

City of Mount Vernon, New York

1 ROOSEVELT SQ. RM. 104
CITY HALL, MOUNT VERNON, NEW YORK 10550
& VIA FACEBOOK.COM/MOUNTVERNONNY



Referral Packet - Final-revised

Comprehensive Plan - "Envision Mount Vernon" Night 2

Tuesday, October 14, 2025

7:00 PM

CITY COUNCIL CHAMBERS

CITY HALL

1 ROOSEVELT SQUARE

MOUNT VERNON, NY 10550

City Council Public Hearing

NICOLE BONILLA, M.B.A.

City Clerk

JORDAN A. RIULLANO

Deputy City Clerk

**** This meeting was held in the council chambers, with virtual participation via ZOOM and CMVNY Facebook. The meeting was not closed to the public however, the maximum number of in-person occupant was limited ****

PRESIDING: Edward Poteat, Acting President

OTHERS: Nicole Bonilla, City Clerk; Jordan Riullano, Deputy City Clerk; Antoinette Anderson, Legislative Aide; Brian Johnson, Corporation Counsel

CALL TO ORDER / PLEDGE OF ALLEGIANCE

Acting Council President Edward Poteat called the meeting to order and provided general house-keeping rules, including encouraging citizens to share the meeting on social media and what to do “in case of emergency”. Acting Council President Poteat explained the 3-minute-plus-1 public comment rule. A Councilperson was asked to lead the council in the Pledge of Allegiance.

PRESENTATIONS

PUBLIC COMMENT

Roll Call administered by City Clerk Nicole Bonilla

To the Council:

FINANCE AND PLANNING

Comprehensive Plan: "Envision Mount Vernon".

Code: FP

Attachments: [Comp Plan Referral with Link](#)
[Comp Plan Committee Mtg July 14](#)
[Comp Plan EAF Part 1](#)
[Comp Plan EAF Part 2](#)
[Comp Plan PH Comments Night 1](#)
[Comp Plan PH Comments Night 2 as of 10-15-2025 1 pm](#)
[Additional Comments](#)

OTHER BUSINESS/CLOSING COMMENTS



PLANNING & COMMUNITY DEVELOPMENT
ONE ROOSEVELT SQUARE
MOUNT VERNON, NEW YORK 10550
PHONE: (914) 840-4029
EMAIL: TGRAHAM-OUATTARA@CMVNY.COM

JAMES RAUSSE, FAICP, WEDG
COMMISSIONER

September 15, 2025

VIA EMAIL:

Honorable City Council Members
City of Mount Vernon
1 Roosevelt Square
Mount Vernon, New York 10550

RE: Request for the Mount Vernon City Council to formally adopt the Mount Vernon Comprehensive Plan – *Envision Mount Vernon*. For consideration on the agenda at the September 24th, 2025, City Council meeting.

Dear Council Members,

On behalf of the Department of Planning and Community Development, I am pleased to submit the draft of the Mount Vernon Comprehensive Plan, *Envision Mount Vernon*, for your formal consideration and adoption. This represents the City's first full Comprehensive Plan update since 1968, and it comes at a critical moment in Mount Vernon's history as we seek to shape a shared vision for the future.

The Department respectfully requests that the City Council begin the environmental review of this matter pursuant to SEQRA by declaring its intention to serve as the lead agency in accordance with the City Charter, and to schedule the required public hearings prior to voting on the acceptance of the Comprehensive Plan. These hearings will provide the public with a final opportunity to engage in this historic process and ensure that adoption reflects the transparent, participatory principles that have guided the Plan's creation.

The development of *Envision Mount Vernon* reflects a deliberate, methodical, and strategic approach to long-range planning. Produced by professional planning consulting firms, Cleary Consulting, AKRF, Inc., Hudson Valley Pattern for Progress, BRS, Inc and Creative Urban Alchemy, LLC, in partnership with the Department of Planning and Community Development, the Plan is grounded in nationally recognized planning standards while remaining flexible and innovative. It is holistic and long-range, addressing all elements of how the City functions—including preservation, land use, housing, transportation, economy, environment, and quality of life—while providing a policy-oriented framework to guide zoning, capital improvements, and public/private investment for the next decade and beyond. The Plan also includes a detailed implementation matrix with 36 goals and 418 objectives, each assigned timeframes, cost considerations, and responsible parties.

Equally important, this Plan is deeply rooted in the voices of Mount Vernon residents. Between Spring 2023 and Summer 2025, the City and its partners conducted a robust engagement process that included over 30 Community Conversations, targeted sessions with seniors, youth, Spanish-speaking residents, and industrial stakeholders, as well as four citywide workshops. In addition, the Department engaged directly with six active neighborhood and tenant associations ensuring that community priorities were incorporated from the outset. These efforts captured the lived experiences, aspirations, and concerns of our community, shaping every chapter of the Plan and embedding inclusivity, equity, and sustainability into its recommendations.





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MOUNT VERNON, NEW YORK 10550
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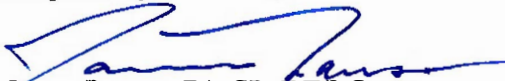
JAMES RAUSSE, FAICP, WEDG
COMMISSIONER

The results are clear: *Envision Mount Vernon* is a professional and technical planning document that reflects extensive community input and sets forth a shared vision for the City's future. It provides the City Council, administration, and residents with a roadmap for decision-making that is data-driven, action-oriented, and grounded in the values of our community.

We respectfully ask the City Council to advance this process by declaring its intent to serve as lead agency, conducting the required circulation to involved and interested agencies, scheduling and hosting the required public hearings, making the necessary referrals to the City Planning Board, Corporation Counsel, and the County Planning Board, and moving forward toward formal adoption of the Comprehensive Plan. With your leadership, Mount Vernon can finally modernize its land use framework and pursue a more equitable, resilient, and prosperous future for all.

Thank you for your consideration and your continued commitment to the people of Mount Vernon. To view the full document please [click here](#).

Respectfully submitted,



James Rausse, FAICP, WEDG

cc: Mayor Shawyn Patterson-Howard
Comptroller Darren M. Morton
Malcolm Clark, Chief of Staff



Envision Mount Vernon



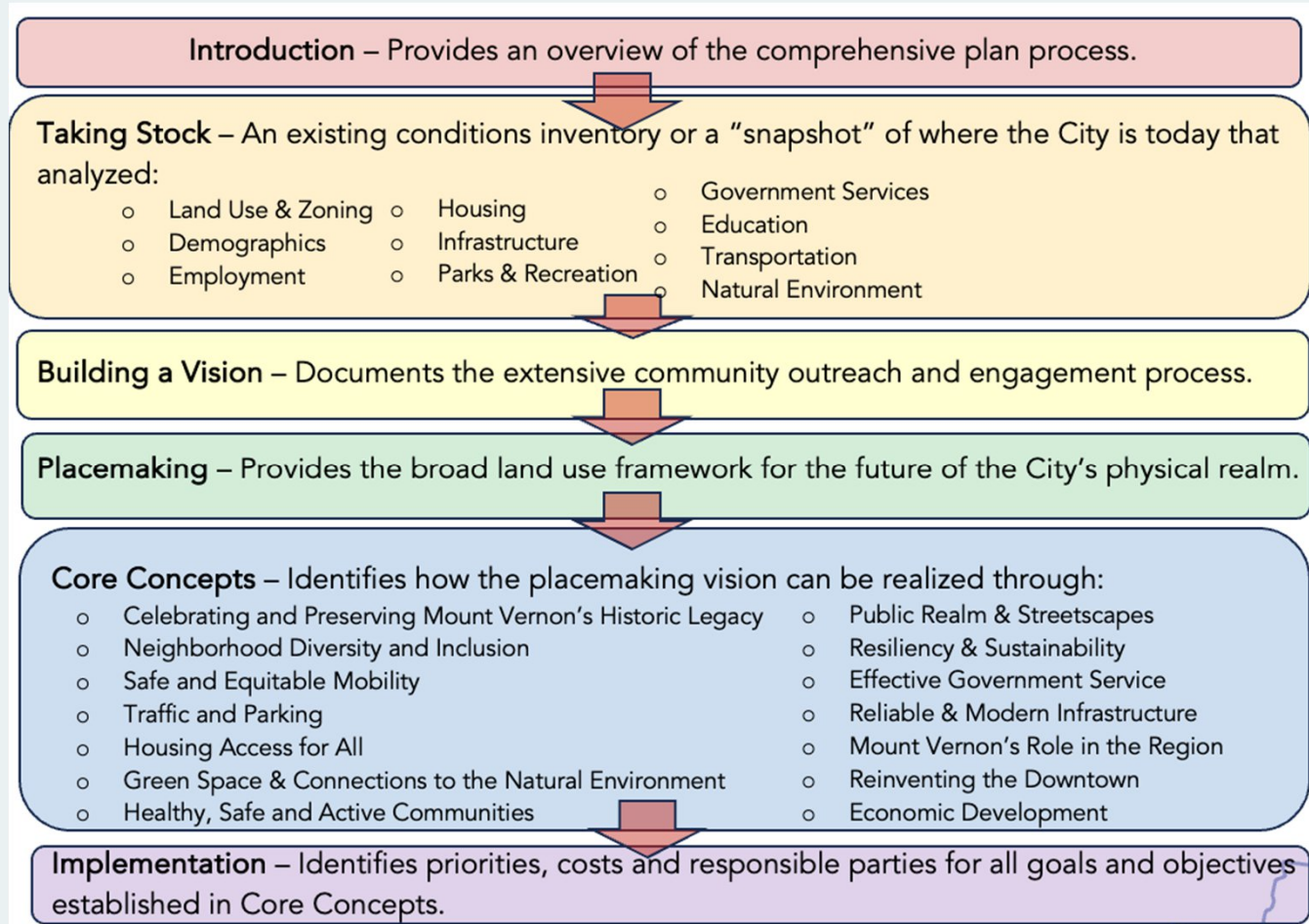
October 8, 2025

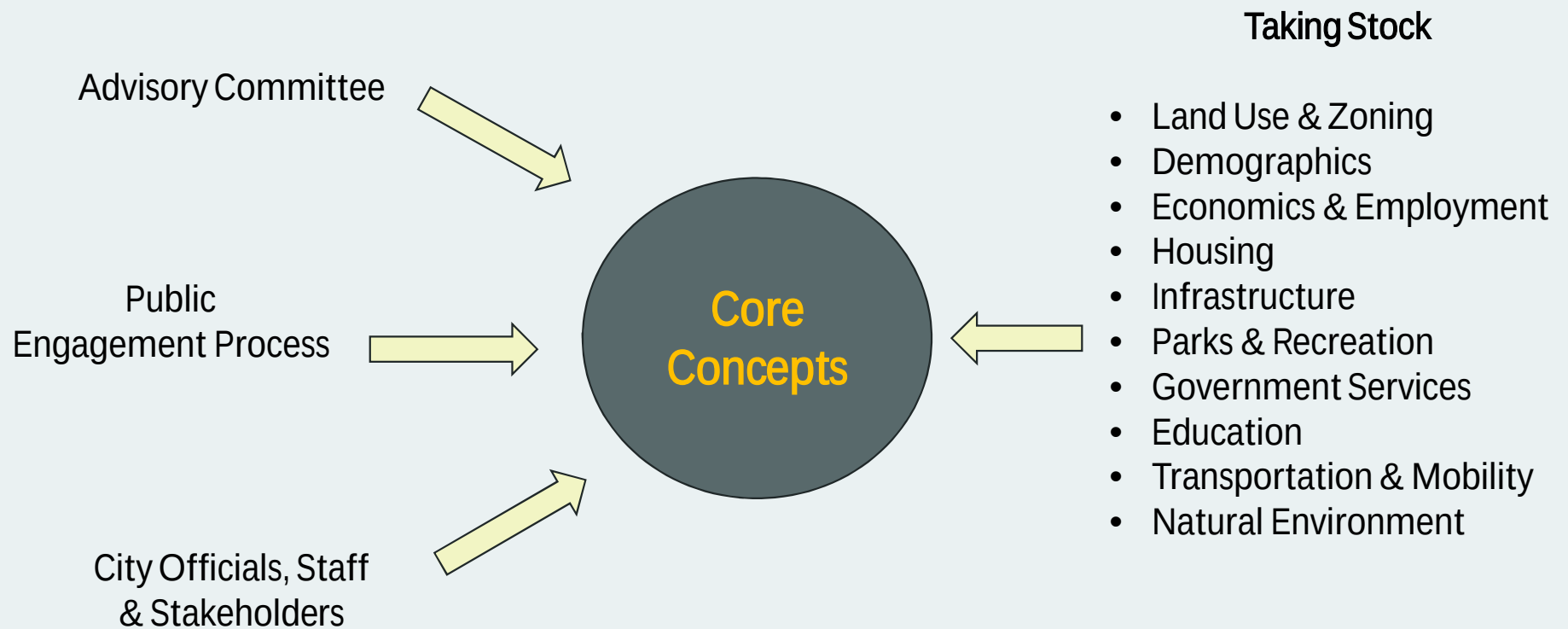
Project Team

City of Mount Vernon – Planning & Community Development

- Cleary Consulting
- AKRF
- Hudson Valley Pattern for Progress
- BRS, Inc.
- Creative Urban Alchemy, LLC

Organization of Envision Mount Vernon





Public Engagement Process

- Phase 1 Public Engagement – Fall 2022 – Winter 2023
- Phase 2 Public Engagement
 - ✓ Youth Engagement Conversations – August – September 2024
 - ✓ Senior Engagement Conversation – November 7, 2024
 - ✓ Spanish Language Workshop – December 5, 2024
 - ✓ City-Wide Engagement Conversations – January 11 & 15, 2025
 - ✓ Industrial Sector Engagement Conversation – January 29, 2025

BRS, Inc.
Creative Urban Alchemy, LLC

Core Concepts

- Mount Vernon's Role in the Region
- Celebrating & Preserving Mount Vernon's Historic Legacy
- Neighborhood Diversity & Inclusion
- Safe & Equitable Mobility
- The Public Realm & Streetscapes
- Housing Access for All
- Green Space & Connections to the Natural Environment
- Healthy, Safe & Active Communities
- Resiliency & Sustainability
- Economic Development
- Reliable & Modern Infrastructure
- Effective Government Service

Mount Vernon's Role in the Region

Why:

As Mount Vernon pursues the goals and strategies in the comprehensive plan, it is important to focus on broader aspirations that frame the city's role in the region.

What:

- ✓ **City of Homes v2.0**
 - Capitalize on Mount Vernon's exceptional transit access to honor Mount Vernon's historic identity of the City of Homes while building a thriving and inclusive future. Through housing growth across a broad range of typologies and price points, Mount Vernon will realize new economic and community benefits.
- ✓ **A Thriving Center for Creative and Cultural Excellence**
 - The city's legacy of producing influential figures that shaped the cultural and artistic landscape of America should be celebrated. It should also be utilized to train, spotlight, and develop the next generation creative and cultural leaders.
- ✓ **A Regional Destination to Play and Compete**
 - Critical mass of sports facilities in Mount Vernon and Pelham should be leveraged to tap into a \$40 billion youth sports economy.
- ✓ **Manufacturing with Access to Key Markets**
 - A well-supported manufacturing sector offers a key opportunity to support a high-value industry cluster of regional importance while strengthening the Mount Vernon economy.

Celebrating & Preserving Mount Vernon's Historic Legacy

Why:

Mount Vernon has a rich historic legacy that has helped to shape the community both physically and culturally. Planning for the future must respect, celebrate, and in some instances redress this legacy.

What:

- ✓ **Preserve the integrity of the historic character of the City.**
 - Assess specific opportunities in each of the City's 15 neighborhoods preserve structures and sites of historic or cultural importance, consider the establishment of historic districts in 6 specific neighborhoods, develop neighborhood character design guidelines for 5 specific neighborhoods
 - Adopt a historic preservation ordinance along with a Historic Preservation Commission.
 - Modify zoning provisions to facilitate the renovation of historic properties.
- ✓ **Preserve Mount Vernon's cultural heritage through the principles of inclusion, diversity, equity and access**
 - Erase the stigma of the railroad cut by improving all bridges and exploring capping the cut to accommodate redevelopment above
 - Modernize and update all historic and cultural markers, signage, exhibits, etc.
 - Work with marginalized communities to ensure their voice is heard
- ✓ **Integrate historic and cultural preservation efforts into economic development policies**
- ✓ **Integrate historic and cultural preservation efforts with green building and long-term sustainability programs**

Neighborhood Diversity & Inclusion

Why:

A fundamental principle of Envision Mount Vernon is that all people, regardless of race, ethnicity, disability status, age or socioeconomic background, have a right to live, work, and play in a Mount Vernon that is safe and inclusive. It provides a blueprint for investment and development in a way that makes meaningful progress toward equity and inclusion.

What:

- ✓ **Address environmental justice inequities in decisions relating to density, traffic, infrastructure, pollution and health disparities.**
 - The majority of Mount Vernon is designated as a Disadvantaged Community (DAC) by New York State. Leverage this designation to secure grant and technical assistance to help with the implement Envision Mount Vernon
 - Implement New York State's Environmental Justice Law to support DAC initiatives
 - Historic redlining
- ✓ **Identify hidden exclusionary zoning provisions and revise.**
- ✓ **Address climate vulnerability in at-risk neighborhoods.**
- ✓ **The benefits of new development should be shared by all, and adverse impacts should not burden vulnerable communities.**
- ✓ **Ensure all neighborhoods have equitable access to government and emergency services and health care.**
- ✓ **Ensure anti-discrimination in housing.**
- ✓ **Foster an equitable workforce ecosystem.**

Safe & Equitable Mobility

Why:

Equity, sustainability, livability, economic growth

What:

- ✓ **Complete Streets**
- ✓ **Safe, efficient, accessible options for moving within City**
 - Sidewalks, crossings, pedestrian signals
 - Cost-sharing programs for sidewalk repair, curb extensions & bump outs, visibility
 - Target corridors with highest safety issues. Detailed recommendations provided for:
 - E/W Grand St (Locust St to Gramatan Ave, Fleetwood MNR station)
 - E Prospect Ave (N 5th Ave to Park Ave: City Hall, Petrillo Plaza, Mt. Vernon East MNR)
 - 5th Ave (Stevens Ave to W 1st Street)
- ✓ **Bicycle access and usage**
 - Infrastructure (bike lanes, shared use paths, bicycle racks)
 - Bicycle network connecting residential to transit to commercial to parks to schools
- ✓ **Expand mobility options**
 - Bike or scooter share for last-mile (MNR stations, Petrillo Plaza, etc.)
 - Microtransit (flexible shuttle; fixed-route or demand response)

Safe & Equitable Mobility Efficient Parking

Why:

Parking is large cost of new development, making housing more expensive

Amount of parking in downtown multifamily housing is strong influence on demand

Existing off-street parking requirements exceed those of other Westchester cities

What:

- ✓ Right-size off-street parking requirements for new development
- ✓ Recognize different needs in different parts of City
- ✓ Encourage shared parking (private and municipal)
- ✓ Increase fee-in-lieu
- ✓ Re-allocate curbside space to allow for delivery vehicle parking
 - Reflect modern use patterns, improve safety (i.e., double parking)

The Public Realm & Streetscapes

Why:

Community feedback: safer and more attractive streets, celebrate local history and identity, improve walkability, enhance maintenance, create more vibrant public spaces.

What:

- ✓ Enhance neighborhood corridors (Lincoln Ave, East Sanford Blvd, Columbus Ave, MacQuesten Parkway, East 3rd Street)
 - District signage and art, neighborhood design standards
- ✓ Reconnect Gramatan and South 4th with a unified identity
 - Build on recommendations from Downtown Vision Report (open streets program, public art)
- ✓ Improve streets, sidewalks, and pedestrian infrastructure
 - Sidewalk repair/maintenance, pedestrian furniture, pedestrian experience, cleanliness
- ✓ Integrate cultural placemaking throughout the City
 - Public art, signage, murals (framework in Arts, Culture & Heritage Master Plan, Downtown Vision Report, S. 4th Avenue Corridor Plan)
 - Temporary or permanent uses of vacant parcels
- ✓ Regulate storefronts & signage, design guidelines, phase out solid roll-down gates
- ✓ Detailed call-out on East Sanford Blvd & Canal Village, with specific recommendations

Housing Access for All

Why:

Mount Vernon's future depends on housing policies that allow the city to grow and preserve its housing stock, support its current residents, welcome new neighbors, compete economically, promote affordability, and offer a high-quality life for its residents.

What:

- ✓ Elimination of exclusionary zoning provisions throughout the City.
- ✓ Increase homeownership opportunities by allowing smaller homes, multi-family ownership (such as co-ops) and other options throughout the city
- ✓ Encourage housing near train stations and in the heart of Mount Vernon's downtown to support transit options, provide a customer base to local business, and "feet on the street"
- ✓ Take steps to meet the demand for market-rate senior housing
- ✓ Prevent displacement and promote affordability through the adoption of an inclusionary zoning policy
 - "Set ratio" and "sliding scale" options are both outlined in the comprehensive plan
- ✓ Allow density bonuses for developers who incorporate affordable units into new projects
- ✓ Streamline the review and permitting process for housing
- ✓ Bring duplex and triplex conversions into compliance, so long as they comply with building safety standards. Focus on safety, health, and anti-displacement in all actions.

Green Space & Connections to the Natural Environment

Why:

Define character of City, critical to livability, recreation, relaxation, personal & social health, and provide connections to nature and each other

Community consistently emphasized desire to restore and enhance connections to natural environment, particularly along the Hutchinson River, and increase green space in neighborhoods where it is lacking

What:

✓ **Improve and connect existing greenspaces**

- Hutchinson River Parkway – potential for linear greenway, public amenities and access. Pair with development controls and ecological restoration.
- Bronx River Reservation – signage and lighting improvements at Oak Street Loop entrance and other key locations (Midland Ave, Laurel Ave, etc.)
- Hunts Woods Park – enhance signage and key entry points, limited interior wayfinding, dog-friendly infrastructure (dog runs?)
- Hartley Park – improve sidewalk access, lighting, maintenance. Create community stewardship program
- Improve access, lighting, signage as New City Parks continues its park rehabilitation

Green Space & Connections to the Natural Environment

What:

✓ **Integrate greenery into the Public Realm**

- Urban forestry initiative (part of Complete Streets, sustainability, environmental justice)
- Identify priority streets for greening and canopy extension
- Repurpose (temporarily or permanently) vacant lots for green spaces
- Advocate for and build partnerships for vegetated sound barrier in select locations proximate to the Cross County Parkway
- Incorporate green design elements into municipal facilities

✓ **Strengthen the City's Tree Ordinance and Advisory Board**

- Clarify role, criteria, and process
- Stronger enforcement tools
- Clearer landscape plan standards for new development and ensure adequacy of fee-in-lieu

Healthy, Safe & Active Communities

Why:

A healthy, safe and active community is one that prioritized the well-being of its residents which will lead to a stronger, more resilient, equitable and prosperous City.

What:

- ✓ **Create complete neighborhoods through mixed-land use**
- ✓ **Prioritize active transportation modalities**
 - Complete Streets
 - Functional bike lanes
 - Improved sidewalks
 - Improved crosswalks
 - Deploy traffic calming techniques
- ✓ **Minimize environmental influences that adversely impact public health**
 - ✓ Pollution, traffic, heat island
- ✓ **Increase access to healthy foods**
- ✓ **Ensure healthy housing**
 - Facilitate universal design, improve indoor air quality, limit VOC's, require detectors

Resiliency & Sustainability

Why:

Climate change, equitable access to resources, improved recovery from disasters, quality of life

What:

- ✓ **Preserve existing natural landscapes**
- ✓ **Preserve existing trees**
 - Inventory publicly-owned and maintained trees, systematize maintenance, partner with community groups
- ✓ **Revitalize the Hutchinson River waterfront**
 - Together with economic development, incorporate ecological restoration, public education, mobility corridor
- ✓ **Reduce heat-island effect**
 - Street trees, public space design upgrades, incentives for specific design features
- ✓ **Improve flood resilience**
 - Green infrastructure, enhanced flood damage regulations, rain barrel/cisterns, demonstration project for an area of urban (non-riverine) flooding, similar to NYC “Cloudburst” program
- ✓ **Improve sustainability of City Operations**
 - Building energy efficiency (in-house, capital, NYPA), renewable energy (solar leasing), greening City fleet, composting, obtaining Bronze certification in Climate Smart Communities Program, sustainable building materials, incorporating climate risk into building and infrastructure projects

Economic Development

Why:

Improve the social and economic well-being of people in Mount Vernon through job attraction and growth; workforce training; investments in infrastructure, transportation and housing; and the promotion of investment and competitiveness.

What:

- ✓ **Utilize the RFEI process to solicit development proposals for city-owned properties throughout Mount Vernon**
 - Full process outlined in great detail in the comprehensive plan
 - Promising and immediate opportunities to jumpstart economic momentum and revitalization
 - Huge public benefits for local business, housing, public realm, neighborhood revitalization
 - Mount Vernon has control to gets the public what it wants
 - Applicable to school buildings that are slated for closure
 - Appropriate role for the nimble powers of the URA
 - City-owned parcels located within the city's only federal opportunity zone
 - Excellent examples in Peekskill, Croton-on-Hudson, Pelham, Middletown, and beyond
 - The city – and its residents – are in control of what they want and what they receive
 - Reduce the land acquisition cost + speed up the review time for best results
 - Pair with required updates to the public realm or public amenities

Economic Development

What:

- ✓ Collaborate with MTA and Westchester County to develop underutilized parking at Mount Vernon East
 - MTA currently doing this in Beacon and Poughkeepsie; village project in Croton
- ✓ Work with a professional marketing company to establish a unified brand for Mount Vernon, and an asset map for business attraction and growth
- ✓ Grow the city's unique manufacturing base
 - “Hub and spokes” model with existing manufacturing businesses for attraction of supply chain
 - Zoning must allow traditional manufacturing and “light” manufacturing (breweries, maker spaces)
 - Advertise opportunities for green tech / clean tech to NYPA, NYSERDA, other partners
- ✓ Adopt an appropriate vacancy ordinance that requires temporary activation or advertising of space through a licensed realtor
- ✓ Collaborate with Westchester County on a unified plan for property along the Hutchinson River
- ✓ Ensure the zoning code responds to the public's desire for family recreation, entertainment, social gathering spaces, cafes, and more

Reliable & Modern Infrastructure

Why:

Mount Vernon can only survive and thrive if infrastructure is maintained in a state of good repair. This is vital to the protection of public health, environmental quality, and connectivity.

What:

- ✓ Comply with the current consent order and finish all sewer inspections and repairs
- ✓ Invest more in asset management systems and create a 10-year capital plan for water, sewer and stormwater infrastructure
- ✓ Investigate Mount Vernon's growing proportion of non-revenue water
 - Focus on leak detection and concepts from the 2017 WaterDM report
 - Stay under the NYC water supply entitlement consumption threshold to avoid huge bills
- ✓ Pursue opportunities for water efficiency
 - Re-engage with NYCDEP on grants; toilet replacement; industrial solutions
- ✓ Help developers by mapping water service capacity and the progress of sewer work
- ✓ Strengthen partnerships that can get laptops, tablets and other devices into the hands of residents who lack internet access for jobs, education, healthcare, etc.

Effective Government Service

Why:

Effective government service turns policy intentions into real-world results by aligning public employees, processes, and resources in pursuit of the public good.

What:

- ✓ Require a mission statement for every city department to avoid duplication and give employees a sense of unified purpose
- ✓ Develop written tasks and standards for every city employee, including an annual performance review
- ✓ Establish a quarterly training program on topics related to all city employees, and allow budget for specialized training
 - Cybersecurity, budgeting, customer service communication, professional licenses, etc.
- ✓ Establish an economic development cabinet that meets monthly to coordinate and expedite projects that would expand jobs, build housing, or involve the pursuit of grants
- ✓ Create SOPs for key tasks → from building permits and fleet maintenance to the tracking of work orders and resident complaint intake, tracking and response
- ✓ Establish a citywide data group with an eye toward unified data systems
- ✓ Require an annual Mayor's Management Report with trackable metrics to show the public how the government is working (or not) on its behalf

Envision Mount Vernon



Thank You!

Full Environmental Assessment Form
Part 1 - Project and Setting

Instructions for Completing Part 1

Part 1 is to be completed by the applicant or project sponsor. Responses become part of the application for approval or funding, are subject to public review, and may be subject to further verification.

Complete Part 1 based on information currently available. If additional research or investigation would be needed to fully respond to any item, please answer as thoroughly as possible based on current information; indicate whether missing information does not exist, or is not reasonably available to the sponsor; and, when possible, generally describe work or studies which would be necessary to update or fully develop that information.

Applicants/sponsors must complete all items in Sections A & B. In Sections C, D & E, most items contain an initial question that must be answered either “Yes” or “No”. If the answer to the initial question is “Yes”, complete the sub-questions that follow. If the answer to the initial question is “No”, proceed to the next question. Section F allows the project sponsor to identify and attach any additional information. Section G requires the name and signature of the applicant or project sponsor to verify that the information contained in Part 1 is accurate and complete.

A. Project and Applicant/Sponsor Information.

Name of Action or Project:		
Project Location (describe, and attach a general location map):		
Brief Description of Proposed Action (include purpose or need):		
Name of Applicant/Sponsor:		Telephone:
		E-Mail:
Address:		
City/PO:	State:	Zip Code:
Project Contact (if not same as sponsor; give name and title/role):		Telephone:
		E-Mail:
Address:		
City/PO:	State:	Zip Code:
Property Owner (if not same as sponsor):		Telephone:
		E-Mail:
Address:		
City/PO:	State:	Zip Code:

B. Government Approvals

B. Government Approvals, Funding, or Sponsorship. (“Funding” includes grants, loans, tax relief, and any other forms of financial assistance.)

Government Entity	If Yes: Identify Agency and Approval(s) Required	Application Date (Actual or projected)
a. City Council, Town Board, or Village Board of Trustees ☐ Yes ☐ No		
b. City, Town or Village Planning Board or Commission ☐ Yes ☐ No		
c. City, Town or Village Zoning Board of Appeals ☐ Yes ☐ No		
d. Other local agencies ☐ Yes ☐ No		
e. County agencies ☐ Yes ☐ No		
f. Regional agencies ☐ Yes ☐ No		
g. State agencies ☐ Yes ☐ No		
h. Federal agencies ☐ Yes ☐ No		
i. Coastal Resources. i. Is the project site within a Coastal Area, or the waterfront area of a Designated Inland Waterway? ☐ Yes ☐ No ii. Is the project site located in a community with an approved Local Waterfront Revitalization Program? ☐ Yes ☐ No iii. Is the project site within a Coastal Erosion Hazard Area? ☐ Yes ☐ No		

C. Planning and Zoning

C.1. Planning and zoning actions.

Will administrative or legislative adoption, or amendment of a plan, local law, ordinance, rule or regulation be the only approval(s) which must be granted to enable the proposed action to proceed? ☐ Yes ☐ No

- **If Yes**, complete sections C, F and G.
- **If No**, proceed to question C.2 and complete all remaining sections and questions in Part 1

C.2. Adopted land use plans.

a. Do any municipally- adopted (city, town, village or county) comprehensive land use plan(s) include the site where the proposed action would be located? ☐ Yes ☐ No

If Yes, does the comprehensive plan include specific recommendations for the site where the proposed action would be located? ☐ Yes ☐ No

b. Is the site of the proposed action within any local or regional special planning district (for example: Greenway; Brownfield Opportunity Area (BOA); designated State or Federal heritage area; watershed management plan; or other?) ☐ Yes ☐ No

If Yes, identify the plan(s):

c. Is the proposed action located wholly or partially within an area listed in an adopted municipal open space plan, or an adopted municipal farmland protection plan? ☐ Yes ☐ No

If Yes, identify the plan(s):

C.3. Zoning	
a. Is the site of the proposed action located in a municipality with an adopted zoning law or ordinance. If Yes, what is the zoning classification(s) including any applicable overlay district?	□ Yes □ No
b. Is the use permitted or allowed by a special or conditional use permit? N/A	□ Yes □ No
c. Is a zoning change requested as part of the proposed action? If Yes,	□ Yes □ No
i. What is the proposed new zoning for the site? _____	
C.4. Existing community services.	
a. In what school district is the project site located? _____	
b. What police or other public protection forces serve the project site? _____	
c. Which fire protection and emergency medical services serve the project site? _____	
d. What parks serve the project site? _____ _____	

D. Project Details

D.1. Proposed and Potential Development	
a. What is the general nature of the proposed action (e.g., residential, industrial, commercial, recreational; if mixed, include all components)? _____	
b. a. Total acreage of the site of the proposed action? _____ acres b. Total acreage to be physically disturbed? _____ acres c. Total acreage (project site and any contiguous properties) owned or controlled by the applicant or project sponsor? _____ acres	
c. Is the proposed action an expansion of an existing project or use? □ Yes □ No i. If Yes, what is the approximate percentage of the proposed expansion and identify the units (e.g., acres, miles, housing units, square feet)? % _____ Units: _____	
d. Is the proposed action a subdivision, or does it include a subdivision? □ Yes □ No If Yes, i. Purpose or type of subdivision? (e.g., residential, industrial, commercial; if mixed, specify types) _____ ii. Is a cluster/conservation layout proposed? □ Yes □ No iii. Number of lots proposed? _____ iv. Minimum and maximum proposed lot sizes? Minimum _____ Maximum _____	
e. Will the proposed action be constructed in multiple phases? □ Yes □ No i. If No, anticipated period of construction: _____ months ii. If Yes: • Total number of phases anticipated _____ • Anticipated commencement date of phase 1 (including demolition) _____ month _____ year • Anticipated completion date of final phase _____ month _____ year • Generally describe connections or relationships among phases, including any contingencies where progress of one phase may determine timing or duration of future phases: _____ 	

f. Does the project include new residential uses? ☐ Yes ☐ No				
If Yes, show numbers of units proposed.				
	<u>One Family</u>	<u>Two Family</u>	<u>Three Family</u>	<u>Multiple Family (four or more)</u>
Initial Phase	_____	_____	_____	_____
At completion	_____	_____	_____	_____
of all phases	_____	_____	_____	_____

g. Does the proposed action include new non-residential construction (including expansions)? ☐ Yes ☐ No	
If Yes,	
i. Total number of structures _____	
ii. Dimensions (in feet) of largest proposed structure: _____ height; _____ width; and _____ length	
iii. Approximate extent of building space to be heated or cooled: _____ square feet	

h. Does the proposed action include construction or other activities that will result in the impoundment of any liquids, such as creation of a water supply, reservoir, pond, lake, waste lagoon or other storage? ☐ Yes ☐ No	
If Yes,	
i. Purpose of the impoundment: _____	
ii. If a water impoundment, the principal source of the water: ☐ Ground water ☐ Surface water streams ☐ Other specify: _____	
iii. If other than water, identify the type of impounded/contained liquids and their source. _____	
iv. Approximate size of the proposed impoundment. Volume: _____ million gallons; surface area: _____ acres	
v. Dimensions of the proposed dam or impounding structure: _____ height; _____ length	
vi. Construction method/materials for the proposed dam or impounding structure (e.g., earth fill, rock, wood, concrete): _____	

D.2. Project Operations

a. Does the proposed action include any excavation, mining, or dredging, during construction, operations, or both? ☐ Yes ☐ No	
(Not including general site preparation, grading or installation of utilities or foundations where all excavated materials will remain onsite)	
If Yes:	
i. What is the purpose of the excavation or dredging? _____	
ii. How much material (including rock, earth, sediments, etc.) is proposed to be removed from the site?	
• Volume (specify tons or cubic yards): _____ • Over what duration of time? _____	
iii. Describe nature and characteristics of materials to be excavated or dredged, and plans to use, manage or dispose of them. _____	
iv. Will there be onsite dewatering or processing of excavated materials? ☐ Yes ☐ No	
If yes, describe. _____	
v. What is the total area to be dredged or excavated? _____ acres	
vi. What is the maximum area to be worked at any one time? _____ acres	
vii. What would be the maximum depth of excavation or dredging? _____ feet	
viii. Will the excavation require blasting? ☐ Yes ☐ No	
ix. Summarize site reclamation goals and plan: _____	

b. Would the proposed action cause or result in alteration of, increase or decrease in size of, or encroachment into any existing wetland, waterbody, shoreline, beach or adjacent area? ☐ Yes ☐ No	
If Yes:	
i. Identify the wetland or waterbody which would be affected (by name, water index number, wetland map number or geographic description): _____	

ii. Describe how the proposed action would affect that waterbody or wetland, e.g. excavation, fill, placement of structures, or alteration of channels, banks and shorelines. Indicate extent of activities, alterations and additions in square feet or acres:

iii. Will the proposed action cause or result in disturbance to bottom sediments? Yes ☐ No ☐
 If Yes, describe: _____

iv. Will the proposed action cause or result in the destruction or removal of aquatic vegetation? ☐ Yes ☐ No ☐
 If Yes:

- acres of aquatic vegetation proposed to be removed: _____
- expected acreage of aquatic vegetation remaining after project completion: _____
- purpose of proposed removal (e.g. beach clearing, invasive species control, boat access): _____
- proposed method of plant removal: _____
- if chemical/herbicide treatment will be used, specify product(s): _____

v. Describe any proposed reclamation/mitigation following disturbance: _____

c. Will the proposed action use, or create a new demand for water? ☐ Yes ☐ No ☐
 If Yes:

i. Total anticipated water usage/demand per day: _____ gallons/day

ii. Will the proposed action obtain water from an existing public water supply? ☐ Yes ☐ No ☐
 If Yes:

- Name of district or service area: _____
- Does the existing public water supply have capacity to serve the proposal? ☐ Yes ☐ No ☐
- Is the project site in the existing district? ☐ Yes ☐ No ☐
- Is expansion of the district needed? ☐ Yes ☐ No ☐
- Do existing lines serve the project site? ☐ Yes ☐ No ☐

iii. Will line extension within an existing district be necessary to supply the project? ☐ Yes ☐ No ☐
 If Yes:

- Describe extensions or capacity expansions proposed to serve this project: _____
- Source(s) of supply for the district: _____

iv. Is a new water supply district or service area proposed to be formed to serve the project site? ☐ Yes ☐ No ☐
 If, Yes:

- Applicant/sponsor for new district: _____
- Date application submitted or anticipated: _____
- Proposed source(s) of supply for new district: _____

v. If a public water supply will not be used, describe plans to provide water supply for the project: _____

vi. If water supply will be from wells (public or private), what is the maximum pumping capacity: _____ gallons/minute.

d. Will the proposed action generate liquid wastes? ☐ Yes ☐ No ☐
 If Yes:

i. Total anticipated liquid waste generation per day: _____ gallons/day

ii. Nature of liquid wastes to be generated (e.g., sanitary wastewater, industrial; if combination, describe all components and approximate volumes or proportions of each): _____

iii. Will the proposed action use any existing public wastewater treatment facilities? ☐ Yes ☐ No ☐
 If Yes:

- Name of wastewater treatment plant to be used: _____
- Name of district: _____
- Does the existing wastewater treatment plant have capacity to serve the project? ☐ Yes ☐ No ☐
- Is the project site in the existing district? ☐ Yes ☐ No ☐
- Is expansion of the district needed? ☐ Yes ☐ No ☐

• Do existing sewer lines serve the project site? _____ • Will a line extension within an existing district be necessary to serve the project? _____ If Yes: • Describe extensions or capacity expansions proposed to serve this project: _____ _____ _____	☐ Yes ☐ No ☐ Yes ☐ No	
iv. Will a new wastewater (sewage) treatment district be formed to serve the project site? _____ If Yes: • Applicant/sponsor for new district: _____ • Date application submitted or anticipated: _____ • What is the receiving water for the wastewater discharge? _____	☐ Yes ☐ No	
v. If public facilities will not be used, describe plans to provide wastewater treatment for the project, including specifying proposed receiving water (name and classification if surface discharge or describe subsurface disposal plans): _____ _____ _____		
vi. Describe any plans or designs to capture, recycle or reuse liquid waste: _____ _____ _____		
e. Will the proposed action disturb more than one acre and create stormwater runoff, either from new point sources (i.e. ditches, pipes, swales, curbs, gutters or other concentrated flows of stormwater) or non-point source (i.e. sheet flow) during construction or post construction? _____ If Yes: i. How much impervious surface will the project create in relation to total size of project parcel? _____ Square feet or _____ acres (impervious surface) _____ Square feet or _____ acres (parcel size) ii. Describe types of new point sources. _____ _____ iii. Where will the stormwater runoff be directed (i.e. on-site stormwater management facility/structures, adjacent properties, groundwater, on-site surface water or off-site surface waters)? _____ _____ • If to surface waters, identify receiving water bodies or wetlands: _____ _____ • Will stormwater runoff flow to adjacent properties? _____	☐ Yes ☐ No ☐ Yes ☐ No ☐ Yes ☐ No	
iv. Does the proposed plan minimize impervious surfaces, use pervious materials or collect and re-use stormwater? _____		
f. Does the proposed action include, or will it use on-site, one or more sources of air emissions, including fuel combustion, waste incineration, or other processes or operations? _____ If Yes, identify: i. Mobile sources during project operations (e.g., heavy equipment, fleet or delivery vehicles) _____ ii. Stationary sources during construction (e.g., power generation, structural heating, batch plant, crushers) _____ iii. Stationary sources during operations (e.g., process emissions, large boilers, electric generation) _____	☐ Yes ☐ No	
g. Will any air emission sources named in D.2.f (above), require a NY State Air Registration, Air Facility Permit, or Federal Clean Air Act Title IV or Title V Permit? _____ If Yes: i. Is the project site located in an Air quality non-attainment area? (Area routinely or periodically fails to meet ambient air quality standards for all or some parts of the year) _____ ii. In addition to emissions as calculated in the application, the project will generate: • _____ Tons/year (short tons) of Carbon Dioxide (CO₂) • _____ Tons/year (short tons) of Nitrous Oxide (N₂O) • _____ Tons/year (short tons) of Perfluorocarbons (PFCs) • _____ Tons/year (short tons) of Sulfur Hexafluoride (SF₆) • _____ Tons/year (short tons) of Carbon Dioxide equivalent of Hydrofluorocarbons (HFCs) • _____ Tons/year (short tons) of Hazardous Air Pollutants (HAPs)		☐ Yes ☐ No ☐ Yes ☐ No

h. Will the proposed action generate or emit methane (including, but not limited to, sewage treatment plants, landfills, composting facilities)? ☐ Yes ☐ No If Yes: i. Estimate methane generation in tons/year (metric): _____ ii. Describe any methane capture, control or elimination measures included in project design (e.g., combustion to generate heat or electricity, flaring): _____			
i. Will the proposed action result in the release of air pollutants from open-air operations or processes, such as quarry or landfill operations? ☐ Yes ☐ No If Yes: Describe operations and nature of emissions (e.g., diesel exhaust, rock particulates/dust): _____			
j. Will the proposed action result in a substantial increase in traffic above present levels or generate substantial new demand for transportation facilities or services? ☐ Yes ☐ No If Yes: i. When is the peak traffic expected (Check all that apply): ☐ Morning ☐ Evening ☐ Weekend ☐ Randomly between hours of _____ to _____. ii. For commercial activities only, projected number of truck trips/day and type (e.g., semi trailers and dump trucks): _____ iii. Parking spaces: Existing _____ Proposed _____ Net increase/decrease _____ iv. Does the proposed action include any shared use parking? Yes ☐ No ☐ v. If the proposed action includes any modification of existing roads, creation of new roads or change in existing access, describe: _____ vi. Are public/private transportation service(s) or facilities available within ½ mile of the proposed site? ☐ Yes ☐ No vii. Will the proposed action include access to public transportation or accommodations for use of hybrid, electric or other alternative fueled vehicles? ☐ Yes ☐ No viii. Will the proposed action include plans for pedestrian or bicycle accommodations for connections to existing pedestrian or bicycle routes? ☐ Yes ☐ No			
k. Will the proposed action (for commercial or industrial projects only) generate new or additional demand for energy? ☐ Yes ☐ No If Yes: i. Estimate annual electricity demand during operation of the proposed action: _____ ii. Anticipated sources/suppliers of electricity for the project (e.g., on-site combustion, on-site renewable, via grid/local utility, or other): _____ iii. Will the proposed action require a new, or an upgrade, to an existing substation? ☐ Yes ☐ No			
l. Hours of operation. Answer all items which apply. <table style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> i. During Construction: • Monday - Friday: _____ • Saturday: _____ • Sunday: _____ • Holidays: _____ </td> <td style="width: 50%; vertical-align: top;"> ii. During Operations: • Monday - Friday: _____ • Saturday: _____ • Sunday: _____ • Holidays: _____ </td> </tr> </table>		i. During Construction: • Monday - Friday: _____ • Saturday: _____ • Sunday: _____ • Holidays: _____	ii. During Operations: • Monday - Friday: _____ • Saturday: _____ • Sunday: _____ • Holidays: _____
i. During Construction: • Monday - Friday: _____ • Saturday: _____ • Sunday: _____ • Holidays: _____	ii. During Operations: • Monday - Friday: _____ • Saturday: _____ • Sunday: _____ • Holidays: _____		

m. Will the proposed action produce noise that will exceed existing ambient noise levels during construction, operation, or both? ☐ Yes ☐ No If yes: i. Provide details including sources, time of day and duration: _____ _____	
ii. Will the proposed action remove existing natural barriers that could act as a noise barrier or screen? ☐ Yes ☐ No Describe: _____ _____	
n. Will the proposed action have outdoor lighting? ☐ Yes ☐ No If yes: i. Describe source(s), location(s), height of fixture(s), direction/aim, and proximity to nearest occupied structures: _____ _____	
ii. Will proposed action remove existing natural barriers that could act as a light barrier or screen? ☐ Yes ☐ No Describe: _____ _____	
o. Does the proposed action have the potential to produce odors for more than one hour per day? ☐ Yes ☐ No If Yes, describe possible sources, potential frequency and duration of odor emissions, and proximity to nearest occupied structures: _____ _____ _____	
p. Will the proposed action include any bulk storage of petroleum (combined capacity of over 1,100 gallons) or chemical products 185 gallons in above ground storage or any amount in underground storage? ☐ Yes ☐ No If Yes: i. Product(s) to be stored _____ ii. Volume(s) _____ per unit time _____ (e.g., month, year) iii. Generally, describe the proposed storage facilities: _____ _____	
q. Will the proposed action (commercial, industrial and recreational projects only) use pesticides (i.e., herbicides, insecticides) during construction or operation? ☐ Yes ☐ No If Yes: i. Describe proposed treatment(s): _____ _____ _____	
ii. Will the proposed action use Integrated Pest Management Practices? ☐ Yes ☐ No	
r. Will the proposed action (commercial or industrial projects only) involve or require the management or disposal of solid waste (excluding hazardous materials)? ☐ Yes ☐ No If Yes: i. Describe any solid waste(s) to be generated during construction or operation of the facility: • Construction: _____ tons per _____ (unit of time) • Operation : _____ tons per _____ (unit of time) ii. Describe any proposals for on-site minimization, recycling or reuse of materials to avoid disposal as solid waste: • Construction: _____ _____ • Operation: _____ _____ iii. Proposed disposal methods/facilities for solid waste generated on-site: • Construction: _____ _____ • Operation: _____ _____	

s. Does the proposed action include construction or modification of a solid waste management facility? ☐ Yes ☐ No
 If Yes:
 i. Type of management or handling of waste proposed for the site (e.g., recycling or transfer station, composting, landfill, or other disposal activities): _____
 ii. Anticipated rate of disposal/processing:
 • _____ Tons/month, if transfer or other non-combustion/thermal treatment, or
 • _____ Tons/hour, if combustion or thermal treatment
 iii. If landfill, anticipated site life: _____ years

t. Will the proposed action at the site involve the commercial generation, treatment, storage, or disposal of hazardous waste? ☐ Yes ☐ No
 If Yes:
 i. Name(s) of all hazardous wastes or constituents to be generated, handled or managed at facility: _____

 ii. Generally describe processes or activities involving hazardous wastes or constituents: _____

 iii. Specify amount to be handled or generated _____ tons/month
 iv. Describe any proposals for on-site minimization, recycling or reuse of hazardous constituents: _____

 v. Will any hazardous wastes be disposed at an existing offsite hazardous waste facility? ☐ Yes ☐ No
 If Yes: provide name and location of facility: _____

 If No: describe proposed management of any hazardous wastes which will not be sent to a hazardous waste facility:

E. Site and Setting of Proposed Action

E.1. Land uses on and surrounding the project site			
a. Existing land uses. i. Check all uses that occur on, adjoining and near the project site. ☐ Urban ☐ Industrial ☐ Commercial ☐ Residential (suburban) ☐ Rural (non-farm) ☐ Forest ☐ Agriculture ☐ Aquatic ☐ Other (specify): _____ ii. If mix of uses, generally describe: _____ _____			
b. Land uses and covertypes on the project site.			
Land use or Covertype	Current Acreage	Acreage After Project Completion	Change (Acres +/-)
• Roads, buildings, and other paved or impervious surfaces			
• Forested			
• Meadows, grasslands or brushlands (non-agricultural, including abandoned agricultural)			
• Agricultural (includes active orchards, field, greenhouse etc.)			
• Surface water features (lakes, ponds, streams, rivers, etc.)			
• Wetlands (freshwater or tidal)			
• Non-vegetated (bare rock, earth or fill)			
• Other Describe: _____ _____			

c. Is the project site presently used by members of the community for public recreation? ☐ Yes ☐ No i. If Yes: explain: _____	
d. Are there any facilities serving children, the elderly, people with disabilities (e.g., schools, hospitals, licensed day care centers, or group homes) within 1500 feet of the project site? ☐ Yes ☐ No If Yes, i. Identify Facilities: _____ _____	
e. Does the project site contain an existing dam? ☐ Yes ☐ No If Yes: i. Dimensions of the dam and impoundment: • Dam height: _____ feet • Dam length: _____ feet • Surface area: _____ acres • Volume impounded: _____ gallons OR acre-feet ii. Dam's existing hazard classification: _____ iii. Provide date and summarize results of last inspection: _____ _____	
f. Has the project site ever been used as a municipal, commercial or industrial solid waste management facility, or does the project site adjoin property which is now, or was at one time, used as a solid waste management facility? ☐ Yes ☐ No If Yes: i. Has the facility been formally closed? ☐ Yes ☐ No • If yes, cite sources/documentation: _____ ii. Describe the location of the project site relative to the boundaries of the solid waste management facility: _____ _____ iii. Describe any development constraints due to the prior solid waste activities: _____ _____	
g. Have hazardous wastes been generated, treated and/or disposed of at the site, or does the project site adjoin property which is now or was at one time used to commercially treat, store and/or dispose of hazardous waste? ☐ Yes ☐ No If Yes: i. Describe waste(s) handled and waste management activities, including approximate time when activities occurred: _____ _____	
h. Potential contamination history. Has there been a reported spill at the proposed project site, or have any remedial actions been conducted at or adjacent to the proposed site? ☐ Yes ☐ No If Yes: i. Is any portion of the site listed on the NYSDEC Spills Incidents database or Environmental Site Remediation database? Check all that apply: ☐ Yes ☐ No ☐ Yes – Spills Incidents database ☐ Yes – Environmental Site Remediation database ☐ Neither database Provide DEC ID number(s): _____ Provide DEC ID number(s): _____ ii. If site has been subject of RCRA corrective activities, describe control measures: _____ _____ iii. Is the project within 2000 feet of any site in the NYSDEC Environmental Site Remediation database? ☐ Yes ☐ No If yes, provide DEC ID number(s): _____ iv. If yes to (i), (ii) or (iii) above, describe current status of site(s): _____ _____	

v. Is the project site subject to an institutional control limiting property uses? ☐ Yes ☐ No	
• If yes, DEC site ID number: _____ • Describe the type of institutional control (e.g., deed restriction or easement): _____ • Describe any use limitations: _____ • Describe any engineering controls: _____ • Will the project affect the institutional or engineering controls in place? ☐ Yes ☐ No • Explain: _____ 	
E.2. Natural Resources On or Near Project Site	
a. What is the average depth to bedrock on the project site? _____ feet	
b. Are there bedrock outcroppings on the project site? ☐ Yes ☐ No If Yes, what proportion of the site is comprised of bedrock outcroppings? _____ %	
c. Predominant soil type(s) present on project site: _____ % _____ _____ % _____ _____ %	
d. What is the average depth to the water table on the project site? Average: _____ feet	
e. Drainage status of project site soils: ☐ Well Drained: _____ % of site ☐ Moderately Well Drained: _____ % of site ☐ Poorly Drained _____ % of site	
f. Approximate proportion of proposed action site with slopes: ☐ 0-10%: _____ % of site ☐ 10-15%: _____ % of site ☐ 15% or greater: _____ % of site	
g. Are there any unique geologic features on the project site? ☐ Yes ☐ No If Yes, describe: _____ 	
h. Surface water features.	
i. Does any portion of the project site contain wetlands or other waterbodies (including streams, rivers, ponds or lakes)? ☐ Yes ☐ No	
ii. Do any wetlands or other waterbodies adjoin the project site? ☐ Yes ☐ No	
If Yes to either <i>i</i> or <i>ii</i> , continue. If No, skip to E.2.i.	
iii. Are any of the wetlands or waterbodies within or adjoining the project site regulated by any federal, state or local agency? ☐ Yes ☐ No	
iv. For each identified regulated wetland and waterbody on the project site, provide the following information:	
• Streams: Name _____ Classification _____ • Lakes or Ponds: Name _____ Classification _____ • Wetlands: Name _____ Approximate Size _____ • Wetland No. (if regulated by DEC) _____	
v. Are any of the above water bodies listed in the most recent compilation of NYS water quality-impaired waterbodies? ☐ Yes ☐ No	
If yes, name of impaired water body/bodies and basis for listing as impaired: _____ 	
i. Is the project site in a designated Floodway? ☐ Yes ☐ No	
j. Is the project site in the 100-year Floodplain? ☐ Yes ☐ No	
k. Is the project site in the 500-year Floodplain? ☐ Yes ☐ No	
l. Is the project site located over, or immediately adjoining, a primary, principal or sole source aquifer? ☐ Yes ☐ No If Yes: i. Name of aquifer: _____	

m. Identify the predominant wildlife species that occupy or use the project site: _____ _____ _____	
n. Does the project site contain a designated significant natural community? ☐ Yes ☐ No If Yes: i. Describe the habitat/community (composition, function, and basis for designation): _____ ii. Source(s) of description or evaluation: _____ iii. Extent of community/habitat: • Currently: _____ acres • Following completion of project as proposed: _____ acres • Gain or loss (indicate + or -): _____ acres	
o. Does project site contain any species of plant or animal that is listed by the federal government or NYS as endangered or threatened, or does it contain any areas identified as habitat for an endangered or threatened species? ☐ Yes ☐ No If Yes: i. Species and listing (endangered or threatened): _____ _____ _____	
p. Does the project site contain any species of plant or animal that is listed by NYS as rare, or as a species of special concern? ☐ Yes ☐ No If Yes: i. Species and listing: _____ _____ _____	
q. Is the project site or adjoining area currently used for hunting, trapping, fishing or shell fishing? ☐ Yes ☐ No If yes, give a brief description of how the proposed action may affect that use: _____ _____	
E.3. Designated Public Resources On or Near Project Site	
a. Is the project site, or any portion of it, located in a designated agricultural district certified pursuant to Agriculture and Markets Law, Article 25-AA, Section 303 and 304? ☐ Yes ☐ No If Yes, provide county plus district name/number: _____	
b. Are agricultural lands consisting of highly productive soils present? ☐ Yes ☐ No i. If Yes: acreage(s) on project site? _____ ii. Source(s) of soil rating(s): _____	
c. Does the project site contain all or part of, or is it substantially contiguous to, a registered National Natural Landmark? ☐ Yes ☐ No If Yes: i. Nature of the natural landmark: ☐ Biological Community ☐ Geological Feature ii. Provide brief description of landmark, including values behind designation and approximate size/extent: _____ _____ _____	
d. Is the project site located in or does it adjoin a state listed Critical Environmental Area? ☐ Yes ☐ No If Yes: i. CEA name: _____ ii. Basis for designation: _____ iii. Designating agency and date: _____	

e. Does the project site contain, or is it substantially contiguous to, a building, archaeological site, or district which is listed on the National or State Register of Historic Places, or that has been determined by the Commissioner of the NYS Office of Parks, Recreation and Historic Preservation to be eligible for listing on the State Register of Historic Places? ☐ Yes ☐ No If Yes: i. Nature of historic/archaeological resource: ☐ Archaeological Site ☐ Historic Building or District ii. Name: _____ iii. Brief description of attributes on which listing is based: _____
f. Is the project site, or any portion of it, located in or adjacent to an area designated as sensitive for archaeological sites on the NY State Historic Preservation Office (SHPO) archaeological site inventory? ☐ Yes ☐ No
g. Have additional archaeological or historic site(s) or resources been identified on the project site? ☐ Yes ☐ No If Yes: i. Describe possible resource(s): _____ ii. Basis for identification: _____
h. Is the project site within five miles of any officially designated and publicly accessible federal, state, or local scenic or aesthetic resource? ☐ Yes ☐ No If Yes: i. Identify resource: _____ ii. Nature of, or basis for, designation (e.g., established highway overlook, state or local park, state historic trail or scenic byway, etc.): _____ iii. Distance between project and resource: _____ miles.
i. Is the project site located within a designated river corridor under the Wild, Scenic and Recreational Rivers Program 6 NYCRR 666? ☐ Yes ☐ No If Yes: i. Identify the name of the river and its designation: _____ ii. Is the activity consistent with development restrictions contained in 6NYCRR Part 666? ☐ Yes ☐ No

F. Additional Information

Attach any additional information which may be needed to clarify your project.

If you have identified any adverse impacts which could be associated with your proposal, please describe those impacts plus any measures which you propose to avoid or minimize them.

G. Verification

I certify that the information provided is true to the best of my knowledge.

Applicant/Sponsor Name _____ Date _____

Signature _____ Title _____

Full Environmental Assessment Form

Part 2 - Identification of Potential Project Impacts

Project :

Date :

Part 2 is to be completed by the lead agency. Part 2 is designed to help the lead agency inventory all potential resources that could be affected by a proposed project or action. We recognize that the lead agency's reviewer(s) will not necessarily be environmental professionals. So, the questions are designed to walk a reviewer through the assessment process by providing a series of questions that can be answered using the information found in Part 1. To further assist the lead agency in completing Part 2, the form identifies the most relevant questions in Part 1 that will provide the information needed to answer the Part 2 question. When Part 2 is completed, the lead agency will have identified the relevant environmental areas that may be impacted by the proposed activity.

If the lead agency is a state agency **and** the action is in any Coastal Area, complete the Coastal Assessment Form before proceeding with this assessment.

Tips for completing Part 2:

- Review all of the information provided in Part 1.
- Review any application, maps, supporting materials and the Full EAF Workbook.
- Answer each of the 18 questions in Part 2.
- If you answer “**Yes**” to a numbered question, please complete all the questions that follow in that section.
- If you answer “**No**” to a numbered question, move on to the next numbered question.
- Check appropriate column to indicate the anticipated size of the impact.
- Proposed projects that would exceed a numeric threshold contained in a question should result in the reviewing agency checking the box “Moderate to large impact may occur.”
- The reviewer is not expected to be an expert in environmental analysis.
- If you are not sure or undecided about the size of an impact, it may help to review the sub-questions for the general question and consult the workbook.
- When answering a question consider all components of the proposed activity, that is, the “whole action”.
- Consider the possibility for long-term and cumulative impacts as well as direct impacts.
- Answer the question in a reasonable manner considering the scale and context of the project.

1. Impact on Land Proposed action may involve construction on, or physical alteration of, the land surface of the proposed site. (See Part 1. D.1) <i>If “Yes”, answer questions a - j. If “No”, move on to Section 2.</i>				☐ NO	☐ YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur		
a. The proposed action may involve construction on land where depth to water table is less than 3 feet.	E2d	☐	☐		
b. The proposed action may involve construction on slopes of 15% or greater.	E2f	☐	☐		
c. The proposed action may involve construction on land where bedrock is exposed, or generally within 5 feet of existing ground surface.	E2a	☐	☐		
d. The proposed action may involve the excavation and removal of more than 1,000 tons of natural material.	D2a	☐	☐		
e. The proposed action may involve construction that continues for more than one year or in multiple phases.	D1e	☐	☐		
f. The proposed action may result in increased erosion, whether from physical disturbance or vegetation removal (including from treatment by herbicides).	D2e, D2q	☐	☐		
g. The proposed action is, or may be, located within a Coastal Erosion hazard area.	B1i	☐	☐		
h. Other impacts: _____ _____		☐	☐		

2. Impact on Geological Features The proposed action may result in the modification or destruction of, or inhibit access to, any unique or unusual land forms on the site (e.g., cliffs, dunes, minerals, fossils, caves). (See Part 1. E.2.g) ☐ NO ☐ YES <i>If "Yes", answer questions a - c. If "No", move on to Section 3.</i>			
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. Identify the specific land form(s) attached: _____	E2g	☐	☐
b. The proposed action may affect or is adjacent to a geological feature listed as a registered National Natural Landmark. Specific feature: _____	E3c	☐	☐
c. Other impacts: _____		☐	☐

3. Impacts on Surface Water The proposed action may affect one or more wetlands or other surface water bodies (e.g., streams, rivers, ponds or lakes). (See Part 1. D.2, E.2.h) ☐ NO ☐ YES <i>If "Yes", answer questions a - l. If "No", move on to Section 4.</i>			
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may create a new water body.	D2b, D1h	☐	☐
b. The proposed action may result in an increase or decrease of over 10% or more than a 10 acre increase or decrease in the surface area of any body of water.	D2b	☐	☐
c. The proposed action may involve dredging more than 100 cubic yards of material from a wetland or water body.	D2a	☐	☐
d. The proposed action may involve construction within or adjoining a freshwater or tidal wetland, or in the bed or banks of any other water body.	E2h	☐	☐
e. The proposed action may create turbidity in a waterbody, either from upland erosion, runoff or by disturbing bottom sediments.	D2a, D2h	☐	☐
f. The proposed action may include construction of one or more intake(s) for withdrawal of water from surface water.	D2c	☐	☐
g. The proposed action may include construction of one or more outfall(s) for discharge of wastewater to surface water(s).	D2d	☐	☐
h. The proposed action may cause soil erosion, or otherwise create a source of stormwater discharge that may lead to siltation or other degradation of receiving water bodies.	D2e	☐	☐
i. The proposed action may affect the water quality of any water bodies within or downstream of the site of the proposed action.	E2h	☐	☐
j. The proposed action may involve the application of pesticides or herbicides in or around any water body.	D2q, E2h	☐	☐
k. The proposed action may require the construction of new, or expansion of existing, wastewater treatment facilities.	D1a, D2d	☐	☐

l. Other impacts: _____ _____		☐	☐
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4. Impact on groundwater The proposed action may result in new or additional use of ground water, or may have the potential to introduce contaminants to ground water or an aquifer. (See Part 1. D.2.a, D.2.c, D.2.d, D.2.p, D.2.q, D.2.t) <i>If “Yes”, answer questions a - h. If “No”, move on to Section 5.</i>			
	☐ NO	☐ YES	
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may require new water supply wells, or create additional demand on supplies from existing water supply wells.	D2c	☐	☐
b. Water supply demand from the proposed action may exceed safe and sustainable withdrawal capacity rate of the local supply or aquifer. Cite Source: _____	D2c	☐	☐
c. The proposed action may allow or result in residential uses in areas without water and sewer services.	D1a, D2c	☐	☐
d. The proposed action may include or require wastewater discharged to groundwater.	D2d, E2l	☐	☐
e. The proposed action may result in the construction of water supply wells in locations where groundwater is, or is suspected to be, contaminated.	D2c, E1f, E1g, E1h	☐	☐
f. The proposed action may require the bulk storage of petroleum or chemical products over ground water or an aquifer.	D2p, E2l	☐	☐
g. The proposed action may involve the commercial application of pesticides within 100 feet of potable drinking water or irrigation sources.	E2h, D2q, E2l, D2c	☐	☐
h. Other impacts: _____ _____		☐	☐

5. Impact on Flooding The proposed action may result in development on lands subject to flooding. (See Part 1. E.2) <i>If “Yes”, answer questions a - g. If “No”, move on to Section 6.</i>			
	☐ NO	☐ YES	
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may result in development in a designated floodway.	E2i	☐	☐
b. The proposed action may result in development within a 100 year floodplain.	E2j	☐	☐
c. The proposed action may result in development within a 500 year floodplain.	E2k	☐	☐
d. The proposed action may result in, or require, modification of existing drainage patterns.	D2b, D2e	☐	☐
e. The proposed action may change flood water flows that contribute to flooding.	D2b, E2i, E2j, E2k	☐	☐
f. If there is a dam located on the site of the proposed action, is the dam in need of repair, or upgrade?	E1e	☐	☐

g. Other impacts: _____ _____		☐	☐
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6. Impacts on Air The proposed action may include a state regulated air emission source. ☐ NO ☐ YES (See Part 1. D.2.f., D.2.h, D.2.g) <i>If “Yes”, answer questions a - f. If “No”, move on to Section 7.</i>			
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. If the proposed action requires federal or state air emission permits, the action may also emit one or more greenhouse gases at or above the following levels: i. More than 1000 tons/year of carbon dioxide (CO ₂) ii. More than 3.5 tons/year of nitrous oxide (N ₂ O) iii. More than 1000 tons/year of carbon equivalent of perfluorocarbons (PFCs) iv. More than .045 tons/year of sulfur hexafluoride (SF ₆) v. More than 1000 tons/year of carbon dioxide equivalent of hydrochloroflourocarbons (HFCs) emissions vi. 43 tons/year or more of methane	D2g D2g D2g D2g D2g D2h	☐ ☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐ ☐
b. The proposed action may generate 10 tons/year or more of any one designated hazardous air pollutant, or 25 tons/year or more of any combination of such hazardous air pollutants.	D2g	☐	☐
c. The proposed action may require a state air registration, or may produce an emissions rate of total contaminants that may exceed 5 lbs. per hour, or may include a heat source capable of producing more than 10 million BTU's per hour.	D2f, D2g	☐	☐
d. The proposed action may reach 50% of any of the thresholds in “a” through “c”, above.	D2g	☐	☐
e. The proposed action may result in the combustion or thermal treatment of more than 1 ton of refuse per hour.	D2s	☐	☐
f. Other impacts: _____ _____		☐	☐

7. Impact on Plants and Animals The proposed action may result in a loss of flora or fauna. (See Part 1. E.2. m.-q.) ☐ NO ☐ YES <i>If “Yes”, answer questions a - j. If “No”, move on to Section 8.</i>			
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may cause reduction in population or loss of individuals of any threatened or endangered species, as listed by New York State or the Federal government, that use the site, or are found on, over, or near the site.	E2o	☐	☐
b. The proposed action may result in a reduction or degradation of any habitat used by any rare, threatened or endangered species, as listed by New York State or the federal government.	E2o	☐	☐
c. The proposed action may cause reduction in population, or loss of individuals, of any species of special concern or conservation need, as listed by New York State or the Federal government, that use the site, or are found on, over, or near the site.	E2p	☐	☐
d. The proposed action may result in a reduction or degradation of any habitat used by any species of special concern and conservation need, as listed by New York State or the Federal government.	E2p	☐	☐

e. The proposed action may diminish the capacity of a registered National Natural Landmark to support the biological community it was established to protect.	E3c	☐	☐
f. The proposed action may result in the removal of, or ground disturbance in, any portion of a designated significant natural community. Source: _____	E2n	☐	☐
g. The proposed action may substantially interfere with nesting/breeding, foraging, or over-wintering habitat for the predominant species that occupy or use the project site.	E2m	☐	☐
h. The proposed action requires the conversion of more than 10 acres of forest, grassland or any other regionally or locally important habitat. Habitat type & information source: _____	E1b	☐	☐
i. Proposed action (commercial, industrial or recreational projects, only) involves use of herbicides or pesticides.	D2q	☐	☐
j. Other impacts: _____		☐	☐

8. Impact on Agricultural Resources The proposed action may impact agricultural resources. (See Part 1. E.3.a. and b.) ☐ NO ☐ YES <i>If "Yes", answer questions a - h. If "No", move on to Section 9.</i>			
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may impact soil classified within soil group 1 through 4 of the NYS Land Classification System.	E2c, E3b	☐	☐
b. The proposed action may sever, cross or otherwise limit access to agricultural land (includes cropland, hayfields, pasture, vineyard, orchard, etc).	E1a, E1b	☐	☐
c. The proposed action may result in the excavation or compaction of the soil profile of active agricultural land.	E3b	☐	☐
d. The proposed action may irreversibly convert agricultural land to non-agricultural uses, either more than 2.5 acres if located in an Agricultural District, or more than 10 acres if not within an Agricultural District.	E1b, E3a	☐	☐
e. The proposed action may disrupt or prevent installation of an agricultural land management system.	E1 a, E1b	☐	☐
f. The proposed action may result, directly or indirectly, in increased development potential or pressure on farmland.	C2c, C3, D2c, D2d	☐	☐
g. The proposed project is not consistent with the adopted municipal Farmland Protection Plan.	C2c	☐	☐
h. Other impacts: _____		☐	☐

9. Impact on Aesthetic Resources The land use of the proposed action are obviously different from, or are in sharp contrast to, current land use patterns between the proposed project and a scenic or aesthetic resource. (Part 1. E.1.a, E.1.b, E.3.h.) <i>If "Yes", answer questions a - g. If "No", go to Section 10.</i>			
		☐ NO	☐ YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. Proposed action may be visible from any officially designated federal, state, or local scenic or aesthetic resource.	E3h	☐	☐
b. The proposed action may result in the obstruction, elimination or significant screening of one or more officially designated scenic views.	E3h, C2b	☐	☐
c. The proposed action may be visible from publicly accessible vantage points: i. Seasonally (e.g., screened by summer foliage, but visible during other seasons) ii. Year round	E3h	☐ ☐	☐ ☐
d. The situation or activity in which viewers are engaged while viewing the proposed action is: i. Routine travel by residents, including travel to and from work ii. Recreational or tourism based activities	E3h E2q, E1c	☐ ☐	☐ ☐
e. The proposed action may cause a diminishment of the public enjoyment and appreciation of the designated aesthetic resource.	E3h	☐	☐
f. There are similar projects visible within the following distance of the proposed project: 0-1/2 mile 1/2 -3 mile 3-5 mile 5+ mile	D1a, E1a, D1f, D1g	☐	☐
g. Other impacts: _____ _____		☐	☐

10. Impact on Historic and Archeological Resources The proposed action may occur in or adjacent to a historic or archaeological resource. (Part 1. E.3.e, f. and g.) <i>If "Yes", answer questions a - e. If "No", go to Section 11.</i>			
		☐ NO	☐ YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may occur wholly or partially within, or substantially contiguous to, any buildings, archaeological site or district which is listed on the National or State Register of Historical Places, or that has been determined by the Commissioner of the NYS Office of Parks, Recreation and Historic Preservation to be eligible for listing on the State Register of Historic Places.	E3e	☐	☐
b. The proposed action may occur wholly or partially within, or substantially contiguous to, an area designated as sensitive for archaeological sites on the NY State Historic Preservation Office (SHPO) archaeological site inventory.	E3f	☐	☐
c. The proposed action may occur wholly or partially within, or substantially contiguous to, an archaeological site not included on the NY SHPO inventory. Source: _____	E3g	☐	☐

d. Other impacts: _____ _____		☐	☐
If any of the above (a-d) are answered “Moderate to large impact may occur”, continue with the following questions to help support conclusions in Part 3: e. i. The proposed action may result in the destruction or alteration of all or part of the site or property. ii. The proposed action may result in the alteration of the property’s setting or integrity. iii. The proposed action may result in the introduction of visual elements which are out of character with the site or property, or may alter its setting.	E3e, E3g, E3f E3e, E3f, E3g, E1a, E1b E3e, E3f, E3g, E3h, C2, C3	☐ ☐ ☐	☐ ☐ ☐

11. Impact on Open Space and Recreation The proposed action may result in a loss of recreational opportunities or a reduction of an open space resource as designated in any adopted municipal open space plan. (See Part 1. C.2.c, E.1.c., E.2.q.) <i>If “Yes”, answer questions a - e. If “No”, go to Section 12.</i>			
		☐ NO	☐ YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may result in an impairment of natural functions, or “ecosystem services”, provided by an undeveloped area, including but not limited to stormwater storage, nutrient cycling, wildlife habitat.	D2e, E1b E2h, E2m, E2o, E2n, E2p	☐	☐
b. The proposed action may result in the loss of a current or future recreational resource.	C2a, E1c, C2c, E2q	☐	☐
c. The proposed action may eliminate open space or recreational resource in an area with few such resources.	C2a, C2c E1c, E2q	☐	☐
d. The proposed action may result in loss of an area now used informally by the community as an open space resource.	C2c, E1c	☐	☐
e. Other impacts: _____ _____		☐	☐

12. Impact on Critical Environmental Areas The proposed action may be located within or adjacent to a critical environmental area (CEA). (See Part 1. E.3.d) <i>If “Yes”, answer questions a - c. If “No”, go to Section 13.</i>			
		☐ NO	☐ YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may result in a reduction in the quantity of the resource or characteristic which was the basis for designation of the CEA.	E3d	☐	☐
b. The proposed action may result in a reduction in the quality of the resource or characteristic which was the basis for designation of the CEA.	E3d	☐	☐
c. Other impacts: _____ _____		☐	☐

13. Impact on Transportation The proposed action may result in a change to existing transportation systems. ☐ NO ☐ YES (See Part 1. D.2.j) <i>If "Yes", answer questions a - f. If "No", go to Section 14.</i>			
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. Projected traffic increase may exceed capacity of existing road network.	D2j	☐	☐
b. The proposed action may result in the construction of paved parking area for 500 or more vehicles.	D2j	☐	☐
c. The proposed action will degrade existing transit access.	D2j	☐	☐
d. The proposed action will degrade existing pedestrian or bicycle accommodations.	D2j	☐	☐
e. The proposed action may alter the present pattern of movement of people or goods.	D2j	☐	☐
f. Other impacts: _____ _____		☐	☐

14. Impact on Energy The proposed action may cause an increase in the use of any form of energy. ☐ NO ☐ YES (See Part 1. D.2.k) <i>If "Yes", answer questions a - e. If "No", go to Section 15.</i>			
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action will require a new, or an upgrade to an existing, substation.	D2k	☐	☐
b. The proposed action will require the creation or extension of an energy transmission or supply system to serve more than 50 single or two-family residences or to serve a commercial or industrial use.	D1f, D1q, D2k	☐	☐
c. The proposed action may utilize more than 2,500 MWhrs per year of electricity.	D2k	☐	☐
d. The proposed action may involve heating and/or cooling of more than 100,000 square feet of building area when completed.	D1g	☐	☐
e. Other Impacts: _____ _____			

15. Impact on Noise, Odor, and Light The proposed action may result in an increase in noise, odors, or outdoor lighting. ☐ NO ☐ YES (See Part 1. D.2.m., n., and o.) <i>If "Yes", answer questions a - f. If "No", go to Section 16.</i>			
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may produce sound above noise levels established by local regulation.	D2m	☐	☐
b. The proposed action may result in blasting within 1,500 feet of any residence, hospital, school, licensed day care center, or nursing home.	D2m, E1d	☐	☐
c. The proposed action may result in routine odors for more than one hour per day.	D2o	☐	☐

d. The proposed action may result in light shining onto adjoining properties.	D2n	☐	☐
e. The proposed action may result in lighting creating sky-glow brighter than existing area conditions.	D2n, E1a	☐	☐
f. Other impacts: _____ _____		☐	☐

16. Impact on Human Health

The proposed action may have an impact on human health from exposure to new or existing sources of contaminants. (See Part 1.D.2.q., E.1. d. f. g. and h.)

☐ NO

☐ YES

If "Yes", answer questions a - m. If "No", go to Section 17.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action is located within 1500 feet of a school, hospital, licensed day care center, group home, nursing home or retirement community.	E1d	☐	☐
b. The site of the proposed action is currently undergoing remediation.	E1g, E1h	☐	☐
c. There is a completed emergency spill remediation, or a completed environmental site remediation on, or adjacent to, the site of the proposed action.	E1g, E1h	☐	☐
d. The site of the action is subject to an institutional control limiting the use of the property (e.g., easement or deed restriction).	E1g, E1h	☐	☐
e. The proposed action may affect institutional control measures that were put in place to ensure that the site remains protective of the environment and human health.	E1g, E1h	☐	☐
f. The proposed action has adequate control measures in place to ensure that future generation, treatment and/or disposal of hazardous wastes will be protective of the environment and human health.	D2t	☐	☐
g. The proposed action involves construction or modification of a solid waste management facility.	D2q, E1f	☐	☐
h. The proposed action may result in the unearthing of solid or hazardous waste.	D2q, E1f	☐	☐
i. The proposed action may result in an increase in the rate of disposal, or processing, of solid waste.	D2r, D2s	☐	☐
j. The proposed action may result in excavation or other disturbance within 2000 feet of a site used for the disposal of solid or hazardous waste.	E1f, E1g E1h	☐	☐
k. The proposed action may result in the migration of explosive gases from a landfill site to adjacent off site structures.	E1f, E1g	☐	☐
l. The proposed action may result in the release of contaminated leachate from the project site.	D2s, E1f, D2r	☐	☐
m. Other impacts: _____ _____			

17. Consistency with Community Plans The proposed action is not consistent with adopted land use plans. (See Part 1. C.1, C.2. and C.3.) <i>If “Yes”, answer questions a - h. If “No”, go to Section 18.</i>			
		☐ NO	☐ YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action’s land use components may be different from, or in sharp contrast to, current surrounding land use pattern(s).	C2, C3, D1a E1a, E1b	☐	☐
b. The proposed action will cause the permanent population of the city, town or village in which the project is located to grow by more than 5%.	C2	☐	☐
c. The proposed action is inconsistent with local land use plans or zoning regulations.	C2, C2, C3	☐	☐
d. The proposed action is inconsistent with any County plans, or other regional land use plans.	C2, C2	☐	☐
e. The proposed action may cause a change in the density of development that is not supported by existing infrastructure or is distant from existing infrastructure.	C3, D1c, D1d, D1f, D1d, E1b	☐	☐
f. The proposed action is located in an area characterized by low density development that will require new or expanded public infrastructure.	C4, D2c, D2d D2j	☐	☐
g. The proposed action may induce secondary development impacts (e.g., residential or commercial development not included in the proposed action)	C2a	☐	☐
h. Other: _____ _____		☐	☐

18. Consistency with Community Character The proposed project is inconsistent with the existing community character. (See Part 1. C.2, C.3, D.2, E.3) <i>If “Yes”, answer questions a - g. If “No”, proceed to Part 3.</i>			
		☐ NO	☐ YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may replace or eliminate existing facilities, structures, or areas of historic importance to the community.	E3e, E3f, E3g	☐	☐
b. The proposed action may create a demand for additional community services (e.g. schools, police and fire)	C4	☐	☐
c. The proposed action may displace affordable or low-income housing in an area where there is a shortage of such housing.	C2, C3, D1f D1g, E1a	☐	☐
d. The proposed action may interfere with the use or enjoyment of officially recognized or designated public resources.	C2, E3	☐	☐
e. The proposed action is inconsistent with the predominant architectural scale and character.	C2, C3	☐	☐
f. Proposed action is inconsistent with the character of the existing natural landscape.	C2, C3 E1a, E1b E2g, E2h	☐	☐
g. Other impacts: _____ _____		☐	☐

Mount Vernon, NY 10552

October 8, 2025

Re: Opposition to Zoning Changes in the Proposed Comprehensive Plan

Dear Members of the Mount Vernon City Council,

My name is Donna Wemple, and I write to you not only as a 26-year resident of Mount Vernon, but as a homeowner and taxpayer.

I am writing to express my strong opposition to the zoning changes proposed in the so-called “Comprehensive Plan,” particularly the elimination of single-family zoning and the blanket legalization of duplexes, triplexes, and accessory dwelling units (ADUs) in residential neighborhoods.

These changes pose a direct threat to the very communities that have sustained Mount Vernon through years of hardship. Our single-family neighborhoods are stable, tax-contributing, and deeply rooted communities. They provide green space, absorb stormwater, and most importantly, support the city’s per-capita tax base.

Instead of being protected or supported, these neighborhoods are being targeted for intensified density with no clear plan to expand infrastructure, address traffic and parking, or preserve community character. Simply, it’s destabilizing policy. It undermines property values, reduces quality of life, and drives away exactly the kind of families and homeowners Mount Vernon needs to retain.

Legalizing multi-unit housing throughout established single-family zones risks turning these neighborhoods into high-turnover, investor-owned rental corridors. It encourages speculative development, absentee landlords, and a transient population less connected to the long-term well-being of our city.

If housing expansion is a goal, do it responsibly by supporting projects near transit hubs and in underutilized commercial corridors. But this plan does not reflect responsible growth. It reflects a rushed, top-down approach that sacrifices community stability for density targets.

I urge you to reject the proposed elimination of single-family zoning.

Sincerely,
Donna Wemple

From: [Mrs. Kenyah Miller](#)
To: [cityclerk](#)
Cc: [MayorSPH](#)
Subject: Comprehensive Plan Feedback
Date: Wednesday, October 8, 2025 11:15:53 AM

You don't often get email from kmiller@intellectusprep.org. [Learn why this is important](#)

Greetings-

Intellectus Preparatory Charter School has not been included in this comprehensive city plan at all. We currently serve 150 students across grades 6-10, we will be adding 11th and 12th grade one at a time over the next two years until we are a full 6-12 campus. Intellectus Prep focuses on accelerated academics and high school completion, as well as early college. I respectfully request that Intellectus Preparatory Charter School is appropriately included in this plan. Even private schools are listed, so I am assuming this is an oversight, and not a slight. Intellectus Prep has consistently served the community, shows up at community events (and pays), and even serves as a training site for the Mount Vernon Police Department.

Furthermore, the way the education section is written refers to changes "proposed" or in the future. At this time, the proposed changes have been enacted, so it should be adjusted to reflect what currently is.

Lastly, the education section only includes enrollment data. However, a strong emphasis should be placed on the actual performance of the district. These numbers can be obtained from data.nysed.gov. This is the data that people are using to determine whether or not to move to Mount Vernon.

I am not able to make the meeting tonight or next week due to prior obligations, but I am happy to be of service in any way possible.

Preparing Scholars for Life,

Mrs. Kenyah Miller

Founder/CEO and Executive Director

[Intellectus Preparatory Charter School](#)

175-177 Gramatan Avenue

Mount Vernon, NY 10550

914.221.6929 x110 | www.intellectusprep.org | [Book a 30-minute Meeting](#)

"Non Scholae Sed Vitae" - We learn not for school, but for life.

Comp Plan Public Hearing Comment

Nicole Bonilla, MBA

City Clerk - City of Mount Vernon, New York

From: Sarah Alim <salim@savills.us>
Sent: Tuesday, October 7, 2025 1:17 PM
To: cityclerk <CityClerk@mountvernonny.gov>
Subject: Commentary on the Mount Vernon 10 Year Plan

You don't often get email from salim@savills.us. [Learn why this is important](#)

Dear Mount Vernon City Board,

My name is Sarah Abdin. I've lived in Mount Vernon for 10 years. I'm 35, a mom of three girls (ages 4, 3, and 6 months), and a real estate program manager—so yes, I think about how businesses and how their real estate portfolio function (or don't) for a living.

I love this city. My two older girls are students at Friendship for Tots (they love it!), and my dream is to keep my girls in the Mount Vernon public schools all the way through high school without constantly worrying if I'm gambling with their education. I want to buy a home here, raise my kids here, and believe in the future here. But right now, Mount Vernon feels like a city that's lost its confidence.

We have *everything* a great city needs: three train stations, 30-minute access to Manhattan, incredible diversity, and a tight-knit community when it's allowed to shine. We could be the Long Island City of Westchester—think Forest Hills energy with Pelham-level schools and New Rochelle pride. But we've got to stop tripping over ourselves and start managing our potential.

So here's my real talk—from someone who loves Mount Vernon enough to stay, and who's stubborn enough to believe we can do better.

1) The North/South Divide is Embarrassingly Real

Mount Vernon is *visibly divided*. You don't need a map to find it — just cross the Metro-North line.

On one side, you've got tree-lined streets, historic homes, and people walking dogs under working streetlights. Cross the tracks and it's a different city — older buildings, cracked sidewalks, empty storefronts, and a gray, tired energy that says, "The city stopped caring about us."

It's not dirt — our streets are actually pretty clean — it's *neglect*. It's a lack of attention, investment, and leadership. It's the "other side of 8 Mile," but ours is just a half-mile apart. That should embarrass us.

And it's not just visual — it's racial, economic, and structural. City services, schools, investment... they all look different depending on which side of the line you're on. That divide isn't accidental — it's the result of years of decisions. And we need to start undoing it, not managing around it.

Nowhere is this divide clearer than on **4th Avenue**, our so-called "Main Street." My family runs businesses there, and I can tell you firsthand: it's in trouble. Homelessness, open drug use, shoplifting, abandoned storefronts — the street has become a place people avoid, not visit.

We lost our **Rite Aid across from the Metro-North** station because of repeated theft and safety issues. Think about that: a national retailer, on a prime corner across from a commuter hub, gave up. That's a failure of safety, not business.

But it doesn't have to stay that way.

4th Avenue could be our comeback story. Across from a major train station, it's perfectly positioned to become a mixed-use, active corridor — our version of Steinway Street or even Downtown New Rochelle. We just need to make it safe, bright, and livable.

What I'm asking for:

- **Light it up.** Reliable streetlights and active cameras so people feel safe after 7 p.m.
- **Feet on the street.** Consistent foot patrols—not just drive-bys. Presence changes behavior.
- **Fix the zoning.** Right now, 4th Avenue is strangled by commercial-only zoning. Let building owners create apartments above storefronts. Residents mean lights on at night, safer streets, and buildings that get real investment. When owners can make income upstairs, they'll modernize downstairs.
- **Don't tax the survivors.** The small businesses that are still there are heroes. Don't burden them with improvement fees — *help them*.
- **Rebrand the corridor.** New signage, fresh storefronts, and art that celebrates Mount Vernon's culture. Bring pride back to the south side.

We can make 4th Avenue the heart of this city again — but we have to stop treating it like its lungs: something we hold our breath around.

2) Homelessness & addiction

Let's talk about the issue we all see but hate to mention: too many people are suffering in the open.

You can walk from the station to 4th Avenue and see people sleeping in doorways, nodding off on benches, or yelling at ghosts. It's heartbreaking, and it's also unsafe. Businesses can't operate like this, and families can't walk their kids around like this.

This isn't just a policing issue — it's a systems issue. These are people with trauma, addiction, mental illness, or all three, and right now we're addressing it with the same approach we use to fill potholes: patch and move on.

We need compassion *and* boundaries:

- **Partner with regional programs.** We're not alone — Westchester County and New Rochelle have programs that connect unhoused residents to treatment, housing, and case management. Use them.
- **Convert vacant city properties** into transitional housing with wraparound services: counseling, job readiness, addiction treatment. Not shelters — structured programs with exit plans.
- **Establish crisis response teams.** We need trained professionals, not police, handling mental health calls when possible. It's more humane and more effective.
- **Clean and reclaim public spaces.** Families and businesses have a right to safety. Compassion without rules is chaos, and right now, we're living the proof.

We can care deeply without letting the city unravel. A safe city *is* a compassionate city.

3) Schools — fewer buildings, better results (and don't leave closed sites to rot)

I've got three little girls I want to keep in this district through high school. Help me say "yes" to that.

We have too many schools for too few students, and not enough results where it counts. I know consolidation and closures are already on the table. Good. My question is: what's the plan for those closed sites? Please don't let them sit vacant and drag neighborhoods down.

What I'm asking for:

- **Yes you are closing & consolidating** underused schools—but **what is the plan for reuse?**
- **Partner with a reputable developer** to convert closed sites into **mixed-income affordable housing** or **community hubs** (childcare, arts/rec, workforce training).
Idle land = blight; reused land = revenue + vitality.
- **Supercharge MVHS.** Modern labs, clean bathrooms, safe halls, rigorous academics,

and college/CTE pathways. Publish a 12-month turnaround plan with monthly public metrics.

- **Slim the admin, fund classrooms.** If dollars aren't reaching teachers and facilities, you're doing it wrong.
- **Full transparency.** Post contracts, vendors, and spend in a simple public dashboard.
-

My family—and a lot of families like mine—are deciding whether to stay based on this.

4) Infrastructure — the pipes, the pavement, the priorities

This one's not glamorous, but it's urgent.

Mount Vernon's sewer system is over 100 years old. The city reports we lose **23.6% of our water** before it even reaches homes. That's not a small leak — that's millions of dollars literally vanishing underground. And the system is failing. Every time it rains hard, basements flood and residents cross their fingers that the toilets will flush.

This is a basic quality-of-life issue. We can't keep patching. We need a rebuild — smartly funded and tightly managed.

How to fund it without raising taxes:

- **Cut redundancy.** We do street sweeping twice a week—that's a rich-city habit. Cut to once and put the savings into pipes.
- **Win grants.** NYS Environmental Facilities Corp exists for this. With that huge city hall building who even works there? Hire a full time grant-writer. That role should pay for itself with all the state and federal money on the table...
- **Targeted infrastructure bond** with independent oversight and a public progress tracker.
- **Fix it right once.** When a street opens for repaving, require full line replacement before closure—no more patchwork boomerangs.

Fix the bones before we add muscle.

5) Homeownership — let working families plant roots (this is personal)

I do spreadsheets for a living, so trust me: I've run the mortgage calculator twelve ways. With prices over \$600k and our property taxes, buying in the city I've lived in for a decade (and my husband grew up in!) still feels like trying to board a train that never stops. And I'm a full-time professional with two incomes in the household. If I can't make it pencil, what chance does a single parent or first-gen buyer have?

Homeownership is what turns "I live here" into "**I'm invested here.**" Owners paint, plant, join PTAs, and fight for better blocks. Renters can be great neighbors too—but ownership stabilizes a city.

Create a real on-ramp:

- **First-Time Buyer Mount Vernon:** down-payment/closing-cost help for residents here **5+ years**, with counseling so people buy safely.
- **Rehab-to-Own:** take vacant/city-owned homes, renovate with trade-school partnerships, and sell below market to resident buyers who agree to live there (not flip).
- **Legal ADUs** (backyard/attic/basement units) with safety codes so owners can offset mortgages and add gentle, regulated density.
- **Shared-equity / community land trust** pilots so affordability lasts for the next family, not just the first.
- **Permit fast-track + pre-approved plan sets** for small rehabs—days, not months. Time is money, and delays kill deals.

Give families like mine a fair shot to **buy here**—and watch loyalty (and the tax base) grow.

6) Corruption...quit the bullshit please

The federal subpoenas, the unpaid school funds, the consulting contracts, it's all out there. This city doesn't have a "bad reputation"; it has a well-earned one. It's time to be the generation that fixes that:

- **Independent audits** of city and school finances.
- **Mandatory public bidding** for contracts and consulting work.
- **A shared transparency portal** showing every expense, from both the city and the school district.
- **Tie leadership raises to transparency metrics.**

You can't rebuild trust if you don't stop breaking it.

7) Bring in revenue (without squeezing residents or small businesses)

No new taxes. No new fees on 4th Ave. Just smarter plays.

- **Redevelop closed school sites and idle city lots** into **mixed-use** with affordable units.
- **Transit-Oriented Development** at all **three stations**—capture our commuter advantage.
- **Signature cultural festivals** (food, music, arts) that celebrate our diversity and bring outside wallets in.
- **Naming rights & sponsorships** for parks, playgrounds, and city events.
- **Public-private partnerships** for infrastructure and streetscapes.
- **Full-time grant office**—stop leaving state/federal money on the table.
- **C-PACE** to help property owners modernize (lower energy costs, safer buildings, prettier streets).

I'm not angry—just exhausted by wasted potential. Mount Vernon is the most well-positioned, underperforming city in Westchester, and it doesn't have to be. I'm choosing to stay. Please make that choice worth it—so my three girls can grow up proud of the city that raised them.

Kindly,
Sarah Abdin

David Reich

Comments to City Council on proposed Comprehensive Plan 10/8/2025

I have quite a few concerns with the comprehensive plan, strictly from a layman's point of view. I'm not a city planner, but I do have common sense and I've also seen the continuing decline of our beloved city over the past 30 years or so.

My first concern is close to home – the Fleetwood and Hunts Woods neighborhoods. Although the plan calls for no zoning change from the current single-family residential, I think we need wording that specifically prohibits work-arounds such as ADUs, splitting parcels and converting single-family homes into duplexes and triplexes. I brought this up to the Mayor and she said, in writing, that she opposes ADUs, so I'd look to hold her to that. However, we need specific wording to prevent that. Otherwise, we risk losing value of our homes, which for most of us is our biggest investment and asset.

Still close to home for me... the Fleetwood business district. It has traditionally had a small-town feel, and I believe that must be preserved. I am alarmed that the plan proposes a change to the blocks between Westchester Avenue going west, from around Cedar St. to just north of the parkway, at Center Street. A change would permit high-rises which will completely change the character of the neighborhood, bring overcrowding and make parking and traffic even more challenging than it currently is. Traffic and parking congestion will kill off many remaining retail businesses along Gramatan and down Broad and Grand, and it will discourage other retail from considering the neighborhood. I strongly urge the council to limit height on those blocks to 3- 4 stories, if even that high.

The plan calls for high-rise residential along transit corridors by rail stations downtown and at MV West. In theory, sounds good, but the city cannot sustain 18 – 21 story residential buildings. Whatever building does take place, it must be

market-rate. MV has more than its share of low-income and affordable housing, so we should stop it now and let other communities in Westchester do their fair share.

Finally – NO MORE PILOTS for residential. If developers want to build in our city, let them pay their fair share of taxes. PILOTS should instead be used to lure commercial and targeted retail development, to provide more jobs for our residents. Also, the plan does not include any specifics for how we will try to attract business into our city. It's nice to say it, but we need to see a realistic and ongoing plan.

The bottom line... this proposed plan is a long way from being ready for adoption by the council. All aspects of the proposals need to be closely examined with generic impact reviews, so we know what we are getting ourselves into.

If you rubber-stamp and fast-track this, you are doing the city and current and future residents a grave disservice. And we, the voters, will remember and work hard to get your behinds out of those chairs you now occupy.

Thank you.

From: noreply@civicplus.com
To: [cityclerk](#)
Subject: Online Form Submittal: Sign-Up to Speak at a City Council Meeting
Date: Wednesday, October 8, 2025 12:56:49 PM

Name	Jerry Canning
------	---------------

Email Address

Address

City	Mount Vernon
------	--------------

State	NY
-------	----

Zip Code	10552
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Phone Number

I hereby request permission to speak before the "Committee of the Whole" of the City Council for four (4) minutes. My Topic is:	Comprehensive plan - I reject the proposed elimination of single-family zoning.
---	---

Will Speaker Log In By Zoom?	Yes
------------------------------	-----

Date	10/8/2025 7:00 PM
------	-------------------

Zoom Info: www.zoom.us

Meeting ID: 974 3754 6185

Email not displaying correctly? [View it in your browser.](#)

October 8, 2025

To Whom It May Concern:

My name is Steven Vazquez and I have resided in Mount Vernon for 3 years now at
I have reviewed the Comprehensive Plan and I have some concerns:

- The plan seems to open the door in other neighborhoods for some serious issues I have noticed in mine by allowing duplexes and triplexes in certain single-family zones 'by right' and retroactively legalizing informal conversions. For example, my street has not once been cleaned by other property owners. Trash has been laid out en masse for months outside some property streets and even on their yards, and to me it is a clear indication of a lack of resources in Code Enforcement. That said, how does this plan ensure that the city gets more resources to address the already lacking services?
- The plan mandates buildings with 10+ units to include permanently affordable housing into many neighborhoods, requiring subsidies or tax abatements that erode the tax base of a city whose budget ran at a \$75 million deficit last year. How will these future subsidies and abatements be paid for? What studies have been conducted here to support this? How will services expand to support this initiative?
- How is the recommended use of general municipal revenue for housing financing sustainable without continuing to increase property taxes at high rates?
- What is the reasoning for producing this plan without a Generic Environmental Impact Statement? How does this plan take environmental impact into consideration here, considering the city faces significant issues with parking, housing mix, flooding and drainage, and neighborhood character?
- How does this plan make public

Please make sure that these concerns are addressed before moving forward with adopting this plan.

From: Nanette Aguirre <
Sent: Wednesday, October 8, 2025 3:39 PM
To: Bonilla, Nicole <nbonilla@mountvernonny.gov>
Cc: nanetteaguirreesq@gmail.com <
Subject: Fwd: Comments regarding rezoning

You don't often get email from nanetteaguirre347@gmail.com. [Learn why this is important](#)

Hello,

Please submit the below objection and have it entered on record with respect to the comprehensive plan and today's hearing.

Thank you,

Nanette Aguirre

Sent from my iPhone

Begin forwarded message:

From: Nanette Aguirre
Date: October 8, 2025 a
To: envisionmv@cmvny.com
Subject: Comments regarding rezoning

Pursuant to the hearing this evening regarding rezoning to multiple family units, please note my objection as the new owner of 16 Burkewood Road. Furthermore, here are a series of priorities that are unaddressed and unacceptable, not to mention, I have lived in my home for less than one year and have never been more concerned about where my tax dollars are going. I am an active real estate investor and attorney. Priority items are:

1) non-stop helicopter and airplanes over 10552 to the point that it is impossible

to keep my windows open or enjoy my backyard,
2) roads, water drains and sewer are in desperate need of updating including the added destruction due to Bronxville Field Club dumping directly into these outdated and at capacity infrastructure lines,
3) Mount Vernon by way of Fleetwood is already a commuter area and it will not help property values or traffic or noise or safety to make more of Mount Vernon a multi family zoning especially in the area by hunt woods. These homes have increased property values only because they are quiet and single family. 10552 pays the bulk of Mount Vernon taxes and we will all flee if this plan proceeds.

Please confirm receipt of this objection from me.

Nanette Aguirre. Esq.

Gabriel Thompson
Mount Vernon NY 10552
October 8th, 2025

Subject: Reject the “Envision Mount Vernon” Plan — Stop the Attack on Our Neighborhoods

To the Mount Vernon City Council and Planning Department:

The so-called Envision Mount Vernon Comprehensive Plan is nothing more than a stealth attempt to wipe out single-family neighborhoods and hand the city over to developers looking to profit off our stability and our history.

Let’s be honest — this plan doesn’t “modernize” zoning; it bulldozes it. By pushing “missing middle” housing and “flexible” lot sizes, you’re setting the stage for multi-unit buildings jammed onto single-family blocks, destroying the quiet character that makes our neighborhoods livable — for Black, Latino, Asian, Indian, and working-class families alike.

What you’re really proposing is to erase a pathway to homeownership and generational wealth in exchange for creating a permanent class of renters beholden to the same generational slumlords who already exploit Mount Vernon. That’s not equity — that’s economic segregation dressed up in planning jargon.

I could easily sell my home, convert it to a triplex, and move to Scarsdale, Bronxville, or Pleasantville if this passes. But future families won’t get what I have — they’ll pay more for less, and they’ll never experience the stable, quiet, diverse neighborhood that exists now. If people here wanted that kind of density, they’d live in the Bronx.

No one asked for this. There’s been little public outreach, no infrastructure plan, and zero explanation of how our overburdened sewers, narrow streets, and aging schools are supposed to absorb this density. I attended the comprehensive plan meetings — this proposal was never once raised by residents. So who asked for it? Developers? Consultants? Campaign donors?

Mount Vernon is not New York City. We have commuter trains, not subways. We are a small, diverse town with no “exclusionary” enclaves to justify this kind of social engineering. Take 10552, for example — the wealthiest ZIP code in Mount Vernon, and it’s roughly 40% Black, 30% Latino, 30% white. This is one of the most integrated single-family neighborhoods anywhere in the region. What problem are you even trying to solve?

Mount Vernon deserves smart, balanced growth, not a developer feeding frenzy disguised as progress. Protect single-family zones. Extend the public review period. And stop trying to rush through a plan that residents clearly and overwhelmingly do not want.

If this plan moves forward as written, expect fierce opposition — in meetings, in court, and at the ballot box.

Sincerely,
Gabriel Thompson
Mount Vernon Resident

Nicole Bonilla, MBA

City Clerk - City of Mount Vernon, New York

From: Adriane Saunders

Sent: Wednesday, October 8, 2025 5:47 PM

To: Bonilla, Nicole <nbonilla@mountvernonny.gov>

Subject: comprehensive Plan

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

Please read this into the record for tonight's city council meeting.

My name is Adriane Saunders, and I am taxpayer of the city of Mount Vernon.

This so-called "Comprehensive Plan" is not at all comprehensive. In fact, it is reckless, as it fails to address two problems that define Mount Vernon's decline:

1. An old, crumbling infrastructure that can't handle what we already have — flooding every time it rains; broken, collapsing storm and sewage drainage systems; raw sewage in basements; roads that test even the best suspensionsystems, and parking shortages everywhere.
2. A city dependent on property taxes for half its budget, with ballooning expenses and shrinking alternative revenuestreams. And those property taxes fall squarely on single-family homeowners who are already stretched to the breaking point.

This plan fixes neither problem. It actually makes both worse.

From what I understand, the city seeks to move this plan forward without preparing a Generic Environmental Impact Statement. You are able to get away with this because a GEIS is not technically required under state law. But just because you *can* do something, doesn't mean you *should*. Under SEQRA, adopting a comprehensive plan is a Type I action — meaning it is *presumed* to have significant environmental impacts. But here, Council doesn't have to "presume" —

you already know the problems faced by this community, and given that reality, a GEIS is absolutely necessary. You should have already issued a Positive Declaration and directed the preparation of a GEIS to assess cumulative impacts on flooding, drainage, parking, housing mix, and neighborhood character.

A GEIS isn't bureaucratic busywork — it's protection. It's how you make sure the public, planners, and the courts can see the truth *before* the damage is done. Rushing to adopt this plan without that review — in a city whose infrastructure is already failing — isn't just bad policy; it's bordering on criminal negligence. It is indefensible. That is especially so here, where the required SEQRA paperwork isn't even complete or signed.

Perhaps the most dangerous part of this plan is the backdoor attempt to erase single-family zoning — legalizing duplexes, triplexes, and ADUs in the very neighborhoods that have kept this city financially afloat. These neighborhoods aren't just zoning categories. They're a lifeline. They provide the bulk of the per capita tax base. They absorb stormwater. They contain significant green space. And — just as important — they are home to people who have stayed here *in spite of everything*. These are residents who pay the highest tax rate in Westchester County, who put up with failing schools, collapsing roads, and nonexistent city services — but remain because they love the homes they have built, their neighborhoods, and their neighbors.

What happens when you drive those people away? When you destroy the very thing — the quiet, single-family character — that makes staying here worthwhile? You lose the city's stable core. You hollow out the tax base. You create a transient city of absentee landlords and renters with no stake in its future. You abort the opportunity for families to create generational wealth. You call that revitalization? I call it collapse.

If this City Council issues a Negative Declaration under SEQRA, it will be one of the most irresponsible, indefensible acts of this administration. A Negative Declaration means the Council is saying this plan will have *no significant environmental impact*. I hope that you are ready to own that pronouncement, because in Mount Vernon, that's absurd on its face. We have flooding, raw sewage, collapsing roads, no parking — I could go on, and you all are prepared to claim that massive zoning changes and new development won't make that worse? Come on. This is exactly the kind of project SEQRA was designed for and the only responsible path is to issue a Positive Declaration and conduct a GEIS. Anything less is a cover-up. And if the Council pushes this through anyway, it will show that this wasn't about good planning or public welfare — it was about political expediency — and it will be challenged in court.

Under New York law, before issuing a Negative Declaration, the lead agency must identify environmental concerns, take a *hard look* at them, and provide a *reasoned elaboration* for its determination. There is no evidence that has happened here.

Do your jobs. Follow the law. Protect this city before it's too late.

Thank you.



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 8, 2025

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 itself-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.

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

After almost three (3) years of stops & starts in preparing the *Draft Plan* before you tonight, the planning commissioner, on September 24, 2025, 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 Council for action. On that date, with ZERO discussion, the Council scheduled two public hearings:

the first one two (2) weeks later on October 8, 2025 (tonight), and the second one six (6) days later on October 14. I highly doubt that any of the Council people read 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. As of October 5, 2025, just four (4) days before tonight's hearing, ZERO documents were placed on the City Council web site (*Granicus Legistar*) for the public to review. After my personal prodding, only some of the documents appeared on line yesterday, October 7, 2025 -- only one (1) day ago. While the planning staff touts the public input process they undertook over several months in producing this *Plan*, the extremely tight timeline, arbitrarily established by the City Council to adopt it, and the absence of complete documents to review on line in a timely manner, seriously

compromises 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 SEQRLaw, the adoption of a comprehensive plan is a Type 1 Action which is presumed to "have a significant adverse impact on the environment". But despite stating in the City Council resolution that the Proposed Action is a Type 1 Action, the scant Long Form Parts 1 & 2, prepared by the planning department, belies that with incredulous responses of "no impact" throughout.

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 Comprehensive Plan update since 1968. This *Plan*, whatever its pluses or minuses as drafted, deserves to be reviewed and vetted very carefully, in accordance with the law. Arbitrarily rushing to approve it before year's end will not accomplish that goal.

As a matter of fact, the public hearing(s) should be kept open until such time as the Comp Plan consulting team and planning department have had a chance to review all comments and respond to them individually, as well as in a revised Draft Comprehensive Plan for posting and further comment by the public. This may take several weeks or months.

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.

I will submit detailed technical comments as an "expert planning witness" before the end of this fast tracked process and public comment period.

Thank you.



CITY OF MOUNT VERNON, N.Y.

Mayor Office

SHAWYN PATTERSON-HOWARD, MPA
Mayor

City Hall, One Roosevelt Square
Mount Vernon, NY. 10550
(914) 665-2362 – Fax: (914) 665-6173

MALCOLM CLARK
Chief of Staff
KHENDRA DAVID
Deputy Chief of Staff

October 8, 2025

Honorable Members of the City Council
City Hall
1 Roosevelt Square
Mount Vernon, NY 10550

RE: Envision Mount Vernon Draft Comprehensive Plan

Members of the City Council,

I apologize for my absence tonight, but it is important to put on paper my initial thoughts about this Draft Comprehensive Plan. I will continue to expand my comments over the next two weeks. First, I want to extend my sincere gratitude to the City Council, the Department of Planning and Community Development, our consultants, advisory board members, and the many community stakeholders who contributed to the development of the Envision Mount Vernon Draft Comprehensive Plan. This plan represents a historic milestone the first comprehensive land-use plan undertaken in the City of Mount Vernon over fifty-five years.

The process to reach this point has been deeply collaborative and inclusive. Over thirty community engagement sessions including workshops, educational forums, neighborhood meetings, and discussions held in churches and community centers have shaped this document. This report is the collaboration of all of Mount Vernon throughout the past few years.

While I support the vision and goals of this draft plan, I want to highlight one area of particular importance: the preservation of our single-family neighborhoods. As we look toward future growth, we must ensure that neighborhood preservation is balanced with smart, intentional development. Growth must be community-driven, not dictated by outside investors. Our residents must remain at the center of shaping Mount Vernon's future.

Housing is one of the most critical elements of our city's future. As Mayor, I strongly support the development of both workforce and market-rate housing. I am not in favor of low-income housing as Mount Vernon has paid its share of investments in that area. To that end, we must ensure that we build housing that allows our residents to remain in our community as they build wealth, raise families, and retire. A vibrant housing mix is an essential one that includes single-family homes, multifamily buildings, townhomes, condominiums, co-ops, and market-rate housing for seniors. Homeownership opportunities must be woven into our growth strategy so that residents at all income levels have a pathway to stability and equity.

"The Jewel of Westchester"



CITY OF MOUNT VERNON, N.Y.

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MALCOLM CLARK
Chief of Staff
KHENDRA DAVID
Deputy Chief of Staff

It is also important that as we consider limited allowances for Accessory Dwelling Units (ADUs), we do so with great care and intention. ADUs should be permitted only on owner-occupied properties not for speculative investment or absentee ownership. We must prevent corporate entities and poorly managed LLCs from exploiting these opportunities at the expense of our neighborhoods and residents.

The Draft Comprehensive Plan goes far beyond housing. It encompasses strategies for economic development, sustainability, transportation, expansion of our tax base, cultural arts, equity, and smart growth. It strikes a thoughtful balance between preserving the character of our neighborhoods and seizing new opportunities for responsible development that benefits our entire community.

I support increasing density in a strategic, data-informed manner particularly along high-traffic corridors, retail areas, and transit-oriented zones. Such development will bring diversity of income, attract neighborhood-serving retail, and create opportunities for dining, recreation, cultural arts, and entertainment. These are the investments that make Mount Vernon not just a place to live, but a destination to experience.

Mount Vernon is not a poor community. Our challenge is not the lack of people or potential, but the lack of diversity in our retail, commercial, and industrial base. By implementing the Envision Mount Vernon plan with focus and discipline, we can create the ecosystem needed to keep residents' spending local, attract new investment, and build the economic richness our city deserves.

Thank you once again for your tireless work, partnership, and dedication to shaping the Mount Vernon of tomorrow. Together, we are ensuring that our city's growth is smart, equitable, and rooted in the strength of our community.

In Service,

Shawyn Patterson-Howard, Mayor
City of Mount Vernon, NY

To: Mount Vernon City Council
From: Michael Justino-ZBA Chair; FNA President; Advisory Committee Member
Date: October 8, 2025
Subject: Comments and Concerns Regarding the Comprehensive Draft Plan

Dear Members of the City Council,

This statement is submitted to express significant concerns regarding the current **Comprehensive Draft Plan** and its associated procedures. Several substantive and procedural issues 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 may expose the City to legal challenges. The GEIS must address cumulative impacts, mitigation strategies, and alternatives in sufficient detail to inform decision-making.

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

The current **Long-Form EAF** is **deficient**, with numerous sections left **blank and unsigned**. This undermines the transparency and completeness of the environmental review process and must be rectified prior to any further consideration of plan adoption.

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.

4. Single-Family Zoning Concerns

The proposed plan raises serious concerns about the preservation and integrity of single-family zoning districts. These areas have long been a defining feature of Mount Vernon's residential character and stability. Any changes to density or permitted uses within these districts should be carefully studied for their long-term impacts on neighborhood cohesion, infrastructure capacity, and property values.

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. The scale, height, and intensity proposed would significantly alter the built environment

and may create adverse impacts on traffic, parking, and overall livability. A more balanced, context-sensitive approach to height and density is warranted.

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. This omission risks undermining the district's commercial vitality and its role as a neighborhood economic anchor. A targeted retail strategy—emphasizing pedestrian activity, small business retention, and mixed-use synergy—is essential before adoption of the broader plan.

7. Insufficient Use of the Advisory Committee

The **Comp Plan Advisory Committee** has not been adequately utilized during the **Phase 2** review process. There were only two (2) meetings called. The first, only to explain the plan to change consultants and other miscellaneous processes, with NO input from the members. The second meeting was a slide presentation and broad overview of the work in progress with scant detail and little feedback from members.

During **Phase 1**, most Advisory Committee members recommended **much lower height and density levels** than those ultimately proposed. This deviation from advisory input raises concerns about the effectiveness of the public participation process and the value placed on community-based recommendations.

8. Public Hearing and Review Process

It is imperative that the **public hearing remain open** until all public and agency comments have been thoroughly reviewed by both the **Planning Department** and the **consulting team**. The public must have the opportunity to:

- Review all consultant responses to public communications and questions. Then present the **revised plan** to the **Advisory Committee** and recirculate for **public review**;
- Address **remaining concerns**; and
- Participate in a transparent discussion regarding the process for **public input evaluation, consolidation, and plan revision** leading to final review.

This step is critical to maintaining public trust, ensuring compliance with SEQRA, and producing a comprehensive plan that reflects the collective vision of the community.

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** is fully and accurately completed;
2. The **GEIS** is completed and accepted;
3. Zoning updates are finalized;
4. The public and Advisory Committee have a full opportunity to review and respond to all revisions.

Respectfully submitted,



Michael Justino

Chairman-Zoning Board of Appeals

President-Fleetwood Neighborhood Association

Member-Comprehensive Plan Advisory Committee

Public Comment on the Comprehensive Plan Draft

Submitted by Wendy Ball-Attipoe, Member, Comp Plan Advisory Committee
Member and a ZBA commissioner

My comments concern diversity of housing options & the elimination of single family zones; inconsistencies in neighborhood designations; density parameters and environmental impact

This plan advocates for a diversity of housing options, yet throughout its 475 pages it repeatedly calls for the elimination of single family only zones and the allowance of duplexes and triplexes “by right” in all single family zones. (For ex. Sections 3-7; 3-18; 4-11; 5-45; 5-70) Are single family zones not among the diverse housing options that should be a feature of a future Mt. Vernon?

As a member of the comp plan advisory committee, I attended many many of the community conversation workshops and sessions over the past 3 years of this process. In not one of them did I hear a community member say, “Gee I really want my neighbor to be able to create an apartment in their basement or attic and add to the parking problems and noise pollution I already experience.” Additionally, the plan does not include Relevant Takeaways from the Community Conversation with Neighborhood Associations that took place from Sept. 2023 – May 2024. In these discussions quality of life was a major concern.

This idea of the elimination of single family exclusionary zoning came late in the game and was presented as part of the plan in June 2025 at a meeting of the Planning Dept., and Cleary Consulting with the Advisory Committee to share a preliminary outline of the draft plan. It was then re-circulated in public plan workshops in July 2025. In the last workshop via Zoom, homeowners expressed their displeasure with this idea and specifically asked the Planning Dept if single family zoning was going to be eliminated across the board as this “elimination by right” language suggests, and we were told No. Yet this concept is repeated throughout this draft plan.

According to the Implementation Plan Section 6, there are only 2-1/2 neighborhoods that would remain single family zones. These are Aubyn & Pasadena, and some residential sections of Fleetwood. The Implementation Plan section is at odds with the Neighborhood Analysis in the Placemaking Section where No Change to the Land Use Characteristics of Huntswood, Chester Hill Park, Chester Heights, and Oakwood Heights, are recommended along with Aubyn & Pasadena—yet only those two and parts of Fleetwood are noted as single family zones in the Implementation Section.

Between the adoption of the Downtown Vision Plan, and the appropriate recommendations for transit oriented development, and corridor mixed use in high and medium density areas, just how much more density can Mt. Vernon take if also now includes the elimination of single family zones and the widespread allowance of the building or conversion to duplexes and triplexes? The City Council must incorporate an environmental impact assessment and density projections analysis into this process so that we all understand beyond the abstract how many people will be living here and what kinds of services are required as a result. I also ask the City Council to reject the notion of the elimination of single family zoning.

Regarding Neighborhood descriptions, Neighborhood descriptions in the plan are overly broad, erasing nuance. I guess Kingsbridge Gardens is somewhere in Parkside, and Langdon Terrace is somewhere in Vernon Heights but the unique characteristics inside neighborhoods are not recognized and thus placemaking opportunities will be lost. Mt. Vernon is a place where one block in a neighborhood can be a completely different experience than another. This is very true of Vernon Heights where some blocks are strictly Single Family and others are multifamily.

In the case of my own Neighborhood of Oakwood Heights the description and boundaries in the plan are just plain incorrect on page 2-44. Here is a map that our Association put together. Oakwood Heights includes approximately 250 family homes on 13 streets in the area bounded in a sloppy triangle by North Columbus, East Lincoln and Lorraine Avenues in zip code 10553. Interior residents live on Willard, East Prospect, Hudson, East Sidney, Esplanade, Mersereau, Darwood, Magnolia, Sycamore, and Oakwood. Neither Traphagen School, or the Parklane or Esplanade Coops are part of Oakwood Heights. They are on the opposite side of Lincoln and are in zip code 10552. Nor does it include a variety of midrise apartment buildings. It was founded 100 years ago as a residential park and largely retains that character today.

In closing, I urge the City Council and Planning Department to revisit this plan with greater fidelity to the nuances and the lived realities of its neighborhoods. In a truly inclusive vision, single family zones should not only be characterized as exclusionary. They are vital threads in the fabric of Mt. Vernon's identity, offering stability, green space, and a quality of life that many residents cherish and have fought to preserve.

Let us move forward with a plan that reflects both the diversity of housing options and the diversity of lived experiences. Let us plan for growth, yes—but with clarity, transparency, and respect for the people who already call Mt. Vernon home and have invested their livelihoods in it.

Good evening. My name is Tamala Boyd, and I offer this testimony as a Mount Vernon resident and taxpayer.

This so-called “Comprehensive Plan” is not at all comprehensive. In fact, it is reckless, as it fails to address two problems that define Mount Vernon’s decline:

1. An old, crumbling infrastructure that can’t handle what we already have — flooding every time it rains; broken, collapsing storm and sewage drainage systems; raw sewage in basements; roads that test even the best suspension systems, and parking shortages everywhere.
2. A city dependent on property taxes for half its budget, with ballooning expenses and shrinking alternative revenue streams. And those property taxes fall squarely on single-family homeowners who are already stretched to the breaking point.

This plan fixes neither problem. It actually makes both worse.

From what I understand, the city seeks to move this plan forward without preparing a Generic Environmental Impact Statement. You are able to get away with this because a GEIS is not technically required under state law. But just because you *can* do something, doesn’t mean you *should*. Under SEQRA, adopting a comprehensive plan is a Type I action — meaning it is *presumed* to have significant environmental impacts. But here, Council doesn’t have to “presume” — you already know the problems faced by this community, and given that reality, a GEIS is absolutely necessary. You should have already issued a Positive Declaration and directed the preparation of a GEIS to assess cumulative impacts on flooding, drainage, parking, housing mix, and neighborhood character.

A GEIS isn’t bureaucratic busywork — it’s protection. It’s how you make sure the public, planners, and the courts can see the truth *before* the damage is done. Rushing to adopt this plan without that review — in a city whose infrastructure is already failing — isn’t just bad policy; it’s bordering on criminal negligence. It is indefensible. That is especially so here, where the required SEQRA paperwork isn’t even complete or signed.

Perhaps the most dangerous part of this plan is the backdoor attempt to erase single-family zoning — legalizing duplexes, triplexes, and ADUs in the very neighborhoods that have kept this city financially afloat. These neighborhoods aren’t just zoning categories. They’re a lifeline. They provide the bulk of the per capita tax base. They absorb stormwater. They contain significant green space. And — just as important — they are home to people who have stayed here *in spite of* everything. These are residents who pay the highest tax rate in Westchester County, who put up with failing schools, collapsing roads, and nonexistent city services — but remain because they love the homes they have built, their neighborhoods, and their neighbors.

What happens when you drive those people away? When you destroy the very thing — the quiet, single-family character — that makes staying here worthwhile? You lose the city’s stable core. You hollow out the tax base. You create a transient city of absentee landlords and renters with no

stake in its future. You abort the opportunity for families to create generational wealth. You call that revitalization? I call it collapse.

If this City Council issues a Negative Declaration under SEQRA, it will be one of the most irresponsible, indefensible acts of this administration. A Negative Declaration means the Council is saying this plan will have *no significant environmental impact*. I hope that you are ready to own that pronouncement, because in Mount Vernon, that's absurd on its face. We have flooding, raw sewage, collapsing roads, no parking – I could go on, and you all are prepared to claim that massive zoning changes and new development won't make that worse? Come on. This is exactly the kind of project SEQRA was designed for and the only responsible path is to issue a Positive Declaration and conduct a GEIS. Anything less is a cover-up. And if the Council pushes this through anyway, it will show that this wasn't about good planning or public welfare — it was about political expediency — and it will be challenged in court.

Under New York law, before issuing a Negative Declaration, the lead agency must identify environmental concerns, take a *hard look* at them, and provide a *reasoned elaboration* for its determination. There is no evidence that has happened here.

Do your jobs. Follow the law. Protect this city before it's too late.

Thank you.

NIGHT 2 COMMENTS

----- Forwarded message -----

From: **Cassandra Rajcumar**

Date: Mon, Oct 13, 2025 at 10:10 PM

Subject: Comprehensive Plan Opposing

To: <AMarmolejos@cmvny.com>, <cathlin4council@gmail.com>, <mayorSPH@cmvny.com>

I'm writing as a resident of Williams St. to let you know that I oppose the proposal in the Comprehensive plan of the rezoning of the section of Fleetwood from Devonia to Birch and Gramatan to N. Maquestern parkway from R2-4.5 one and two family home to medium density and high density housing. This proposal would allow developers to demolish homes and build more than 2 family units in what is already a congested and overburdened area.

I do not support the building of more apartment buildings on N. Macquestern parkway as the street lacking any road markings is already extremely dangerous.

Please do not support this rezoning change. Our schools are already overcrowded with Pennington receiving and additional 120 students. Our children's lunch period consists of 184 students. Their special classes have been cut from 2-3 a week to one person subject. The district is in significant financial distress cannot handle the addition of more families. The infrastructure of our streets and parking cannot handle more residents.

These proposed zoning changes would ruin what is a lovely neighborhood and overburden our already strained resources.

Please stand with me and oppose these changes.

Respectfully submitted,
Cassandra Rajcumar

Mt. Vernon, NY 10552

Sent from my iPhone

From:

Sent: Monday, October 13, 2025 10:58 PM

To: Bonilla, Nicole <nbonilla@mountvernonny.gov>; MayorSPH <mayorsph@mountvernonny.gov>

Subject: Envision Mount Vernon - STOP IT!

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To the Mount Vernon City Council and Planning Department:

My husband, Steven Friedlander, and I, would like to be included in the voices speaking out against the so-called “Comprehensive Plan” that would eliminate single-family zoning across Mount Vernon.

We moved to this neighborhood (Zip code 10552) because of its diversity, it’s small-town feel, its beautiful tree-lined streets and the wonderful, well-maintained, single-family homes that Mount Vernon is so famous for. Families on our block look out for each other, we know each other’s children and pets, and there’s a feeling of security and safety.

What we didn’t know about at the time we moved to Mount Vernon were the over-burdened sewers, stretched infrastructure, and its local government that seems to have grown more corrupt with each successive administration.

Gabriel Thompson’s letter of October 8, 2025 expresses it perfectly and we echo his words.

Leslie and Steven Friedlander

Mount Vernon, NY 10552

[Sent from the all new AOL app for iOS](#)

From: Jillana >
Sent: Monday, October 13, 2025 10:26 PM
To: Bonilla, Nicole <nbonilla@mountvernonny.gov>
Subject: Zoning change from Single Family to multi family in 10552

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<https://aka.ms/LearnAboutSenderIdentification>]

Please add to comments at meeting:

I live on Central Parkway and do not want multi family houses built in my neighborhood. The reason I bought my house was for the beauty of the street and the privacy. If a multi family house goes up next to me or behind me they will be able to see directly into my home and my backyard. The lots here aren't big enough to support this. I would not have purchased my home here if that was the case. There will be plenty of lawsuits against Mt Vernon if this passes so they should be prepared for that. Changing the zoning will completely destroy this neighborhood and our property values will plummet. There are so many children riding bikes on these streets with cars zooming down the roads already and now you want to put more housing with more traffic. Get ready for lawsuits, accidents and major parking issues. This is just not right to destroy what we moved here for. If I wanted a dense population with apartments I would have bought a property somewhere else.

Sent from my iPhone

From: Cathcart, Ralph >
Sent: Monday, October 13, 2025 9:35 PM
To: cityclerk <cityclerk@mountvernonny.gov>
Cc: Bonilla, Nicole <nbonilla@mountvernonny.gov>; Ralph Cathcart >
Subject: Objection To Portions Of "Comprehensive Plan"

Some people who received this message don't often get email from
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To: Mount Vernon City Council – cityclerk@mountvernonny.gov;
NBonilla@mountvernonny.gov

I have been a homeowner here in Mount Vernon since 2010 and reside in the Huntswood neighborhood. I am a practicing attorney and have volunteered significant time over the years in support of Mount Vernon, including as a member of The Mount Vernon Citizen's Budget Committee For The Mount Vernon City School District.

While many aspects of the "Comprehensive Plan" seem positive, I am categorically opposed to any attempt to change current single family home zoning or otherwise provide variances to allow construction of multi-family units or other non-conforming uses in areas zoned for single family homes. Indeed, every homeowner I have spoken to in Huntswood is also vehemently opposed to such a plan. This is true of the "old timers" who have lived here for decades, as well as recent buyers who moved here in the last five years.

To begin with, Mount Vernon has the highest population density of any city or town in the entire County of Westchester. It would be irresponsible to make this worse. Although only about 4 square miles in area, we have over 75,000 residents. The strain this puts on our aging and neglected infrastructure, sewer system, roads, sidewalks, local schools, fire department, police department, etc. is just too much.

Much of our infrastructure is in dire need of repair. E.g., the sewer system is in ecological crisis and we do not have the funds required to repair and replace the aging and overburdened system. We have been found in violation of the Clean Water Act and a consent decree and were at risk of having substantial fines levied. Residents have been subjected to repeated sewer back ups of contaminated sewer water with fecal matter flooding their homes, coming out of faucets and draining into the Huntswoods and Bronx river. Making matters worse, Bronxville dumps sewage into our overburdened system. This is the same Bronxville that our city had a dispute with over ownership and access to Scout Field a few years back.

It is time for other towns and cities in Westchester to provide for low income/affordable housing, senior housing and multi-family housing. The Justice department found Westchester in violation of a consent decree requiring same, but Mount Vernon is regularly targeted by developers looking to make a buck to construct more and more of such housing in Mount Vernon, just like the PILOT plan where developers get tax abatements

and pay little or no taxes, exacerbating our already stressed tax base. The result is more and more renters who don't pay real estate taxes. This along with our extremely expensive school budget has made Mount Vernon's effective tax rate one of the highest in Westchester. Yet we are not a wealthy town like Bronxville, Scarsdale, etc. This problem of population density and scarcity of resources creates an untenable situation. A few years ago when my children were in Pennington elementary, and I served on the budget committee, I learned that it takes approximately \$37,000 of funding for each student. Moreover, our school district has a very high percentage of students with learning disabilities, and other issues requiring expensive resources. We just don't have the tax basis to pay for all these much needed resources. So, increasing the population density is not a viable solution. Yes, there is a national affordable housing crisis, but Mount Vernon cannot be the sole city or town to absorb all of the low/moderate income, senior housing and multi-family needs for the entire County of Westchester. We already have far more than our share.

Many of us chose to move here because of the diversity of its residents, and the beautiful, single family houses and safe neighborhoods, surrounded by trees, nature, etc. Allowing for multi-family units will destroy our neighborhoods eventually, for no reason, as we are a diverse community, the segregation in past decades a repugnant footnote in Mount Vernon's past history. The road to hell is paved with good intentions.

We say no to this portion of the "Comprehensive Plan".

Sincerely, Ralph Cathcart

From: Cassandra Hyacinthe >
Sent: Monday, October 13, 2025 8:15 PM
To: Bonilla, Nicole <nbonilla@mountvernonny.gov>
Subject: Comments on the Proposed Draft Comprehensive Plan

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Dear City Clerk,
Please see the attached statement containing comments I would like read into the record at the October 14th meeting on the Comprehensive Plan Draft.
Thank you,
Cassandra Hyacinthe

Mount Vernon, NY 10552

October 13, 2025

Dear City Clerk Nicole Bonilla,

I request that my statement below be read into the record of the October 14th meeting.

As a homeowner in Hunt's Woods neighborhood, I am concerned about the proposed Comprehensive Plan recommendations that would change zoning for single-family housing districts.

I am opposed to the following items suggested in the plan:

"Allow duplexes and triplexes by right in all single-family zones", which could not be a more clear indication of the intent and objective of the Plan to eliminate the current (and long-standing) single family residential zoning district (i.e., R1-7; R1-4.5; and R1-3.6) restrictions on "permitted principal uses" in said zones to only "one-family dwellings." MV Code Section 267-17(A), (B), and (C). Duplexes and triplexes should not be "permitted principal uses" in single family zoning districts as such would change the nature and character of same and give rise corollary issues such as increased density, parking, traffic and an impediment to access by emergency vehicles.

"Elimination of exclusionary zoning provisions throughout the City"

"Mount Vernon's Role in the Region / Housing Access for All:

- Eliminate exclusionary zoning and legalize small-scale multifamily housing, supporting the creation of mixed-income neighborhoods with a diverse range of affordable housing options ("City of Homes v2.0")."

"Allow duplexes and triplexes by right in all single-family zones to expand housing options citywide and reduce exclusic lary zoning practices through "gentle" increases in housing density, diversity, and quality, all while ensuring that these housing types follow design standards to ensure compatibility with existing neighborhood character."

I hope you will reconsider this Comprehensive Plan draft and rescind these recommendations immediately to retain what makes our "City of Homes" unique and desirable to so many families.

Concerned Mt. Vernon Resident and Homeowner,

**Cassandra Hyacinthe
29 Fairway Street
Mount Vernon, NY 10552**

From: Joseph B. Houlihan >
Sent: Monday, October 13, 2025 2:44 PM
To: Anna Filipkowski Houlihan >; Bonilla, Nicole <nbonilla@mountvernonny.gov>
Subject: Response to the Draft Comprehensive Plan

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Nicole:

My wife and I are unable to attend the meeting on October 14 at City Hall to express our very serious concerns about the proposed Comprehensive master plan. Attached are our thoughts and I am requesting that you forward these to each member of the City Council. Please do not close the public hearing on this matter as further work needs to be done to amend this plan.

Joe Houlihan
Licensed Real Estate Broker
Houlihan & O'Malley Real Estate Services
133 Parkway Road
Bronxville, NY 10708
Office: 914.337.7888; Cell: 914.645.6640
houlihanomalley.com

Joseph Houlihan

Mount Vernon, NY 10552

To: Mount Vernon City Council

From: Joe and Anna Houlihan, owners of 35 Clinton St.

Date: October 13, 2025

Subject: Comments and Concerns Regarding the Comprehensive Draft Plan

Dear Members of the City Council,
This statement is submitted to express **significant** concerns regarding the current Comprehensive Draft Plan and its associated procedures. Several substantive and procedural issues 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 may expose the City to legal challenges. The GEIS

must address cumulative impacts, mitigation strategies, and alternatives in sufficient detail to inform decision-making.

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

The current Long-Form EAF is deficient, with numerous sections left blank and unsigned. This undermines the transparency and completeness of the environmental review process and must be rectified prior to any further consideration of plan adoption.

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.

4. Single-Family Zoning Concerns

The proposed plan raises serious concerns about the preservation and integrity of single-family

zoning districts. These areas have long been a defining feature of Mount Vernon's residential

character and stability. Any changes to density or permitted uses within these districts should be carefully studied for their long-term impacts on neighborhood cohesion, infrastructure capacity, and property values.

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. The scale, height, and intensity proposed would significantly alter the built environment and may create adverse impacts on traffic, parking, and overall livability. A more balanced, context-sensitive approach to height and density is warranted.

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. This omission risks undermining the district’s commercial vitality and its role as a neighborhood economic anchor. A targeted retail strategy—emphasizing pedestrian activity, small business retention, and mixed-use synergy—is essential before adoption of the broader plan.

7. Public Hearing and Review Process

It is imperative that the public hearing remain open until all public and agency comments have been thoroughly reviewed by both the Planning Department and the consulting team. The public must have the opportunity to:

Review all consultant responses to public communications and questions. Then present the revised plan to the Advisory Committee and recirculate for public review; address remaining concerns; and Participate in a transparent discussion regarding the process for public input evaluation, consolidation, and plan revision leading to final review.

This step is critical to maintaining public trust, ensuring compliance with SEQRA, and producing a comprehensive plan that reflects the collective vision of the community.

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 is fully and accurately completed;
2. The GEIS is completed and accepted;
3. Zoning updates are finalized;
4. The public and Advisory Committee have a full opportunity to review and respond to all revisions.

Respectfully submitted,

Joe & Anna Houlihan

From: Susan Emilio < >
Sent: Monday, October 13, 2025 12:07 PM
To: Bonilla, Nicole <nbonilla@mountvernonny.gov>
Subject: Comprehensive Pan

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<https://aka.ms/LearnAboutSenderIdentification>]

Dear Ms. Bonilla, My name is Susan Emilio, I have been a resident of Mt. Vernon since 1968. Please enter my comments into the City Council's minutes for the October 14th meeting. I attended the October 8th City Council meeting where Vince Ferrandino, a well known and respected city planning expert, expressed his concerns about various portions of the proposed Comprehensive Plan, most notably changes to single family zoning. I urge the CC to take Mr. Ferrandino's concerns into serious consideration. Why not use his expertise to help craft a plan to protect single family zoning in MV. Single family homes are a large part of what makes MV the "City of Homes". Please protect our neighborhoods from unnecessary change. Sincerely, Susan Emilio

Sent from my iPhone

From: Daria Sheehan

Sent: Monday, October 13, 2025 5:52:19 AM

To: Bonilla, Nicole <nbonilla@mountvernonny.gov>; MayorSPH <mayorsph@mountvernonny.gov>

Subject: Opposition to Elimination of Single Family Zoning

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Daria M. Sheehan

Mount Vernon, NY 10552

13 October 2025

Dear Sir or Madam,

Regarding the “**Comprehensive Plan**” involving Zoning Changes, I am expressing my views below and wish to have them aired and read into the record of the various hearings, committee meetings and other pertinent forums regarding zoning changes.

I strongly oppose any proposal to eliminate single family zoning in the City **and oppose**

the allowance of duplexes, 2-family residences, triplexes, and 3-family residences as as-of-right permitted uses in zoning districts that currently are limited to single family residences.

Single family residences provide the neighborhood stability that has been an hallmark of Mount Vernon.

A proposed change to allow 2-family and 3-family residences would turn neighborhoods currently dominated by home owners into neighborhoods dominated by renters. This would jeopardize the current stability of the single family neighborhoods. Mount Vernon is one of the most densely populated cities in New York State. It is of no advantage to the residents that

it become even more densely populated. A public official who would vote to eliminate single family zoning would be betraying the trust of the citizens of this City.

The current zoning envelope allows a much larger cubic volume on a lot that the older, more stately houses have. This makes - even with current laws - the opportunity to build a big, boxy shape that in my opinion visually overfills the lot. Examples of this are the three houses built several years ago at the southwest corner of Lincoln Ave, and Columbus Ave. To allow new 2 and 3-family dwellings would encourage construction of many of these oversize buildings in our existing, charming neighborhoods.

Very truly yours,
Daria M. Sheehan
Home Owner

From: William Sheehan >
Sent: Sunday, October 12, 2025 9:44 AM
To: Bonilla, Nicole <nbonilla@mountvernonny.gov>
Subject: Opposition to Elimination of Single Family Zoning in Mt Vernon

You don't often get email from
William G. Sheehan

[. Learn why this is important](#)

Mount Vernon, NY 10552

12 October 2025

Dear Sir or Madam,

Regarding the "**Comprehensive Plan**" involving Zoning Changes, I am expressing my views below and wish to have them aired and read into the record of the various hearings, committee meetings, and other pertinent forums regarding zoning changes.

I strongly oppose any proposal to eliminate single family zoning in the City
and oppose the allowance of duplexes, 2-family residences, triplexes, and 3-family residences as as-of-right permitted uses in zoning districts that currently are limited to single family residences.

Single family residences provide the neighborhood stability that has been a hallmark of Mount Vernon.

A proposed change to allow 2-family and 3-family residences would turn neighborhoods currently dominated by home owners into neighborhoods dominated by renters. This would jeopardize the current stability of the single family neighborhoods.

Across the tristate area, I have had the opportunity to observe single-family zoned neighborhoods and multi-family zoned neighborhoods. As a group, the houses and properties of the single-family areas are always better maintained than the multi-family properties.

Additional residential units require increased services for education and other city services. Education and other City services are already strained to the limit (indeed, sometimes beyond the limit) of what is currently needed. It is unlikely that increased taxes on the additional residential units will be sufficient to cover the cost of the necessary increase in services, let alone compensate for current budget stresses.

Very truly yours,

William G. Sheehan
Home Owner and
Registered Architect in the State of New York

From: Ellen Story >
Sent: Saturday, October 11, 2025 3:37 PM
To: cityclerk <cityclerk@mountvernonny.gov>; Bonilla, Nicole <nbonilla@mountvernonny.gov>
Subject: Public Comments to be read into the record regarding Comprehensive Plan draft

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We have been Mount Vernon residents and homeowners at St., Mount Vernon for 20 years. We oppose the current Comprehensive Plan draft, specifically the intention to remove single-family home zones and replace with "low-density" zoning to include single-family, duplex and even triplex housing. Smart integration of affordable housing is a noble goal, however, this Comprehensive Plan is not smart. It will further degrade our already-crumbling infrastructure while at the same time reducing revenue from what needs to be a sustainable tax base. We are also concerned about how this plan will impact the value of our home, and this issue has not been addressed in the plan draft. The Fleetwood area where we live is a lovely neighborhood with rich diversity. Converting this area to multi-family housing, among other problems, adds traffic and safety concerns, lack of parking, and will undoubtedly diminish the charm that brought us to buying a home here in the first place. Current and future home seekers looking for single-family neighborhoods, will not consider Mount Vernon and move on. We urge our municipal decision makers - who are charged with being good stewards of the city - to not move forward with the Comprehensive Plan as drafted. Listen to the residents and maintain zones for single-family homes, including Fleetwood.

Respectfully submitted,
Ellen & Daryl Story

Mount Vernon, NY. 10552

From: Matt Roddan >
Sent: Monday, October 13, 2025 10:02 PM
To: cityclerk <cityclerk@cmvny.com>; cityclerk <cityclerk@mountvernonny.gov>; MayorSPH <MayorSPH@cmvny.com>; McSweeney, Kelsie <kmcsweeney@cmvny.com>
Subject: Formal Objection to Proposed Rezoning North of N. Birch Street in Fleetwood (Envision Mount Vernon Draft Plan)

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Dear Members of the Mount Vernon City Council and Planning Department,

I am a resident of the Fleetwood neighborhood, living on Hayward Ave just north of N. Birch Street. I am writing to register my **strong objection** to the proposed land-use change shown in *Chapter 4 – Placemaking, pages 4-24 to 4-25* of the *Envision Mount Vernon Draft Comprehensive Plan (September 2025)*.

Under the current draft, the area above N. Birch Street—currently zoned **R2-4.5 low-density residential**—is shown as **“Medium-Density Residential.”** This represents a significant up-zoning that would fundamentally alter the quiet, single-family residential character of our neighborhood.

The blocks north of N. Birch St are narrow, tree-lined, and already affected by overflow parking and traffic from the larger apartment buildings south of N. Birch Street. Introducing medium-density zoning here would increase congestion, reduce on-street parking, strain aging infrastructure, and erode the neighborhood character that makes Fleetwood unique. There has been **no neighborhood-specific impact analysis** and no public meeting explaining why this change is necessary or beneficial to existing residents.

Equally concerning is the **lack of accessibility** of the planning document. The 475-page PDF posted to the City’s website is **not text-searchable**, making it nearly impossible for the public to find neighborhood-specific changes or understand their implications. Expecting residents to manually review hundreds of pages to locate relevant information is not consistent with transparent or equitable public engagement.

For these reasons, I respectfully request that the City Council:

1. **Remove or defer** the proposed rezoning north of N. Birch Street from the Comprehensive Plan adoption; and
2. **Direct Planning staff** to hold a dedicated public session with Fleetwood residents before any zoning changes are considered for our area.

Fleetwood's success as a transit-oriented neighborhood depends on thoughtful planning that balances growth with preservation of its established low-density residential streets. I urge the Council to protect this balance.

Thank you for considering this comment and for ensuring the voices of current residents are genuinely heard before any final vote.

Sincerely,

Matt Roddan

Mount Vernon, NY 10552

Public Hearing Statement in Response to Councilman Poteat's October 8th Comments re: the Comprehensive Plan

Submitted by Wendy Ball-Attipoe to the City Clerk to be read at the Oct. 14, 2025

Comprehensive Plan public hearing

This statement addresses Councilman Poteat's remarks at the October 8th public hearing that Mt. Vernon was more densely populated in 1960 than it is today.

- In 1960, Mt. Vernon had a population of approximately (~) **76,000**.
- Today, according to the most recent U.S. Census and Westchester County, the population is roughly **72,500**.
- Population density in 1960 was about **17,275 people per square mile**, compared to **16,500 people per square mile** in 2025.

Officially, this reflects a slight decrease in population density over the past 65 years. However, city leaders have acknowledged that the **unofficial population** may be significantly higher due to:

- Unregulated multifamily conversions
- High numbers of undocumented residents

For the sake of argument then, let's assume population is flat with 1960. What's not flat are other critical measures of density:

1. Automobile Density

- In 1960: there were approximately 0.65 cars per household → or a total of 14,950 cars citywide → and **3,398 cars per square mile**
- In 2025: there is 1 car per household → or a total of 28,500 cars citywide → and **6,477 cars per square mile**

That's a **90% increase in car density**.

2. Projected Growth and Parking Impact

- If just **3% of a projected 10% population increase** occurs through "by right" expansion of duplexes/triplexes into single-family zones, that could add **1,500+ cars** to these neighborhoods.
- This does **not** include overflow from proposed high- and mid-rise developments.
- Many neighborhoods are already functioning as **paved parking lots**. This plan does **not adequately address parking** or the domino effect of plan related vehicle growth.

3. Environmental and Noise Pollution

- Increased car usage and population density contribute to **declining air quality** and **rising noise levels**.
- Mt. Vernon has **not updated its noise or decibel regulations in over 65 years**, despite:
 - More vehicles
 - Louder traffic

- Electronic music and amplified sound

This plan fails to address the need for **modern noise standards** as part of environmental protections.

In Closing

It's time for our city leaders to take a hard look at the **full picture of density**—not just population numbers, but the lived reality of traffic, parking, and environmental stress in our neighborhoods.

We urge the Council to **revisit this plan** with a commitment to:

- Transparency
- Updated data
- Residential neighborhoods
- Meaningful community engagement
- Market rate housing and upper limits of AMI that yield robust economic development

Let's pursue smarter growth, not just more growth. NYS housing incentives as a Trojan Horse behind this plan are not going to make us the kind of city residents have told you we want to be.

From: Jerry Canning >
Sent: Monday, October 13, 2025 4:56 PM
To: cityclerk <cityclerk@cmvny.com>
Subject: remarks for 10/14 meeting

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Please read my remarks at the 10/14 meeting. Thank you.

My name is Jerry Canning and we have been home owners in Mount Vernon for over 27 years. I want to go on record with our opposition to the proposal to eliminate single family zoning in our neighborhood.

There are multiple issues our government should be focused on addressing, and this initiative is NOT one of them. Our leaders suggest that Mount Vernon should be known at the "jewel of Westchester," but I am certain that pursuing this initiative will only move us further from that vision. Thank you.

From: Tom Collins >
Sent: Monday, October 13, 2025 1:32 PM
To: cityclerk <CityClerk@mountvernonny.gov>
Subject: Comprehensive Plan - Low density zones, page 4-11

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I oppose the move to eliminate One Family residence zones and replace them with a "Low Density" zone which includes duplex and triplex structures, and accessory apartments. We've lived here 36 years on a beautiful block. Why jeopardize that?

Tom Collins

From: Bethany Leddy >
Sent: Sunday, October 12, 2025 11:36 PM
To: cityclerk <CityClerk@mountvernonny.gov>
Subject: Opposition to the Comprehensive plan to rezone Fleetwood

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Dear City Council

I'm writing as a resident of Hayward Avenue to let you know that I oppose the proposal in the Comprehensive plan of the rezoning of the section of Fleetwood from Devonia to Birch and Gramatan to N. Maquestern parkway from zone R2-4.5 one and two family home to medium density and high density housing. This proposal would allow developers to demolish homes and build more than 2 family units in what is already a congested and over burdened area.

I do not support the building of more apartment buildings on N. Macquestern parkway as the street lacks any road markings and is already extremely dangerous.

Please do not support this rezoning change. Our schools are already overcrowded with Pennington receiving and additional 120 students. Our children's lunch period consists of 184 students. Their special classes have been cut from 2-3 a week to one per subject. The district is in significant financial distress cannot handle the addition of more families.

The infrastructure of our streets and parking cannot handle more residents.

These proposed zoning changes would ruin what is a lovely neighborhood and over burden our already strained resources.

Please stand with me and oppose these changes.

Sincerely

Dr. Bethany Leddy,

Pennington PTA VP

DACM, Licensed Acupuncturist and Chinese Herbalist

Owner Elemental Acupuncture

108 W. 39th St., Suite 1205

New York, NY 10018

273 Columbus Ave., Suite 6A

Tuckahoe, NY 10707

From:
Sent: Sunday, October 12, 2025 6:43 PM
To: cityclerk <CityClerk@mountvernonny.gov>
Subject: Comment on Comprehensive Plan Draft

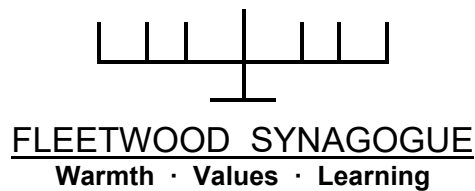
You don't often get email from [REDACTED] [Learn why this is important](#)

To Whom it May Concern,

Attached please find the comment of Fleetwood Synagogue with respect to the recently published Comprehensive Plan Draft. We thank the City for offering the opportunity to comment.

Best,

Fleetwood Synagogue



October 10, 2025

Department of Planning and Community Development
City Hall
1 Roosevelt Square
Mount Vernon, NY 10550

Re: Comments on Draft Comprehensive Plan - *Envision Mount Vernon: 10 Years Forward*

Dear Members of the Planning Department and Comprehensive Plan Advisory Committee,

Support for the Plan's Overarching Goals

Fleetwood Synagogue appreciates the opportunity to comment on the draft Comprehensive Plan. We commend the City's efforts to enhance livability, strengthen neighborhoods, and promote sustainable growth. We also support the Plan's emphasis on transit-oriented development. The neighborhood's access to Metro-North service makes it well suited for additional housing and reinforces its role as a regional connectivity hub.

Support for Denser Residential Zoning along Broad and Grand St. near Gramatan Ave

We support the recommendation to reclassify the Low-Density Residential area between Gramatan Avenue and Westchester Avenue (from East Grand Street to the Cross County Parkway) as High-Density Residential. This change reflects existing land use patterns and the area's proximity to the Fleetwood commercial district and Metro-North stations. Allowing denser residential zoning along East Broad and Grand Streets will strengthen the corridor, promote walkability, and help sustain community institutions such as Fleetwood Synagogue.

Support for Capping the Cross County Parkway and Other Mitigation Measures

Fleetwood Synagogue directly abuts the Parkway, and we experience first-hand the noise, pollution, and neighborhood disruption caused by the Parkway – traffic noise from the Parkway regularly disrupts our services. We appreciate the Plan's recognition of the Parkway and strongly support efforts to mitigate its impact.

We ask the City to go further than vegetated sound barriers and pursue capping or bridging sections of the Parkway to restore continuity, reduce noise and air impacts, and create usable public open space. A decked Parkway would provide substantial long-term benefits—meaningful noise reduction for abutters, improved pedestrian and bicycle connections, expanded parkland, and stronger neighborhood cohesion. We urge the City to prioritize feasibility studies, funding strategies, and intergovernmental coordination to make capping/bridging a project objective rather than relying solely on incremental sound mitigation.

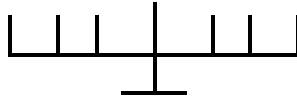
Opposition to the Proposed Primrose Park Historic District

We strongly oppose designation of Primrose Park as a historic district. While the neighborhood has notable character, historic-district designation would impose unnecessary regulatory burdens. These would significantly hinder homeowners' ability to maintain and repair their properties, make energy-efficiency improvements, or modest design changes. These added costs and procedural hurdles would be harmful to residents and community institutions.

Conclusion

• •
WWW.FLEETWOODSYNAGOGUE.ORG

11 EAST BROAD STREET, MOUNT VERNON, NEW YORK 10552-2207 · (914) 664-7643



FLEETWOOD SYNAGOGUE

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Fleetwood Synagogue appreciates the opportunity to comment on the *Envision Mount Vernon* draft Comprehensive Plan. We share the City's vision for a Mount Vernon that is safe, livable and welcoming to families, with policies that promote long-term affordability, vibrant public spaces, and responsible growth. Thank you for considering our comments.

Respectfully submitted,

Joshua Schickman
President
Fleetwood Synagogue

From:

Sent: Tuesday, October 14, 2025 6:53 AM

To: McSweeney, Kelsie <KmcSweeney@cmvny.com>; Marmolejos, Arisleidy <AMarmolejos@cmvny.com>

Cc: cityclerk <CityClerk@mountvernonny.gov>; cathlin4council@gmail.com <cathlin4council@gmail.com>

Subject: Opposition to the Comprehensive Plan for Fleetwood Section

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

Hello,

I'm writing as a resident of Hayward Avenue to let you know that I oppose the proposal in the Comprehensive plan of the rezoning of the section of Fleetwood from Devonia to Birch and Gramatan to N. Maquestern parkway from R2-4.5 one and two family home to medium density and high density housing. This proposal would allow developers to demolish homes and build more than 2 family units in what is already a congested and over burdened area.

I do not support the building of more apartment buildings on N. Macquestern parkway as the street lacking any road markings is already extremely dangerous.

Please do not support this rezoning change. Our schools are already overcrowded with Pennington receiving and additional 120 students. Our children's lunch period consists of 184 students. Their special classes have been cut from 2-3 a week to one person subject. The district is in significant financial distress cannot handle the addition of more families.

The infrastructure of our streets and parking cannot handle more residents.

These proposed zoning changes would ruin what is a lovely neighborhood and over burden our already strained resources.

Please stand with me and oppose these changes.

Regards,

Belina Middleton

From: k1mann

Sent: Tuesday, October 14, 2025 10:58 AM

To: cityclerk <CityClerk@mountvernonny.gov>

Cc: Wendy Ball-Attipoe <wendyannball@gmail.com>; Fia Davis new neighbor

Nicola

Donna Mussenden

>

Subject: Opposition to Proposed Zoning Changes

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Good morning,

I am writing to express my strong opposition to the proposed zoning changes that would eliminate single-family zoning and allow duplexes or triplexes to be built “as of right” in existing residential neighborhoods.

While I understand the need for thoughtful growth and affordable housing options, this plan goes too far and risks undermining the character, safety, and stability of our community. Allowing multi-family construction in single-family zones without public input or variance review would bring more traffic, parking challenges, noise, and strain on already overburdened infrastructure such as our roads, sewers, and drainage systems.

Mount Vernon already struggles with absentee landlords and property maintenance issues. Removing single-family zoning protections would only make this worse by incentivizing investors to buy and convert owner-occupied homes into rentals, reducing neighborhood pride and long-term stability.

I support responsible development, but it must be balanced with respect for existing homeowners, infrastructure limits, and community voice. I urge the City to reconsider this zoning proposal and instead engage residents in a plan that protects the character and quality of life in Mount Vernon.

Thank you for the opportunity to share my concerns.

Franklin Mann

Mount Vernon Resident

----- Forwarded message -----

From: **Amy Farkas Levy**

>

Date: Tue, Oct 14, 2025 at 11:48 AM

Subject: Mount Vernon Zoning changes - Opposed

To: cathlin4council@gmail.com <cathlin4council@gmail.com>, <AMarmolejos@cmvny.com>, <mayorSPH@cmvny.com>

To Whom it May Concern:

I'm writing as a resident of Hayward Avenue to let you know that I oppose the proposal in the Comprehensive plan of the rezoning of the section of Fleetwood from Devonia to Birch and Gramatan to N. Maquestern parkway from R2-4.5 one and two family home to medium density and high density housing. This proposal would allow developers to demolish homes and build more than 2 family units in what is already a congested and over burdened area.

I do not support the building of more apartment buildings on N. Macquestern parkway as the street lacking any road markings is already extremely dangerous. I similarly do not support any zoning changes that would enable a 1 family house to be demolished and changed to a multi-family dwelling.

Please do not support this rezoning change. Our schools are already overcrowded with Pennington receiving and additional 120 students. Our children's lunch period consists of 184 students. Their special classes have been cut from 2-3 a week. The district is in significant financial distress cannot handle the addition of more families.

The infrastructure of our streets and parking cannot handle more residents.

These proposed zoning changes would ruin what is a lovely neighborhood and over burden our already strained resources.

Please stand with me and oppose these changes.

Sincerely,
Amy

From: Lisa Voll < >
Sent: Tuesday, October 14, 2025 12:18 PM
To: Bonilla, Nicole <nbonilla@mountvernonny.gov>
Subject:

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I would like to submit my comments for the record . Please confirm receipt of the email. Thank you
Lisa Vollgraff

I am writing to express my opposition to the proposed Comprehensive Plan for the City of Mount Vernon

When my husband and I made the decision to move from New York City to Mount Vernon, a key factor in our choice was the opportunity to live in a quiet, single-family residential neighborhood. The proposed re-zoning to "Low Density Residential" — which would allow for duplexes, triplexes, and accessory dwelling units in traditionally single-family zones — threatens to fundamentally alter the character and livability of these neighborhoods.

Allowing higher-density housing in these areas will not only change the nature of our community, but will also overburden existing infrastructure, utilities, and street parking. The Plan itself acknowledges that Mount Vernon is already the second most densely populated city in New York State. Expanding density without proven capacity to manage it is irresponsible and short-sighted.

Furthermore, there is no credible evidence presented in the Plan to suggest that these zoning changes will actually result in significantly more affordable housing. What seems more likely is that such changes will primarily benefit developers seeking new investment opportunities — not current or future residents looking for affordable, sustainable living.

The city already struggles with maintaining basic infrastructure. When we first looked at homes in Mount Vernon in 2017, we discovered a YouTube video highlighting the non-functioning pedestrian crossing lights at Gramatan Avenue and Broad Street. That issue still has not been fixed. This is just one example of how existing problems have been ignored, raising serious concerns about the city's ability to support new development.

Lastly, I must take issue with the Plan's claim that Mount Vernon suffers from "exclusionary zoning" that "excludes communities of color" (Page 247). This assertion is frankly absurd in a city where only about 15% of the population is

white. Rather than addressing real infrastructure and quality-of-life concerns, the Plan uses misleading language that serves political and development interests rather than the people who actually live here.

Tamala Boyd, Mount Vernon Resident and Taxpayer
October 14, 2025

Good evening. My name is Tamala Boyd, and I speak tonight as a taxpaying resident of Mount Vernon.

Right now, across this city, homeowners are setting up extra pumps and quick dams because it's about to rain hard—and we all know what that means. Four inches of water or raw sewage in our basements. We have crumbling, unpaved roads. Parking shortages everywhere. Buildings neglected for years. Streetlights that don't work. Expenses that keep growing and virtually no new revenue sources beyond property taxes. After three years and more than \$600,000, the City's so-called Comprehensive Plan doesn't fix a single one of these problems. Instead, it proposes to eliminate single-family zoning. It would allow duplexes and triplexes **as-of-right**—and it proposes to do this without the benefit of a Generic Environmental Impact Statement.

The idea that anyone charged with protecting this city would adopt that plan—knowing full well that our infrastructure can't handle what's already here—is not just irresponsible. It borders on criminal negligence.

Rather than face that reality, this plan hides behind meaningless planning jargon, some of which is flat-out dishonest. One passage says, and I quote:

“Allow duplexes and triplexes by right in all single-family zones to expand housing options citywide and reduce exclusionary zoning practices through ‘gentle’ increases in housing density, diversity, and quality, all while ensuring that these housing types follow design standards to ensure compatibility with existing neighborhood character.” That statement is ridiculous—an internally inconsistent piece of word salad whose only purpose is to sell out our single-family neighborhoods to developers.

First, “as-of-right” means no public hearing, no variance, no community review. Really?

Under the current system, if someone wants to build a duplex or triplex

in a single-family zone, they have to apply for a variance or a special permit. That triggers:

- Public notice to neighbors,
- A hearing before the Zoning Board, and
- Conditions that can be imposed to mitigate harm—parking, drainage, traffic, design.

Once you make that use as-of-right, none of that happens. The city's boards and residents lose the only process that ensures accountability. In Mount Vernon—where flooding, drainage, parking, and road capacity are already at crisis levels—removing public review means removing the last safeguard against disaster.

The paragraph also uses words like “gentle” and “compatible,” but there is nothing gentle about stripping away the few remaining protections that keep our neighborhoods livable. And you cannot preserve “neighborhood character” while abolishing the zoning that defines it. Single-family neighborhoods are more than façades—they are patterns of ownership, traffic flow, and community stability. A triplex may look similar from the street, but it brings more cars, more waste, more runoff, and more strain on an infrastructure that already fails every time it rains. To suggest that we can absorb thousands of additional housing units “gently,” without first fixing our basic infrastructure, is reckless and delusional.

This is exactly why the law requires an Environmental Impact Statement. A full EIS isn't red tape—it's responsible governance. It forces the city to study traffic, parking, flooding, drainage, school capacity, and yes, neighborhood character, before taking an action that would permanently reshape every residential district in Mount Vernon. Skipping that step would be indefensible.

Finally, the claim that single-family zoning in Mount Vernon is “exclusionary” is offensive and false. This is one of the most racially and economically diverse cities in Westchester County. That talking point was written for wealthy, gated suburbs and has no place here.

Mount Vernon can and should create more housing—but not by destroying the very neighborhoods that have held this city together through decades of neglect and mismanagement.

The council must issue a positive declaration and require a Full Environmental Impact Statement before any part of this plan moves forward.

Thank you.

----- Forwarded message -----

From: **Taylor Curry**

>

Date: Tue, Oct 14, 2025 at 1:42 PM

Subject: Opposition to the proposed Comprehensive Plan

To: <cathlin4council@gmail.com>, <CGleason@mountvernonny.gov>

Cc: Francesca Curry

Dear Councilwoman Gleason,

I am writing as a resident of Hayward Avenue to express my opposition to the proposed Comprehensive Plan, which would rezone our section of Hayward from low-density housing to medium-density housing. This change would fundamentally alter the character of our neighborhood and allow developers to build larger, more disruptive projects.

Our street already faces significant parking shortages, and the Crash Heat Map data shows that our intersections experience frequent accidents. Increasing density would only worsen these safety and infrastructure issues. The existing low-density zoning is appropriate for the scale and layout of our area and helps maintain the quiet, residential nature that makes our community special.

I urge you to protect the integrity of our neighborhood by rejecting this proposed zoning change.

Thank you for your time and consideration.

Taylor and Francesca Curry
Homeowners on Hayward Avenue

From: Kathryn Heintz >
Sent: Tuesday, October 14, 2025 2:26 PM
To: cityclerk <CityClerk@mountvernonny.gov>
Subject: Comprehensive Plan Feedback

You don't often get email from [REDACTED]. [Learn why this is important](#)

Dear CMV City Council,

My apologies that I cannot attend tonight's meeting in person. I wish to share my concern about amending zoning to be an as of right change for a homeowner. Do not do this! Compel those wanting to redevelop properties to come before the city and request a variance. In some locations, carefully prescribed and narrowly defined locations in immediate proximity to transit hubs, perhaps you could try a pilot. Please tread carefully! A blanket change destroys one of the last remaining affordable locations for single-family homes in lower Westchester. Moreover, we are among the very few diverse communities with single-family homes. We are an aspiration and should remain this jewel of the suburbs.

Where I live, in Fleetwood south of the Cross County Parkway, we are mostly single family homes. It is urban suburban by design with small homes (many 3 BR) built close together on small lots. Parking is already a premium. No longer do households maintain a single car. Many are 2 or even 3. There are a few homes that have been rezoned and modified as 2-4 family, some legally, some definitely not legally. The tax office has not kept up, the buildings dept has not kept up, schools are overwhelmed, and parking on some of these blocks is awful. We have several homes near us that clearly support 4-6 cars each.

I fully appreciate the need for affordable housing. The first 17 years of my married adult life, we lived in sub-standard housing with our family of 4 packed into tiny, cheap, 2-bedroom apartments. We chose our locations for walking proximity to transit and stores. That is where your emphasis should be. Encourage building downtown and in places that will stimulate redevelopment of distressed property. Incentivize this. De-incentivize expansion that reaches into our remaining homes. Destroying our remaining single-family neighborhoods would degrade our "city of homes" in irreversible ways.

Sincerely,

Kathryn Heintz

From:

Sent: Tuesday, October 14, 2025 3:06 PM

To: Bonilla, Nicole <nbonilla@mountvernonny.gov>

Subject: Comprehensive Plan Public Hearing Comments

Dear City Clerk Bonilla,

Please let this letter serve as my opposition to the Comprehensive Plan in its current format which is full of inaccuracies. In short, there is no baseball field in Hunts Woods and there are no safe pedestrian crosswalks at or near the Fleetwood Train Station, you should receive a refund from the consultants.

This Public Hearing should remain open with further added dates for public comment. On Friday October 10th the cmvny web site was changed and in doing so all the pertinent information needed for the community to easily find the Envision Report was gone. Unless one knew to navigate to the Planning Department page and scroll down left side points, it was nowhere to be found. The meeting calendar showed there was a Public Hearing however when you clicked on the link "Here" to find the documents, nothing was on the Granicus Legistar, not even this Public Hearing. The community went 4 full days without easy visible access to the report.

As of Tuesday Oct 14, The Envision Report was placed back on the home page however the Public Hearing meeting on Granicus Legistar remains blank..(see attached photos)

And in the end, approving this Comprehensive Plan without a Full GEIS would be not only irresponsible, but it would also be disingenuous to the entire community.

Thank you

Regards

Karen Scacchi

Mount Vernon NY 10552

From: barbara grossman < >
Sent: Tuesday, October 14, 2025 3:12 PM
To: Bonilla, Nicole <nbonilla@mountvernonny.gov>
Subject: October 14 city council meeting

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Nicole,

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I would like to enter this into the record objecting to the proposed city zoning plan.

I could not obtain a permit to put siding over brick in the front of my house because the powers that be guiding the permits said it would directly affect and change the aesthetics of the existing neighborhood. What does the council think all of these proposed changes would do to the aesthetic of our neighborhoods!!!

I look forward to the councils response

Barbara Servedio
Fleetwood

From: PAUL HERRICK
Sent: Tuesday, October 14, 2025 3:13 PM
To: Bonilla, Nicole <nbonilla@mountvernonny.gov>
Cc: MayorSPH <mavorsph@mountvernonny.gov>
Subject: Comprehensive Plan Public Hearing comments

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Dear Nicole,

Please read my written comments into the record in opposition to the Comprehensive Plan being considered this evening's public hearing and include the attachment as part of the record.

The adoption of a Comprehensive Plan is a Type I Action under SEQR § 617.4. A Full EAF is mandated.

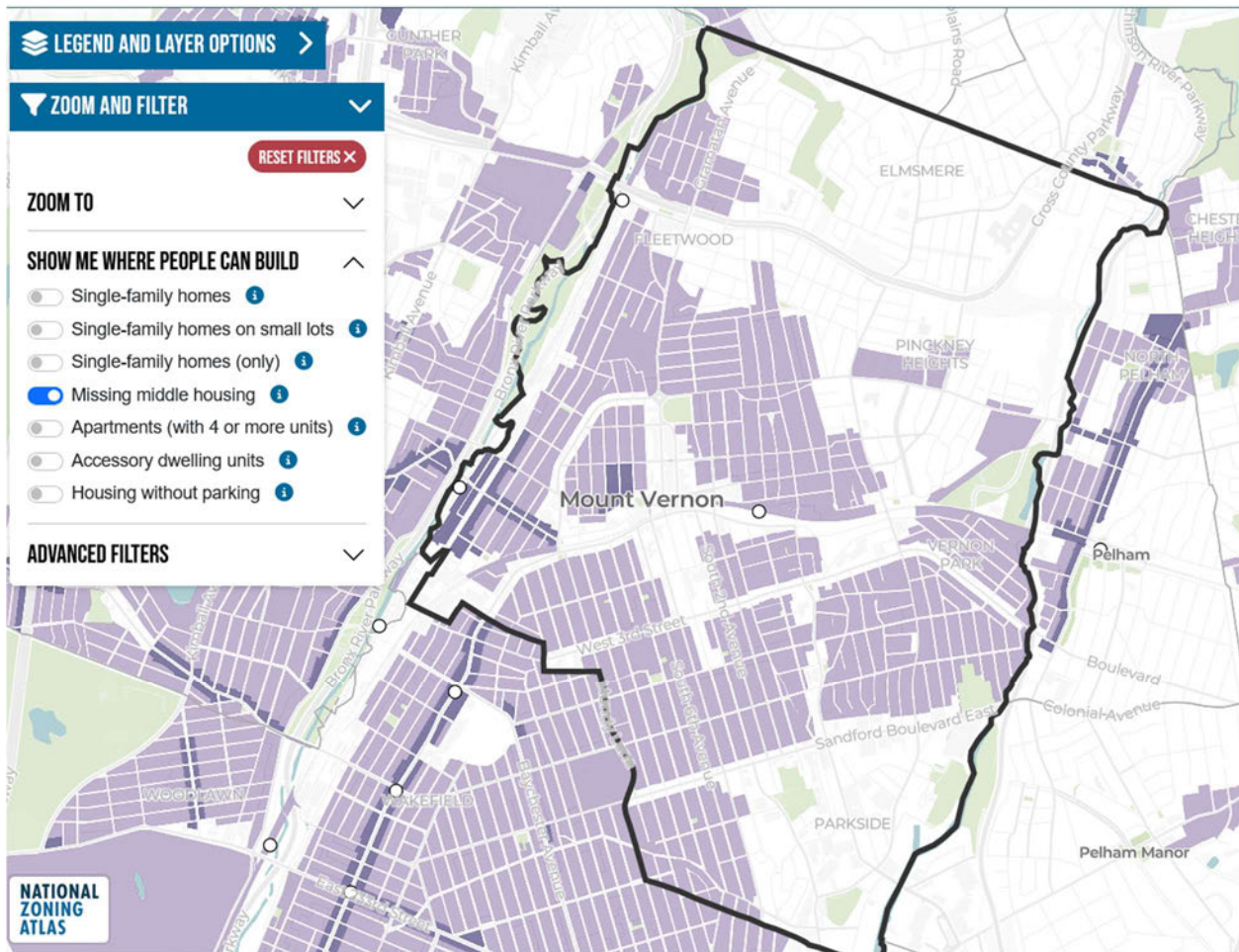
I believe that the City Council must do the right thing make a Positive Declaration determination that will produce a comprehensive Environmental Impact Statement (EIS) for the entire community to review and consider. We cannot ignore the obvious fact that this plan will result in placing a greater burden on our school system, sanitary and storm sewers, roads and bridges, parks, and other infrastructure without addressing how we will pay for it. Transit oriented development is fine when the developers pay their fair share of the cost of infrastructure improvements, but abolishing single family zoning in neighborhoods that were built nearly 100 years ago with narrow streets and now failing sewer systems is not what the community wants. I say this having lived in Mount Vernon for almost 40 years - the last 29 years in a house situated in a two family zone on a 50' wide street - not a 25' or 30' wide street.

The attached map shows where 2, 3 or 4+ family housing is permitted “as of right” under the current Mount Vernon zoning code. We do not practice exclusionary zoning in Mount Vernon. That is a region-wide issue, but we are not the culprit. We are a beautifully diverse small city that can't fix this exclusionary zoning problem. We can't afford this solution. I believe it will devastate Mount Vernon. We will become a city of landlords - not stakeholders. Please see attachment. The City of Mount Vernon is 4.4 square miles and is home to approximately 73,893 residents (according to the US Census), making it the 8th largest city in New York State; the 2nd most densely populated city in New York State; and 11th most densely populated city (with a population over 50,000) in the United States.

If our goal is to become the most densely populated small city in the United States, this plan will do that.

Sincerely,
Paul Herrick

Mount Vernon, NY 10552



This map shows where 2, 3 or 4+ family housing is permitted “as of right” under the current Mount Vernon zoning code.

Public Hearing Testimony of Gabriel Thompson

Mount Vernon City Hall – October 14, 2025

Re: Opposition to the “Envision Mount Vernon” Comprehensive Plan

Good evening. My name is Gabriel Thompson, and I rise tonight not to “envision” Mount Vernon — but to defend it from what this plan truly represents: **the Enshittification of Mount Vernon. A comprehensive failure dressed up as visionary jargon.**

Let’s be clear — this isn’t planning. It’s linguistic theater. **A cut-and-paste parade of Ivy League planning buzzwords force-fitted to a city they clearly don’t understand.** The consultants who wrote this thing probably spent more time copy-pasting from other cities’ plans than they did walking our neighborhoods. They throw around phrases like:

- **“Legalize small-scale multifamily housing to create mixed-income neighborhoods.”**
- **“Allow duplexes and triplexes by right in all single-family zones.”**
- **“Remove exclusionary zoning that perpetuates inequities.”**

It’s all the language du jour — the pseudo-progressive, consultant-friendly boilerplate that sounds noble in theory, but lands as nonsense when applied to a place like Mount Vernon. **Because here’s the truth: Mount Vernon is already everything these consultants claim to want.**

We are one of the most racially and economically integrated small cities in the entire Northeast. We’re 65% Black, 25% Latino, 10% white and Asian combined, and our single-family neighborhoods are among the most diverse and affordable in Westchester County. **We don’t have exclusionary zoning. We don’t have “gated enclaves.” We have block parties, corner stores, commuters, and working-class families who actually talk to their neighbors.**

This is the City of Homes — and that identity wasn’t created by consultants. It was built by generations of strivers who wanted a modest house, a small yard, and a shot at stability. It’s one of the few places left in this county where a postal worker, a nurse, or a city employee can actually buy a home. That is inclusion. That is equity.

So when I read lines like:

- **“Goal: Eliminate components of the City’s zoning that may be considered exclusionary...”**
- **“Study upzoning high-opportunity areas to allow for more inclusive housing...”**

I have to ask — what planet are you on? **You’re describing Scarsdale, not Mount Vernon.** You’re diagnosing a disease that doesn’t exist here — while ignoring the real infections rotting City Hall from within.

Because while you’re lecturing us about “equity,” you’re simultaneously recommending that the city give historic preservation status to the “Bronxville” Field Club — an almost

all-white private tennis club that literally redlined eight acres of Mount Vernon and hides behind a fake “Bronxville” ZIP code — 10708 — on its IRS filings.

This is an organization that has excluded Mount Vernon residents for generations, that has never paid its fair share, and that refuses even to admit it exists within our city. And yet this so-called “equity plan” wants to honor it as part of our “heritage.” A club that would deny most of you based on your immutable characteristics?

That's not inclusion. That's a parody of inclusion. That's equity for the privileged and amnesia for everyone else.

And if that hypocrisy weren't enough, this same club has overwhelmed a public storm pipe that runs through several residents' backyards — causing massive flooding and property damage. Instead of holding them accountable, the City is now negotiating behind closed doors to give them back their denied zoning as favors in exchange for finally doing what they're legally obligated to do: enlarge the stormwater system they broke.

They're literally trying to barter basic compliance for special treatment — and the City is entertaining it. No notice to the neighbors. No easements. No transparency. Just a quiet deal between City Hall and a private club that doesn't even claim to be part of Mount Vernon.

So let's stop pretending this plan is about “justice” or “housing access.” It's about power. It's about the same cycle Mount Vernon has suffered for decades — consultants get paid, developers get richer, and residents get left out of the room.

They call it “Housing Access for All.” What it really means is Housing Access for Developers.

They call it “City of Homes v2.0.” What it really means is the End of Homes v1.0.

And they call it “gentle density.” But there's nothing gentle about **bulldozing generational neighborhoods** under the pretext of inclusion while doing backroom favors for a private country club.

The irony would be funny if it weren't so tragic.

Mount Vernon doesn't need to be “re-imagined.” It needs to be respected. **It needs leadership that can bring real economic development, not slogans and “task forces,”** that listens to the people who actually live here — not consultants quoting Brookings white papers about “missing middle housing.”

Mount Vernon needs leaders that hire qualified people, not friends and family. Leaders that do not spend their days hopping from one photo op to another. Its insulting to those of us who pay through the nose in taxes and cannot get basic services.

If you pass this plan, you won't just be “re-zoning” — you'll be erasing credibility. You'll be codifying hypocrisy. **You'll be telling every resident who sacrificed to buy a home here, you were the problem all along.**

This isn't Envision Mount Vernon. It's Enshittify Mount Vernon. Keep the public hearing open and remove this foul language from this consultant's tome.

John Peter Gasior

Mount Vernon, NY 10552

MEMORANDUM

To: President and Members of the Mount Vernon City Council

From: John P. Gasior

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

Date: October 13, 2025

I request that these comments be submitted into the record to be generated at the October 14, 2025, public hearing on the issue of Mount Vernon's Comprehensive Plan – Envision Mount Vernon (the "*Draft Plan*").

I have lived in Mount Vernon for 37 years. I am very concerned that the City Council is posed to close comments – and thereby block further community assessment – of the *Draft Plan*. It is simply inconceivable that the City Council seriously thought that it could receive meaningful and considered public assessment of a 475-page document, filled with technical and esoteric data, in less than one month. Most of my neighbors have no idea that important zoning changes are being contemplated in the *Draft Plan* and will likely not learn about the plan until after the comment period has closed. This is not how good government should work.

The extremely abbreviated period for public assessment and comment on the Draft Plan must be extended.

If the comment period is not extended, and the Council adopts the plan, it will be inviting Open Meetings Law litigation – both by private citizens and, possibly, the Office of the New York State Attorney General.

Another red flag for the *Draft Plan* is the fact that documents cited in the plan do not seem to be accessible to the public. Here too the Council seems to be ignoring the possibility that the *Draft Plan* will face the serious possibility of litigation down the road.

I also have reviewed comments submitted to the Council by Vince Ferrandino, AICP and, once again, am shocked to think that anyone thought that all of the issues he raises could, in any meaningful way, be properly assessed, both by the Council and the community, in one month. The comment period must be extended and each point raised by Mr. Ferrandino addressed by Mount Vernon.

Finally, the *Draft Plan's* goal of eliminating zoning that maintains certain neighborhoods with single family dwellings is simply not acceptable. I have neighbors who once wanted to put new siding over parts of their home that are clad in brick. The Mount Vernon Department of Buildings ("DOB") forbid them from doing so because DOB said it would "change the character of the neighborhood." Some might have said that DOB was picking nits. But the *Draft Plan's* total elimination of single-family zoning tosses "neighborhood character" to the curb and is a radical rejection of what makes certain neighborhoods in Mount Vernon so desirable. To repeat, the elimination of single-family zoning must not be approved. Approval would certainly have the appearance of providing a windfall to developers motivated by profit, not the well-being of established communities.

Tanesia M. Walters
Mount Vernon, NY 10552

Date: October 13, 2025

To: The Honorable Members of the Mount Vernon City Council
City Hall, 1 Roosevelt Square, Mount Vernon, NY 10550

Re: Public Comment Opposing the City of Mount Vernon Comprehensive Draft Plan

Dear Council Members:

I am writing as a long-time resident of the City of Mount Vernon to formally express my opposition to the proposed Comprehensive Draft Plan currently under consideration. While I recognize the importance of updating our city's planning framework, I believe this plan in its present form is deeply flawed and should not be adopted without substantial revision and full environmental review.

First, the City has not conducted an adequate environmental review under the State Environmental Quality Review Act (SEQRA). The Comprehensive Draft Plan proposes extensive changes to land use, density, and zoning classifications that would have far-reaching environmental and socioeconomic impacts. SEQRA requires a thorough evaluation, preferably through a Generic Environmental Impact Statement (GEIS) before such a plan is approved. Without this step, the City risks noncompliance with state law and potential litigation.

Second, the plan's emphasis on upzoning and mixed-use redevelopment poses a direct threat to existing residential neighborhoods. Broad upzoning across large sections of Mount Vernon would erode the character of single-family areas, invite speculative development, and place enormous pressure on homeowners. By removing residential protections and encouraging large-scale mixed-use projects without clear boundaries or infrastructure planning, the plan effectively prioritizes density over livability.

Third, the draft lacks concrete anti-displacement and affordability safeguards. While it promotes "diverse housing," it offers no enforceable requirements for affordable units,

inclusionary zoning mandates, or measures to protect tenants and homeowners from displacement. Mount Vernon's residents, many of whom have lived here for generations should not bear the burden of redevelopment through higher property taxes, rising rents, or forced relocations.

Fourth, the plan does not adequately address the infrastructure demands that would accompany increased density. Our existing systems for water, sewer, stormwater management, public safety, transportation, and schools are already strained. The absence of a binding capital improvement plan or financing strategy raises serious fiscal and logistical concerns. Before expanding land-use entitlements, the City must first identify how and by whom infrastructure improvements will be funded.

Finally, this plan was drafted with limited transparency and insufficient community engagement. Residents have repeatedly voiced concerns about the potential impacts of upzoning and the loss of neighborhood character. A true comprehensive plan must reflect the values and aspirations of the community it serves, not the priorities of outside developers or planning consultants.

For these reasons, I respectfully urge the City Council to reject the Comprehensive Draft Plan in its current form. The Council should direct staff to (1) conduct a full SEQRA review, including a Generic Environmental Impact Statement; (2) scale back or phase any upzoning proposals until environmental and infrastructure studies are completed; (3) incorporate enforceable affordable housing and anti-displacement protections; and (4) strengthen public engagement through additional hearings and publication of all supporting data.

Mount Vernon deserves a forward-looking plan that balances growth with equity, environmental sustainability, and respect for our established communities. The current draft does not achieve that balance. I urge you to stand with residents and ensure that any plan adopted truly reflects the best interests of Mount Vernon.

Thank you for your attention and your service to our community.

Respectfully submitted,

Tanesia M. Walters
Resident, City of Mount Vernon

October 14, 2025

My name is Susan Lally, and I own my residence in the City of Mt. Vernon.

I read the Comprehensive Plan and have concerns that the proposed changes will have permanent adverse effects on the Jewel of Westchester, also known as the City of Homes. These proposed changes will completely change the character of the City, which attracted so many of us to make Mt. Vernon home. Once the character is destroyed, there's no getting it back.

Preserving historically significant buildings and highlighting significant locations are wonderful recommendations but who will spearhead these initiatives? There is no historical society dedicated solely to the City of Mt. Vernon. The Library's local history room is considered the source along with Foursquare, which last hosted an event in 2022 according to their website. The library is planning to erase important Mt. Vernon history by renaming the Grace Greene Baker Community Room for Assemblyman Gary Pretlow. The Library Board has banned public comment at meetings. The library also failed to keep the HVAC system operating and could not fulfill the community function as a cooling station while boasting about receiving a \$400,000 grant for repairs. On another occasion, the Library Board, in January 2025, approved a \$1.7 million bond referendum to purchase the E.B. White home but did not have a quorum. How can these proposals be successful under the current lack of effective leadership and their serious lack of respect for history?

Expanding and increasing local access to parks and green spaces is like saying you love mom and apple pie. Who wouldn't agree with that part of the plan? The City of Mt. Vernon declared a state of emergency in 2023 due to flooding and other hazardous conditions resulting from heavy rain. Now at the end of 2025, the infrastructure issues continue in Hunts Woods and other locations around Mt. Vernon. Hartley Park is a homeless tent city. The current parks and green spaces are not well managed so envisioning expansion under the current leadership does not seem like a reasonable idea.

The Comprehensive Plan proposes ambitious recommendations to increase density and housing development throughout the City of Mt. Vernon while also proposing that the City of Mt. Vernon contribute city owned land, tax breaks, and municipal revenue to support some of the development, especially the 'affordable' housing options. The Buildings Department cannot manage its current workload, and it takes personal phone calls from politicians to get building permits processed. When I read these sections of the Comprehensive Plan, I was wondering how these proposals are connected to the two tax lien sales that suddenly and seemingly urgently happened in 2025. The tax liens were sold without prioritizing local purchasers and there was zero effort in the process to help people living in these properties to remain in these properties. Bundling of purchases was permitted, a practice that appears to benefit deep pocketed developers over local residents.

Any approval of a plan that will unleash unbridled development in this City under this regime will be the beginning of the end of the City as we know it. I, for one, chose to live here because it is a unique, heterogenous, and relatively affordable City that is centrally located with excellent public transportation and highway access. I wondered why we were not flourishing like all the towns and cities in close proximity; it was a mystery to me until I realized we are being ruled by a dysfunctional municipal government. I cannot support proceeding with a Comprehensive Plan that leaves so many serious and underlying issues unaddressed while simultaneously unlocking the doors to developers to reshape our City, develop expensive high density hi-rise buildings, and ignore all the details that are necessary to ensure a healthy, safe quality of life. The current conditions of the City need to be cleaned up and managed effectively. Because of the lack of confidence in the current leadership, no Comprehensive Plan containing major and significant proposals for change can be approved because we know it cannot be thoughtfully and fairly implemented in a way that serves the residents and honors our history.

Susan Lally

List of concerns:

1. Up-zoning
 - Removing single family zoning or up-zoning permitting multiple family dwellings,
 - reducing lot size requirements, and
 - reducing parking requirements.

This combination of changes will lead to overdevelopment and overcrowding.
2. Aging infrastructure
 - There is no discussion about repairing the aging infrastructure.
 - Increased density places increased demands on the City's infrastructure, which is already challenged.
3. Financial impacts of affordable housing development
 - Use of City owned land for affordable housing
 - Offering tax abatements to developers
 - Using municipal revenue to pay for affordable housing development
4. Transportation hub focused development
 - Increased housing density near transportation hubs.
 - The extremely hi rise development near the railroad stations of Fleetwood and Mt. Vernon West are completely out of context with the surrounding neighborhoods.
 - Reducing the parking requirements makes it difficult for new residents to park
 - The high density creates a lot of automobile congestion.
 - Fleetwood and Oak Avenue exits are very dangerous with long lines of vehicles exiting the Bronx River Parkway and the Cross County Parkway backed into the traffic lanes of the high-speed roads while waiting to enter local streets.
5. Service needs go unaddressed
 - There is no discussion about the need for services to support the influx of new residents.
 - Are the social services available in Mt. Vernon capable of handling more constituents?
 - How many more students can the school system manage and are the schools distributed in close proximity to the new developments?
 - Can the public transportation network absorb the increased ridership?



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.

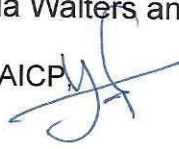
- The large advisory committee size is deemed unwieldy, and smaller groups are recommended for better participation.
- Public engagement activities should include attendance numbers and survey results for transparency.
- The density distribution recommendations are criticized for being too high and out 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: 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" and last name "Ferrandino" clearly legible.

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

From: Riullano, Jordan <jriullano@mountvernonny.gov>

Sent: Tuesday, October 14, 2025 6:58 PM

To: Bonilla, Nicole <nbonilla@mountvernonny.gov>

Subject: Belina Middleton

Hi. I oppose the proposed zoning plan for the Fleetwood section. Mount Vernon needs to focus on creating **jobs**, not just building more high-density housing. Why push for more residential development when we still lack a strong business presence in the city?

Basic infrastructure is being overlooked, bus routes stop running too early, many streets are missing name signs, and traffic is constantly backed up on Oak Street due to congestion near the Bronx River Parkway.

I'm strongly against the plan to build more apartments near the Fleetwood train station on McQuesten Parkway. Instead, let's focus on bringing in small businesses that actually serve the community, like coffee shops, daycares, supermarkets, and ice cream shops. Aka creating jobs.

Right now, I find myself leaving Mount Vernon just to spend my money, it should be spent in Mount Vernon. Let's build a local economy we can be proud of, not just more buildings.

~ Belina Middleton resident of Hayward Ave

Community Concerns Regarding the Comprehensive Planning Document

The Draft Comprehensive Plan raises numerous unanswered questions and contains several questionable proposals that do not reflect the input of residents.

Mount Vernon is already the most densely populated city in Westchester County and the second most densely populated in New York State. Despite this, the city's financial situation remains dire. Taxes continue to rise—well above the 2% cap—while businesses close and industries relocate elsewhere.

Several newly approved developments focus primarily on affordable housing, which may further erode the city's tax base. Residents who participated in the planning sessions expressed clear opposition to additional high-rise construction, instead favoring lower building heights and adequate parking. Yet, the draft plan contradicts these concerns by proposing taller buildings and reducing parking requirements.

If more residents move into an already overcrowded city with a shrinking tax base and few initiatives to attract new businesses or revenue sources, how will Mount Vernon sustain itself? With aging infrastructure and limited resources, can the city realistically support an influx of new residents? Or will taxpayers continue to face steep increases each year with little visible improvement in return?

The community has been consistent and clear: Mount Vernon is already too dense, with too many high-rise developments. Residents oppose the addition of Accessory Dwelling Units (ADUs) and multi-family dwellings, and they have called on city officials to address the growing burden of tax-exempt **PILOT (Payment in Lieu of Taxes)** agreements that further strain city finances.

If the city plans to increase its population, how will it fund the expanded services needed to support more residents—especially given the city's deteriorating infrastructure?

Mount Vernon's failing water and sewage systems are already a major concern. Increasing density through more high-rise construction will only worsen these issues. Furthermore, if these developments are built and given PILOT programs, the limited tax revenue will make it even harder to finance necessary maintenance and repairs.

In **Mount Vernon West**, the plan promotes “park once and walk”, implying that shops and services will be within easy walking distance. However, this assumption does not reflect current conditions and is neither practical nor enforceable. It should not be presented as a realistic or effective strategy.

The continued closure of local stores also raises serious doubts about the plan's proposal to add more **mixed-use buildings**. How will these commercial spaces be filled when existing mixed-use properties already sit partially vacant? For example, on **Gramatan Avenue near Hartley Park**, one mixed-use building contains a doctor's office, a dollar store, and empty storefronts, while another remains unfinished. On **Broad Street**, several storefronts—such as those near the dentist's office and School of Rock—are also vacant. Empty storefronts mean lower tax revenue, deepening the city's financial deficit.

Vacant storefronts stretch from **Fleetwood down Gramatan Avenue to Fourth Street**. What is the city doing to attract new businesses and retain existing ones? The Comprehensive Plan does not define any clear strategy for business attraction or retention.

Mount Vernon was once known as the “**City of Homes**,” yet the new Comprehensive Plan appears to undermine this legacy by proposing the elimination of single-family zoning. Homeownership has long been a cornerstone of community stability and a symbol of success. When and how was this discussed with residents during the planning process? Single-family homes exist in every corner of Mount Vernon—eliminating that zoning would destroy the heart of the community and lead to disarray. Converting single-family homes into multi-family dwellings or permitting widespread ADUs will only accelerate neighborhood decline and create a patchwork of incompatible housing types. This is not thoughtful planning; it is dismantling the very foundation of Mount Vernon’s identity.

In **Mount Vernon East**, the proposed parking requirements for new developments are unrealistic. While some commuters in Transit-Oriented Development (TOD) zones may not own cars, most households still rely on at least one vehicle. The train provides convenient access to work, but most other activities require driving. Allowing only **0.6 parking spaces per unit** will worsen congestion in an already crowded area. Where are the studies to substantiate this?

The city should instead prioritize **urban renewal in blighted areas** to improve Mount Vernon’s appearance and quality of life. The Urban Renewal Agency should focus on attracting new businesses and revitalizing neglected neighborhoods to enhance community pride and promote sustainable growth.

Finally, while community meetings were held to gather input, questions remain about the level of genuine public participation. How many residents actually attended these sessions—and how many attended more than one? Attendance figures should exclude city staff and officials to accurately reflect true community engagement.

In summary, the community calls for a revised Comprehensive Plan that:

- Reflects resident input and preserves single-family neighborhoods.
- Encourages development that accommodates home ownership.
- Prioritizes infrastructure repair before new development.
- Establishes clear strategies to attract and retain businesses.
- Reduces reliance on PILOTs and strengthens the tax base.
- Focuses on urban renewal and sustainable growth rather than overdevelopment.

These hearings must remain open so that the Planning Department and Consultants can make necessary changes that result in Comprehensive Plan that benefits all stakeholders.

Submitted by: Eileen Justino. In person at City Council Hearing on 10/14/25

----- Forwarded message -----

From:

Date: 1

Subject: Opposition to Proposed High-Density Rezoning in Fleetwood (Page 174 chapter 4-24, Comprehensive Plan

To: <cathlin4council@gmail.com>

Hello,

I am writing about the proposed land use changes outlined on page 174, chapter 4-24 of the *Envision Mount Vernon* Comprehensive Plan (Draft), specifically concerning the Fleetwood neighborhood.

According to the plan, the City recommends replacing the existing Commercial Business zoning along McQuesten Parkway with High Density Residential use, citing Fleetwood's proximity to the Metro-North train station as justification. As a resident who works closely with Mount Vernon residents, I strongly oppose this direction and urge the City to reconsider for the following reasons:

1. **Loss of Commercial Vitality and Services**

Fleetwood already lacks essential businesses that make a neighborhood livable, cafés, daycare centers, indoor activity spaces for kids, gyms, restaurants, and small local services. Rezoning commercial areas to high-density residential use risks eliminating future opportunities for business development that could bring jobs and services to the community.

2. **Negative Impact on Quality of Life**

The major talks about "financial empowerment," but increasing residential density without adequate infrastructure, parking, traffic controls, public transit, and local jobs, will only burden residents and lower quality of life. How is financial empowerment achieved when developers get 20+ year tax abatements, but there are no guaranteed jobs or real economic benefits for Mount Vernon residents?

Where are the jobs in Mount Vernon for our residents? Where's the opportunity? For example, that 200+ unit building going up on MacQuesten Parkway by Mount Vernon West is all low-income housing, but no jobs, no new businesses. Just more buildings.

To me, **financial empowerment** means giving people the tools, opportunities, and environment they need to improve their economic situation and achieve financial independence. It's not just about having a residence it's about having access to good jobs, fair wages, affordable housing, education, and support for small businesses. It's about creating a community where people can build wealth, support their families, and feel secure about their financial future.

In practical terms, that could mean:

More local jobs with livable wages.

Access to affordable services like childcare, transportation, and healthcare.

Opportunities to start or grow a business

Safe neighborhoods with amenities that improve daily life.
Fair policies that prevent displacement and protect residents.
Financial empowerment means people aren't just surviving, they're thriving and have a real chance to improve their lives.

3. **No Protection for Single-Family Home Zones**

If zoning changes aren't clearly defined, developers may buy and demolish single-family homes to build multi-unit complexes. There needs to be a written rule that medium- and high-density zoning is limited to certain streets or parcels, and that no rezoning happens in single-family home areas. Also, if apartments are built, each unit should have at least two parking spaces along with a visitor parking area.

4. **Conflict of Interest – Councilman Edward Poteat**

Councilman Edward Poteat owns a development company with a background in low-income housing. I was told he is also co-chair of the Finance & Planning Standing Committee and influences zoning decisions, if it's true then this is a clear conflict of interest. He shouldn't be involved in approving land use policies that could benefit his own business or associates.

5. **Community Needs Are Being Ignored**

I work with residents every day, and their concerns are always the same:

- No affordable housing for working families
- No local jobs
- No late-night public transit
- No street name signage in Mount Vernon
- Heavy traffic congestion, especially on Oak Street and near Sprain Parkway

These basic problems aren't being addressed. Building more apartments without a real plan for infrastructure and services will only make things worse.

6. **Fleetwood's Diverse Residents and Their Needs**

Fleetwood is home to many seniors, families with school-age children, and young single professionals. The plan should address the needs of these groups first. For example:

- What has been done to help seniors age in place?
- What steps have been taken to ensure young professionals want to stay in Fleetwood or Mount Vernon to build their lives and raise families here?
- What is being proposed to prevent young families from moving out once their kids turn five or graduate 8th grade, especially because of concerns about the school district?
- What plans are in place to encourage parents to send their children to Mount Vernon public schools instead of private or neighboring districts?

Additionally, there needs to be a clear written statement that developers are **not allowed** to build multi-family buildings in blocks where single-family and two-family homes exist, due to lack of parking and neighborhood traffic congestion/impact. For

commercial zones, if buildings are constructed, they should include adequate parking for residents and visitors so current parking congestion isn't made worse.

Please take these concerns seriously and reconsider the proposed changes. The community needs real solutions, not more buildings that don't address our biggest problems.

Thank you for your time and consideration

Regards,

Belina Middleton

From: Aileen Memoli
Sent: Thursday, October 16, 2025 10:25 PM
To: cityclerk <CityClerk@mountvernonny.gov>
Subject: Change in Zoning

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Hello-

I am writing as a resident of Hayward Avenue to express my strong opposition to the proposed rezoning in the Comprehensive Plan for the section of Fleetwood from Devonia to Birch and Gramatan to North MacQuesten Parkway. The proposal to change this area's zoning from R2-4.5 (one- and two-family homes) to medium- and high-density housing would allow developers to demolish existing homes and construct multi-unit buildings in a neighborhood that is already congested and overburdened.

I am particularly concerned about the potential construction of additional apartment buildings along North MacQuesten Parkway. This street, which currently lacks adequate road markings, is already hazardous for drivers and pedestrians. Increasing density in this area would only exacerbate safety issues.

Furthermore, our schools are already overcrowded. Pennington School has recently taken on an additional 120 students, leading to lunch periods with as many as 184 children and a reduction in special classes from two or three per week to just one per subject. The district is facing significant financial distress and is in no position to accommodate an influx of new families.

The infrastructure of our streets, parking, and utilities cannot sustain an increased number of residents. These proposed zoning changes would erode the character of our neighborhood and place additional strain on resources that are already strained.

I urge you to stand with the residents of this community and oppose the rezoning proposal. Please help us preserve the integrity, safety, and livability of our neighborhood.

Thank you for your time and consideration.

Sincerely,

Aileen Memoli

Mount Vernon, NY 10552

Sent from my iPhone

From:

Sent: Thursday, October 16, 2025 8:26 AM

To: cityclerk <CityClerk@mountvernonny.gov>

Subject: Opposition to Proposed High-Density Rezoning in Fleetwood (Page174 chapter 4-24, Comprehensive Plan

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Hello,

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Fleetwood already lacks essential businesses that make a neighborhood livable, cafés, daycare centers, indoor activity spaces for kids, gyms, restaurants, and small local services. Rezoning commercial areas to high-density residential use risks eliminating future opportunities for business development that could bring jobs and services to the community.

2. **Negative Impact on Quality of Life**

The major talks about "financial empowerment," but increasing residential density without adequate infrastructure, parking, traffic controls, public transit, and local jobs, will only burden residents and lower quality of life. How is financial empowerment achieved when developers get 20+ year tax abatements, but there are no guaranteed jobs or real economic benefits for Mount Vernon residents?

Where are the jobs in Mount Vernon for our residents? Where's the opportunity? For example, that 200+ unit building going up on MacQuesten Parkway by Mount Vernon West is all low-income housing, but no jobs, no new businesses. Just more buildings.

To me, **financial empowerment** means giving people the tools, opportunities, and environment they need to improve their economic situation and achieve financial independence. It's not just about having a residence it's about having access to good jobs, fair wages, affordable housing, education, and support for small businesses. It's about creating a community where people can build wealth, support their families, and feel secure about their financial future.

In practical terms, that could mean:

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Councilman Edward Poteat owns a development company with a background in low-income housing. I was told he is also co-chair of the Finance & Planning Standing Committee and influences zoning decisions, if it's true then this is a clear conflict of interest. He shouldn't be involved in approving land use policies that could benefit his own business or associates.

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Additionally, there needs to be a clear written statement that developers are **not allowed** to build multi-family buildings in blocks where single-family and two-family homes exist, due to lack of parking and neighborhood traffic congestion/impact. For commercial zones, if buildings are constructed, they should include adequate parking for residents and visitors so current parking congestion isn't made worse.

Please take these concerns seriously and reconsider the proposed changes. The community needs real solutions, not more buildings that don't address our biggest problems.

Thank you for your time and consideration

Regards,

Belina Middleton

From: Dorothy Domeika >
Sent: Wednesday, October 15, 2025 12:51 PM
To: cityclerk <CityClerk@mountvernonny.gov>
Subject: Comprehensive Plan

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I attended the difficult meeting last night after reading much of the plan. I have worked on projects such as the Comprehensive Plan in my past life. Here is my quick assessment:

Start by stating the problem you are trying to solve. In the report's first few pages, there is information covering the past 20 years. Mount Vernon's aging issue and the lack of young families to support the schools must be stated at every presentation. Otherwise, it looks like the status quo to many citizens. It clearly is not after reading the statistics in the plan.

In your next presentations, repeat and re-repeat the problems. Then you will begin to see a shift in attitude about remedies.

Thank you for the opportunity to participate.

Dorothy Domeika

From: Joshua

Sent: Tuesday, October 21, 2025 1:03 PM

To: Browne, Danielle <DBrowne@mountvernonny.gov>; Poteat, Edward <EPoteat@mountvernonny.gov>; Thompson, Derrick <dthompson@mountvernonny.gov>; Boxhill, Jaevon S <jsboxhill@mountvernonny.gov>; Gleason, Cathlin <CGleason@mountvernonny.gov>; Anderson, Antoinette <AAnderson@mountvernonny.gov>; cityclerk <cityclerk@mountvernonny.gov>; Riullano, Jordan <jriullano@mountvernonny.gov>; Mvlaw <mvlaw@cmvny.com>; Foilnylaw <foilnylaw@ci.mount-vernon.ny.us>

Subject: Re: Comments on the Draft Envision Mount Vernon Comprehensive Plan

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Dear Members of the Mount Vernon City Council,

Please find our company's written comments on the Draft Comprehensive Plan, both attached and pasted below, for your convenience and for inclusion in the docket.

Hudson River Labs INC
315 East Third Street
Mount Vernon, New York 10553

October 21, 2025

City Council
City of Mount Vernon
1 Roosevelt Square
Mount Vernon, NY, 10550

Via Email to: DBrowne@mountvernonny.gov ; EPoteat@mountvernonny.gov ;
dthompson@mountvernonny.gov ; jsboxhill@mountvernonny.gov ;
CGleason@mountvernonny.gov ; AAnderson@mountvernonny.gov ;
cityclerk@mountvernonny.gov ; jriullano@mountvernonny.gov ; mvlaw@cmvny.com ;
foilnylaw@ci.mount-vernon.ny.us

Re: Comments on the Draft Envision Mount Vernon Comprehensive Plan

Dear Members of the City Council:

As a New York State licensed cannabis operator investing in Mount Vernon's industrial renewal, we appreciate the opportunity to comment on the Envision Mount Vernon Comprehensive Plan draft. Our facility at 315 East Third Street represents a significant private investment in adaptive reuse, clean manufacturing, and sustainable job creation, precisely the type of revitalization the plan seeks to advance.

Our mission aligns directly with the *Envision Mount Vernon* vision. By converting a dormant industrial site into a clean, efficient, and compliant facility, we are advancing adaptive reuse, sustainability, and workforce development, the same priorities that define the City's strategy for inclusive economic growth. Our team has transformed an underutilized building into a state-of-the-art cultivation and processing facility that operates safely, odor-free, and fully complies with New

York State law. The project is more than a business. It is a case study in how responsible operators can restore Mount Vernon's industrial heritage while creating high-skill jobs for city residents.

Mount Vernon's Moment for Leadership

Mount Vernon stands at a critical juncture. The draft comprehensive plan acknowledges the importance of modern industry, workforce development, and adaptive reuse, yet several proposed zoning concepts could inadvertently undermine these goals. Provisions that reclassify industrial corridors into mixed-use or residential districts risk displacing lawful, job-producing operations that have already invested millions in compliance and infrastructure.

Our operations are environmentally responsible, odor-free, and energy-efficient. We will employ numerous Mount Vernon residents and provide compliance, science, and technology training. These commitments support the City's long-term environmental and economic objectives, ensuring that redevelopment in Mount Vernon benefits the people who live and work here today, while welcoming more businesses to grow here tomorrow.

If these operators are not protected, Mount Vernon could lose precisely the kind of private investment that fuels its industrial comeback. Those who have complied with every regulation and invested early in Mount Vernon deserve stability and recognition as part of the City's future, not uncertainty discouraging others from following their example.

State Preemption and Legal Framework

The **Marijuana Regulation and Taxation Act (MRTA)** established a comprehensive and uniform statewide framework for regulating cannabis enterprises. The law reserves exclusive authority to the State of New York to license, regulate, and oversee the cannabis industry. Municipalities retain certain zoning powers but may not enact or enforce rules that conflict with or unreasonably burden state-licensed operations. See Marijuana Regulation and Taxation Act, ch. 92, § 131 (2021).

The **Cannabis Control Board (CCB)** has repeatedly affirmed this principle. In its advisory opinions, the Board clarified that local governments may not impose duplicative, obstructive, or conflicting requirements that frustrate the MRTA's purpose. For ready reference, here are two CCB opinions that preempt localities from implementing unreasonable or impracticable restrictions:

- N.Y. Cannabis Control Bd., Advisory Op. 2025-01, Advisory Opinion for the Town of Riverhead, available at <https://cannabis.ny.gov/advisory-opinion-2025-01>
- N.Y. Cannabis Control Bd., Advisory Op. 2025-02, Advisory Opinion for the Town of Southampton, available at <https://cannabis.ny.gov/advisory-opinion-2025-02>

These opinions confirm that municipalities cannot rezone or regulate in ways that directly or indirectly prohibit a lawful cannabis use once licensed by the State. The CCB's interpretive authority derives from N.Y. Cannabis Law art. 3, § 13, which grants it exclusive jurisdiction over all matters concerning regulating adult-use cannabis in New York.

For these reasons, Mount Vernon should ensure that its final plan and zoning updates reflect compliance with the State's preemption framework. Any ambiguity could expose the City to unnecessary litigation, delay economic growth, and discourage legitimate operators from investing further.

Acknowledge Existing Grandfather Status and Preserve As-of-Right Protections

We respectfully urge the City Council to include explicit language in the final plan affirming that:

1. State-licensed cannabis cultivation and processing facilities are recognized as lawful as-of-right industrial uses consistent with “modern manufacturing” classifications.
2. Existing facilities that have obtained state licenses are grandfathered and protected from future zoning or land use changes that might render them non-conforming.
3. The City will collaborate with compliant operators to align local development goals with state regulatory standards rather than layering additional or conflicting review processes.

To illustrate why this protection is essential, consider the practical realities of coexistence between industrial and residential uses. It would be unfair to new residents moving into a dwelling, whether a single-family home, a multifamily structure, or an apartment building, adjacent to an established industrial business, to expect the same quiet environment found in a residential zone. It would also be unfair to the business, which operates under lawful practices and state oversight, to face new restrictions or enforcement actions because of conditions it did not create. This principle is well-established in New York zoning precedent; lawful industrial uses retain protection from post hoc nuisance claims arising from subsequent residential encroachment.

Industrial operations such as ours often require early deliveries, shift changes, and service vehicles that may begin arriving before 7:00 AM. These are normal aspects of lawful business activity in an industrial district. Introducing residential development into these areas inevitably leads to noise complaints, traffic disputes, and pressure on the City to curtail legitimate business operations.

The City should also ensure that compliant cannabis manufacturers are eligible for any local or regional incentive programs related to green industry, workforce training, or adaptive reuse. Equal access to these opportunities will affirm Mount Vernon’s commitment to economic inclusion and fairness.

For these reasons, we strongly recommend that the City remove or revise any clause in the comprehensive plan that would encourage or permit residential development within existing industrial zones without more consideration for the impact on existing businesses and the tax base. Doing so will limit future conflicts, preserve industrial integrity, and ensure that Mount Vernon continues to attract responsible, job-creating enterprises that contribute to its economic recovery.

Advancing a Collaborative Cannabis Cluster -Infrastructure, Utilities, and Zoning Priorities

To ensure sustainable operations and equitable industrial growth, we respectfully request that the City of Mount Vernon include the following priorities within the Comprehensive Plan:

- Upgrade electrical grid capacity in partnership with Con Edison to support clean industrial operations, including cultivation facilities.
- Conduct microgrid and renewable energy feasibility studies to align with Mount Vernon’s Green Building goals.
- Include industrial retrofit corridors in stormwater and wastewater improvement plans to support closed-loop water systems.
- Assess logistics and delivery traffic flow, particularly along East Third Street, to reduce bottlenecks and improve safety.
- Pilot EV charging infrastructure for commercial fleet use in industrial corridors.
- Establish a Mount Vernon Industrial Overlay Zone to safeguard compliant industrial businesses from displacement through mixed-use rezoning.

These initiatives will position Mount Vernon as a leader in sustainable manufacturing while protecting existing operators who have invested significantly in the City’s industrial recovery.

We further propose that Mount Vernon work directly with our team and other state-licensed operators to establish a Mount Vernon Cannabis Cluster Plan, a coordinated local strategy for integrating cultivation, manufacturing, logistics, and workforce training within the City's industrial districts.

Such a plan would not only align with the Envision Mount Vernon Comprehensive Plan's emphasis on sustainable industry, energy efficiency, and green infrastructure but would also allow the City to shape, rather than react to, the growth of the cannabis economy.

By partnering with existing licensed operators who have already invested in Mount Vernon, the City can develop clear guidelines for future sites, improve traffic and infrastructure planning, and establish a unified model for compliance, safety, and community engagement. This collaboration would create a transparent framework for responsible growth while safeguarding the City's interests and the rights of compliant businesses.

Mount Vernon has a rare opportunity to lead New York State in defining a fair, modern, and economically vibrant cannabis industry. The City that helps cannabis blossom responsibly will boom economically.

Protecting the Promise of Mount Vernon's Economic Revival

We commend the City Council and planning team for engaging the public in shaping Mount Vernon's future. We ask only that the final plan safeguard those already fulfilling its promises, those who have turned idle industrial spaces into centers of clean production and employment.

We are not opposing development but defining what responsible, sustainable development looks like in Mount Vernon. The City's industrial revival will not come from speculation but from steady, lawful investment. Protecting compliant cannabis operators under state law and acknowledging their role in the City's redevelopment ensures that progress remains equitable, sustainable, and consistent with the rule of law.

Finally, we respectfully request that the City's Planning Department engage directly with existing licensed operators before adopting any future zoning or land-use amendments. Proactive dialogue will ensure redevelopment efforts protect existing investments, preserve Mount Vernon's industrial workforce, and align with the City's long-term economic goals.

Considerately submitted,

Joshua Fahrenholtz
COO

Thank you for your consideration. Please confirm receipt at your convenience.
Joshua Fahrenholtz
COO @ Hudson River Labs INC

October 21, 2025

James Rausse, Commissioner
Department of Planning and Community Development
City of Mount Vernon
One Roosevelt Square
Mount Vernon, NY 10550

County Planning Board Referral File MTV 25-010
Envision Mount Vernon – Comprehensive Plan

Dear Mr. Rausse:

The Westchester County Planning Board has received a draft copy of *Envision Mount Vernon: 10 Years forward for the Jewel of Westchester*, intended to serve as Phase 2 of the City's new comprehensive plan. Together with the *Downtown Vision Report* that constitutes Phase 1 of the Plan, this is proposed to replace the City's 1968 Master Plan, which is the oldest municipal comprehensive plan still in use in Westchester County. The County Planning Board provided comment on Phase 1 in a letter dated January 22, 2024. Phase 2 is focused on the rest of the City outside of Downtown.

Envision Mount Vernon is an ambitious and wide-ranging document that seeks to improve not only planning and zoning but infrastructure, utilities, open spaces, and the City government's operations. The Plan consists of six chapters: an introduction, a survey of existing conditions, a description of the public engagement process, chapters on "Placemaking," "Core Concepts," and a final chapter describing the implementation process. The "Core Concepts" described in the plan are: Mount Vernon's Role in the Region; Celebrating & Preserving Mount Vernon's Historic Legacy; Neighborhood Diversity & Inclusion; The Public Realm & Streetscapes; Housing Access for All; Green Space & Connections to the Natural Environment; Healthy, Safe & Active Communities; Resiliency & Sustainability; Economic Development; Reliable & Modern Infrastructure; and Effective Government Service.

We have reviewed the Plan under the provisions of Section 239 L, M and N of the General Municipal Law and Section 277.61 of the County Administrative Code. We applaud the City's efforts to update its comprehensive plan, and appreciate the City's presentation to the County Planning Board at our meeting on October 7, 2025. We offer the following comments for the City to consider as it finalizes this important document and works toward its implementation:

1. Consistency with County Planning Board policies.

We commend the numerous recommendations within the Plan that are consistent with the County Planning Board's long-range planning policies set forth in ***Westchester 2025—Context for County and Municipal Planning and Policies to Guide County Planning***, and its recommended strategies set forth in ***Patterns for Westchester: The Land and the People***. Mount Vernon is the most densely populated municipality in Westchester, and an important urban center in the County and the region. The City's future success is integral to the wellbeing of the County as a whole.

2. Zoning.

Envision Mount Vernon proposes to replace the current zoning code, which regulates housing by the number of the units per acre, with one that relies more heavily on floor area ratios (F.A.R.) to regulate development. We are encouraged that the City is considering a comprehensive rewrite of the zoning code following the adoption of this Plan, as we have consistently recommended in the many use variance appeals that we have reviewed over the past decades. Development proposals in Mount Vernon frequently involve variance requests for reduced setbacks, parking requirements, and dimensional standards, an indication that the standards in the City's zoning require review. The Plan also suggests exploring the use of design guidelines and form-based criteria to improve the streetscape and functionality of specific areas such as Sandford Boulevard and Canal Village, which we strongly support. We continue to urge the City to focus zoning policy toward managing the size and design of buildings rather than the uses. Form based practices may provide a means to manage the character of a neighborhood while allowing for a greater range of businesses and residential uses.

3. Affordable housing.

The acute shortage of affordable housing in Westchester County has been documented in the County's *Housing Needs Assessment* and it is critical for all of Westchester's municipalities to play a role in meeting this need, particularly since the economic and social impacts of the affordable housing shortage are spread throughout the County. The *Housing Needs Assessment* also found that 54% of Mount Vernon renter households pay more than 30% of their income toward housing costs. We applaud the inclusion of the Housing Access for All section of the Plan. We particularly support the Plan's suggestion to work toward the elimination of exclusionary zoning and the pursuit of a "City of Homes v.2.0" campaign built on an expanded definition of "home" that includes apartments, co-ops, townhouses, cottages, tiny homes, modular and panelized structures, dormitories, and senior living. The Plan notes that the City's transit access makes it well equipped to serve a growing population, and includes discussion of strategies such as co-housing and community land trusts to preserve affordability.

We encourage the City to work toward the adoption of the goals and objectives in the Housing Access for All section of the Plan, particularly the many objectives that are consistent with the County's [Model Ordinance Provisions](#), including the provision that all new development over 10 units provide a 10% affordable housing set-aside. The Plan suggests adopting a "sliding scale" set-aside policy similar to that used by New Rochelle, but we would suggest that the City consider a blanket 10% set-aside for its simplicity and consistency with other municipalities throughout the County that have adopted the County's Model Ordinance Provisions. We also support the use of density bonuses for additional affordable housing.

We support the Plan's recommendations to permit higher density housing along MacQuesten Parkway among other locations due to the proximate transit access. The City should further consider the removal of height restrictions around the three major transit hubs. We additionally support reducing parking requirements in these areas to bring down the cost of housing. The Plan recognizes that new housing opportunities should also be created in smaller scale buildings. The Plan references the City's historic segregation and redlining that for decades divided the community by the New Haven Line railroad tracks, underscoring the importance of housing opportunities being incorporated into every neighborhood in the City. The Plan's housing goals and objectives provide a toolkit for doing so in lower density neighborhoods, including the use of "missing middle" development, legalizing residential uses in commercial corridors, and allowing residential uses above existing ground floor retail locations. The

City should consider carefully how to balance the importance of these goals with the Plan's suggestions to maintain the existing land use classifications and densities permitted under current zoning in some areas to preserve neighborhood and historic character.

We support the Plan's recommendations to reform the City government's operation by streamlining the review and processing of building permits. We encourage the City to explore whether Mount Vernon could further encourage transit-oriented development by adopting a Generic Environmental Impact Statement for the future zoning code, in a manner similar to New Rochelle's Downtown Overlay Zone, to spur development and the creation of new housing.

4. Public outreach.

A successful municipal comprehensive planning process should be built on robust community engagement to ensure that the Plan is informed by local knowledge. The process of developing *Envision Mount Vernon* began with public outreach in 2022 and included specific engagement opportunities with local youth, seniors, Spanish-speaking residents, and industrial sector leaders. The City should be commended for conducting engagement events and public workshops tailored to a variety of residents and stakeholders and located in a large number of different locations throughout the City, including the outreach made towards the City's significant Portuguese-speaking community. As the City continues the public engagement process in preparation for adopting a new zoning code, great care should be taken to continue to provide opportunities for everyone in Mount Vernon to participate, including the City's Spanish-speaking residents. As the Plan notes, "there is a need for ongoing and consistent engagement with the Spanish-speaking community to ensure that they are at the table when important decisions are made." The City should continue to prioritize Spanish-language outreach, hold engagement events in predominantly Latino neighborhoods, and engage with Latino organizations and community leaders.

5. Streets and public transportation.

The Plan notes that Mount Vernon is well-connected by mass transit with two stations on Metro-North's Harlem Line and an additional station on the New Haven Line. It is well-served by Bee-Line bus and many South Side residents are within walking distance of the New York City Subway. The Plan highlights the fact that despite this, the City has onerous off-street parking requirements in excess of those found in other cities in Westchester. We support reforming the City's off-street parking requirements. We encourage the City to consider further recommendations in the Plan to manage and reduce parking demand within the City as a whole, including "unbundling" of parking with the cost of rental housing units.

The Plan includes a discussion of Complete Streets, providing a broad toolbox with illustrative photos showing how Mount Vernon's streets, which cover approximately 22% of the City's land area, could better accommodate cyclists and pedestrians. The City should also consider how street space is allocated for bus service, including locations where any potential dedicated bus lanes could improve travel. The Plan notes that residents complain of "unreliable" bus service, but as the Bee-Line bus fleet itself is relatively reliable, the cause of unreliability stems from car traffic blocking the buses. The Plan could benefit from a toolbox of options that includes bus lanes with camera enforcement, protected bus lanes with physical barriers, bus queue jumps, and transit signal priority. The Plan should recommend that when the City replaces traffic signals they should accommodate these traffic management techniques. The Plan should also discuss collaboration with the County to implement the future recommendations that are included in the *County Mobility and Transit Plan*.

The County Planning Board's policies aim to reduce unnecessary driving of single-occupancy vehicles. We recommend that the Plan include reference to the County's *Transportation Demand Management Toolkits*. These toolkits serve to provide guidelines for municipalities to incorporate Transportation Demand Management techniques within their zoning codes in order to reduce single-occupancy vehicle trips, lower congestion, and reduce total miles traveled in automobiles. Using parking management incentives can help meet both goals and could potentially allow municipalities to lower parking requirements, which can have positive benefits in reducing land disturbance and stormwater runoff. Developing Transportation Demand Management regulations could also help provide solutions such as shared parking arrangements, ridesharing programs, and other means to help manage parking demand. These toolkits can be provided by the County Planning Department, which also offers a Smart Commute Program that can assist employers to implement TDM strategies.

6. Economic and industrial development.

The Plan frames demographic change in the context of the City's economic fortunes. The City has seen a significant decrease in its youth population and Mount Vernon's seniors now outnumber its youth by more than 3,000 people. The enrollment decline in the City's schools has resulted in significant fiscal distress and the school district is implementing a reorganization plan in response to future projected decline. It is important that the City proactively work to increase both economic and housing opportunities to create an ample supply of trained workers and a larger customer base amidst an increasingly older population. The Plan notes that 92% of Mount Vernon residents commute outside the City for work. The City's zoning should provide more flexibility to promote economic development, including through zoning that formalizes nonconforming uses and buildings that may not be enlarged under current zoning. The Plan mentions the benefits of neighborhood retail in walking distance of homes, but the City should consider whether retail should be permitted in more residential areas.

The City has worked in recent years to craft a new vision for the revitalization of Canal Village, one of Westchester's largest industrial areas. The City should continue to examine whether certain types of light manufacturing uses may be appropriate for more areas where they do not produce nuisances or hazards.

7. Open space and river access.

The Plan calls for strategies to improve the water quality and access of the Hutchinson River, including the creation of a Hutchinson River Greenway and collaboration with the Hutchinson River Restoration Project. The Plan should also consider other organizations such as Groundwork Hudson Valley, who are expanding their scope outside of the Saw Mill River watershed. The Plan could also consider outreach to other successful watershed alliances to understand best practices and consider the establishment of a Hutchinson River Watershed Basin committee that involves adjacent municipalities to coordinate efforts. The City should additionally identify specific entities in the municipality to initiate efforts along with adjacent stakeholders. New York State Department of Transportation owns the land adjacent to Migui Park, who would need to participate in stewardship discussions. The Plan should emphasize the role of regional partnerships that may be outside of the municipality's borders.

8. County sewer impacts.

The Plan references the 2023 consent order the City signed with the U.S. Department of Justice, U.S. Environmental Protection Agency, and New York State Department of Environmental Protection to

inspect, repair, and replace sewer lines that are found to be broken, and eliminate illicit discharges through both the sanitary and stormwater systems. As new development occurring within the City would increase sewage flows and add to the volume requiring treatment at a Water Resource Recovery Facility operated by Westchester County, we recommend the Plan includes a reference to the longstanding policy of the County Department of Environmental Facilities (WCDEF) that municipal governments require development applicants to identify mitigation measures that offset projected increase in flow, in order to comply with the *County Environmental Facilities Sewer Act*. The best means to do so is through reductions in inflow/infiltration (I&I) at a ratio of three for one for market rate units and a ratio of one for one for affordable units.

The County Planning Board further recommends that the City implement a program that requires inspection of sewer laterals from private homes for leaks and illegal connections to the sewer system, such as from sump pumps. These private connections to the system have been found to be a significant source of avoidable flows. At a minimum, we encourage the City to enact a requirement that a sewer lateral inspection be conducted at the time property ownership is transferred and any necessary corrective action be enforceable by the municipal building inspector.

9. Universal design.

We encourage the City to consider the principles of Universal Design in all future development, and to reference universal design standards within the Comprehensive Plan. Universal Design standards allow all residents and visitors to fully engage in our public and residential spaces. Universal Design is also an important means of allowing household residents to age in place as well as to provide access for persons with mobility issues.

Thank you for giving us the opportunity to review this important action.

Please inform us of the City's decision so that we can make it a part of the record.

Respectfully,

WESTCHESTER COUNTY PLANNING BOARD



Bernard Thombs

Chair, Westchester County Planning Board

BT/eal

cc: Blanca Lopez, Commissioner, Westchester County Department of Planning
Vincent Kopicki, Commissioner, Westchester County Department of Environmental Facilities
Steve Elie-Pierre, Director of Maintenance, Westchester County Department of Environmental Facilities
Craig Lader, Director of Transportation Planning, Westchester County Department of Planning
Theresa Fleischman, Housing Program Director, Westchester County Department of Planning
Leonard Gruenfeld, Housing Program Administrator, Westchester County Department of Planning
Heather Reiners, Smart Commute Program Coordinator, Westchester County DPW&T

From: Michael Templeton <
Sent: Tuesday, October 21, 2025 3:22 PM
To: cityclerk <CityClerk@mountvernonny.gov>
Cc: Michael Templeton <
Subject: Opposition to the Draft "Comprehensive Plan"

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

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

Dear Clerk Bonilla,

The attached PDF is my written submission made in Opposition to the Draft "Comprehensive Plan."

I would be grateful if you could please file my submission and distribute as appropriate. When convenient, I would also appreciate it if you could please email back to me a time-stamped copy showing your receipt of my submission.

Thank you very much for your assistance, and please feel free to contact me if you any questions.

Kind regards,
Michael J. Templeton

Michael J. Templeton

October 21, 2025

Mount Vernon, NY 10552

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

Re: Opposition to Draft "Comprehensive Plan"

My wife and I have resided in our home in the Hunts Woods neighborhood of Mount Vernon for nearly 30 years. We make this written submission in support of our opposition to the Draft "Comprehensive Plan" ("Draft Plan"), and to supplement my statements in opposition to the Draft Plan made at the public hearing before the City Council on October 8, 2025.

Opposition to Elimination of Single-Family Residential Zones and Related Proposals and Statements in the Draft Plan

While there are a number of problems, deficiencies, ungrounded assumptions, and otherwise objectionable sections and statements in the Draft Plan (which other residents have spoken to), - - including the documents over use of jargonistic, vague, and undefined terminology - -, the statements and proposals in the Draft Plan that would effectively eliminate the City's long-standing single-family home zoned residential neighborhoods are particularly objectionable and ill-conceived. We oppose those statements and sections in the Draft Plan concerning proposed zoning changes to our existing single-family residence zoned communities.

Under the City Zoning Code, there are three single-family residence zones: R1-7; R1-4.5; and R1-3.6. The residential permitted principal use for these zones is for "one-family dwellings,"¹ and the maximum Floor Area Ratio ("F.A.R") is 0.35.² Multi-family housing structures, duplexes and triplexes, are not permitted principal uses in these zones. These one-family residence zones comprise well-established decades-old neighborhoods, including communities in Hunts Woods, Pasadena, Chester Hill Park, Chester Heights, and Oakwoods Heights, among others, which have long served as a bedrock of economic support, stability, renewal, and enduring strength for the City.

The Draft Plan proposes to effectively eliminate these long-established single-family home residential zones, and to increase the maximum F.A.R in these neighborhoods,³ to allow for not

¹ Zoning Code §267-17(A)-(C).

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

³ The Draft Plan proposes to increase the F.A.R for what it terms "Low Density Residential" neighborhoods to 0.5 – 1.0 F.A.R for so-called "LD-1" residential areas (a 50% to over 100% increase from the existing maximum F.A.R for single family zones of 0.35) to 1.5 – 2.0 F.A.R for so-called "LD-3" residential areas. Draft Plan at pg. 4-11.

only single-family homes, but in addition to also allow for multi-family duplexes and triplexes (as stated in the Draft Plan “as-of-right ... in all single-family zones”), and accessory dwelling units (“ADUs”).⁴

These proposed zoning changes would effectively open the door to and invite outside developers and investors to come in to our single-family residence zoned neighborhoods to acquire and “flip” (by tear-down or conversion) houses in these communities to construct multi-family triplexes and duplexes structures in their place for commercial purposes to rent out. The adverse consequences of such zoning changes in our single-family neighborhoods both for the City, and in particular for the residents who live in these neighborhoods (many of whom have resided in these single-family residence communities for decades, with their home being their largest investment and asset), are significant.

The varied potential negative consequences and repercussions include:

- Even more density in what is already one of the densest municipalities in the state, and all that would entail - - including increased police and fire public safety burdens, and more sanitation department garbage, recycling and waste disposal;
- Increased burdens on the City’s overburdened infrastructure (including sanitation sewers, MS-4 stormwater-drainage sewers and related flooding problems, roads (many of which require repair and repaving), and water usage demands;
- More congestion, cars, and traffic exacerbating parking problems and deficiencies in a number of neighborhoods;
- Further burdens and pressures on the City’s school system;
- Disruption to the long-term stability and character of single-family neighborhoods, with the displacement of residents from one-family homeowners (who occupy and are invested in the enhancement, upkeep and maintenance of their homes) to instead have transient renter-tenants and absentee out-of-City landlords;
- Detracting impacts on neighborhood aesthetics, privacy, and open spaces;
- Possible erosions to property values appreciation, and the City’s per-capita tax base; and
- Hinderances or dissuasions for single families who are looking to move to the City and purchase one-family houses here, but may be unable to because of competition from developers (with greater access to capital and tax breaks) who can outbid them;

In sum, the proposals in the Draft Plan to effectively eliminate the City’s single-family residence zones (and to increase the maximum allowable Floor Area Ratios of structures in these single-family neighborhoods) must be rejected and removed from the Draft Plan. Existing single-family residence districts zoning controls and requirements (including all applicable procedures,

⁴ Draft Plan at 5-45; and similar-type statements in the Draft Plan, including at 3-14 (“[a]llow duplexes and triplexes by right in all single-family zones...”); at 5-70 (“[c]onsider the suitability of duplexes and triplexes in certain single-family zones by right”); and at 4-11 (“[t]ypes of allowed uses” in so-called “low density residential” stated in the Draft Plan to include “Duplex – Triplex” and “Accessory Apartments”).

regulations, necessary approvals and variances of the City's land-use Boards) must be maintained and enforced for these single-family neighborhoods, and only those permitted principal uses expressly provided for in the Zoning Code for R1-7, R1-4.5, and R1-3.6 one-family residence districts be allowed. As discussed above, the proposals and related statements in the Draft Plan concerning changes to single-family residential zones are misguided, detrimental to our single-family home communities and residents, not based in real world on the ground data-driven strategic analyses, and are counterproductive to the long-term well-being and productive growth of the City.

Opposition to Certain Statements and Apparent Proposal in the Draft Plan Regarding the Bronxville Field Club

In addition to our overall opposition to the proposals in the Draft Plan concerning the effective elimination of single-family zoned residence districts, we also specifically oppose certain statements and an apparent proposal in the Draft Plan with respect to the Bronxville Field Club ("BFC" or "Club"). The Draft Plan refers to the BFC as a so-called "notable feature" in the Hunts Woods neighborhood, and appears to propose some nebulous undefined "Landmark" designation with respect to the BFC.⁵ We object to such inappropriate and unfounded statements and designation.

The BFC is a nonconforming use located in the Hunts Woods single-family residential neighborhood zoned R1-7. In its marketing materials, its purported "address," the Club's website, and elsewhere (including its name), the BFC asserts or implies a "Bronxville" location, even though all of its property is physically located in Mount Vernon. It 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". The racial demographic of the membership of the BFC is mostly white, and over ninety-percent of the Club's members do not live in Mount Vernon. The small number of residents in Mount Vernon who are members predominantly relocated from Bronxville and carried their Bronxville-based membership with them when they moved.

The BFC's location is surrounded by long-standing single-family homes in a well-established residential neighborhood. Over the years, the BFC has undertaken (or proposed to undertake) a number of expansions and various construction projects, which local area Mount Vernon residents have opposed, and which have been the subject of lengthy disputes, contested land-use Board proceedings, and litigations. Opposition residents have stated and asserted that the BFC has not been a "good neighbor;" that its development projects (and proposed projects) constitute impermissible expansions of the Club's nonconforming use in violation of the Zoning Code;⁶ have caused (or will cause) exacerbated local flooding conditions; increased parking and traffic problems; intrusive noise and light pollution; and other complaints, adversely impacting the neighborhood.

⁵ Draft Plan at 5-9; 4-26; 4-27.

⁶ Zoning Code §267-11(B)(1)-(6).

The statement in the Draft Plan that the Bronxville Field Club is a “notable feature” in the Hunts Woods neighborhood inappropriately indicates or suggests that (notwithstanding the above) the BFC serves or is inclusive of the Hunts Woods community, is somehow Hunts Woods centric, allows the Hunts Woods neighborhood open access to and use of the Club’s facilities, or that the Club openly acknowledges its Hunts Woods Mount Vernon location, none of which is accurate. This characterization and reference regarding the BFC should be removed from the Draft Plan.

Moreover, the Bronxville Field Club should not be referenced or noted in a statement or proposed “map” in the Draft Plan as a so-called “Landmark”. Such a purported designation is lacking in meaningful definition and specifics in the Draft Plan, and furthermore is unsupported and unwarranted with respect to the BFC. Any such “Landmark” designation as to the BFC should be removed from the Draft Plan.

Thank you in advance for your review of our comments and attention to the above points in opposition to the Draft Plan. We believe that meaningful consideration and input of these points and revisions in the plan drafting process will improve and enhance the preparation of the Comprehensive Plan to the benefit of the City, its single-family residential neighborhoods, and residents.

Sincerely,
Michael J. Templeton
Mount Vernon Resident and Homeowner

From: [Bonilla, Nicole](#)
To: [ferrandino](#)
Cc: [Rausse, James](#); [Molina, Marlon](#); [Herbert, Lukas](#); [Zaino, Amelia](#)
Subject: Re: Draft Comp Plan -- Availability of Public Comments on the Record and Inclusion of City Council Lead Agency Resolution/NB
Date: Wednesday, October 22, 2025 3:25:00 PM

Hi,

I will add this email thread as requested.

Regards,

Nicole Bonilla, MBA
City Clerk - City of Mount Vernon, New York

From: ferrandino@aol.com <ferrandino@aol.com>
Sent: Wednesday, October 22, 2025 2:04 PM
To: Bonilla, Nicole <nbonilla@mountvernonny.gov>; ferrandino <ferrandino@aol.com>
Cc: Rausse, James <jrausse@mountvernonny.gov>; Molina, Marlon <mmolina@mountvernonny.gov>; Herbert, Lukas <lherbert@mountvernonny.gov>; Zaino, Amelia <azaino@mountvernonny.gov>
Subject: Re: Draft Comp Plan -- Availability of Public Comments on the Record and Inclusion of City Council Lead Agency Resolution/NB

Thank you Nicole. I am not sure how the public would know where to look unless you told them.

Also, there is a key missing document that is part of the *Draft Plan* that has still not been posted, despite several admonitions by me to do so: the City Council Lead Agency resolution which includes language on the *Draft Plan* being a Type One Action under SEQR. Please post this as well for purposes of full disclosure. I have copied the Planning Department on this email as well to facilitate placement.

PLEASE INCLUDE THIS CORRESPONDENCE STRING AS A PUBLIC COMMENT ON THE *DRAFT PLAN*, AND INSERT IT UNDER "ADDITIONAL COMMENTS" ON THE CITY WEB SITE WHERE COMMENTS ARE POSTED.

Thank you.

VJF
<http://www.faplanners.com>

On Wednesday, October 22, 2025 at 10:04:44 AM EDT, Bonilla, Nicole <nbonilla@mountvernonny.gov> wrote:

Hi Vince,

The additional comments are located as a separate attachment named "Additional Comments" [TMP-1695](#).

The file has been updated as of 10:00 am today.

Regards,

Nicole Bonilla, MBA

City Clerk - City of Mount Vernon, New York

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

Sent: Tuesday, October 21, 2025 11:38 PM

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

Cc: Michael Justino <mjustinocmv@gmail.com>; Ttb1368 <ttb1368@gmail.com>

Subject: Re: Draft Comp Plan -- Availability of Public Comments on the Record

Hi Nicole,

I believe you have said that updated written comments are available for public viewing at the end of each business day. If so, where can they be found and can you send me a link? I could only locate comments on line through October 15, 2025.

Many thanks!

VJF

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