# **NIGHT 2 COMMENTS**

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

From: Cassandra Rajcumar

Date: Mon, Oct 13, 2025 at 10:10 PM Subject: Comprehensive Plan Opposing

To: <<u>AMarmolejos@cmvny.c m</u>>, <<u>cathlin4council@gmail.com</u>>,

<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 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.

Respectfully submitted, Cassandra Rajcumar

Mt. Vernon, NY 10552

Sent from my iPhone

From:

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

To: Bonilla, Nicole <a href="mailto:nbonilla@mountvernonny.gov">nbonilla, Nicole <a href="mailto:nbonilla@mountvernonny.gov">nbonilla, Nicole <a href="mailto:nbonilla@mountvernonny.gov">nbonilla@mountvernonny.gov</a>; MayorSPH <a href="mailto:nbonilla@mountvernonny.gov">mailto:nbonilla@mountvernonny.gov</a>;

Subject: Envision Mount Vernon - STOP IT!

You don't often get email from

. Learn why this is important

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

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

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 < <a href="mailto:cityclerk@mountvernonny.gov">cityclerk@mountvernonny.gov</a>>

Cc: Bonilla, Nicole <<u>nbonilla@mountvernonny.gov</u>>; Ralph Cathcart

Subject: Objection To Portions Of "Comprehensive Plan"

Some people who received this message don't often get email from

. <u>Learn why this is important</u>

>

To: Mount Vernon City Council – <u>cityclerk@mountvernonny.gov</u>; 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

You don't often get email from

. Learn why this is

### <u>important</u>

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 <<u>nbonilla@mountvernonny.gov</u>>

>

Subject: Response to the Draft Comprehensive Plan

You don't often get email from

. Learn why this is important

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 <u>significant</u> 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

[You don't often get email from <a href="https://aka.ms/LearnAboutSenderIdentification">https://aka.ms/LearnAboutSenderIdentification</a> ]

Learn why this is important at

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 < <a href="mailto:nbonilla@mountvernonny.gov">nbonilla@mountvernonny.gov</a> ; MayorSPH < <a href="mayorsph@mountvernonny.gov">mayorSPH < a href="mayorsph@mountvernonny.gov">mayorSPH < a href="mayorsph@mountvernonny.gov">nbonilla@mountvernonny.gov</a> ;

Subject: Opposition to Elimination of Single Family Zoning

You don't often get email from

. Learn why this is

important

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

. Learn why this is important

William G. Sheehan

Mount Vernon, NY 10552

12 October 2025

Dear Sir or Madam,

Regarding the "<u>Comprehensive Plan</u>" 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 <u>strongly oppose</u>** 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 < <a href="mailto:cityclerk@mountvernonny.gov">cityclerk < <a href="mailto:cityclerk@mountvernonny.gov">cityclerk@mountvernonny.gov</a>> Subject: Public Comments to be read into the record regarding Comprehensive Plan draft

### You don't often get email from

. Learn why this is important

We have been Mount Vernon residents and homeowners at 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

<<u>MayorSPH@cmvny.com</u>>; McSweeney, Kelsie <<u>kmcsweeney@cmvny.com</u>>

Subject: Formal Objection to Proposed Rezoning North of N. Birch Street in Fleetwood (Envision Mount

Vernon Draft Plan)

You don't often get email from . <u>Learn why this is</u> important

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
- 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 of14,950 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:
  - o More vehicles
  - Louder traffic

o 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

You don't often get email from . <u>Learn why this is</u> important

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 <u>multiple</u> 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 < <u>CityClerk@mountvernonny.gov</u>>

Subject: Comprehensive Plan - Low density zones, page 4-11

You don't often get email from . <u>Learn why this is important</u>

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 < <a href="mailto:cityclerk@mountvernonny.gov">cityclerk@mountvernonny.gov</a>>

Subject: Opposition to the Comprehensive plan to rezone Fleetwood

You don't often get email from

. Learn why this is

<u>important</u>

### 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 < <a href="mailto:cityclerk@mountvernonny.gov">CityClerk@mountvernonny.gov</a>>
Subject: Comment on Comprehensive Plan Draft

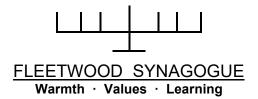
You don't often get email from i Learn why this is important

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

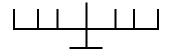
Fleetwood Synagogue directly abuts the Parkway, and we experience first-hand the noise, pollution, and neighborhood disruption caused by the Parkway – traffic noise from the Parkway regularly disrupts our services. We appreciate the Plan's recognition of the Parkway and strongly support efforts to mitigate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



### FLEETWOOD SYNAGOGUE

### Warmth · Values · Learning

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,

Jul L Schiefen

Joshua Schickman

President

Fleetwood Synagogue

From:

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

To: McSweeney, Kelsie < <a href="mailto:Kmcsweeney@cmvny.com">KmcSweeney@cmvny.com</a>; Marmolejos, Arisleidy

<<u>AMarmolejos@cmvny.com</u>>

**Cc:** cityclerk < <a href="mailto:cityClerk@mountvernonny.gov">cityclerk@mountvernonny.gov</a>; <a href="mailto:cathlin4council@gmail.com">cathlin4council@gmail.com</a>

<cathlin4council@gmail.com>

**Subject:** Opposition to the Comprehensive Plan for Fleetwood Section

[You don't often get email from <a href="https://aka.ms/LearnAboutSenderIdentification">https://aka.ms/LearnAboutSenderIdentification</a> ]

Learn why this is important at

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

You don't often get email from <u>Learn why this is important</u>

### 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 >,

<a href="mailto:</a><a href="mailto:AMarmolejos@cmvny.com">,<a href="mailto:mayorSPH@cmvny.com">mayorSPH@cmvny.com</a>>

### 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:

You don't often get email from . Learn why this is important 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: <<u>cathlin4council@gmail.com</u>>, <<u>CGleason@mountvernonny.gov</u>>

>

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 < <u>CityClerk@mountvernonny.gov</u>>
Subject: Comprehensive Plan Feedback

You don't often get email from . <u>Learn why this is</u> 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. Deincentivize 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 < <a href="mailto:nbonilla@mountvernonny.gov">nbonilla@mountvernonny.gov</a> **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 10<sup>th</sup> 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

You don't often get email from Nicole,

Learn why this is important

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 < <a href="mailto:nbonilla@mountvernonny.gov">nbonilla@mountvernonny.gov</a> Cc: MayorSPH < <a href="mayorsph@mountvernonny.gov">mayorsph@mountvernonny.gov</a> Subject: Comprehensive Plan Public Hearing comments

# You don't often get email from

Learn why this is important

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 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.

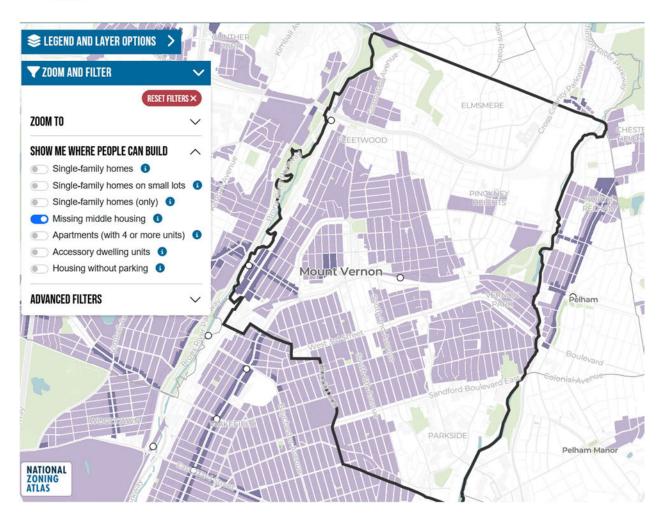
The attached map shows where 2, 3 or 4+ family housing is permitted "as of right" under the current Mount Vernon zoning code. We do not practice exclusionary zoning in Mount Vernon. That is a region-wide issue, but we are not the culprit. We are a beautifully diverse small city that can't fix this exclusionary 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 Sates, 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 lvy 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 farreaching 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 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 hirise 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 the 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 SEQR law.
- 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.

### **SEQR 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.

mandrino

- 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!

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! Vince Terrandino

Vince Ferrandino, AICP 45 Parkway West

Mount Vernon, New York 10552

www.faplanners.com



#### **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 Vison 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 <u>Type 1 Action</u> 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.

Ferrandino & Associates Inc.

- ➤ Short circuiting the environmental review process by inadequately and incorrectly filling out the Long Form EAF, Parts 1 & 2 and arbitrarily concluding "no impacts", especially with regard to the major rezonings proposed in the Phase *I Downtown Vision Report* and elsewhere in the *Draft Plan*, is contrary to SEQR law.
- ➤ 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.

Ferrandino & Associates Inc.

### 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* Ferrandino & Associates Inc.

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.

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 COMPRHENSIVE 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.

Ferrandino & Associates Inc.

**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 says15%. 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 <u>both</u> 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.

Ferrandino & Associates Inc.

- **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.

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 Couty 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 Sandford 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

Ferrandino & Associates Inc.

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.

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 reuse 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.

Ferrandino & Associates Inc.

# **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 a 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 Ferrandino & Associates Inc.

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 Ferrandino & Associates Inc.

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 <u>not</u> 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 <u>build out analysis</u> 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 Ferrandino & Associates Inc.

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)

**Pages1 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 <u>formatting footnote</u>, 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.

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 Ferrandino & Associates Inc.

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 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 < <a href="mailto:jriullano@mountvernonny.gov">jriullano@mountvernonny.gov</a>>

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