

III.R Cumulative Impacts (CI)

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Comment CI-1:

The only other thing really that as I look at this is, I want to make sure that somebody somewhere is keeping tabs of some kind of analysis of the cumulative impact of all of the proposed projects on the table.

(Charlie Hensley, Public Hearing, 4/29/2008, Page 177)

Response CI-1:

The cumulative impact of this Project and other projects in downtown Yonkers is addressed in Chapter VII of the DEIS as well as in the Land Use, Traffic, Community Facilities, and Utilities chapters of the DEIS. The analyses should be updated as part of all future environmental reviews in downtown Yonkers, including those that are presented to the Planning Board and the City Council.

Comment CI-2:

As a general matter we are concerned that the DEIS does not account for the cumulative impacts of this and other major redevelopment projects that are currently contemplated by the City of Yonkers, and we think that this omission has effects on a number of the impacts detailed in the DEIS and a number of the impacts that I will discuss tonight. Specific areas of concern include the social and neighborhood impacts of the development. While the DEIS generally acknowledges that gentrification may result from the development, we do not think that it adequately evaluates the potential impact of the development on the affordability of nearby housing, and on the potential displacement of residents in the study area and in Yonkers beyond the study area.

(Gavin Kearney, Esq., Representative, Yonkers Alliance for Community Benefit, Public Hearing, 5/13/2008, Page 66-67)

Response CI-2:

The cumulative impact of this Project and other projects in downtown Yonkers is addressed in Chapter VII of the DEIS as well as in the Land Use, Traffic, Community Facilities, and Utilities chapters of the DEIS. The impact was determined based on a "No Build" list developed by the City, which included 24 projects. The impact of developments on the housing market other than the proposed Project is beyond the scope of the analysis. However, as discussed in the Chapter III.I in the DEIS and summarized throughout the FEIS, cumulative impacts on housing and displacement for the study area and beyond were analyzed and considered in the DEIS.

For example, while no data is available on current overall rents in the study area, the DEIS presents data which suggests that median rents in the Study Area in 2000 were 18% less than the City of Yonkers as a whole. Rental units in recently added market rate units located in downtown Yonkers or along the waterfront range between \$1,625 per month for a one-bedroom unit to \$2,600 per month for a two-bedroom unit. These current market rents are significantly higher than the \$562 median rent for the Study Area reported in the 2000 Census. Because of this marked shift in housing market construction, a change in the character of the Study Area household incomes is already in evidence. Cumulatively, the redevelopment already occurring in

downtown Yonkers suggests that a trend of change is underway that will make downtown Yonkers a more attractive place to live. By nature of its mixed-use program, the SFC Project would not introduce a critical mass of non-residential uses that would solely contribute to that trend. Of the 15 currently anticipated development projects in the project area and vicinity, there are six residential developments with a total of over 700 units. The largest of these is Hudson Park North, with 312 units located at a site on the Hudson Riverfront near the Yonkers Metro-North Railroad Station.

Additionally, it is important to note that, spatially, much of the growth in downtown Yonkers is concentrated in an area surrounding the Yonkers Metro-North Railroad Station and along Main Street. In contrast, there is no substantial development planned in the immediate vicinity around Getty Square, Yonkers' traditional downtown shopping and commercial area, or near Nodine Hill, a lower-income, multi-family residential neighborhood. Further, the City's "no-build" list includes a significant number of office and residential uses and very few retail and food service establishments, both of which are included in the SFC Project. The new retail and restaurant offerings, in combination with other new uses in the SFC Project, will create a destination in downtown Yonkers for shoppers and visitors and provide amenities for those who live in the area. These amenities include open space and recreation opportunities such as improved access to Hudson River waterfront and baseball games, as well as food services and shopping opportunities in River Park Center. The SFC Project would also provide a significant number of employment opportunities available to local residents. These jobs will enable local residents to remain in the project area and participate in a positive way in the growth and change that is already underway in downtown Yonkers.

Presently, the vast majority of the land comprising the SFC Project sites is presently vacant and/or underutilized and a significant proportion of parcels surrounding the SFC Project sites (approximately 41.7 acres) are either vacant or underutilized (i.e., partially vacant). Therefore, if these surrounding parcels were to be improved, there would be minimal primary or secondary population displacement.

Further, there are other waterfront projects in the planning/construction stages in the Study Area. These include "Hudson Park North" which is currently under construction and will feature 294 one- and two-bedroom apartments in two buildings of 14 and 12 stories. With regard to affordable housing in the project area and in the downtown, it should be noted that between 1990 and 1999, 829 affordable units were built and a \$60 million renovation of Parkledge Housing (a 311 unit affordable housing development) on Yonkers Avenue was completed in 2005. The Yonkers Municipal Housing Authority is overseeing a HOPE VI urban redevelopment project along Ashburton Avenue to replace Mulford Gardens (adding a net increase of 225 affordable units) and construct 62 affordable two-family homes. Further, there are approximately 183 new affordable housing units to be provided by other currently planned projects in the Yonkers downtown. The Applicant has agreed to the provision of affordable/workforce units equal to 10% of the total number of residential units at the SFC Project; either new affordable units will be constructed, or the redeveloper will contribute equivalent value to an affordable housing fund to assist in the rehabilitation of housing and/or storefronts in the immediate vicinity of the proposed development. Once these projects are complete, the total number of housing units within the Study Area would increase by about 18% from the 2000 census total to approximately 10,000. The residential units of the proposed Project (1,386 units) would therefore add only 13.9

% to the total supply in the Study Area. (Note that this does not include the proposed "Point Street Landing," which would include 1,219 units.) Notwithstanding the information supplied by the Applicant concerning current and planned affordable housing, a member of the Council indicated that a number of affordable units have been removed throughout the City of Yonkers, including in the project area. However, it should be noted that the recent losses of affordable housing indicated by the Councilmember reportedly resulted from events and actions unrelated to the Proposed Project. Nonetheless, in recognition of this issue, the Applicant has increased its proposal for affordable housing from 6% to 10%. For details on this proposal, see Response LA-5.

Finally, in order to respond to potential growth in the downtown, the City has undertaken several initiatives to make certain that surrounding areas are improved. These actions include existing and proposed master plans for the nearby Nodine Hill, Ashburton Avenue, Ravine Avenue and Alexander Street areas. The Nodine Hill and Ravine Avenue plans identify potential opportunities for affordable infill housing and for rehabilitation of existing housing. As mentioned above, the Ashburton Avenue plan includes a HOPE VI component with new housing affordable replacing the Mulford Gardens public housing complex.

All these projects, proposals and geographies were taken under consideration in the housing affordability and potential secondary displacement analyses presented in the DEIS, and in total present what the Applicant believes to be an acceptable level of cumulative analysis.

Comment CI-3:

In terms of mitigation of these effects, we also believe that the DEIS improperly relies on incomplete neighborhood housing plans that may or may not come to fruition in the future.

(Gavin Kearney, Esq., Representative, Yonkers Alliance for Community Benefit, Public Hearing, 5/13/2008, Page 66-67)

Response CI-3:

The DEIS does not rely on plans for nearby neighborhoods, but cites them as part of the City's effort to upgrade various portions of southwest Yonkers.

Comment CI-4:

None of the current renderings show the cumulative effect of all the proposed development downtown, including the Nepperhan Valley and Alexander Street.

(Charlie Hensly, Resident, Letter, 5/30/2008)

Response CI-4:

A scale model of the SFC project and surrounding area prepared by the Applicant has been utilized at Council meetings. A separate computer model of the City's proposed Alexander Street urban renewal plan has been prepared by the City's consultants to assist with the City's continuing review of that proposal but is not connected to the Proposed Project. Since the Alexander Street urban renewal plan has not yet been approved and is only conceptual,

incorporating it into the model of the Project could be misleading because Alexander Street's computer model is a massing study only and may not be representative of site-specific plans to be submitted for development projects at a to-be-determined future date. The Alexander Street planning process discusses a 10-20 year timeline for redevelopment of the corridor and there could be significant changes to the projects to be eventually constructed. However, the Applicant understands the importance of such an illustration to the City Council and as illustrated on Exhibit II-18 in this FEIS, a visual depiction has been prepared which includes the Proposed Action as well as conceptually planned, but as of yet not proposed, development program to the north.