitted herewith are my updated comments on the ***Revised Draft Comprehensive Plan*** transmitted to the City Council on **October 30, 2025** by the Planning Department and the subject of a questionable, and likely, illegally constituted and scheduled public hearing on November 10, 2025. Please note that these comments supplement the questions/comments I delivered in person and writing at the November 10, 2025 public hearing which the City Council members, true to form, did not address.

The attached comments are an *annotated update* to the 175+ comments/questions on 31 single spaced pages that I submitted for the October 14, 2025 public hearing and they address the changes made to the Draft Plan document following that hearing. Fully, **95%** of those comments were not addressed in the so called amended *Draft Plan*, and I ask that they now be addressed in any updated *raft Plan* that is put on the table and considered for adoption. Please further note that all comments and questions I have raised have been done so as BOTH a Mount Vernon resident and expert planning witness. A copy of these comments has been submitted to the Westchester County Department of Planning as well.

Finally, I ask that until such time as all the requisite environmental documentation, including an amended and completed Long Form EAF, Parts 1, 2 & 3, is submitted, that no SEQR determination of significance be made, by the Lead Agency, as the environmental record is incomplete. Further, the public should have an opportunity to review and comment upon those documents in a re-opened public hearing. As a **Type One Action under SEQR**, nothing less will suffice..

Please confirm receipt of this communication and place it -- both this transmittal and the five (5) attachments contained herein -- in the public record.

Thank you.

Vince Ferrandino, AICP
Ferrandino & Associates Inc. Planning and Development Consultants
45 Parkway West
Fleetwood, New York
www.faplanners.com

|



FERRANDINO & ASSOCIATES INC.
PLANNING AND DEVELOPMENT CONSULTANTS

MEMORANDUM

To: City Clerk Tanesia Walters and Members of the City Council

From: Vince Ferrandino, AICP, Principal 

Date: November 15, 2023

Re: MOUNT VERNON COMPREHENSIVE PLAN -- COMMENTS ON THE DRAFT PHASE I VISION REPORT/DOWNTOWN PLAN

I am unable to attend tonight's public hearing. Please accept the below referenced comments for placement into the public record.

My name is Vince Ferrandino. I am a professional planner with an active consulting practice in the tri-state area, a former Commissioner of Planning & Development for the City of Mount Vernon, and current Mount Vernon resident. I have reviewed the draft Phase I Downtown Plan/Vision Report and offer the following preliminary comments. Following the two scheduled public hearings, I may opt to add to these comments.

Kudos to the City for pursuing the adoption of a Comprehensive Plan, the first in over 50 years. However, after more than a year of consultant research and public input, I must say the draft Phase 1 report is more "off the shelf" than "on the shelf", that is, the consultants, who are not very familiar with Mount Vernon, chose to select "models"/"templates" from other communities, often without context, nor relevant comparison. The "Downtown Vision Report is noteworthy more for what is NOT included, than what IS included.

Let me offer a few examples:

1) URBAN DESIGN -- the key urban design idea -- a proposed pedestrian walkway connecting Gramatan with South Fourth Avenue -- although purported to be "innovative", in actuality does not work, as I believe it would wreak havoc on vehicular traffic (cars & trucks) seeking to access establishments in the downtown. Absent a detailed traffic study exploring vehicular re-routing that should be performed as part of a full blown Generic Environmental Impact Statement, it is just a conceptual idea. There actually was a similar proposal back in the late 70s which sought to "cover the railroad cut" that included this "new idea", but it never advanced due to obvious logistical and cost concerns. Those concerns are more pronounced today.

2) ZONING -- this is the crux of the downtown plan and is its most flawed element. Despite overwhelming public sentiment to limit height & density, the proposal to allow "13+ story buildings" along both sides of the Mount Vernon East tracks is exceedingly vague, and a paean to the ill-conceived development proposals now on the table -- Library Square and the Mount Vernon TOAD overlay zone. Does "13+ stories" mean that there will be no limit to the buildings' height and bulk in this area? And although the recommendation to limit height along the existing Gramatan-South Fourth Avenue spine to the existing 4 stories is commendable, the landscape is already marred by

two out of character 12 story high rises just south of Hartley Park -- that is, the damage is already done.

What is proposed along East Third Street, between South Fulton and South Columbus Avenues, recently zoned MX-1 allowing, with density bonuses, up to 12 story mixed use residential buildings, is unclear. Will this mixed-use commercial corridor again be rezoned to allow something taller as of right, with less stringent parking requirements?

I was pleased to see that there are no recommendations for the so called "Form Based Zoning" that characterizes both East Third Street and the Mount Vernon West area, but surprised that there are no density bonus provisions for the new high rise zoning downtown which would "incentivize" developers to provide "community benefits" in return for increased height and density. As proposed, the higher density would be allowed "as of right", with no community benefits -- again, a paean to the developers.

3) PARKING -- equally disturbing are the proposed limitations on off street parking that would literally eliminate most of what is currently required in favor of far less than one space per dwelling unit-- under the mistaken assumption that since new development will be near mass transit, there will be no need for on-site parking. It is naive to assume that Mount Vernon is New York City, as these reduced parking standards will lead to increased traffic congestion and on street parking shortages throughout the downtown. Again, absent a comprehensive traffic and parking study, this is untested and a boon to developers.

4) AFFORDABLE/WORK FORCE HOUSING -- the recommendation for inclusionary housing makes sense, but I would mandate affordable fixed at 20 percent of the total number of units in any development, at incomes that are at or below 50% of the area median income (AMI) for Mount Vernon. While the goal should be attracting more market rate development, it should not do so at the expense of residents. Any percentage above or below the 20% affordable mandate will skew that objective, as has been the case along Mount Vernon West/MacQuesten Parkway, where almost all the new development has been affordable/work force housing -- not market rate.

5) ECONOMIC DEVELOPMENT -- Most of these recommendations are things the City should have been doing all along and are examples of "off the shelf" thinking from other communities. For example, a Business Improvement District (BID), currently recommended by the consultants for the downtown, was explored by the City in the late 80s when I was planning commissioner, but ruled out because there are insufficient tax ratable entities in the downtown to support a reasonable BID budget, including many tax exempt and vacant properties, but this is not mentioned in the Vision Report. There is still no strategic plan for attracting the types of retail and other uses suggested by the consultants and it appears these recommendations were made with little or no coordination with City economic development and IDA staff.

6) MISSING ELEMENTS/DATA -- Here are some examples:

a) Accident data and crime statistics in the downtown, as crime is a deterrent, real or imagined, to attract shoppers.

b) A strategy to address crime in concert with the Mount Vernon Police Department.

c) Inventory of infrastructure needs -- water, sewer, sidewalks, curbs, signage, street trees, etc. -- and the resources needed to address them to support a functioning downtown as part of a city-wide economic development plan.

d) A market niche analysis and targeted retail recruitment plan to attract tenants to vacant space downtown.

e) Strategic use of ARPA and other federal & state funds/grants in a coordinated effort to finance economic development and public improvements.

f) Detailed time table for accomplishing all the above, with tasks assigned to each participant.

7) SEGMENTATION -- Phase 1 is now being called a "Downtown Vision Report" because it cannot be adopted as a stand-alone "Comprehensive Plan" unless it is part of the entire Plan (Phases 1 and 2) and undergoes a detailed (NYSEQR) environmental review. That is the legal requirement to avoid "segmentation" under NYSEQR. Adoption of the entire plan, plus any new zoning, including public input, required hearings, etc. will, in my opinion, take at least another year.

I could go on, but addressing these elements, I believe, is essential if this Plan is to be meaningful/functional in improving our city.

Please confirm receipt.

Thank you!

A handwritten signature in blue ink, reading "Vince Ferrandino". The signature is fluid and cursive, with the first name "Vince" and last name "Ferrandino" clearly distinguishable.

Vince Ferrandino, AICP
45 Parkway West
Mount Vernon, New York 10552



FERRANDINO & ASSOCIATES INC.
PLANNING AND DEVELOPMENT CONSULTANTS

MEMORANDUM

To: City Clerk Tanesia Walters and Members of the City Council

From: Vince Ferrandino, AICP,
Principal

Date: December 6, 2023

Re: MOUNT VERNON COMPREHENSIVE PLAN -- COMMENTS ON THE DRAFT
PHASE I VISION REPORT/DOWNTOWN PLAN -- ADDENDUM TO
NOVEMBER 15, 2023 COMMENTS

Please add the following comments to those I submitted on November 15, 2023 and read into the record.

2) ZONING -- Downtown Density:

Density bonuses, as included in the nearby MX-1 zoning district, should be employed to extract community benefits from proposed developments. I think the building height cap, with all density bonuses, should be 12 stories as it is in the MX-1 zone along East Third Street, starting with a "high density" base of 8 stories. A creative developer can purchase more land and build out instead of up, to achieve a reasonable number of units to make a profit, without building skyscrapers which will create "canyons" along narrow streets.

4) AFFORDABLE/WORK FORCE HOUSING -- Inclusionary Zoning:

I recommended 20% affordable because that is what New York State will accept to finance projects with Low Income Housing Tax Credits. So called "80-20" projects are commonplace. There is also the issue of gentrification and displacement that comes into play without a reasonable amount of affordable/work force units in the mix. For developers who want to build 100 percent market rate housing, there is the option of their contributing to an affordable housing trust fund, administered by the City, devoted to the construction of affordable housing off site, including rehabilitation of existing housing. The Cities of White Plains and New Rochelle have this provision in their code, and I would recommend that it be part of this Plan.

6) MISSING ELEMENTS/DATA -- Infrastructure:

It is unclear whether there is sufficient downtown infrastructure to support the densities proposed. The Vision Report lacks documentation that addresses this and how prospective developers may contribute to help finance that infrastructure. A chapter on this component should be included in the Plan.

Please confirm receipt.

Thank you!

A handwritten signature in blue ink that reads "Vince Ferrandino". The signature is fluid and cursive, with the first name "Vince" being more prominent than the last name "Ferrandino".

Vince Ferrandino, AICP
45 Parkway West
Mount Vernon, New York 10552
www.faplanners.com



SUMMARY OF EXPERT TESTIMONY DATED OCTOBER 12, 2025 **Submitted by Vince Ferrandino, AICP**

Comprehensive Plan Adoption Process Concerns

The Draft Comprehensive Plan for Mount Vernon has faced criticism for its rushed adoption process and inadequate public review.

- The City Council scheduled public hearings on the Draft Plan with minimal time for review, raising concerns about transparency.
- The Draft Plan is lengthy (475 pages) and includes 36 goals and 419 objectives, but lacks sufficient public access to documents prior to hearings.
- The environmental review process is being expedited, potentially bypassing a full Generic Environmental Impact Statement (GEIS) as required by NYS SEQRLaw.
- The plan proposes significant zoning changes that could increase the population by 10-15%, impacting infrastructure.

Major Concerns Regarding the Draft Plan

The Draft Plan has several critical omissions and inadequacies that need addressing before adoption.

- The public has not been given adequate time to review the Draft Plan and associated documents, violating Open Meetings Law.
- The environmental review process is inadequately completed, with many "no impact" responses that contradict the proposed zoning changes.
- There is a lack of detailed studies supporting the numerous goals and objectives outlined in the Draft Plan.
- Recommendations for zoning changes, such as converting single-family homes to duplexes, lack proper impact studies.

SEQRLaw Process and Long Form EAF Issues

The Long Form Environmental Assessment Forms (EAF) submitted for the Draft Plan are incomplete and inadequate for a Type 1 Action.

- The Long Form EAF is undated and unsigned, indicating deficiencies in the submission.
- Only 3 of the 13 pages of the Long Form EAF were filled out, leaving critical information missing.
- The EAF incorrectly states that no zone changes are requested, despite the Draft Plan including significant zoning changes.
- The environmental review process should be suspended until the EAF is properly completed and a full GEIS is prepared.

Detailed Comments on the Draft Comprehensive Plan

The Draft Comprehensive Plan contains numerous inaccuracies and areas for improvement across various chapters.

- The introduction fails to mention the importance of environmental review in the planning process.
- Population analysis does not adequately address the decline in younger demographics, which is critical for future planning.
- The education section should include data on closed private and parochial schools to illustrate declining enrollments.
- Infrastructure assessments, particularly regarding wastewater and sewer systems, need to be more detailed to understand their impact on proposed developments.

Neighborhood-Specific Recommendations and Concerns

The Draft Plan's recommendations for specific neighborhoods often overlook local context and existing conditions.

- Many neighborhoods are recommended for zoning changes that do not align with their current character or infrastructure capabilities.
- The plan should include detailed neighborhood improvement plans to address specific local needs and conditions.
- Recommendations for high-density developments in areas with existing low-density character could strain infrastructure and community resources.
- The plan lacks a clear definition of "Mixed Use Corridor" zoning, leading to confusion about its implications for various neighborhoods.

Mount Vernon's Historic Legacy and Preservation

The chapter discusses the importance of Mount Vernon's history and preservation while addressing inconsistencies in zoning recommendations.

- Some neighborhoods lack the recommendation to "preserve existing zoning controls," including Hunt's Woods and Chester Hill Park.
- Concerns are raised about accommodating a "broader range of housing types" in Chester Hill, which may not align with neighborhood character.
- Recommendations for Downtown should include rehabilitating derelict buildings and improving storefronts and streetscapes.
- The form-based code approach in Mount Vernon West is criticized for allowing high-density buildings that overwhelm the neighborhood.
- Historic preservation initiatives are supported but should be summarized in the Appendices for clarity.

Neighborhood Diversity and Inclusion

This section emphasizes the need for equitable zoning and community benefits while questioning specific recommendations.

- The recommendation to eliminate exclusionary zoning components is supported, but the rationale for revising bulk and parking regulations is unclear.
- The plan should include environmental impact considerations for changes in parking standards and housing types.

- Community Benefits Agreements (CBA) should address the needs of underserved communities, and the definition of CBA should be included.
- The planning department's GIS capabilities should be utilized to map emergency services and healthcare as a priority.

Enhancing Public Realm and Streetscapes

The chapter focuses on improving neighborhood corridors and regulations for storefronts and signage.

- Additional corridors like South Fourth Avenue and Mount Vernon Avenue should be included for enhancement.
- A brief explanation of the "New City Parks" program and "Complete Streets Initiative" should be provided.
- Existing sign code requirements need consistent enforcement, and a program to incentivize good design should be revived.
- Targeted small area plans should be developed for all commercial districts, especially Fleetwood and Mount Vernon Avenue.

Housing Access for All

This section discusses housing policies and the need for balanced development.

- The statement about housing as a foundation for thriving communities should include commercial development.
- Mixed-use development should be encouraged in select neighborhoods rather than all neighborhoods.
- Environmental analysis is necessary for considering duplexes and triplexes in single-family zones.
- A mandatory inclusionary housing policy should be summarized in the Appendices, as it is speculative.
- Reviving low-interest rehabilitation loans for code compliance is recommended, referencing past successful programs.

Connecting Green Spaces to Natural Environment

This chapter is praised for its strong recommendations regarding green spaces and biophilic planning.

- The recommendations for connecting green spaces are seen as beneficial and warrant implementation.
- Strengthening the responsibilities of the Tree Advisory Board is also highlighted as important.

Healthy, Safe, and Active Communities

The focus is on ensuring proper density distribution and infrastructure considerations.

- A build-out analysis should be included in a Generic Environmental Impact Statement (GEIS) to assess neighborhood density.
- The need for balancing bike lanes with on-street parking availability is emphasized.
- Residential street signage should be improved for clarity and uniformity.

Reliable and Modern Infrastructure

This chapter emphasizes the importance of infrastructure in relation to future development.

- Recommendations are sound but should highlight the need to balance development with infrastructure upgrades.
- Environmental documentation should accompany infrastructure improvements to ensure sustainability.

Effective Government Service

The need for professional oversight in government efficiency is stressed.

- A professional should oversee the multi-varied tasks proposed to improve government efficiency.
- The recent rejection of a professional management opportunity by the Charter Commission is noted as a concern.

Implementation of the Comprehensive Plan

The implementation section suggests improvements for clarity and next steps.

- The matrices summarizing goals and objectives should be enlarged for readability.
- Immediate next steps should include environmental documentation preparation and zoning adoption.
- A definition of "Mixed Use Corridor" zoning is necessary to address gaps in the Draft Plan.

Comments on Phase 1 Downtown Vision Report

The report is criticized for redundancy and lack of organization, with specific recommendations for improvement.

- The large advisory committee size is deemed unwieldy, and smaller groups are recommended for better participation.
- Public engagement activities should include attendance numbers and survey results for transparency.
- The density distribution recommendations are criticized for being too high and out of scale with existing neighborhoods.
- A GIS-mapped inventory of vacant lots and storefronts is recommended for better planning.
- The report's emphasis on zoning consistency is undermined by recent special district rezonings that contradict its recommendations.



FERRANDINO & ASSOCIATES INC.
PLANNING AND DEVELOPMENT CONSULTANTS

MEMORANDUM

To: President and Members of the City Council

From: Vince Ferrandino, AICP

Re: Comments on Mount Vernon Draft Comprehensive Plan –
Envision Mount Vernon-- Unveiled on September 24, 2025

Date: October 12, 2025

Please accept the below referenced testimony/comments for placement into the public record.

My name is Vince Ferrandino. I am a professional planner with an active consulting practice in the tri-state area, a former Commissioner of Planning & Development for the City of Mount Vernon, and current Mount Vernon resident. I have reviewed the *Draft Plan* including the *Phase 1 Downtown Vision Report*, as well as the Long Form EAF, Parts 1 & 2, and the resolution by the City Council declaring it self Lead Agency under SEQR and setting the public hearings for October 8 and 14, 2025. I offer the following preliminary comments. Following the completion of the second public hearing, I may opt to add to these comments.

Introduction

Kudos to the City for pursuing the adoption of a Comprehensive Plan, the first in over 55 years. However, after more than three (3) years of consultant research and public input, I must say the *Draft Plan*, like the *Phase 1 Downtown Vision Report*, is more “off the shelf” than “on the shelf,” that is, the consultant team chose to select “models/templates” from other communities, often without context, nor relevant comparison to our City. The *Draft Plan*, although quite lengthy, is noteworthy more for what is NOT included, than what IS included.

Before delving into the SEQR process and the text of both the *Draft Plan* and the *Phase I Downtown Vision Plan Report* that is part and parcel of the *Draft Plan*, I want to comment on the rushed process to adopt this Plan before the end of the year.

After almost three (3) years of stops & starts in preparing this *Draft Plan* on September 24, 2025, the planning commissioner submitted a 475 page document, replete with 36

goals and 419 objectives, recommendations for several zone changes, and other land use procedures & capital improvements, to the City Council for action. On that date, with ZERO discussion, the Council scheduled two public hearings: the first two (2) weeks later on October 8, and the second six (6) days later on October 14. I highly doubt any of the Council people looked at the *Draft Plan* before accepting the document as "complete" and scheduling these hearings; and just as likely, members of the public will not have sufficient time to review, digest and comment upon it. While the planning staff heralds the public input process undertaken over several months in producing this *Draft Plan*, the extremely tight timeline, arbitrarily established by the City Council to adopt it, obviates that process.

Further, the environmental review process is also being rushed, with the goal of bypassing a full vetting of the impacts of this *Draft Plan* via a full *Generic Environmental Impact Statement (GEIS)*. Under NYS SEQR law, the adoption of a comprehensive plan is a Type 1 Action which is presumed to "have a significant adverse impact on the environment". Despite stating in the City Council resolution that the Action is a Type 1, the scant Long Form Parts 1 & 2 prepared by the planning department belies that with incredulous responses of "no impact" throughout, which I have addressed in detail below in my technical comments.

A comprehensive plan "sets the table for the future", usually over a ten year time frame. This one proposes radical zone changes in a number of City neighborhoods which could negatively affect community character and increase our population by 10 to 15%, adversely impacting our already aging & fragile infrastructure. We have not had a Plan update since 1968. This *Draft Plan*, whatever its pluses or minuses as drafted, deserves to be reviewed and vetted very carefully, in accordance with the law. Rushing to approve it before year's end will not accomplish that goal.

I ask you to rethink the process and the environmental consequences of your actions, as a lawsuit will be in the offing if you do not

Summary of Major Concerns

- For the adoption of a Comprehensive Plan, under the Open Meetings Law and NYS SEQR, all documents that are the subject of a public hearing(s) must be made available to the public well in advance of the public hearing(s). As of Sunday, October 5, 2025 no documents were put on the City Council web site noticing the October 8, 2025 hearing. This includes links to the 475 page *Draft Plan*, the letter from the planning commissioner asking for its adoption, all SEQR documentation, and the City Council Lead Agency Resolution. This, in concert with the City Council's efforts to "fast track" the adoption of this Plan, constitutes a major breach, and the public hearing(s) should be re-scheduled or kept open until such time as the documents can be made available in a timely manner, giving the public sufficient opportunity to review them and intelligently comment.

- Short circuiting the environmental review process by inadequately and incorrectly filling out the Long Form EAF, Parts 1 & 2 and arbitrarily concluding "no impacts", especially with regard to the major rezonings proposed in the *Phase I Downtown Vision Report* and elsewhere in the *Draft Plan*, is contrary to SEQRL law.
- The adoption of the Comprehensive Plan is a Type 1 Action under NYS environment law and, as such, merits the preparation of full *Generic Environmental Impact Statement (GEIS)*.
- There are no detailed studies supporting the 36 goals and 419 objectives in the *Draft Plan*. Alternatively, these studies for example, for traffic, parking, fiscal impacts, etc.-- could be included in a *Draft Generic Environmental Impact Statement* accompanying, and prepared prior to the adoption of the Comprehensive Plan.
- Arbitrarily recommending conversion of single family homes to duplexes & triplexes in single family districts, legalizing otherwise illegal conversions, and pursuing the construction of Accessory Dwelling Units (ADUs) are ill conceived without a study vetting its impacts on those neighborhoods.
- While several economic development initiatives are suggested in the *Draft Plan*, no overall administrative mechanism is described to carry this out, with measurable benchmarks, over a prescribed period of time. Further, there is no definitive business attraction & retention strategy linked with zoning and capital improvements to fortify existing industrial and commercial corridors, nor to expand them. This is a major omission.
- Recommending rezoning in four (4) neighborhoods to something called "Mixed Use Corridor" zoning without defining exactly what that is anywhere in the *Draft Plan* is a major omission. Further, the absence of any neighborhood improvement plans for areas like Fleetwood, Mount Vernon Avenue, South Fulton Avenue, East Third Street etc. is a major flaw in the *Draft Plan*.
- With over 1,000 units in the pipeline for development Downtown, and over 600 units recently approved there via major zone changes in the last year, the maximum height & density proposed in the *Draft Plan/Downtown Vision Report* at 18 stories plus up to 3 stories with a density bonus for a total of 21 stories—should be reduced to a maximum of 12 stories, with a cap of 2 additional stories with density bonus.
- There is already a shortage of on-street parking in the Downtown. Limiting off street parking to .6 spaces per unit, even for a so call Transit Oriented Development (TOD) building, is unrealistic. At least one (1) space per dwelling unit to accommodate tenants, retail shoppers and visitors/service providers makes more sense. Please amend accordingly.
- With respect to housing types, there must be a balance among market rate, moderate and lower income units, with an appropriate mix in each development. This balance applies not only to the Downtown but to Fleetwood & other business hamlets as well, and should be used as a guide in adopting any inclusionary housing regulations moving forward.

I COMMENTS ON SEQR PROCESS AND LONG FORM EAF PARTS 1 & 2

The Proposed Action -- the adoption of the Comprehensive Plan -- as stated in the City Council resolution initiating the SEQR review process, is a **Type 1 Action**. See Section 617.4. "Type 1 Actions" of the NYS SEQRA regulations and its Implementing regulations, 6 N.Y.C.R.R. Part 617. By definition, a **Type 1 Action** is presumed to have a "significant adverse impact on the environment".

Section 617.5b of this Part states: "The following actions are **Type 1** if they are to be directly undertaken, funded or approved by an agency: 1) the adoption of a **municipality's land use plan**, the adoption by any agency of a comprehensive resource management plan or the initial adoption of a municipality's comprehensive zoning regulations." The action that is the subject of these public hearings is the adoption of a "land use plan", also known as a "comprehensive plan" which, in Mount Vernon's case, contains several specific recommendations for changes to the City's zoning map and text, some of which have already taken place as a result of the City Council's adoption of the *Phase I Downtown Vision Report* in January 2024, which is part and parcel of the overall *Comprehensive Plan* under consideration.

The Long Form EAF Parts 1 and 2 are woefully inadequate for purposes of vetting a **Type 1 Action** under SEQR, and should be revised accordingly to trigger a Positive Declaration and the preparation of a full **Draft Generic Environmental Impact Statement (DGEIS)** under the law. Until such time as that occurs, this **environmental review process should be suspended**, as there is insufficient information in the Long Form EAF Parts 1 & 2 to make a reasoned judgment on impacts.

Below Are My Comments On The Long Form EAF, Parts 1 & 2

Part 1 – Project and Setting:

- 1) The 13 page Long Form is UNDATED AND UNSIGNED, AS SUCH, IT IS DEFICIENT.
- 2) Only 3 of the 13 pages was filled out. PLEASE EXPLAIN WHY AND FILL OUT THE REMAINDER.
- 3) Page 1 of 13 -- A. Name of Action or Project. This was left blank. IT NEEDS TO BE FILLED I SAYING "ADOPTION OF COMPREHENSIVE PLAN DATED SEPTEMBER 2025".
- 4) Page 2 of 13 -- C. 2.b. "Is the proposed action within any local or regional planning district". The response was "no" and should be "yes", as the *Canal Village Brownfield*

Opportunity Area (BOA) is within this transitional neighborhood and, as a result may be the basis for substantial land use & zoning changes. There may also be a BOA adjacent to the Mount Vernon East train station that was in the works by the City a few years back. PLEASE CLARIFY AND PROVIDE THE STATUS OF BOTH BOA AREAS, AS DEVELOPMENT IS CURRENTLY TAKING PLACE IN THE LATTER AREA.

5) Page 3 of 13 -- C-3 Zoning. "Is a zone change being requested as part of the Proposed Action?" The response was "no" and should be "yes", as the *Draft Comprehensive Plan* includes specific language in several chapters that describe major zoning map & text changes, including those in the *Phase I Downtown Vision Report*, adopted by the City Council in January 2024 (with no SEQR review), which calls for significant changes in height, density & parking on a number of downtown parcels, two of which have been approved, and one of which (Grace Baptist Church/Mounto application) was in the pipeline for processing at the October 8, 2025 City Council meeting requesting Lead Agency designation. The *Downtown Vision Report* is part and parcel of the 475 page *Draft Comprehensive Plan* under review. **Further, a specific zoning map and text change should accompany the Draft Plan and included as part of the Proposed Action to be vetted via a full GEIS.** PLEASE CHANGE TO "YES".

6) With this substantive change, the remainder of the 13 pages of this Part 1 form needs to be filled out, as a proposed zone change will require responses under SEQR. And the responses in the Part 2 form -- "Identification of Potential Project Impacts" -- will also change from "no Impact" in every category to "moderate to large impact" which will certainly trigger a Positive Declaration under SEQR and the preparation of a full *DGEIS* before any Comprehensive Plan and new zoning are adopted.

Part 2 – Identification of Potential Project Impacts:

All of the project impact categories are checked "no", while most should be checked "yes". Until the remainder of the Part 1 form is filled out, it is difficult to determine with any precision how many "yes's" will be triggered, and to what degree. But certainly those under 1. Impact on Land; 4. Impact on Groundwater; 5. Impact on Flooding; 6. Impact on Air; 9. Impact on Aesthetic Resources; 10. Impact on Historic and Archaeological Resources; 11. Impact on Open Space and Recreation; 12. Impact on Critical Environmental Areas; 13. Impact on Transportation; 14. Impact on Energy; 15. Impact on Noise, Odor and Light; 16. Impact on Human Health; 17. Consistency with Community Plans; and 18. Consistency with Community Character will be affected.

Until such time as both EAF Parts 1 & 2 Forms are filled out properly and completely, this environmental review process should be **SUSPENDED** and the public hearings kept indefinitely open until this information is made part of the record.

Further, the amended Parts 1 & 2 documents should be made part of any notice for
Ferrandino & Associates Inc.

continued public hearings, as the documentation for the October 8, 2025 public hearing on *Granicus Legistar* did not include a link to the *Draft Plan*, or the existing Parts 1 & 2 SEQR forms, nor does the link to the *Draft Comprehensive Plan* on the City's web site do so, giving the public only a partial view of what is being proposed for adoption. How can the public comment on SEQR and the *Draft Comprehensive Plan* if all the documents are not there to comment upon? This appears to be a material violation of the Open Meetings law and SEQR, and could be grounds for legal challenge.

II COMMENTS ON THE DRAFT COMPREHENSIVE PLAN

Below is a chapter by chapter, page by page review of the *Draft Plan*. Some of it is on target, but unfortunately at 475 pages, including the *Phase I Downtown Vision Report*, a lot of it "gets lost in the weeds", as it is too long, repetitive and redundant.

Credit Page: at bottom, supplement "made possible by..." with "in addition to \$_____ paid for with local taxpayer dollars," and insert the amount of local monies budgeted toward paying for this Plan from inception with the original consulting team. I have estimated this to total approximately \$600,000 including payments made to the original MUD Workshop consulting team which was terminated at the conclusion of the *Phase I Downtown Vision Report*.

Acknowledgements: Pam Tarlow is incorrectly listed as both First Deputy Commissioner and Assistant Commissioner: delete the latter.

Chapter 1: Introduction

General Comment: This chapter fails to mention the role of environmental review in vetting what has been proposed in the *Draft Plan*. As **Type 1 Action** under SEQR this typically takes the form of a full *Generic Environmental Impact Statement (GEIS)*. With 36 policy goals and 418 objectives, including proposed major rezonings and other proposed land use regulations, why has this been omitted?

Page 1-3 -- Core Concepts: I recommend inserting "Mount Vernon's Role in the Region" as the first Core Concept, with all others to follow, and inserting "Economic Development" and "Reinventing the Downtown" at the tail end, as these Concepts appear to be a more logical progression.

General Comment: While comparisons are made internally for Mount Vernon, this chapter would benefit from comparing and contrasting trends in Mount Vernon with a few surrounding communities, e.g. the Cities of Yonkers and New Rochelle, and perhaps the Town of Eastchester to the north where many Mount Vernon residents have moved over the years.

Pages 1 to 1-3 -- Population: While focusing on the senior population, the 2000-2023 population analysis fails to highlight the decrease in population for cohorts 1 to 19 years old and 30 to 49 years old which comprise the younger working population and their offspring fleeing Mount Vernon for other communities, coinciding with the 36% decrease in white population during this period. Please amend accordingly.

Chapter 2: Taking Stock

Page 2-4 -- Race & Ethnicity: Paragraph preceding Table 2-2. The percentages for population by ethnic group differ here from the percentages in the Introduction ("What is Mount Vernon") occasioned by the use of 2020 vs 2023 data. For example, the Introduction says the white population is 17.2% while the paragraph preceding Table 2-2 says 15%. To avoid confusion, the differences should be footnoted to point this out.

Page 2-11 -- Education: The statement that declining school enrollments is caused by "outmigration of young families to other less expensive areas" should be amended to simply say "other areas", as some of this outmigration is to other more expensive communities with better school districts and services.

Page 2-15 -- Education: The school list should also include the private & parochial schools that have closed in Mount Vernon in the last 20 years to re-enforce the point of declining enrollment in both private and public schools. The existing charter schools and their respective enrollments should also be listed to round out the total number of schools in Mount Vernon.

General Comment: There should be a section on colleges/college offerings in Mount Vernon.

Page 2-17 -- Employment - Table 2-12: "Mount Vernon Employment By Industry Sector" would benefit by adding percentages of change in the last column. Please do so.

Page 2-18 -- Employment - Table 2-13: "Mount Vernon Occupations & Wages" would benefit from a comparison between 2000 (or 2010) & 2025 to show movement.

Page 2-20 -- Employment: Stating that 92% of Mount Vernon residents work outside Mount Vernon appears to be incorrect. Because 8% of Mount Vernon residents work from home does not necessarily mean the remainder commute outside the City for employment. What is the source of this statement? Please check and correct that.

Page 2-22 -- Government Services: Add "sanitation and snow removal" to the responsibilities of the DPW.

Page 2-23 -- Comptroller: Add "oversees municipal investments and borrowing" to the Comptroller's responsibilities.

Page 2-27 -- Housing - Table 2-16 "Housing Developments in Pipeline": Please correct the status of 505 Gramatan Avenue Senior Housing, as it has NOT been approved and, after almost five (5) years and strong opposition from the Fleetwood community, it mysteriously remains "pending" by the City Council. Also, totals should be included in this table to coincide with the narrative preceding it, as the numbers do not add up. Further, on this page under "Household Characteristics", correct the statement regarding renter occupied housing (58%) versus owner occupied housing (42%), as there are not "slightly more people living in renter occupied housing than owner occupied housing". It should read "substantially more...".

Page 2-27 -- Housing Characteristics: There should be some mention statistically of the percentage of minority and non-minority households occupying owner occupied single family housing as, despite past red lining, there are a substantial number of minority owned single family homes in many integrated neighborhoods, including the north side of the City.

Pages 2-32 & 33 -- Urban Renewal Agency: This section would benefit by explaining why the functions of the Urban Renewal Agency are listed here and how it addresses the City's housing concerns.

Pages 2-34 to 37 -- Infrastructure -- Drinking Water: Not sure why this level of detail is necessary here; further, it is not clear what the link between water supply and the *Draft Plan* is here. Please explain.

Pages 2-38 to 40 -- Waste Water & Sewer -- Effect on Development: The key takeaway here is the condition of sanitary sewers in Outfall 24 which comprises the downtown where thousands of potential dwelling units could be built if planned rezonings take place, and the impact of these changes on the infrastructure which must be vetted in a full GEIS before any of these recommendations move forward.

Page 2-44 -- Land Use: Correct the number (five plus part of Fleetwood) and names of neighborhoods considered to be in the northern sector of the City, that is north of the Cross County Parkway: per Figure 2-3, Sunset Hill and Chester Hill do not belong.

Page 2-44 -- Land Use: Correction -- Scout Field is located in the northwest (not northeast) portion of Aubyn Manor (not Aubyn). Also, for consistency, add Saints Peter & Paul Church, United Methodist Church, Immanuel Lutheran Church and Fleetwood Synagogue to the list of north side resources. There may be others.

Page 2-48 -- Existing Zoning Table 2-22 "Area By Zoning District": Does not

contain all the zoning districts in the City and the fifth line is blank. Please amend.

Pages 2-52 & 53 -- Existing Zoning: Commercial Corridor District MX-1: The description does not include maximum height(s), including density bonus provisions. Please add. Also, the *MX-1 Zone* is not technically form based -- it is a hybrid -- and cite in a footnote that the designation of this zone is being challenged as to the legality of procedures leading to its adoption.

Pages 2-50 to 54 -- Mixed Use Districts: For all four (4) Districts, include the dates adopted by the City Council, as well as the acreages for each District, as they are quite extensive in area.

Pages 2-62 to 64 -- Variances: While the statistics on use & area variances granted, etc. are interesting, this section would benefit from a conclusion that “there is a need to amend the City's zoning code to prevent the continued proliferation of variances, as the County Planning Board has advised over the years”.

Pages 2-77 & 78 -- Parks: Figure 2-12 "Public Parks" and Table 2-28 "Public Parks" incorrectly list Hunt's Woods as having a baseball diamond; it also fails to list or map portions of Scout Field in the northwestern part of the City. Also, the correct spelling is "Hunt's Woods", named after the Hunt family whose farm was originally in this area.

Pages 2-94 and 95 -- Off Street Parking: Table 2-30 "Minimum Off Street: Parking Spaces in Downtown Area": should include the recently adopted and more liberal parking requirements for the *DTOAD* and *Mount Vernon East TOD-1* zones, requiring much less than one space per dwelling unit.

General Comment: Other than traffic accident data, the section on transportation contains no data on traffic volumes, conditions/congestion or parking shortages downtown and in Fleetwood, and along major corridors, where new development occasioned by this *Draft Plan* is likely to occur. This is a major omission of "existing conditions". Please include.

Chapter 3: Building a Vision

General Comments:

- This chapter fails to mention that the recommendations of a majority of the then constituted Advisory Committee for the *Phase I Downtown Vision Report* were ignored in the final drafting & adoption of that report by the City Council in January of 2024 and that, from that point on to August 2024, when the new consulting team was brought on board, very little happened with regard to moving Phase 2 of this Plan forward, except perhaps some city planning staff

logistical involvement. This is all part of the record.

- While the consulting team used "state of the art" methods to elicit public involvement, to help gauge the level of participation it would be helpful if the number of participants were attached to each public engagement session. Please do so. In addition, the survey that was undertaken should also be summarized here and the full survey included in an Appendix to the Plan.
- In viewing Figure 3-1 "Community Engagement Locations" on page 3-3, none were held north of the Cross County Parkway, and only one north of Lincoln Avenue. In the City's efforts to elicit citywide participation, please explain why was this occasioned, as the neighborhoods north of the Cross County Parkway comprise more than one third (1/3) of the City.
- While several input sessions were held, none were focused on individual neighborhoods: for example, Fleetwood, Mount Vernon Avenue, East and West Lincoln Avenue, South Fulton Avenue, East and West Sanford Boulevard, East and West Third Street, etc. While these areas were mentioned randomly in some of the sessions in response to a question, this was a missed opportunity to gain input and craft individual neighborhood improvement plans in a targeted fashion for areas sorely in need of them.

Chapter 4: Place Making

General Comment: The maps in each neighborhood, especially the street names therein, are difficult to read. The Plan would benefit from inserting larger maps on each page for each neighborhood.

Page 4-22 – Aubyn (Manor): The correct name of the neighborhood is "Aubyn Manor" and, for historical context, the Plan would benefit by some explanation of how the neighborhood got its name. This applies to all fifteen (15) neighborhoods discussed in this Plan. I concur with the recommendation of no changes to the land use characteristics of this area.

Pages 4-24 and 25 -- Fleetwood: Locust Street should be included in the neighborhood description of one story commercial uses. Please advise where there is a "Tower on Podium" building in this neighborhood. The 16 story *42 Broad* building should be highlighted as unusually tall and dense for this neighborhood, as most other residential buildings do not exceed 8 stories. There should also be a description of the retail located here, including the relatively high vacancy rate of retail store frontages and second floor office space. There should also be a description of on and off street parking. I concur with the recommendation to rezone the CB District on North

MacQuesten Parkway to high density residential, but there should be some limitation on height noted to coincide with the existing heights, character and scale of the area in the range of 6-8 stories maximum. Please amend accordingly.

Pages 4-25 & 27 – Hunt’s Woods: is the correct spelling for the name of this neighborhood. I concur with the recommendation of no changes to the land use characteristics of this area, but would caveat that with a description of long standing drainage issues, including run off from neighboring Bronxville & The Bronxville Field Club, and the need to discourage any expansion of that facility.

Pages 4-28 & 29 -- Pasadena (Park): is the correct name for this neighborhood. I concur with the recommendation of no changes to the land use characteristics of this area.

Pages 4-30 & 31 -- Chester Hill Park: It should be noted here that before Mount Vernon High School was constructed in the 1960s, the land on which it was built was a golf course, and that the correct name for the townhouse condominiums built in the 1980s, also part of the former golf course, is *Pasadena Green*. I concur with the recommendation of no changes to the land use characteristics of this area.

Pages 4-32 & 33 -- Chester Heights: I concur with the recommendation of no changes to the land use characteristics of this area.

Pages 4-34 & 35 -- Oakwood Heights: I concur with the recommendation of no changes to the land use characteristics of this area.

Pages 4-36 & 37 -- Primrose Park: Parts of this area along Gramatan Avenue, from East Grand to East Broad Streets, should be re-designated "Fleetwood", as it identifies more with the Fleetwood neighborhood/business district. Further, I strongly disagree with the recommendation to extend multi-family residential along East Broad and East Grand Streets east of Gramatan Avenue to Westchester Avenue, as most of this area is comprised of predominantly one and two family homes. On street parking is also a problem here, which speaks to the need to keep the density low. Please amend accordingly.

Pages 4-38 & 39 -- Sunset Hill: I disagree with the recommendation to amend the zoning of the industrial area along the east side of North MacQuesten Parkway to high rise residential, as it would further erode the industrial base of this area and compete with such large employers as Sally Sherman/Ace Endico, etc. on the west side of the street. Proximity to the railroad has long been a reason why industry has thrived here, as employees use mass transit to get to their jobs from points north and south without driving. Please amend accordingly.

Pages 4-40 & 41 -- Chester Hill: I disagree with the recommendation to amend the

zoning to high rise residential, as the predominant portion (two thirds) of the area is low to medium density residential. Any rezoning to high rise residential should be limited to those areas closest to the Metro North station, with height restrictions, as the other areas of this neighborhood should remain as is. Please amend accordingly.

Pages 4-42 & 43 -- Downtown: Add to the list of "landmarks" downtown the Mount Vernon Library, a Carnegie grant building that serves as the central library for the Westchester Library System. I concur with the recommendation to change the zoning along Third Street to "Corridor Mixed Use", but await further explanation of that re-use in this Plan. I disagree however with the zoning designations outlined in the *Phase I Downtown Vision Report* and already adopted by the City Council, as too tall, too dense and with insufficient off street parking. Two projects, comprising over 600 units -- *Library Square and 140 East Prospect Tower* -- have already been prematurely "greenlighted" under two new overlay zones which I believe will impose undue strain on the downtown infrastructure and not pay for themselves.

Pages 4-44 & 45 -- Mount Vernon West: Add the iconic art deco former Mount Vernon West rail station to the list of "landmarks" in the area. The conversion and rezoning from industrial to high rise "tower on podium" residential & mixed use has contributed to a net loss of high paying jobs in this once thriving industrial neighborhood, while imposing mammoth 12 plus story high rises in an otherwise low density area. I strongly disagree with the existence of the *Mount Vernon West TOD* zone, as that zone should revert to industrial except for the nodes surrounding the intersection of South MacQuesten Parkway and Mount Vernon Avenue. I also disagree with consolidating the Neighborhood Business and Commercial Business zones along West Lincoln Avenue into "Corridor Mixed Use," but await further explanation of that re-use in this Plan.

Pages 4-46 & 47 -- Southside: Recommendations to amend the current zoning to "Corridor Mixed Use" may have merit, but awaits further explanation of that re-use in this Plan.

Pages 4-48 & 49 -- Vernon Heights: Recommendations to amend the current mixed zoning, including the MX-1 along East Third Street between South Columbus and South Fulton Avenues, to "Corridor Mixed Use" may have merit, but awaits further explanation in this Plan.

Pages 4-50 & 51 -- Parkside/Canal Village: This area includes the former Salvation Army Building recently demolished and touted by the Mayor as a possible "market rate housing" site -- quite odd in a heavily industrial area. Recommendations to amend the current zoning to "Corridor Mixed Use" may have merit, but awaits further explanation of that re-use in this Plan.

Chapter 5: Core Concepts

Pages 5-1 to 5-4 -- Mount Vernon's Place in the Region: In reading this section, there appears to be a bias toward developing more dense housing as opposed to taking advantage of the City's location and transit links to attract new tax paying and job producing commerce & industry, and to retain what is already here. Mount Vernon is already one of the most densely populated cities in the country, and there needs to be a better balance between living and working space. This point does not resonate in this chapter. Further, while I concur that there should be an equitable balance between low and high density housing options, one must not forget Mount Vernon's legacy as the City of Homes and one of the first suburbs in the nation. Further, recent city planning efforts have been to eliminate or shrink existing industrially zoned areas and replace them with high density housing -- mostly along the MacQuesten Parkway Corridor. This must be reversed and that mistake not repeated in this Plan.

Pages 5-5 to 5-42 -- Mount Vernon's Historic Legacy: Some of this Chapter is redundant with Chapter 4, and it might make sense to combine them, if possible, as the *Draft Plan* is exceedingly long. I agree that Mount Vernon's history and preservation are important elements in maintaining neighborhood character. However, not all low density residential neighborhoods in this chapter contain the recommendation to "preserve existing zoning controls". Perhaps it was an oversight, but Hunt's Woods, Chester Hill Park, Primrose Park and Oakwood Heights, for example, are notably absent that recommendation. Please include. I am also concerned about the recommendation for Chester Hill to accommodate a "broader range of housing types", as this may not be in keeping with the character of portions of the neighborhood. Notably absent from the recommendations for Downtown is the need to rehabilitate derelict buildings, improve and maintain store fronts & streetscape, impose uniform signage, and undertake a concentrated code enforcement and commercial rehabilitation program there. Historic preservation *per se* unfortunately is not enough to revitalize this long neglected area. Regarding Mount Vernon West, it is correct to say that new high density high rises -- completely overwhelming -- are at variance with the surrounding neighborhood. I strongly agree that the form based code approach needs to be revisited -- scrapped actually -- and that the "new architecture" needs to be seriously re-assessed to prevent what has happened there from happening again, as it is quite stark .

Regarding the historic preservation initiative, including individual landmarking as well as district landmarking, I believe this is something worth pursuing. However, the level of detail of this chapter is unnecessary and should be put in the Appendices. Comprehensive plans are supposed to deal with the "big picture" -- not *minutiae*.

Pages 5-43 to 51 -- Neighborhood Diversity and Inclusion:

Page 5-45 -- "Eliminate components of the City's zoning that may be considered exclusionary". I concur, but am not sure why "bulk, area, dimensional and parking

regulations need to be revised to ensure equity", and question the efficacy of "legalizing... as of right duplexes and triplexes in all single family zones". What is the basis for doing this? Also, in addressing "excessive parking standards that limit density", one must also examine the environmental impacts and practicality of doing so on a case by case basis. Please include this qualifying language in the text.

Page 5-48 -- I concur that "all new development should generate real estate taxes sufficient to cover all municipal service costs" and that "Community Benefits Agreements" (CBA) should include the needs of traditionally underserved communities. However, this has not been done in the four (4) recently approved, and tax abated, development projects on South MacQuesten Parkway and South West Street. The *Draft Plan* would also benefit by defining CBA in a footnote. Rather than conduct a "spatial equity audit" down the road, this Plan should use the planning department's newly enhanced GIS capability to include the mapping of "emergency services and health care" as an Appendix to this Plan, as it appears to be a priority of this chapter. Please do so.

Page 5-50 -- Housing Diversity in Single Family Neighborhoods: Please define "greenlining" in the context of how it is used here.

Pages 5-52 to 65 -- The Public Realm & Streetscapes:

Page 5-52 -- Enhance Neighborhood Corridors: I would add South Fourth Avenue/Gramatan Avenue (Downtown), Mount Vernon Avenue and Fleetwood to this listing, the latter two corridors lacking any discernible or targeted plan for improvement in this *Draft Plan*.

Page 5-54 -- Recognizing that they are defined in Appendix 2, briefly explain in a footnote or cross reference the "New City Parks" program. Also, explain in a footnote the "Complete Streets Initiative" and where the City stands in adopting one.

Page 5-61 -- Adopt Storefront and Signage Regulations: The City already has most of these requirements in its sign code; they just need to be enforced by the Building Department on a consistent basis. There should also be a program to incentivize good design. Years ago, the City implemented such a program with a CDBG loan & grant incentive that included free design services in return for compliance. This should be mentioned here and revived in every commercial district. The City's current Small Business Grant Program misses the mark in that it is not targeted, and its guidelines are so vague that the program lends itself to potential fraud.

Pages 5-61 to 64 -- Targeted Small Area Plans - East Sandford Boulevard: This protocol should be replicated for every commercial district in the City, but certainly for Fleetwood and Mount Vernon Avenue -- both walkable neighborhoods and key gateways to Mount Vernon -- with detailed recommendations made across the board for

improvement where needed. Perhaps more than East Sandford Boulevard, these two areas are crying out for help, as they are most visible to pedestrians & drivers alike, and have been deteriorating, with zoning violations, office & retail vacancies and streetscape neglect, for a number of years with ZERO attention. They absolutely require the inclusion of a detailed "Small Area Plan" in this *Draft Plan*.

Pages 5-66 to 80 -- Housing Access For All:

Page 5-67 --The statement "Housing will be the foundation that allows Mount Vernon to thrive" should be broadened to say: "housing and the expansion of commercial development", as there needs to be a balance for either to succeed. There should also be cross reference to the City's recently adopted *Consolidated Plan for Community Development* which devotes itself largely to addressing Mount Vernon's housing market and needs. This *Plan* is not mentioned anywhere.

Page 5-69 -- The recommendation to "Allow and encourage mixed use development with a residential component in ALL neighborhoods of the City" should be amended to say "in SOME neighborhoods, including..."

Page 5-70 --The recommendation to "consider the suitability of duplexes and triplexes in certain single family zones by right" is not a wise policy without undertaking some environmental analysis on a case by case/neighborhood basis. Please do so in this Plan. Also, please define "gentle density" here.

Pages 5-72 to 76 -- "Approve a mandatory inclusionary housing policy". Much of this detail should be summarized and included in an Appendix, as it is speculative and subject to adoption during the implementation of the Plan.

Page 5-79 -- "Offer low interest rehabilitation loans for code compliance upgrades through a municipal fund:" Point out that this type of program was administered by the planning department in the 1980s using CDBG funds, but was subsequently abandoned by the City, and should be revived now.

Pages 5-81 to 96 -- Connecting Green Spaces To the Natural Environment: This is perhaps the *Draft Plan's* strongest chapter and many of the recommendations warrant implementation, including references to biophilic planning and strengthening of the responsibilities of the Tree Advisory Board.

Pages 5-97 to 114 -- Healthy, Safe and Active Communities:

Page 5-99 -- "Ensure the density within neighborhoods is properly distributed". This properly calls for a **build out analysis** that should be included in a **Generic Environmental Impact Statement (GEIS)** made a part of this *Draft Plan*, and not diverted to the drafting of zoning down the road, as it is at the core of neighborhood

density and other zoning regulations. To do otherwise would, in my opinion, constitute **segmentation** under SEQR, as zoning map and text changes should be part of the Comprehensive Plan review.

Page 5-101 -- Bike lanes: While bike lanes are desirable in a city as dense as Mount Vernon, given the paucity of on street spaces in general there is a need to balance the loss of on street parking spaces to bike lanes. This should be vetted as part of the GEIS alluded to above to determine impacts of all alternatives.

Page 5-109 -- Wayfinding: Please add a section to this chapter on residential street signage as, in most neighborhoods, street signs are either nonexistent, damaged or unclear. The signage should be uniform, reflective and easy to read.

Pages 5-115 to 126 -- Resiliency & Sustainability: I have no concerns with this section, as it proposes "best practices" for Mount Vernon employed in many other municipalities.

Pages 5-127 to 140 -- Economic Development:

Page 5-127 -- Introduction: I would add to the definition of economic development "the generation of wealth via real estate and sales tax revenue to finance municipal services, public safety, infrastructure and education". Also, much of what is contained in this *Draft Plan's* economic development strategy was contained in Mount Vernon's New York State approved *Empire Zone Plan* from some years ago. That *Plan* should be revisited for other recommendations, and referenced in this *Draft Plan*. Further, many of the economic development tasks are labor intensive, requiring the retention of additional qualified personnel experienced in economic development. This needs to be taken into account in implementing any successful economic attraction & retention program, and an administrative mechanism recommended to oversee and coordinate this ambitious economic development effort. Please include, as that is missing in this *Draft Plan*.

Pages 129 to 134 -- The RFEI Process: This is highlighted as a key tool for the City to dispose of and redevelop its municipally owned land. It could also apply to the School District which will be shuttering several schools that may be ripe for redevelopment/conversion to other economically viable uses. However, much of this detail as to how RFEIs work, etc. could best be relegated to an Appendix, along with a few examples of where RFEIs have succeeded, instead of in the body of the Plan text.

Page 5-137 -- Mount Vernon West: While the *Draft Plan* calls for maintaining industrial uses here, the current *Mount Vernon West TOD* zoning contradicts that, with several industrially zoned parcels now converted to high rise low to moderate income housing. I concur in the need to retain the industrial uses near this mass transit hub, limiting any new residential to areas within 500-750 feet of the Metro North Station.

Pages 5-141 to 148 -- Reliable and Modern Infrastructure:

This is a key chapter in the Plan, and its recommendations appear to be sound, again based upon "best practices" employed in other municipalities. However, there is no mention of the need for the City to balance future development, occasioned by proposed higher density zoning, with the upgrading and maintenance of its aging infrastructure. This should be highlighted and vetted by environmental documentation, accompanied by appropriate mitigation measures where necessary, in a full GEIS

Pages 5-149 to 158 -- Effective Government Service:

In reviewing the goals and objectives proposed to improve government efficiency, it is obvious that these multi-varied tasks need to be overseen by a professional. That clearly is not the case now, nor has it been for many years. The most recent opportunity to change that was recently voted down by a majority of the Mayoral and City Council appointed Charter Commission members with the support of those elected officials. The need for change was totally ignored. Until such time as a professional is appointed to direct the day to day functioning of City government, it will continue to be managed by amateurs, and much of what is being proposed in the Comprehensive Plan will be for nought.

Chapter 6: Implementation

Pages 6-1 to 34 -- The Plan would benefit by enlarging the matrices employed to summarize its 36 goals and 391 (*sic*) (or is it 418?) objectives, as they are difficult to read on the page and when printed out. It would also be helpful to include, in narrative form, a brief explanation of immediate next steps, including the preparation of environmental documentation under SEQR, as well as the adoption of implementation tools, including zoning and other regulatory mechanisms, before this Plan is approved.

Finally, despite several references to "Mixed Use Corridor" zoning in four (4) neighborhoods, there is no definition of that in the *Draft Plan* – a gaping omission – as, according to this *Draft Plan*, that will constitute any new zoning in existing low to medium density neighborhoods. This is a major flaw and omission that must be addressed before any Plan is adopted.

Pages 1-1 to 1-6 -- Very helpful.

III COMMENTS ON PHASE 1 DOWNTOWN VISION REPORT (Appendix 2)

Pages 1 to 68 -- Overall, like the other chapters of this *Draft Plan*, this appended *Phase 1 Downtown Vision Report* is redundant & repetitive, and its organization is challenging. As part of something that is now going to be officially adopted *in toto*, it should be revised.

This questionable *Phase 1 Downtown Vision Report* was approved by the City Council almost two years ago to enable developers in the downtown to proceed, unobstructed, with their rezonings and projects, without the benefit of an adopted & complete Comprehensive Plan, and no environmental documentation, calling into question the environmental review process under NYSEQR and the possibility of "segmentation". Further, it was put before the legislative body by the planning department despite the opposition of a majority of the Comprehensive Plan Advisory Committee whose members voiced strong dissatisfaction with the height, density and parking recommendations therein. At that time, I commented on the *Draft Downtown Vision Report* in testimony given on November 15, 2023 and December 6, 2023, now incorporated as an attachment to this testimony. As part and parcel of this *Draft Comprehensive Plan*, it is subject to complete review and comment, as well as full environmental review under NYSEQR. It is also worth noting that the lead consultant for Phase 1 -- the MUD Workshop from New York City -- was suddenly terminated following the completion of their Report, and the Associate Planning Commissioner, who was hired and whose position was specifically created to oversee this Plan, also abruptly resigned. It took the planning department more than a year thereafter to bring in a new consulting team, and "jumpstart" Phase 2.

As a formatting footnote, half of the page numbers in this Report are missing at the bottom of the page -- every other page is labeled -- making it difficult to follow. This should be corrected in any revision to this document, and incorporation into this Draft Plan.

Below is a chapter by chapter, page by page review of the *Phase 1 Downtown Vision Report*. Some of it is on target, but unfortunately, a lot of it, like the *Phase 2 Draft Plan*, "gets lost in the weeds".

Page 8 -- Advisory Committee: Having a forty five (45) person committee is unwieldy and very unusual and, in the *Phase 2 Draft Plan*, that number was slightly reduced to thirty seven (37) people -- almost as bad. Most Comprehensive Plans employ much smaller advisory groups, ranging from seven (7) people to fifteen (15) people, with representatives from all walks of community life, including members of other advisory boards like planning, zoning, conservation, etc. Of the 45 members, I understand only a small percentage consistently participated, and those were the ones who voiced strong opposition to the *Downtown Vision Report* that the City Council adopted without question or substantive change.

Pages 9 to 11 -- Key Engagement Activities: To accurately gauge the actual level of public participation, this section would benefit by citing the number of attendees at each activity/hearing, as well as public survey responses. The survey document and results should also be included as an Appendix to the *Vision Report*. Please insert both.

Page 11 -- Village Character: Despite concerns about preserving "village character"

and lip service given by staff, as central to the revitalization of the downtown as expressed on this page, that was completely ignored in the final *Downtown Vision Report*, as high density housing was proposed and approved as a key zoning determinant.

Page 15 -- Downtown Revitalization Guidelines: While the *Downtown Vision Report* keeps referring to "thoughtful community driven development downtown", the final recommendations do anything but reflect that, as the results were more "developer driven". The lack of "foot traffic" needed to patronize downtown businesses is driven more by the lack of quality retail and services, as the density of the surrounding area can support existing and additional businesses if there is a reason to do so. Building more dense housing without sufficient parking, especially lower income housing, will not be the sought after "magnet." For example, Rye, Tuckahoe and Bronxville have thriving downtowns without the residential density called for in this *Report*. And while I champion retaining up to four (4) story buildings along the Gramatan-South Fourth Avenue corridor, and will support somewhat taller buildings in the downtown, I do not support "super tall" high density high rises on the east-west streets surrounding the corridor, on both sides of the tracks, especially 21 story buildings that will be (and are now going to be) out of scale with the surrounding neighborhoods due to rezonings approved this past year based upon the ill-conceived recommendations in this *Report*.

Pages 17 and 19 -- In planning for the repurposing of vacant lots and storefronts in the downtown, it would be helpful to have a GIS-mapped inventory of these spaces so that one can ascertain where the major gaps are. This *Report* does not contain that and it should be amended to do so. Also absent from this section is any recommendation to engage in a City assisted commercial rehabilitation program to help store and property owners to upgrade. (See my other comments on this issue.)

Pages 22 to 25 -- Downtown Density Distribution:

Pages 22 & 23 -- The Density Distributions and Density Map calling for up to 21 story buildings in a majority of the downtown, especially in the eastern portion, north and south of the tracks, is contrary to the recommendations of a majority of the Advisory Committee, entirely too dense and out of scale with most of the downtown. The Density Map is difficult to read and should be enlarged. ***Most importantly, the Medium (up to 9 stories) and the Mid High (up to 12 stories) density designations should replace the High (up to 15 stories) and Highest (up to 21 stories) density designations, perhaps allowing a density bonus of 2 stories for the Mid High designation, permitting a cap of 14 stories there. All other density designations should be adjusted downward accordingly at appropriate scales for the neighborhoods in which they are located. I realize this will be difficult to do, now that two downtown developments have been greenlighted with heights up to 21 stories. But the vast number of parcels potentially eligible for rezonings in the downtown need to be capped at more reasonable heights & densities in order to be***

sustainable and in character with existing neighborhoods. This is a must.

Page 24 -- Public Benefit of Density Increases: While these rationalizations may apply to areas of low density, they do not necessarily apply to Mount Vernon which is one of the most densely populated communities in New York State. More density must be **balanced** with the ability of the infrastructure to support it and the financial costs or benefits needed to finance it, including tax incentives and abatements.

Page 27 to 35 – (1) Define Building Density and Uses In and Around Downtown to Attract a Consumer Base and Investment to Support Businesses.

Page 31 -- Policy Initiatives: "Increase consistency in Downtown zoning potentially by creating a single Downtown zoning use district with a uniform set of permitted uses; and within that use district, the regulations for building form and dimensions could be tied to the Downtown Density Distributions Map". This clearly was NOT adhered to in the two greenlighted special district rezonings for the *Library Square* and *140 East Prospect Tower* multi-family developments, both in direct contravention to this recommendation. In fact, these two new zoning districts, with different requirements, were adopted without each taking into account the other. So much for coordinated planning based upon this *Vision Report*.

Pages 33 and 34 -- Inclusionary Housing: This Report recommends that Mount Vernon incorporate an Inclusionary Housing Policy mandating that 10 to 20% of units in new residential buildings of 10 or more units be set aside as affordable units for households making between 30 to 100% of AMI. This clearly was NOT adhered to in one of the greenlighted rezonings -- *140 East Prospect Tower*, a 100% market rate development in the downtown. Again, so much for coordinated planning based upon this *Vision Report*.

Pages 36 to 40 -- (2) Reinforce the Identities of Gramatan and South 4th Avenues as the Downtown Corridor.

Page 39 -- Capital Projects: "Conduct a study to assess vehicular traffic and identify recommendations to facilitate the flow of vehicles more effectively through the Downtown Corridor". In view of the recommended increases in density, this is a sound recommendation and should be undertaken as part the environmental documentation in a GEIS to be prepared as part of, and prior to, the adoption of this Comprehensive Plan.

Pages 41 to 45 – (3) Make Transit Use a Convenient Choice for Residents and Visitors.

Page 44 -- Policy Initiatives: "Prioritize public transit and active land uses by reducing off street parking requirements and reimagining underutilized parking lots and garages". I do not see what "prioritizing public transit" has to do with "reducing off street

parking requirements". People will take public transit if they need or choose to, and reducing off street parking requirements will not be an incentive for doing that. The reduction in off street parking in new buildings to less than one space per unit is a sop to developers to save money, as it is their interest to do so. In Westchester, most people have cars, even if they take public transit. Further, in most suburban TOD districts, it has been proven that most renters have at least one car per household. And then of course, there are visitors and service providers who may travel by car -- where do they park? ***On street parking is already at a premium in the downtown. Reducing off street parking will only exacerbate that. This should be amended to require one parking space per unit. Please do so.***

Page 44 -- Policy Initiatives: "Complete Streets". The *Report* says "being designed (January 2024). What is the status in October 2025? Please advise.

Page 44 -- Policy Initiatives - Capital Projects: "Consider renovating and/or rebuilding aging, dilapidated and underutilized municipal parking garages to encourage their usage by residents and visitors." Supplement this statement by acknowledging that the Mount Vernon Charter Review Commission has recommended to the City Council the re-institution of the Mount Vernon Parking Authority to undertake capital projects and management of the City's garages.

Pages 46 to 50 -- (4) Repurpose Underutilized Lots and Buildings with Interim Community Uses and Integrate them into the Urban Fabric as they Await Development and/or New Ownership.

Page 50 -- Public Private Partnerships: Again, there is no reference in the "tool kit" to a commercial rehabilitation loan & grant program administered by the City to address underutilized, blighted, or vacant buildings/storefronts on the City's main downtown (and other) corridors.

Pages 51 to 55 -- (5) Create a Recognizable Network of Open Spaces and Pedestrian Connections for a Walkable Downtown District.

I have previously commented on the need for a traffic study to be part of the GEIS accompanying this Comprehensive Plan prior to adoption.

Pages 50 to 68 -- (6) Evaluating Existing Barriers to Economic Development and Advance a Cohesive Strategy to Assist Local Business Owners and Attract New Investment.

Page 58 -- "Provide consistent and cohesive zoning throughout the Downtown area". This has already been violated by the two "special district" zones adopted this year to greenlight the two aforementioned high rise developments prior to the completion of this Plan.

Pages 60-61 -- Policy Initiatives: The emphasis on zoning here is key. I concur with many of the recommendations, except for those pertaining to height, density and reduced off street parking. ***However, before any updated Comprehensive Plan is adopted, the zoning to implement this Plan should be drafted and made a part of the adoption process, including the preparation of a full GEIS to vet the impacts of both the Comprehensive Plan and zoning. To do anything less would bifurcate the process and fail to present a complete picture of what is being put forth, in violation of SEQR.***

Page 62-68 -- Economic Development Strategy: I concur with most of what is being recommended to "jump start" and create a long term viable economic development plan. However, the City is hamstrung to implement these programs absent a coordinated effort led by a professional economic development team. This needs to be stressed in any efforts to improve. Please do so here.

A footnote on BIDs: in the mid-1980s, the City explored the formation of a Downtown BID via a consultant feasibility study. The results were that due to the large number of religious and not for profit owned (tax exempt) properties in the downtown, there would be insufficient assessable income to support a BID. The number of tax exempt properties has proliferated since then, such that the original conclusion reached would likely be the same today. However, a revitalized and functioning Chamber of Commerce could fill some of that role.

Conclusion

The City has an opportunity to amend this *Downtown Vision Report* to incorporate less dense zoning, as part of the overall Comprehensive Plan. With thousands of units in the pipeline, now is the time to do it.

OVERALL CONCLUSION AND RECOMMENDATIONS

Given the length and breadth of these comments, the public hearing should be kept open until such time as the Comprehensive Plan consulting team and planning department have had a chance to review all public comments and respond to them individually, as well as prepare a revised *Draft Comprehensive Plan*, vetted by a full GEIS, for posting and further comment by the public. This may take several weeks or months.

As part of this “due diligence review” I have offered to meet with the planning department and their consulting team to discuss my and other community members’ concerns, in an effort to facilitate the City team’s responses and revisions to the amended *Draft Plan*.

Finally, I ask you to rethink the process and the environmental consequences of your actions, as a lawsuit will absolutely be in the offing if you do not.

Enclosures: 3

- Testimony delivered regarding *Phase 1 Downtown Vision* Report on November 15, 2023 and December 6, 2023.
- Summary of Expert Testimony dated October 12, 2025 submitted with the detailed comments.



FERRANDINO & ASSOCIATES INC.
PLANNING AND DEVELOPMENT CONSULTANTS

MEMORANDUM

To: President and Members of the City Council

From: Vince Ferrandino, AICP

Re: Comments on the Mount Vernon Draft Comprehensive Plan – *Envision Mount Vernon* -- Unveiled on September 24, 2025 and **AMENDED ON OCTOBER 30, 2025.**

Date: October 12, 2025 – **AMENDED NOVEMBER 11, 2025**

Please accept the below referenced testimony/comments for placement into the public record. **ALL CHANGES/ADDITIONS ARE NOTED IN BOLD CAPS BELOW.**

My name is Vince Ferrandino. I am a professional planner with an active consulting practice in the tri-state area, a former Commissioner of Planning & Development for the City of Mount Vernon, and current Mount Vernon resident. I have reviewed the **AMENDED Draft Plan RED LINED VERSION**, including the *Phase 1 Downtown Vision Report*, as well as the **UNAMENDED** Long Form EAF, Parts 1 & 2, and the resolution by the City Council declaring itself Lead Agency under SEQR and setting the public hearings for October 8 and 14, 2025, and I offer the following preliminary comments. Following the completion of **THE ILLEGALLY RE-OPENED NOVEMBER 10, 2025 PUBLIC HEARING, WHICH WAS NOT SCHEDULED VIA ANY CITY COUNCIL RESOLUTION OR PUBLIC NOTICE THAT I AM AWARE OF, AND FOR WHICH A FORMAL OBJECTION IS BEING FILED, I MAY OPT TO ADD TO THESE COMMENTS BEFORE THE CLOSE OF THE COMMENT PERIOD ON NOVEMBER 17, 2025.**

Introduction

Kudos to the City for pursuing the adoption of a Comprehensive Plan, the first in over 55 years. However, after more than three (3) years of consultant research and public input, I must say the *Draft Plan*, **AS WELL AS THE AMENDED DRAFT PLAN**, like the *Phase 1 Downtown Vision Report*, is more “off the shelf” than “on the shelf,” that is, the consultant team chose to select “models/templates” from other communities, often without context, nor relevant comparison to our City. The *Draft Plan*, **AS WELL AS THE AMENDED DRAFT PLAN** although quite lengthy, is noteworthy more for what is NOT included, than what IS included.

Before delving into the SEQR process and the text of both the *Draft Plan* **AND AMENDED DRAFT PLAN** and the *Phase I Downtown Vision Plan Report* that is part and parcel of the *Draft Plan*, I want to comment on the rushed process to adopt this Plan before the end of the year.

After almost three (3) years of stops & starts in preparing this *Draft Plan* on September 24, 2025, the planning commissioner submitted a 475 page (**NOW 419 PAGE**) document, replete with 36 goals and 419 objectives, recommendations for several zone changes, and other land use procedures & capital improvements, to the City Council for action. On that date, with ZERO discussion, the Council scheduled two public hearings: the first two (2) weeks later on October 8, and the second six (6) days later, on October 14, **AND NOW A THIRD PUBLIC HEARING ON NOVEMBER 10, 2025, WITH NO DULY ADOPTED RESOLUTION OF THE CITY COUNCIL SCHEDULING THIS HEARING, NOR PUBLIC NOTICE THAT I AM AWARE OF.** I highly doubt any of the Council people looked at the *Draft Plan*, **NOR THE AMENDED DRAFT PLAN**, before accepting the document as "complete" and scheduling these hearings; and just as likely, members of the public will not have sufficient time to review, digest and comment upon it, **AS THE NOVEMBER 10, 2025 ILLEGALLY CONVENED HEARING WAS CLOSED.** While the planning staff **AND OUR MAYOR** have heralded the public input process undertaken over several months in producing this **AMENDED Draft Plan**, the extremely tight timeline, arbitrarily established by the City Council to adopt it, makes a mockery of that process.

Further, the environmental review process is also being rushed, with the goal of bypassing a full vetting of the impacts of this **AMENDED Draft Plan** via a full *Generic Environmental Impact Statement (GEIS)*. Under NYS SEQR law, the adoption of a comprehensive plan is a Type 1 Action which is presumed to "have a significant adverse impact on the environment". Despite stating in the City Council **LEAD AGENCY** resolution that the Action is a Type 1, the scant Long Form Parts 1 & 2 prepared by the planning department belies that with incredulous responses of "no impact" throughout, which I have addressed in detail below in my technical comments.

A comprehensive plan "sets the table for the future", usually over a ten year time frame. This one proposes radical zone changes in a number of City neighborhoods which could negatively affect community character and increase our population by 10 to 15%, adversely impacting our already aging & fragile infrastructure. We have not had a Plan update since 1968. This **AMENDED Draft Plan**, whatever its pluses or minuses as drafted, deserves to be reviewed and vetted very carefully, in accordance with the law. Rushing to approve it before year's end, **CLEARLY REINFORCED BY ABRUPTLY CLOSING LAST NIGHT'S PUBLIC HEARING**, will not accomplish that goal.

I ask you to rethink the process and the environmental consequences of your actions, as a lawsuit will be in the offing if you do not

Summary of Major Concerns

- For the adoption of a Comprehensive Plan, under the Open Meetings Law and NYS SEQR, all documents that are the subject of a public hearing(s) must be made available to the public well in advance of the public hearing(s). As of October 5, 2025 no documents were put on the City Council web site noticing the October 8, 2025 **HEARING, AND LATER, THE OCTOBER 14, 2025** hearing. **FURTHER, NOT ALL DOCUMENTS WERE PUT ON THAT SITE FOR THE NOVEMBER 10, 2025 HEARING, MOST NOTABLY THE AMENDED LONG FORM EAF, PARTS 1 & 2.** Missing documents include links to the 475 page (**NOW 413 PAGE**) **AMENDED Draft Plan**, the letter from the planning commissioner asking for its adoption, all SEQR documentation, and the City Council Lead Agency Resolution. This, in concert with the City Council's efforts to "fast track" the adoption of this Plan, constitutes a major breach, and the public hearing(s) should be re-scheduled or kept open until such time as the documents can be made available in a timely manner, giving the public sufficient opportunity to review and intelligently comment upon them.
- Short circuiting the environmental review process by inadequately and incorrectly filling out the Long Form EAF, Parts 1 & 2 and arbitrarily concluding "no impacts", especially with regard to the major rezonings proposed in the *Phase I Downtown Vision Report* and elsewhere in the *Draft Plan*, is contrary to SEQR law. **AS OF NOVEMBER 10, 2025, THE LONG FORM EAF, PARTS 1 & 2 ARE STILL NOT AMENDED, NOR COMPLETED FOR PLACEMENT ON GRANICUS LEGISTAR FOR REVIEW.**
- The adoption of the Comprehensive Plan is a Type 1 Action under NYS environment law and, as such, merits the preparation of full *Generic Environmental Impact Statement* (GEIS).
- There are no detailed studies supporting the 36 goals and 419 objectives in the **AMENDED Draft Plan**. Alternatively, these studies for example, for traffic, parking, visual, fiscal impacts, etc.-- could be included in a *Draft Generic Environmental Impact Statement* accompanying, and prepared prior to, the adoption of the Comprehensive Plan. **THE AMENDED DRAFT PLAN STILL CONTAINS NO DETAILED STUDIES.**
- Arbitrarily recommending conversion of single family homes to duplexes & triplexes in single family districts, legalizing otherwise illegal conversions, pursuing the construction of Accessory Dwelling Units (ADUs), **AND ALLOWING FLOOR AREA RATIOS (FARs) UP TO 1.0** are ill conceived without a study vetting their impacts on those neighborhoods. **THERE ARE NO SUCH STUDIES IN THE AMENDED DRAFT PLAN.**
- While several economic development initiatives are suggested in the **AMENDED Draft Plan**, no overall administrative mechanism is described to carry this out, with measurable benchmarks, over a prescribed period of time. Further, there is no definitive business attraction & retention strategy linked with zoning and capital improvements to fortify existing industrial and commercial corridors, nor to expand them. This is a major omission. **THESE GLARING OMISSIONS REMAIN IN THE AMENDED DRAFT PLAN..**

- Recommending rezoning in four (4) neighborhoods to something called “Mixed Use Corridor” zoning without defining exactly what that is anywhere in the **AMENDED Draft Plan** is a major omission. Further, the absence of any neighborhood improvement plans for areas like Fleetwood, Mount Vernon Avenue, South Fulton Avenue, East Third Street etc. is a major flaw in the **AMENDED Draft Plan**. **BOTH DEFICIENCIES REMAIN IN THE AMENDED DRAFT PLAN.**
- With over 1,000 units in the pipeline for development Downtown, and over 600 units recently approved there via major zone changes in the last year, the maximum height & density proposed in the *Draft Plan/Downtown Vision Report* at 18 stories plus up to 3 stories with a density bonus for a total of 21 stories—should be reduced to a maximum of 12 stories, with a cap of 2 additional stories with density bonus. **NO CHANGES IN HEIGHT AND DENSITY WERE MADE IN THE AMENDED DRAFT PLAN.**
- There is already a shortage of on-street parking in the Downtown. Limiting off street parking to .6 spaces per dwelling unit, even for a so called Transit Oriented Development (TOD) building, is unrealistic. At least one (1) space per dwelling unit to accommodate tenants, retail shoppers and visitors/service providers makes more sense. Please amend accordingly. **NO CHANGES IN PARKING STANDARDS WERE MADE IN THE AMENDED DRAFT PLAN.**
- With respect to housing types, there must be a balance among market rate, moderate and lower income units, with an appropriate mix in each development. This balance applies not only to the Downtown but to Fleetwood & other mixed use business hamlets as well, and should be used as a guide in adopting any inclusionary housing regulations moving forward.

I COMMENTS ON SEQR PROCESS AND LONG FORM EAF PARTS 1 & 2

The Proposed Action -- the adoption of the Comprehensive Plan -- as stated in the City Council resolution initiating the SEQR review process, is a **Type 1 Action**. See Section 617.4. "Type 1 Actions" of the NYS SEQRA regulations and its Implementing regulations, 6 N.Y.C.R.R. Part 617. By definition, a **Type 1 Action** is presumed to have a “significant adverse impact on the environment”.

Section 617.5b of this Part states: "The following actions are **Type 1** if they are to be directly undertaken, funded or approved by an agency: 1) the adoption of a **municipality's land use plan**, the adoption by any agency of a comprehensive resource management plan or the initial adoption of a municipality's comprehensive zoning regulations." The Action that is the subject of these public hearings is the adoption of a "land use plan", also known as a "comprehensive plan" which, in Mount Vernon's case, contains several specific recommendations for changes to the City's zoning map and text, some of which have already taken place as a result of the City Council's endorsement of the *Phase I Downtown Vision Report* in January 2024, which is part and parcel of the overall *Comprehensive Plan*

under consideration.

The Long Form EAF Parts 1 and 2 are woefully inadequate for purposes of vetting a **Type 1 Action** under SEQR, and should be completed and revised accordingly to trigger a Positive Declaration and the preparation of a full ***Draft Generic Environmental Impact Statement (DGEIS)*** under the law. **DESPITE EMPTY PROMISES TO DO SO, UNTIL SUCH TIME AS THAT OCCURS**, this environmental review process should be suspended, as there is insufficient information in the Long Form EAF Parts 1 & 2 to make a reasoned judgment on impacts.

Below Are My Comments on the Long Form EAF, Parts 1 & 2 AS OF NOVEMBER 10, 2025, NO CHANGES AND/OR ADDITIONS WERE MADE THROUGHOUT THIS DOCUMENT.

Part 1 – Project and Setting:

- 1) The 13 page Long Form is UNDATED AND UNSIGNED, AS SUCH, IT IS DEFICIENT.
- 2) Only 3 of the 13 pages was filled out. PLEASE EXPLAIN WHY AND FILL OUT THE REMAINDER.
- 3) Page 1 of 13 -- A. Name of Action or Project. This was left blank. IT NEEDS TO BE FILLED I SAYING "ADOPTION OF COMPREHENSIVE PLAN DATED SEPTEMBER 2025" **AS AMENDED.**
- 4) Page 2 of 13 -- C. 2.b. "Is the proposed action within any local or regional planning district". The response was "no" and should be "yes", as the *Canal Village Brownfield Opportunity Area (BOA)* is within this transitional neighborhood and, as a result may be the basis for substantial land use & zoning changes. There may also be a BOA adjacent to the Mount Vernon East train station that was in the works by the City a few years back. PLEASE CLARIFY AND PROVIDE THE STATUS OF BOTH BOA AREAS, AS DEVELOPMENT IS CURRENTLY TAKING PLACE IN THE LATTER AREA.
- 5) Page 3 of 13 -- C-3 Zoning. "Is a zone change being requested as part of the Proposed Action?" The response was "no" and should be "yes", as the *Draft Comprehensive Plan* includes specific language in several chapters that describe major zoning map & text changes, including those in the *Phase I Downtown Vision Report*, adopted by the City Council in January 2024 (with no SEQR review), which calls for significant changes in height, density & parking on a number of downtown parcels, two of which have been approved, and one of which (Grace Baptist Church/Mountco application) was in the pipeline for processing at the October 8, 2025 City Council meeting requesting Lead Agency designation. The *Downtown Vision Report* is part and parcel of the 475 page (**NOW 413 PAGE**) *Draft Comprehensive Plan* under review. **Further, a specific zoning map and text changes should accompany the AMENDED Draft Plan and included as part of the**

Proposed Action to be vetted via a full GEIS. PLEASE CHANGE TO "YES".

6) With this substantive change, the remainder of the 13 pages of this Part 1 form needs to be filled out, as a proposed zone change will require responses under SEQR. And the responses in the Part 2 form -- "Identification of Potential Project Impacts" -- will also change from "no Impact" in every category to "moderate to large impact" which will certainly trigger a Positive Declaration under SEQR and the preparation of a full *DGEIS* before any Comprehensive Plan and new zoning are adopted.

Part 2 – Identification of Potential Project Impacts:

All of the project impact categories are checked "no", while most should be checked "yes". Until the remainder of the Part 1 form is filled out, it is difficult to determine with any precision how many "yes's" will be triggered, and to what degree. But certainly those under 1. Impact on Land; 4. Impact on Groundwater; 5. Impact on Flooding; 6. Impact on Air; 9. Impact on Aesthetic Resources; 10. Impact on Historic and Archaeological Resources; 11. Impact on Open Space and Recreation; 12. Impact on Critical Environmental Areas; 13. Impact on Transportation; 14. Impact on Energy; 15. Impact on Noise, Odor and Light; 16. Impact on Human Health; 17. Consistency with Community Plans; and 18. Consistency with Community Character will be affected, **THEREBY TRIGGERING A POSITIVE DECLARATION UNDER SEQR, AND THE PREPARATION OF A FULLY SCOPED DGEIS.**

Until such time as both EAF Parts 1 & 2 Forms are filled out properly and completely, this environmental review process should be **SUSPENDED** and the public hearings kept indefinitely open until this information is made part of the record. **THIS RECOMMENDATION STANDS IN THIS CURRENT REVIEW OF THE LATEST AMENDED DRAFT PLAN.**

Further, the amended Parts 1 & 2 documents should be made part of any public notice for continued public hearings, as the documentation for the **OCTOBER 8, 2025, OCTOBER 14, 2025 AND NOVEMBER 10, 2025** public hearings on *Granicus Legistar* did not include a link to the existing Long Form EAF Parts 1 & 2 SEQR forms, nor does the link to the **AMENDED Draft Comprehensive Plan** on the City's web site do so, giving the public only a partial view of what is being proposed for adoption. How can the public comment on SEQR and the **AMENDED Draft Comprehensive Plan** if all the documents are not there to comment upon? This appears to be a material violation of the Open Meetings law and SEQR, and could be grounds for legal challenge.

II COMMENTS ON THE AMENDED DRAFT COMPREHENSIVE PLAN

Below is a chapter by chapter, page by page review of the *Draft Plan*. Some of it is on **target, but unfortunately at 475 pages (NOW 413 PAGES), including the Phase I**

Downtown Vision Report, a lot of it still "gets lost in the weeds", as it is too long, repetitive and redundant. **THE AMENDED DRAFT PLAN IS STILL REDUNDANT AND REPETITIVE, EVEN THOUGH THE NUMBER OF PAGES HAS ACTUALLY INCREASED.**

*****PLEASE NOTE THAT ALTHOUGH THE NUMBER OF PAGES HAS CHANGED, MY COMMENTS BELOW ARE PREDICATED UPON THE ORIGINAL 475 PAGE DOCUMENT.*****

Credit Page: at bottom, supplement "made possible by..." with "in addition to \$_____ paid for with local taxpayer dollars," and insert the amount of local monies budgeted toward paying for this Plan from inception with the original consulting team. I have estimated this to total approximately \$600,000 including payments made to the original MUD Workshop consulting team which was terminated at the conclusion of the *Phase I Downtown Vision Report*. **NO CHANGE MADE.**

Acknowledgements: Pam Tarlow is incorrectly listed as both First Deputy Commissioner and Assistant Commissioner: delete the latter. **NO CHANGE MADE, DISPLAYING A LACK OF ATTENTION TO DETAIL.**

Chapter 1: Introduction

General Comment: This chapter fails to mention the role of environmental review in vetting what has been proposed in the *Draft Plan*. As **Type 1 Action** under SEQR this typically takes the form of a full *Generic Environmental Impact Statement (GEIS)*. With 36 policy goals and 418 objectives, including proposed major rezonings and other proposed land use regulations, why has this been omitted? **NO CHANGE MADE.**

Page 1-3 -- Core Concepts: I recommend inserting "Mount Vernon's Role in the Region" as the first Core Concept, with all others to follow, and inserting "Economic Development" and "Reinventing the Downtown" at the tail end, as these Concepts appear to be a more logical progression. **NO CHANGE MADE.**

General Comment: While comparisons are made internally for Mount Vernon, this chapter would benefit from comparing and contrasting trends in Mount Vernon with a few surrounding communities, e.g. the Cities of Yonkers and New Rochelle, and perhaps the Town of Eastchester to the north where many Mount Vernon residents have moved over the years. **NO RESPONSE OR CHANGE MADE.**

Pages 1 to 1-3 -- Population: While focusing on the senior population, the 2000-2023 population analysis fails to highlight the decrease in population for cohorts 1 to 19 years old and 30 to 49 years old which comprise the younger working population and their offspring fleeing Mount Vernon for other communities, coinciding with the 36% decrease in white population during this period. Please amend accordingly. **NO CHANGE MADE.**

Chapter 2: Taking Stock

Page 2-4 -- Race & Ethnicity: Paragraph preceding Table 2-2. The percentages for population by ethnic group differ here from the percentages in the Introduction ("What is Mount Vernon") occasioned by the use of 2020 vs 2023 data. For example, the Introduction says the white population is 17.2% while the paragraph preceding Table 2-2 says 15%. To avoid confusion, the differences should be footnoted to point this out. **NO CHANGE MADE, DISPLAYING A LACK OF ATTENTION TO DETAIL**

Page 2-11 -- Education: The statement that declining school enrollments is caused by "outmigration of young families to other less expensive areas" should be amended to simply say "other areas", as some of this outmigration is to other more expensive communities with better school districts and services. **FERRANDINO CHANGE MADE HERE.**

Page 2-15 -- Education: The school list should also include the private & parochial schools that have closed in Mount Vernon in the last 20 years to re-enforce the point of declining enrollment in both private and public schools. The existing charter schools and their respective enrollments should also be listed to round out the total number of schools in Mount Vernon. **NO CHANGE OR ADDITIONS MADE.**

General Comment: There should be a section on colleges/college offerings in Mount Vernon. **NO CHANGE MADE.**

Page 2-17 -- Employment - Table 2-12: "Mount Vernon Employment By Industry Sector" would benefit by adding percentages of change in the last column. Please do so. **FERRANDINO CHANGE MADE HERE.**

Page 2-18 -- Employment - Table 2-13: "Mount Vernon Occupations & Wages" would benefit from a comparison between 2000 (or 2010) & 2025 to show movement. **NO CHANGE MADE.**

Page 2-20 -- Employment: Stating that 92% of Mount Vernon residents work outside Mount Vernon appears to be incorrect. Because 8% of Mount Vernon residents work from home does not necessarily mean the remainder commute outside the City for employment. What is the source of this statement? Please check and correct that. **FERRANDINO CHANGE MADE HERE, BUT NO SOURCE PROVIDED.**

Page 2-22 -- Government Services: Add "sanitation and snow removal" to the responsibilities of the DPW. **FERRANDINO CHANGE MADE HERE.**

Page 2-23 -- Comptroller: Add "oversees municipal investments and borrowing" to the Comptroller's responsibilities. **FERRANDINO CHANGE MADE HERE.**

Page 2-27 -- Housing - Table 2-16 "Housing Developments in Pipeline": Please correct the status of 505 Gramatan Avenue Senior Housing, as it has NOT been approved and, after almost five (5) years and strong opposition from the Fleetwood community, it mysteriously remains "pending" by the City Council. Also, totals should be included in this table to coincide with the narrative preceding it, as the numbers do not add up. Further, on this page under "Household Characteristics", correct the statement regarding renter occupied housing (58%) versus owner occupied housing (42%), as there are not "slightly more people living in renter occupied housing than owner occupied housing". It should read "substantially more...". **FERRANDINO CORRECTION MADE TO 505 GRAMATAN AVENUE SENIOR HOUSING ERROR, BUT STILL NO TOTALS PROVIDED. ALSO, THE ALEXANDER AND LIBRARY SQUARE PROJECTS HAVE BEEN APPROVED BY THE PLANNING BOARD.**

Page 2-27 -- Housing Characteristics: There should be some mention statistically of the percentage of minority and non-minority households occupying owner occupied single family housing as, despite past red lining, there are a substantial number of minority owned single family homes in many integrated neighborhoods, including the north side of the City. **NO CHANGE MADE.**

Pages 2-32 & 33 -- Urban Renewal Agency: This section would benefit by explaining why the functions of the Urban Renewal Agency are listed here and how it addresses the City's housing concerns. **NO CHANGE MADE**

Pages 2-34 to 37 -- Infrastructure -- Drinking Water: Not sure why this level of detail is necessary here; further, it is not clear what the link between water supply and the *AMENDED Draft Plan* is here. Please explain. **NO EXPLANATION PROVIDED.**

Pages 2-38 to 40 -- Waste Water & Sewer -- Effect on Development: The key takeaway here is the condition of sanitary sewers in Outfall 24 which comprises the downtown where thousands of potential dwelling units could be built if current and planned rezonings take place, and the impact of these changes on the infrastructure which must be vetted in a full GEIS before any of these recommendations move forward. **NO CHANGE MADE.**

Page 2-44 -- Land Use: Correct the number (five, plus part of Fleetwood) and names of neighborhoods considered to be in the northern sector of the City, that is north of the Cross County Parkway: per Figure 2-3, Sunset Hill and Chester Hill do not belong. **NO CHANGE MADE.**

.Page 2-44 -- Land Use: Correction -- Scout Field is located in the northwest (not northeast) portion of Aubyn Manor (not Aubyn). Also, for consistency, add Saints Peter & Paul Church, United Methodist Church, Immanuel Lutheran Church and Fleetwood

Synagogue to the list of north side resources. There may be others. **FERRANDINO CHANGE MADE HERE.**

Page 2-48 -- Existing Zoning Table 2-22 "Area By Zoning District": Does not contain all the zoning districts in the City and the fifth line is blank. Please amend. **FERRANDINO CHANGE MADE HERE.**

Pages 2-52 & 53 -- Existing Zoning: Commercial Corridor District MX-1: The description does not include maximum height(s), including density bonus provisions. Please add. Also, the *MX-1 Zone* is not technically form based -- it is a hybrid -- and cite in a footnote that the designation of this zone is being challenged as to the legality of procedures leading to its adoption. **NO CHANGES OR ADDITIONS MADE.**

Pages 2-50 to 54 -- Mixed Use Districts: For all four (4) Districts, include the dates adopted by the City Council, as well as the acreages for each District, as they are quite extensive in area. **NO CHANGE MADE.**

Pages 2-62 to 64 -- Variances: While the statistics on use & area variances granted, etc. are interesting, this section would benefit from a conclusion that "there is a need to amend the City's zoning code to prevent the continued proliferation of variances, as the County Planning Board has advised over the years". **NO CHANGE MADE.**

Pages 2-77 & 78 -- Parks: Figure 2-12 "Public Parks" and Table 2-28 "Public Parks" incorrectly list Hunt's Woods as having a baseball diamond; it also fails to list or map portions of Scout Field in the northwestern part of the City. Also, the correct spelling is "Hunt's Woods", named after the Hunt family whose farm was originally in this area. **FERRANDINO CHANGES MADE EXCEPT FOR INCORRECT LOCATION AND REFERENCE TO SCOUT FIELD.**

Pages 2-94 and 95 -- Off Street Parking: Table 2-30 "Minimum Off Street: Parking Spaces in Downtown Area": should include the recently adopted and more liberal parking requirements for the *DTOAD* and *Mount Vernon East TOD-1* zones, requiring much less than one space per dwelling unit. **NO CHANGE MADE.**

General Comment: Other than traffic accident data, the section on transportation contains no data on traffic volumes, conditions/congestion or parking shortages downtown and in Fleetwood, and along major corridors, where new development occasioned by this *Draft Plan* is likely to occur. This is a major omission of "existing conditions". Please include. **NO CHANGE MADE.**

Chapter 3: Building a Vision

- This chapter fails to mention that the recommendations of a majority of the then constituted Advisory Committee for the *Phase I Downtown Vision Report* were ignored in the final drafting & adoption of that report by the City Council in January of 2024 and that, from that point on to August 2024, when the new consulting team was brought on board, very little happened with regard to moving Phase 2 of this Plan forward, except perhaps some city planning staff logistical involvement. This is all part of the record. **NO CHANGE MADE.**
- While the consulting team used "state of the art" methods to elicit public involvement, to help gauge the level of participation it would be helpful if the number of participants were attached to each public engagement session. Please do so. In addition, the survey that was undertaken should also be summarized here and the full survey included in an Appendix to the Plan. **NO ADDITIONS OR CHANGES MADE.**
- In viewing Figure 3-1 "Community Engagement Locations" on page 3-3, none were held north of the Cross County Parkway, and only one north of Lincoln Avenue. In the City's efforts to elicit citywide participation, please explain why was this occasioned, as the neighborhoods north of the Cross County Parkway comprise more than one third (1/3) of the City. **NO EXPLANATION PROVIDED**
- While several input sessions were held, none were focused on individual neighborhoods: for example, Fleetwood, Mount Vernon Avenue, East and West Lincoln Avenue, South Fulton Avenue, East and West Sanford Boulevard, East and West Third Street, etc. While these areas were mentioned randomly in some of the sessions in response to a question, this was a missed opportunity to gain input and craft individual neighborhood improvement plans in a targeted fashion for areas sorely in need of them. **NO CHANGE MADE.**

Chapter 4: Place Making

General Comment: The maps in each neighborhood, especially the street names therein, are difficult to read. The Plan would benefit from inserting larger maps on each page for each neighborhood. **NO CHANGE MADE.**

Page 4-22 – Aubyn (Manor): The correct name of the neighborhood is "Aubyn Manor" and, for historical context, the Plan would benefit by some explanation of how the neighborhood got its name. This applies to all fifteen (15) neighborhoods discussed in this Plan. I concur with the recommendation of no changes to the land use characteristics of this area. **FERRANDINO CHANGE MADE HERE.**

Pages 4-24 and 25 -- Fleetwood: Locust Street should be included in the neighborhood

description of one story commercial uses. Please advise where there is a "Tower on Podium" building in this neighborhood. The 16 story 42 *Broad* building should be highlighted as unusually tall and dense for this neighborhood, as most other residential buildings do not exceed 8 stories. There should also be a description of the retail located here, including the relatively high vacancy rate of retail store frontages and second floor office space. There should also be a description of on and off street parking. I concur with the recommendation to rezone the CB District on North MacQuesten Parkway to high density residential, but there should be some limitation on height noted to coincide with the existing heights, character and scale of the area in the range of 6-8 stories maximum. Please amend accordingly. **LOCUST STREET INCLUDED, BUT NO OTHER FERRANDINO CHANGES MADE/EXPLANATIONS PROVIDED**

SEVERAL GRAPHICS RANDOMLY INSERTED IN THE AMENDED DRAFT PLAN ON LOW, MEDIUM AND HIGH DENSITY RESIDENTIAL, WITH NO PAGINATION ???.

Pages 4-25 & 27 – Hunt's Woods: is the correct spelling for the name of this neighborhood. I concur with the recommendation of no changes to the land use characteristics of this area, but would caveat that with a description of long standing drainage issues, including run off from neighboring Bronxville & The Bronxville Field Club, and the need to discourage any expansion of that facility. **FERRANDINO CHANGE MADE HERE, WITHOUT MY CAVEAT ADDRESSED.**

Pages 4-28 & 29 -- Pasadena (Park): is the correct name for this neighborhood. I concur with the recommendation of no changes to the land use characteristics of this area. **FERRANDINO CHANGE MADE HERE.**

Pages 4-30 & 31 -- Chester Hill Park: It should be noted here that before Mount Vernon High School was constructed in the 1960s, the land on which it was built was a golf course, and that the correct name for the townhouse condominiums built in the 1980s, also part of the former golf course, is *Pasadena Green*. I concur with the recommendation of no changes to the land use characteristics of this area. **NO CHANGE MADE.**

Pages 4-32 & 33 -- Chester Heights: I concur with the recommendation of no changes to the land use characteristics of this area.

Pages 4-34 & 35 -- Oakwood Heights: I concur with the recommendation of no changes to the land use characteristics of this area.

Pages 4-36 & 37 -- Primrose Park: Parts of this area along Gramatan Avenue, from East Grand to East Broad Streets, should be re-designated "Fleetwood", as it identifies more with the Fleetwood neighborhood/business district. Further, I strongly disagree with the recommendation to extend multi-family residential along East Broad and East Grand Streets east of Gramatan Avenue to Westchester Avenue, as most of this area is comprised of predominantly one and two family homes. On street parking is also a problem

here, which speaks to the need to keep the density low. Please amend accordingly.**NO CHANGE MADE., AS THIS RECOMMENDATION VIOLATES LONG STANDING EXISTING ZONING.**

Pages 4-38 & 39 -- Sunset Hill: I disagree with the recommendation to amend the zoning of the industrial area along the east side of North MacQuesten Parkway to high rise residential, as it would further erode the industrial base of this area and compete with such large employers as Sally Sherman/Ace Endico, etc. on the west side of the street. Proximity to the railroad has long been a reason why industry has thrived here, as employees use mass transit to get to their jobs from points north and south without driving. Please amend accordingly.**NO CHANGE MADE.**

Pages 4-40 & 41 -- Chester Hill: I disagree with the recommendation to amend the zoning to high rise residential, as the predominant portion (two thirds) of the area is low to medium density residential. Any rezoning to high rise residential should be limited to those areas closest to the Metro North station, with height restrictions, as the other areas of this neighborhood should remain as is. Please amend accordingly.**NO CHANGE MADE.**

Pages 4-42 & 43 -- Downtown: Add to the list of "landmarks" downtown the Mount Vernon Library, a Carnegie grant building that serves as the central library for the Westchester Library System. I concur with the recommendation to change the zoning along Third Street to "Corridor Mixed Use", but await further explanation of that re-use in this Plan. I disagree however with the zoning designations outlined in the *Phase I Downtown Vision Report* and already adopted by the City Council, as too tall, too dense and with insufficient off street parking. Two projects, comprising over 600 units -- *Library Square and 140 East Prospect Tower* -- have already been prematurely "greenlighted" under two new overlay zones which I believe will impose undue strain on the downtown infrastructure and not pay for themselves. **FERRANDINO ADDITION OF LIBRARY AS LANDMARK MADE, BUT NO OTHER CHANGES MADE. ALSO, NO DEFINITION OF MIXED USE CORRIDOR ZONING PROVIDED.**

Pages 4-44 & 45 -- Mount Vernon West: Add the iconic art deco former Mount Vernon West rail station to the list of "landmarks" in the area. The conversion and rezoning from industrial to high rise "tower on podium" residential & mixed use has contributed to a net loss of high paying jobs in this once thriving industrial neighborhood, while imposing mammoth 12 plus story high rises in an otherwise low density area. I strongly disagree with the existence of the *Mount Vernon West TOD* zone, as that zone should revert to industrial except for the nodes surrounding the intersection of South MacQuesten Parkway and Mount Vernon Avenue. I also disagree with consolidating the Neighborhood Business and Commercial Business zones along West Lincoln Avenue into "Corridor Mixed Use," but await further explanation of that re-use in this Plan. **NO CHANGE MADE HERE. ALSO, NO DEFINITION OF MIXED USE CORRIDOR ZONING PROVIDED.**

Pages 4-46 & 47 -- Southside: Recommendations to amend the current zoning to

"Corridor Mixed Use" may have merit, but awaits further explanation of that re-use in this Plan. **NO DEFINITION OF MIXED USE CORRIDOR ZONING PROVIDED.**

Pages 4-48 & 49 -- Vernon Heights: Recommendations to amend the current mixed zoning, including the MX-1 along East Third Street between South Columbus and South Fulton Avenues, to "Corridor Mixed Use" may have merit, but awaits further explanation in this Plan. **NO DEFINITION OF MIXED USE CORRIDOR ZONING PROVIDED.**

Pages 4-50 & 51 -- Parkside/Canal Village: This area includes the former Salvation Army Building recently demolished and touted by the Mayor as a possible "market rate housing" site -- quite odd in a heavily industrial area. Recommendations to amend the current zoning to "Corridor Mixed Use" may have merit, but awaits further explanation of that re-use in this Plan. **NO DEFINITION OF MIXED USE CORRIDOR ZONING PROVIDED.**

Chapter 5: Core Concepts

Pages 5-1 to 5-4 -- Mount Vernon's Place in the Region: In reading this section, there appears to be a bias toward developing more dense housing as opposed to taking advantage of the City's location and transit links to attract new tax paying and job producing commerce & industry, and to retain what is already here. Mount Vernon is already one of the most densely populated cities in the country, and there needs to be a better balance between living and working space. This point does not resonate in this chapter. Further, while I concur that there should be an equitable balance between low and high density housing options, one must not forget Mount Vernon's legacy as the City of Homes and one of the first suburbs in the nation. Further, recent misguided city planning efforts have been to eliminate or shrink existing industrially zoned areas and replace them with high density housing -- mostly along the MacQuesten Parkway Corridor. This must be reversed and that mistake not repeated in this Plan. **NO CHANGE MADE HERE, BUT SOME NEW NARRATIVE WAS INSERTED ON PAGE 5-5 EXPANDING THE DEFINITION OF "HOME", AND IN THE "HOUSING ACCESS FOR ALL" PAGE 5-45 PERTAINING TO "STARTER HOMES" FOR THE "MISSING MIDDLE" WHICH ATTEMPTS TO RATIONALIZE THE NEED FOR DUPLEXES, TRIPLEXES, ETC. IN SINGLE FAMILY ZONES AND ELSEWHERE. I DO NOT AGREE WITH THIS AS WRITTEN. ALSO ON PAGES 5-69 AND 5-70, LANGUAGE WAS RANDOMLY INSERTED AND SOFTENED TO ELIMINATE THE CALLING OUT OF SPECIFIC SINGLE FAMILY NEIGHBORHOODS FOR INCREASED DENSITY. WHILE I CONCUR WITH THIS, THE "DEVIL WILL BE IN THE DETAILS" OF THE ZONING THAT WILL IMPLEMENT THIS -- AND THAT NEEDS TO BE INCLUDED IN THIS PLAN AND VETTED IN A FULL GEIS. HOWEVER, IN GENERAL, RANDOM INSERTIONS ARE CONFUSING AND OUT OF CONTEXT.**

Pages 5-5 to 5-42 -- Mount Vernon's Historic Legacy: Some of this Chapter is redundant with Chapter 4, and it might make sense to combine them, if possible, as the *Draft Plan* is exceedingly long. I agree that Mount Vernon's history and preservation are important

elements in maintaining neighborhood character. However, not all low density residential neighborhoods in this chapter contain the recommendation to "preserve existing zoning controls". Perhaps it was an oversight, but Hunt's Woods, Chester Hill Park, Primrose Park and Oakwood Heights, for example, are notably absent that recommendation. Please include. I am also concerned about the recommendation for Chester Hill to accommodate a "broader range of housing types", as this may not be in keeping with the character of portions of the neighborhood. Notably absent from the recommendations for Downtown is the need to rehabilitate derelict buildings, improve and maintain store fronts & streetscape, impose uniform signage, and undertake a concentrated code enforcement and commercial rehabilitation program there. Historic preservation *per se* unfortunately is not enough to revitalize this long neglected area. Regarding Mount Vernon West, it is correct to say that new high density high rises -- completely overwhelming -- are at variance with the surrounding neighborhood. I strongly agree that the form based code approach needs to be revisited -- scrapped actually -- and that the "new architecture" (for example "The Modern") needs to be seriously re-assessed to prevent what has happened there from happening again, as it is quite stark. **NO CHANGE MADE.**

Regarding the historic preservation initiative, including individual landmarking as well as district landmarking, I believe this is something worth pursuing. However, the level of detail of this chapter is unnecessary and should be put in the Appendices. Comprehensive plans are supposed to deal with the "big picture" -- not *inutiae*. **NO CHANGE MADE.**

Pages 5-43 to 51 -- Neighborhood Diversity and Inclusion:

Page 5-45 -- "Eliminate components of the City's zoning that may be considered exclusionary". I concur, but am not sure why "bulk, area, dimensional and parking regulations need to be revised to ensure equity", and question the efficacy of "legalizing... as of right duplexes and triplexes in all single family zones", as well as increasing FAR. What is the basis for doing this? Also, in addressing "excessive parking standards that limit density", one must also examine the environmental impacts and practicality of doing so on a case by case basis. Please include this qualifying language in the text. **NO CHANGE MADE.**

Page 5-48 -- I concur that "all new development should generate real estate taxes sufficient to cover all municipal service costs" and that "Community Benefits Agreements" (CBA) should include the needs of traditionally underserved communities. However, this has not been done in the four (4) recently approved, and tax abated, development projects on orth & South MacQuesten Parkway and South West Street. The *Draft Plan* would also benefit by defining CBA in a footnote. Rather than conduct a "spatial equity audit" down the road, this Plan should use the planning department's newly enhanced GIS capability to include the mapping of "emergency services and health care" as an Appendix to this Plan, as it appears to be a priority of this chapter. Please do so. **NO ADDITIONS OR CHANGES MADE.**

Page 5-50 -- Housing Diversity in Single Family Neighborhoods: Please define "greenlining" in the context of how it is used here. **NO CHANGE MADE.**

Pages 5-52 to 65 -- The Public Realm & Streetscapes:

Page 5-52 -- Enhance Neighborhood Corridors: I would add South Fourth Avenue/Gramatan Avenue (Downtown), Mount Vernon Avenue and Fleetwood to this listing, the latter two corridors lacking any discernible or targeted plan for improvement in this *Draft Plan*. **FERRANDINO CHANGE MADE HERE.**

Page 5-54 -- Recognizing that they are defined in Appendix 2, briefly explain in a footnote or cross reference the "New City Parks" program. Also, explain in a footnote the "Complete Streets Initiative" and where the City stands in adopting one. **NO CHANGE MADE.**

Page 5-61 -- Adopt Storefront and Signage Regulations: The City already has most of these requirements in its sign code; they just need to be enforced by the Building Department on a consistent basis. There should also be a program to incentivize good design. Years ago, the City implemented such a program with a CDBG loan & grant incentive that included free design services in return for compliance. This should be mentioned here and revived in every commercial district. The City's current Small Business Grant Program misses the mark in that it is not targeted, and its guidelines are so vague that the program lends itself to potential fraud. **NO CHANGE MADE.**

Pages 5-61 to 64 -- Targeted Small Area Plans - East Sanford Boulevard: This protocol should be replicated for every commercial district in the City, but certainly for Fleetwood and Mount Vernon Avenue -- both walkable neighborhoods and key gateways to Mount Vernon -- with detailed recommendations made across the board for improvement where needed. Perhaps more than East Sanford Boulevard, these two areas are crying out for help, as they are most visible to pedestrians & drivers alike, and have been deteriorating, with zoning violations, office & retail vacancies and streetscape neglect, for a number of years with ZERO attention. They absolutely require the inclusion of a detailed "Small Area Plan" in this *Draft Plan*. **NO CHANGE MADE.**

Pages 5-66 to 80 -- Housing Access For All:

Page 5-67 --The statement "Housing will be the foundation that allows Mount Vernon to thrive" should be broadened to say: "housing and the expansion of commercial development", as there needs to be a balance for either to succeed. There should also be cross reference to the City's recently adopted *Consolidated Plan for Community Development* which devotes itself largely to addressing Mount Vernon's housing market and needs. This *Plan* is not mentioned anywhere. **NO CHANGE MADE.**

Page 5-69 -- The recommendation to "Allow and encourage mixed use development with a residential component in ALL neighborhoods of the City" should be amended to say "in

SOME neighborhoods, including..." **FERRANDINO CHANGE PARTIALLY MADE HERE.**

Page 5-70 –The recommendation to "consider the suitability of duplexes and triplexes in certain single family zones by right" is not a wise policy without undertaking some environmental analysis on a case by case/neighborhood basis. Please do so in this Plan. Also, please define "gentle density" here. **NO DEFINITION PROVIDED OR DETAILED ANALYSIS UNDERTAKEN PER FERRANDINO RECOMMENDATION.**

Pages 5-72 to 76 -- "Approve a mandatory inclusionary housing policy". Much of this detail should be summarized and included in an Appendix, as it is speculative and subject to adoption during the implementation of the Plan. **NO CHANGE MADE.**

Page 5-79 -- "Offer low interest rehabilitation loans for code compliance upgrades through a municipal fund." Point out that this type of program was administered by the planning department in the 1980s using CDBG funds, but was subsequently abandoned by the City, and should be revived now. **NO CHANGE MADE.**

Pages 5-81 to 96 -- Connecting Green Spaces To the Natural Environment: This is perhaps the *Draft Plan's* strongest chapter and many of the recommendations warrant implementation, including references to biophilic planning and strengthening of the responsibilities of the Tree Advisory Board.

Pages 5-97 to 114 -- Healthy, Safe and Active Communities:

Page 5-99 -- "Ensure the density within neighborhoods is properly distributed". This properly calls for a build out analysis that should be included in a ***Generic Environmental Impact Statement (GEIS)*** made a part of this *Draft Plan*, and not diverted to the drafting of zoning down the road, as it is at the core of neighborhood density and other zoning regulations. To do otherwise would, in my opinion, constitute segmentation under SEQR, as zoning map and text changes should be part of the Comprehensive Plan review. **NO CHANGE MADE.**

Page 5-101 -- Bike lanes: While bike lanes are desirable in a city as dense as Mount Vernon, given the paucity of on street spaces in general there is a need to balance the loss of on street parking spaces to bike lanes. This should be vetted as part of the GEIS alluded to above to determine impacts of all alternatives. **NO CHANGE MADE.**

Page 5-109 -- Wayfinding: Please add a section to this chapter on residential street signage as, in most neighborhoods, street signs are either nonexistent, damaged or unclear. The signage should be uniform, reflective and easy to read. **NO CHANGE MADE.**

Pages 5-115 to 126 -- Resiliency & Sustainability: I have no concerns with this section, as it proposes "best practices" for Mount Vernon employed in many other municipalities.

Pages 5-127 to 140 -- Economic Development:

Page 5-127 -- Introduction: I would add to the definition of economic development "the generation of wealth via real estate and sales tax revenue to finance municipal services, public safety, infrastructure and education". Also, much of what is contained in this *Draft Plan's* economic development strategy was contained in Mount Vernon's New York State approved *E pire Zone Plan* from some years ago. That *Plan* should be revisited for other recommendations, and referenced in this *Draft Plan*. Further, many of the economic development tasks are labor intensive, requiring the retention of additional qualified personnel experienced in economic development. This needs to be taken into account in implementing any successful economic attraction & retention program, and an administrative mechanism recommended to oversee and coordinate this ambitious economic development effort. Please include, as that is missing in this *Draft Plan*. **NO CHANGE MADE.**

Pages 129 to 134 -- The RFEI Process: This is highlighted as a key tool for the City to dispose of and redevelop its municipally owned land. It could also apply to the School District which will be shuttering several schools that may be ripe for redevelopment/conversion to other economically viable uses. However, much of this detail as to how RFEIs work, etc. could best be relegated to an Appendix, along with a few examples of where RFEIs have succeeded, instead of in the body of the Plan text. **NO CHANGE MADE.**

Page 5-137 -- Mount Vernon West: While the *Draft Plan* calls for maintaining industrial uses here, the current *Mount Vernon West TOD* zoning contradicts that, with several industrially zoned parcels now converted to out of scale high rise low to moderate income housing. I concur in the need to retain the industrial uses near this mass transit hub, limiting any new residential to areas within 500-750 feet of the Metro North Station. **NO CHANGE MADE.**

Pages 5-141 to 148 -- Reliable and Modern Infrastructure:

This is a key chapter in the Plan, and its recommendations appear to be sound, again based upon "best practices" employed in other municipalities. However, there is no mention of the need for the City to balance future development, occasioned by proposed higher density zoning, with the upgrading and maintenance of its aging infrastructure. This should be highlighted and vetted by environmental documentation, accompanied by appropriate mitigation measures where necessary, in a full GEIS. **NO CHANGE MADE.**

Pages 5-149 to 158 -- Effective Government Service:

In reviewing the goals and objectives proposed to improve government efficiency, it is obvious that these multi-varied tasks need to be overseen by a professional. That clearly is not the case now, nor has it been for many years. The most recent opportunity to change that was summarily voted down by a majority of the Mayoral and City Council appointed Charter Commission members with the support of those elected officials. The need for

change was totally ignored. Until such time as a professional is appointed to direct the day to day functioning of City government, it will continue to be managed by amateurs, and much of what is being proposed in the Comprehensive Plan will be for nought.

Chapter 6: Implementation

Pages 6-1 to 34 -- The Plan would benefit by enlarging the matrices employed to summarize its 36 goals and 391 (*sic*) (or is it 418?) objectives, as they are difficult to read on the page and when printed out. It would also be helpful to include, in narrative form, a brief explanation of immediate next steps, including the preparation of environmental documentation under SEQR, as well as the adoption of implementation tools, including zoning and other regulatory mechanisms, before this Plan is approved. **NO CHANGE MADE.**

Finally, despite several references to "Mixed Use Corridor" zoning in four (4) neighborhoods, there is no definition of that in the *Draft Plan* – a gaping omission – as, according to this *Draft Plan*, that will constitute any new zoning in existing low to medium density neighborhoods. This is a major flaw and omission that must be addressed before any Plan is adopted. **NO CHANGE MADE, NOR A DEFINITION OF MIXED USE CORRIDOR ZONING PROVIDED – THIS CONTINUES TO BE A MAJOR OMISSION AND FLAW IN THIS PLAN.**

Pages 1-1 to 1-6 -- Very helpful, **EXCEPT THE ADDITION OF LANGUAGE ON PARKING -- OBJECTIVE 3.3.2: "UPDATE PARKING REQUIREMENTS BASED ON GEOGRAPHY": THIS IS TOO VAGUE AND SEEKS TO JUSTIFY THE ABSURDLY LOW .6 OFF STREET PARKING SPACES PER DWELLING UNIT IN DOWNTOWN BUILDINGS. I DO NOT CONCUR – PLEASE AMEND OR ELIMINATE.**

III COMMENTS ON PHASE 1 DOWNTOWN VISION REPORT (Appendix 2) NO CHANGES MADE.

FOR ALL THE COMPONENTS OF THIS APPENDIX AND PLAN CHAPTER, THERE WERE ZERO CHANGES MADE IN THE AMENDED DRAFT PLAN, SO I WILL NOT TAKE THE TIME AND MAKE THE EFFORT TO GO THROUGH EACH ONE. THE DOWNTOWN IS A KEY NEIGHBORHOOD OF THE CITY THAT HAS THE POTENTIAL TO BE AN ECONOMIC DRIVER. HOWEVER, AS PROPOSED, IT DOES NOT ACHIEVE THAT POTENTIAL, AS IT RELIES ON A PRIMARILY RESIDENTIAL BASE AND ZONING THAT WILL RESULT IN BUILDINGS THAT ARE TOO TALL, TOO DENSE AND WITHOUT SUFFICIENT OFF STREET PARKING. AS SUCH, I OPPOSE WHAT IS BEING RECOMMENDED AND STRONGLY URGE THAT MORE REASONABLE HEIGHTS AND DENSITIES IN MY COMMENTS BELOW, AS WELL AS MORE SUFFICIENT PARKING, BE CONSIDERED, AMONG OTHER THINGS.

Pages 1 to 68 -- Overall, like the other chapters of this *Draft Plan*, this appended *Phase 1 Downtown Vision Report* is redundant & repetitive, and its organization is challenging. As part of something that is now going to be officially adopted *in toto*, it should be revised.

This questionable *Phase 1 Downtown Vision Report* was approved by the City Council almost two years ago to enable developers in the downtown to proceed, unobstructed, with their rezonings and projects, without the benefit of an adopted & complete Comprehensive Plan, and no environmental documentation, calling into question the environmental review process under NYSEQR and the possibility of "segmentation". Further, it was put before the legislative body by the planning department despite the opposition of a majority of the Comprehensive Plan Advisory Committee whose members voiced strong dissatisfaction with the height, density and parking recommendations therein. At that time, I commented on the *Draft Downtown Vision Report* in testimony given on November 15, 2023 and December 6, 2023, now incorporated as an attachment to this testimony. As part and parcel of this *Draft Comprehensive Plan*, it is subject to complete review and comment, as well as full environmental review under NYSEQR. It is also worth noting that the lead consultant for Phase 1 -- the MUD Workshop from New York City -- was suddenly terminated following the completion of their Report, and the Associate Planning Commissioner, who was hired and whose position was specifically created to oversee this Plan, also abruptly resigned. It took the planning department more than a year thereafter to bring in a new consulting team, and "jumpstart" Phase 2.

As a for atting footnote, half of the page numbers in this Report are missing at the bottom of the page -- every other page is labeled -- making it difficult to follow. This should be corrected in any revision to this document, and incorporation into this Draft Plan.

Below is a chapter by chapter, page by page review of the *Phase 1 Downtown Vision Report*. Some of it is on target, but unfortunately, a lot of it, like the *Phase 2 Draft Plan*, "gets lost in the weeds".

Page 8 -- Advisory Committee: Having a forty five (45) person committee is unwieldy and very unusual and, in the *Phase 2 Draft Plan*, that number was slightly reduced to thirty seven (37) people -- almost as bad. Most Comprehensive Plans employ much smaller advisory groups, ranging from seven (7) people to fifteen (15) people, with representatives from all walks of community life, including members of other advisory boards like planning, zoning, conservation, etc. Of the 45 members, I understand only a small percentage consistently participated, and those were the ones who voiced strong opposition to the *Downtown Vision Report* that the City Council adopted without question or substantive change.

Pages 9 to 11 -- Key Engagement Activities: To accurately gauge the actual level of public participation, this section would benefit by citing the number of attendees at each activity/hearing, as well as public survey responses. The survey document and results should also be included as an Appendix to the *Vision Report*. Please insert both.

Page 11 -- Village Character: Despite concerns about preserving "village character" and lip service given by staff, as central to the revitalization of the downtown as expressed on this page, that was completely ignored in the final *Downtown Vision Report*, as high density housing was proposed and approved as a key zoning determinant.

Page 15 -- Downtown Revitalization Guidelines: While the *Downtown Vision Report* keeps referring to "thoughtful community driven development downtown", the final recommendations do anything but reflect that, as the results were more "developer driven". The lack of "foot traffic" needed to patronize downtown businesses is driven more by the lack of quality retail and services, as the density of the surrounding area can support existing and additional businesses if there is a reason to do so. Building more dense housing without sufficient parking, especially lower income housing, will not be the sought after "magnet." For example, Rye, Tuckahoe and Bronxville have thriving downtowns without the residential density called for in this *Report*. And while I champion retaining up to four (4) story buildings along the Gramatan-South Fourth Avenue corridor, and will support somewhat taller buildings in the downtown, I do not support "super tall" high density high rises on the east-west streets surrounding the corridor, on both sides of the tracks, especially 21 story buildings that will be (and are now going to be) out of scale with the surrounding neighborhoods due to rezonings approved this past year based upon the ill-conceived recommendations in this *Report*.

Pages 17 and 19 -- In planning for the repurposing of vacant lots and storefronts in the downtown, it would be helpful to have a GIS-mapped inventory of these spaces so that one can ascertain where the major gaps are. This *Report* does not contain that and it should be amended to do so. Also absent from this section is any recommendation to engage in a City assisted commercial rehabilitation program to help store and property owners to upgrade. (See my other comments on this issue.)

Pages 22 to 25 -- Downtown Density Distribution:

Pages 22 & 23 -- The Density Distributions and Density Map calling for up to 21 story buildings in a majority of the downtown, especially in the eastern portion, north and south of the tracks, is contrary to the recommendations of a majority of the Advisory Committee, entirely too dense and out of scale with most of the downtown. The Density Map is difficult to read and should be enlarged. ***Most importantly, the Medium (up to 9 stories) and the Mid High (up to 12 stories) density designations should replace the High (up to 15 stories) and Highest (up to 21 stories) density designations, perhaps allowing a density bonus of 2 stories for the Mid High designation, permitting a cap of 14 stories there. All other density designations should be adjusted downward accordingly at appropriate scales for the neighborhoods in which they are located. I realize this will be difficult to do, now that two downtown developments have been greenlighted with heights up to 21 stories. But the vast number of parcels potentially eligible for rezonings in the downtown need to be capped at more reasonable***

heights & densities in order to be sustainable and in character with existing neighborhoods. This is a must.

Page 24 -- Public Benefit of Density Increases: While these rationalizations may apply to areas of low density, they do not necessarily apply to Mount Vernon which is one of the most densely populated communities in New York State. More density must be **balanced** with the ability of the infrastructure to support it and the financial costs or benefits needed to finance it, including tax incentives and abatements.

Page 27 to 35 – (1) Define Building Density and Uses In and Around Downtown to Attract a Consumer Base and Investment to Support Businesses.

Page 31 -- Policy Initiatives: "Increase consistency in Downtown zoning potentially by creating a single Downtown zoning use district with a uniform set of permitted uses; and within that use district, the regulations for building form and dimensions could be tied to the Downtown Density Distributions Map". This clearly was NOT adhered to in the two greenlighted special district rezonings for the *Library Square* and *140 East Prospect Tower* multi-family developments, both in direct contravention to this recommendation. In fact, these two new zoning districts, with different requirements, were adopted without each taking into account the other. So much for coordinated planning based upon this *Vision Report*.

Pages 33 and 34 -- Inclusionary Housing: This Report recommends that Mount Vernon incorporate an Inclusionary Housing Policy mandating that 10 to 20% of units in new residential buildings of 10 or more units be set aside as affordable units for households making between 30 to 100% of AMI. This clearly was NOT adhered to in one of the greenlighted rezonings -- *140 East Prospect Tower*, a 100% market rate development in the downtown. Again, so much for coordinated planning based upon this *Vision Report*.

Pages 36 to 40 -- (2) Reinforce the Identities of Gramatan and South 4th Avenues as the Downtown Corridor.

Page 39 -- Capital Projects: "Conduct a study to assess vehicular traffic and identify recommendations to facilitate the flow of vehicles more effectively through the Downtown Corridor". In view of the recommended increases in density, this is a sound recommendation and should be undertaken as part the environmental documentation in a GEIS to be prepared as part of, and prior to, the adoption of this Comprehensive Plan.

Pages 41 to 45 – (3) Make Transit Use a Convenient Choice for Residents and Visitors.

Page 44 -- Policy Initiatives: "Prioritize public transit and active land uses by reducing off street parking requirements and reimagining underutilized parking lots and garages". I do not see what "prioritizing public transit" has to do with "reducing off street parking

requirements". People will take public transit if they need or choose to, and reducing off street parking requirements will not be an incentive for doing that. The reduction in off street parking in new buildings to less than one space per unit is a sop to developers to save money, as it is their interest to do so. In Westchester, most people have cars, even if they take public transit. Further, in most suburban TOD districts, it has been proven that most renters have at least one car per household. And then of course, there are visitors and service providers who may travel by car -- where do they park? ***On street parking is already at a premium in the downtown. Reducing off street parking will only exacerbate that. This should be amended to require one parking space per unit. Please do so.***

Page 44 -- Policy Initiatives: "Complete Streets". The *Report* says "being designed (January 2024)". What is the status in October 2025? Please advise.

Page 44 -- Policy Initiatives - Capital Projects: "Consider renovating and/or rebuilding aging, dilapidated and underutilized municipal parking garages to encourage their usage by residents and visitors." Supplement this statement by acknowledging that the Mount Vernon Charter Review Commission has recommended to the City Council the re-institution of the Mount Vernon Parking Authority to undertake capital projects and management of the City's garages.

Pages 46 to 50 -- (4) Repurpose Underutilized Lots and Buildings with Interim Community Uses and Integrate them into the Urban Fabric as they Await Development and/or New Ownership.

Page 50 -- Public Private Partnerships: Again, there is no reference in the "tool kit" to a commercial rehabilitation loan & grant program administered by the City to address underutilized, blighted, or vacant buildings/storefronts on the City's main downtown (and other) corridors.

Pages 51 to 55 -- (5) Create a Recognizable Network of Open Spaces and Pedestrian Connections for a Walkable Downtown District.

I have previously commented on the need for a traffic study to be part of the GEIS accompanying this Comprehensive Plan prior to adoption.

Pages 50 to 68 -- (6) Evaluating Existing Barriers to Economic Development and Advance a Cohesive Strategy to Assist Local Business Owners and Attract New Investment.

Page 58 -- "Provide consistent and cohesive zoning throughout the Downtown area". This has already been violated by the two "special district" zones adopted this year to greenlight the two aforementioned high rise developments prior to the completion of this Plan.

Pages 60-61 -- Policy Initiatives: The emphasis on zoning here is key. I concur with Ferrandino & Associates Inc.

many of the recommendations, except for those pertaining to height, density and reduced off street parking. ***However, before any updated Comprehensive Plan is adopted, the zoning to implement this Plan should be drafted and made a part of the adoption process, including the preparation of a full GEIS to vet the impacts of both the Comprehensive Plan and zoning. To do anything less would bifurcate the process and fail to present a complete picture of what is being put forth, in violation of SEQR.***

Page 62-68 -- Economic Development Strategy: I concur with most of what is being recommended to "jump start" and create a long term viable economic development plan. However, the City is hamstrung to implement these programs absent a coordinated effort led by a professional economic development team. This needs to be stressed in any efforts to improve. Please do so here.

A footnote on BIDs: in the mid-1980s, the City explored the formation of a Downtown BID via a consultant feasibility study. The results were that due to the large number of religious and not for profit owned (tax exempt) properties in the downtown, there would be insufficient assessable income to support a BID. The number of tax exempt properties has proliferated since then, such that the original conclusion reached would likely be the same today. However, a revitalized and functioning Chamber of Commerce could fill some of that role.

Conclusion

The City has an opportunity to amend this *Downtown Vision Report* to incorporate less dense zoning, as part of the overall Comprehensive Plan. With thousands of units in the pipeline, now is the time to do it.

OVERALL CONCLUSION AND RECOMMENDATIONS

Given the length and breadth of these comments, the public hearing should be kept open until such time as the Comprehensive Plan consulting team and planning department have had a chance to review all public comments and respond to them individually, as well as prepare a revised *Draft Comprehensive Plan*, vetted by a full GEIS, for posting and further comment by the public. This may take several weeks or months. **THIS RECOMMENDATION STANDS, AS IT APPEARS, FROM ACTIONS TAKEN AT THE NOVEMBER 10, 2025 PUBLIC HEARING TO CLOSE THE HEARING AND LIMIT COMMENTS, THAT THIS CITY COUNCIL IS PREPARED TO RAM THIS PLAN THROUGH WITH MINIMAL, IF ANY, CHANGES, AND WITHOUT SPECIFIC ZONING VETTED VIA A FULL GEIS.**

As part of this "due diligence review" I have offered to meet with the planning department and their consulting team to discuss my and other community members' concerns, in an effort to facilitate the City team's responses and revisions to the amended *Draft Plan*. **ON OCTOBER 21, 2025, A GROUP OF RESIDENTS MET WITH**

THE PLANNING DEPARTMENT STAFF AND MADE SEVERAL RECOMMENDATIONS TO AMEND THIS DRAFT PLAN. SADLY, ONLY A VERY FEW OF THOSE RECOMMENDATIONS WERE ADDRESSED. A SECOND EFFORT TO MEET BEFORE THE NOVEMBER 10, 2025 PUBIC HEARING COULD NOT BE ACCOMMODATED DUE TO SCHEDULING CONFLICTS. AT THIS TIME, A THIRD MEETING IS BEING ATTEMPTED, BUT WITH THE MAYOR, COMPTROLLER AND A REPRESENTATIVE OF THE CITY COUNCIL, TOGETHER WITH CITY PLANNING STAFF, TO FURTHER REVISE THE AMENDED *DRAFT PLAN* AND "RIGHT SIZE THE ENVIRONMENTAL REVIEW PROCESS".

Finally, I ask you to rethink the process and the environmental consequences of your actions, as a lawsuit will ABSOLUTELY be filed if you do not. THAT RECOMMENDATION STILL STANDS, AS IT APPEARS THAT THE CITY COUNCIL WILL RUSH THIS PLAN THROUGH, WITHOUT THE REQUIRED ZONING AND ENVIRONMENTAL DOCUMENTATION VIA THE PREPARATION OF A FULL GEIS. NOTHING LESS IS ACCEPTABLE!

- Testimony delivered regarding *Phase 1 Downtown Vision* Report on November 15, 2023 and December 6, 2023.
- Summary of Expert Testimony dated October 12, 2025 submitted with the detailed comments.



FERRANDINO & ASSOCIATES INC.
PLANNING AND DEVELOPMENT CONSULTANTS

MEMORANDUM

To: President and Members of the City Council

From: Vince Ferrandino, AICP

Date: November 14, 2025

Re: Amended Comments on The Amended Draft Comprehensive Plan

President and Members of the City Council

Please add these to my comments on the revised Draft Comprehensive Plan delivered in person at the November 10, 2025 public hearing, and to those comments emailed to the City Clerk on November 12, 2025.

1) I have learned that the *Public Notice* placed in the *Journal News* by the Planning Department on October 30, 2025 does not comply with City Council regulations for properly scheduling hearings. Therefore, absent a certified resolution of the City Council authorizing same, the November 10, 2025 public hearing was illegally called and is **null and void**. However, any comments received from the public at that hearing, and before the comment deadline of November 17, 2025, should be included in the public record.

2) It has come to my attention that the entire amended *Draft Plan* was not included on *Granicus Legistar*, the medium for including all Plan documents, nor on the City Planning Department web site. Conspicuously missing from the 413 page document was the *Phase I Downtown Vision Report*, a key chapter in the overall Plan that was previously included in the original 475 page *Draft Plan* as an *Appendix*. This constitutes a **material breach** that needs to be corrected **IMMEDIATELY** if this process is to move forward. Please advise for the record why this key chapter was omitted.

Please address both points above in any response the consulting team provides regarding this Plan.

Thank you.

Comp Plan

From Rhoshena Allen <rhoshe71@yahoo.com>

Date Sat 11/15/2025 1:19 PM

To Bonilla, Nicole <nbonilla@mountvernonny.gov>

Cc hubby <callen34@verizon.net>

[You don't often get email from rhoshe71@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Please just STOP with this plan. Does not seem to benefit anyone - definitely not homeowners nor the citizens in general, of Mount Vernon. We are way too crowded, much too dense and overpopulated - enough is enough!!

AND, we are already a very diverse community, so even that should not be argued in favor of this plan! Not to mention our infrastructure can't handle anymore buildings, multiple family homes, people, cars, etc.

STOP!!!!

Cortney and Shena Allen, 30 year MTV residents and homeowners

Comprehensive Plan

From Marlene <marlosa902@aol.com>

Date Mon 11/17/2025 8:56 AM

To Bonilla, Nicole <nbonilla@mountvernonny.gov>

You don't often get email from marlosa902@aol.com. [Learn why this is important](#)

To add to the file on responses to the CP

Ms. Bonilla -

I follow, with respect, all the exchanges passing among those who are so knowledgeable and persistent in their responses to the unfolding of the Comprehensive Plan. I do not see the plan as a reflection of community participation and interest but a yielding to the demands of developers. The Mayor's glossy lengthy weekly reports of the goings-on in Mt. Vernon cannot whitewash the fact that the path of development in the hands of, unfortunately, ALL of our administration moves forward unchanged and in defiance of required process and respect for the community they are supposed to serve.

Mt. Vernon deserves far better than this.

Marlene H. Wertheim
100 Sycamore
Nov. 17, 2025

Michael J. Templeton
Mount Vernon, NY 10552

November 17, 2025

To: Hon. Nicole Bonilla, City Clerk, City of Mount Vernon, New York

Re: Comments to the Revised Draft "Comprehensive Plan"

I have resided in the Hunt's Woods neighborhood of Mount Vernon for nearly 30 years. I make this submission to supplement my comments regarding the drafts of the "Comprehensive Plan" at the public hearings on October 8 and November 10, 2025, and in my prior written submission of October 21, 2025.

Opposition to Increased Floor Area Ratio for Single-Family Residence Districts in Revised Draft Comprehensive Plan

There are three single-family residence zones under the City Zoning Code: R1-7; R1-4.5; and R1-3.6. The only residential permitted principal use for these zones is for "one-family dwellings,"¹ Multi-family housing structures, duplexes and triplexes, and accessory dwelling units ("ADUs"), are not permitted principal uses in single-family districts. Significantly, the maximum Floor Area Ratio (F.A.R.) under the Zoning Code for single-family zones is 0.35.²

The prior Draft Plan proposed to eliminate existing single-family home residential zones, in what the Draft Plan termed as "Low Density Residential" "LD-1" districts to allow for not only single-family homes, but in addition to also allow for multi-family duplexes and triplexes, and ADUs. The Draft Plan also proposed greatly increased F.A.Rs. in these so-called "LD-1" residential neighborhoods to "0.5 – 1.0".³ This is a 50% to more than 100% increase in the F.A.R. from the existing maximum F.A.R. in the Zoning Code for single-family residence districts.

Following two public hearings and many residents' objections, comments, and submissions in opposition to the Draft Plan (including overwhelming residents' opposition to elimination of, or changes to, existing single-family residence zones), a Revised Draft Comprehensive Plan ("Revised Plan") was published by the Planning Department. The Revised Plan was accompanied by a Memorandum Statement "Update" by the Planning Department summarizing "changes" to the prior Draft Plan made in response to "public feedback."

¹ Zoning Code §267-17(A)-(C).

² Zoning Code Chapter 267 Attachment 1 ("Schedule of Dimensional Regulations, Residential Districts").

³ Prior Draft Comprehensive Plan, at 4-11.

Under the subheading “Single-Family Zones,” the “Update” Memorandum from the Planning Department provided with the Revised Plan states:

“Many residents expressed concern that the Comprehensive Plan might eliminate or rezone existing single-family neighborhoods, leading to overdevelopment or loss of neighborhood character. **Response: Single-family zoning is not being eliminated. The revised plan preserves the integrity of single-family neighborhoods by maintaining existing densities and patterns.**”⁴ (Bold type in original; underlining added).

In the Revised Plan’s discussion regarding what it refers to as “Low Density Residential” areas, the Revised Plan removes from the prior Draft Plan listing of “Types of Allowed Uses”: “Duplex – Triplex” and “Accessory Apartments.”⁵ Under the Revised Plan, the Types of Allowed Uses” for “Low Density Residential” areas are limited to “Single-Family Residential” “Low-Rise Civic Uses,” and “Recreational Uses.”⁶

However, notwithstanding the removal of duplexes, triplexes, and ADUs from the list of “allowed uses” in this “Low Density Residential” category, the Revised Plan still keeps the same larger “suggested” Floor Area Ratio of “0.5 - 1.0” for “Low Density Residential” “LD-1” areas, as was stated in the prior Draft Plan. By definition, this increase in the F.A.R. set forth in the Revised Plan for single-family residence districts constitutes a substantial increase in single-family neighborhood density.

This increase is contrary to the Planning Department statement (quoted above) that the Revised Plan “maintain[s] existing densities” for single-family neighborhoods. Among other impacts, such increased F.A.R. density will alter and detract from the long-established character of single-family neighborhoods, reduce open space, lead to diminished setbacks and expanded impervious surface coverages, and further burden already overburdened infrastructure.

Under the City’s Zoning Code, the “specific purposes” of residence districts include to promote and encourage “a suitable environment for family life where safe streets, wide yards and quiet neighborhoods are of paramount importance, and to provide “adequate open space, sunlight and air.””⁷ For the Revised Plan to fully “preserve[] the integrity of single-family

⁴ Email Statement entitled “Update to Mount Vernon’s Comprehensive Plan: A Community-Driven Vision for the Future,” from the City Planning Department, dated November 7, 2025, M. Molina, Deputy Commissioner Mount Vernon Department of Planning and Community Development.

⁵ Prior Draft Comprehensive Plan, at 4-11.

⁶ Revised Draft Comprehensive Plan, at 4-11. The category “Low Density Residential” is described in the Revised Plan to include “detached single-family homes on individual lots characterized by larger yard setbacks and robust landscaping.” Page 4-11. The clear intent of the reference to “Recreational Uses,” which is listed as an “allowed use” in this “Low Density Residential” category, means “Public” Recreational Uses (i.e., open to the public for recreational use such as neighborhood parks), and does not include private clubs.

⁷ Zoning Code §267-15(A)(1); (3).

neighborhoods,” as was assured by the Planning Department, the maximum Floor Area Ratio for single-family residence districts should not be increased as “suggested” in the Revised Plan, and should remain as provided for in the existing Zoning Code.

References in the Revised Plan that the Bronxville Field Club is a “Notable Feature” of Hunt’s Woods, or is a “Landmark,” Should Be Stricken and Removed from the Revised Plan

The Revised Plan (as in the prior Draft Plan) refers to the Bronxville Field Club (“BFC” or “Club”) as a so-called “notable feature” in the Hunt’s Woods neighborhood (Pages 5-8; 5-9), and appears to propose some undefined “landmark” reference designation (Pages 4-26; 4-27) with respect to the BFC. These references or characterizations as to the BFC are inappropriate, unfounded, and unwarranted, and should be removed from the Revised Plan.

The Bronxville Field Club is a nonconforming use located in the Hunt’s Woods single-family residence neighborhood zoned R1-7. With respect to nonconforming uses, the New York Court of Appeals (the State’s highest court) has recognized that “ [t]he law . . . generally views nonconforming uses as detrimental to a zoning scheme, and the overriding public policy of zoning in New York State and elsewhere is aimed at their reasonable restriction and eventual elimination.”⁸ The Mount Vernon Zoning Code has express statutory restrictions and prohibitions governing nonconforming uses,⁹ and consistent with New York’s “overriding public policy” aimed at the “eventual elimination” of nonconforming uses, the BFC nonconforming use in the Hunt’s Woods single-family residence district is not a “notable feature” of the single-family neighborhood, and is not properly characterized as such.

Moreover, as discussed in my October 21 submission, the BFC does not serve and is not inclusive of Hunt’s Woods. It is not Hunt’s Woods centric, and does not allow the Hunt’s Woods community open access to and use of its facilities. The BFC is a private members-only club, with limited select membership, high initiating fees and dues, and claims 501(c)(7) tax exempt status as a “private club.” Over 90% of the Club’s members do not reside in Mount Vernon. The BFC does not openly acknowledge that its physical location is in Mount Vernon. In its marketing materials, its claimed “address,”¹⁰ and its website, the BFC asserts or implies a “Bronxville” location and association (not Hunt’s Woods), even though all of its property is physically located in Mount Vernon.

⁸ Rudolf Steiner Fellowship Foundation v. De Luccia, 90 N.Y.2d 453, 458, 662 N.Y.S.2d 411 (1997) (emphasis added), quoting Toys “R” Us v. Silva, 89 N.Y.2d 411, 417, 654 N.Y.S.2d 100 (1996).

⁹ Zoning Code §267-11(B).

¹⁰ The BFC website gives the Club’s address as “40 Locust Lane, Bronxville, NY 10708.” Mount Vernon City records list the Bronxville Field Club’s address as 24 Locust Lane, Mount Vernon, NY 10552.

In sum, for these reasons and others as discussed in my prior submission, the Bronxville Field Club is not a “notable feature” of Hunt’s Woods, and such a reference regarding the BFC (Pages 5-8; 5-9) should be removed from the Revised Plan.

For some of the same reasons, the Bronxville Field Club should not be referenced or noted in a statement or proposed “map” in the Revised Plan as a so-called “landmark.” Hunt’s Woods Park, which is also referenced as a “landmark” in the Revised Plan (Pages 4-26; 4-27), is completely different from and not analogous to the Bronxville Field Club. Unlike Hunt’s Woods Park, the BFC members-only private club is not free and open to all for use and enjoyment of the Hunt’s Woods community, and does not provide accessible expansive green space and nature for the neighborhood. Nor is the BFC some purported significant beneficial historical or cultural asset or resource to Hunt’s Woods, or to the identity of Hunt’s Woods.

The reference or designation in the Revised Plan to the BFC as a “landmark” in the Hunt’s Woods neighborhood (Pages 4-26; 4-27) is unsupported and unwarranted, and should be removed from the Revised Plan.

Respectfully submitted,
Michael J. Templeton
Mount Vernon Resident and Homeowner