

Dygert, Bianca

From: noreply@civicplus.com
Sent: Thursday, April 28, 2022 6:27 AM
To: DeLuca, Katie; LaRow, Patrick; Anastasio, Marisa; Pruitt, Jacalyn; Dygert, Bianca; Becker, Shanice; Mangs, Peter
Subject: Online Form Submittal: Contact Us

[EXTERNAL]

Contact Us

First Name	Michael
Last Name	Redden
Email Address	redden.m@att.net
Subject	Proposed Development of former American Can property
Message	Your organization needs to do a thorough analysis of this project's potential impact on Byram River Flooding. I believe most if not all of that property drains into the Byram river watershed. Every square foot of building and asphalt will increase flooding because the water will run off into drains that will empty into the river. We already have enough flooding downstream. If you approve the project then insist the new bridges on the post road get built first as a condition.

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

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From: [LaRow, Patrick](#)
To: [Vargas, Madeline](#)
Cc: [DeLuca, Katie](#)
Subject: FW: 41 Structures 50 Stories High/American Can
Date: Tuesday, April 26, 2022 11:28:53 AM

This is being bcc'd to the entire commission.

Please see below comments related to the 1 American Lane Pre-app

Patrick LaRow
Deputy Director / Assistant Town Planner

From: Alban, Margarita
Sent: Tuesday, April 26, 2022 11:26 AM
To: LaRow, Patrick <Patrick.LaRow@greenwichct.org>
Subject: Fwd: 41 Structures 50 Stories High/American Can

Hi. Please circulate to Commission etc.

Margarita

Begin forwarded message:

From: KAREN FASSULIOTIS <drkarencass@aol.com>
Date: April 26, 2022 at 11:21:33 AM EDT
To: "Alban, Margarita" <Margarita.Alban@greenwichct.org>, "DeLuca, Katie" <Katie.DeLuca@greenwichct.org>
Subject: 41 Structures 50 Stories High

[EXTERNAL]

Margarita and Katie,

I'm unable to attend the meeting this afternoon. I am writing as an individual who is concerned about where the town is heading with the overdevelopment of various parcels in town. We are a town, not a city, and developers should consider that fact when proposing projects before P&Z. Conversely, O&Z should consider that fact when reviewing these projects.

I am writing in opposition to the proposed request for a special permit to enable residential use at the Greenwich American Center. The town should be encouraging commercial tenants as the site was originally intended. The request for a special permit and the project as proposed should be rejected in its entirety.

The project as proposed is in direct line of the landing strip for Westchester Airport. I question whether there are additional approvals needed from the FAA or whether Westchester Airport management have been consulted and have weighed in with any

concerns. For example, will lighting from the proposed 50 story buildings interfere with the landing strip used? Are there others considerations, such as noise from overhead planes landing or taking off, that have not been taken into account?

Additionally, the reports of lack of fire coverage is simply not true. Round Hill and Glenville Fire Stations can and do respond. There has been no townwide adoption of acceptable response times and the conclusion that there is no fire coverage is erroneous. If you intend to approve this development, P&Z should require sprinklers, water supply for fire suppression, similar to what has been done for other structures in the area.

Finally, if families with school aged children will be living there will there be the appropriate school bus service to area schools available to them or will there be a need to take the kids to school by car, increasing the number of drop offs at schools?

Please do not accept this proposal. It will set a horrible precedent for the development of large properties in Greenwich. This should be any easy decision. Your answer should be "no".

Karen Fassuliotis

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From: [DeLuca, Katie](#)
To: [PZ-COMMISSION](#); [Vargas, Madeline](#)
Subject: Fw: Greenwich American Center development
Date: Wednesday, April 27, 2022 6:32:06 PM

From: allwill@optonline.net <allwill@optonline.net>
Sent: Tuesday, April 26, 2022 3:27 PM
To: DeLuca, Katie <Katie.DeLuca@greenwichct.org>
Subject: Greenwich American Center development

[EXTERNAL]

Hi Katie,

I can't make this afternoon's Zoom meeting about the proposed residential development project at Greenwich American Center, but you might want to raise a point of clarification to Chairperson Margarita Alban. Greenwich does indeed provide fire protection for this northwest corner of town -- not Armonk F.D.

"We don't have fire service in that area," pointed out P&Z chair Margarita Alban, adding that North Castle would have to provide fire response for the development."

In fact, Greenwich has always provided fire protection there. It just takes a long time (10-12 minutes+) to get there. As you're very aware, several former Greenwich Fire Chiefs have met over the years with Armonk Fire officials to try and work out a plan whereby Armonk would be initial responders.

AFD has maintained they will always help with mutual aid, but cannot become Greenwich incident first responders for a host of understandable reasons.

Thanks,
Allen Williams
President
Northwest Greenwich Association

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From: [DeLuca, Katie](#)
To: [Vargas, Madeline](#)
Subject: Fw: 1 American Lane Proposed Development -Corrected
Date: Tuesday, April 26, 2022 12:54:58 PM

Please add to the record

Thanks

From: KAREN FASSULIOTIS <drkarenfass@aol.com>
Sent: Tuesday, April 26, 2022 12:42 PM
To: DeLuca, Katie <Katie.DeLuca@greenwichct.org>; Alban, Margarita <Margarita.Alban@greenwichct.org>
Subject: 1 American Lane Proposed Development -Corrected

[EXTERNAL]

Katie,

Please replace my previous email with this s for the record.

Thanks.

Karen Fassuliotis

>

> P&Z Commissioners,

>

> I'm unable to attend the meeting this afternoon. I am writing as an individual who is concerned about where are town is heading with the overdevelopment of various parcels in town. Specifically the proposed development at 1 American Lane. We are a town, not a city, and developers should consider that fact when proposing projects before P&Z. Conversely, P&Z should consider that fact when reviewing these projects.

>

> I am writing in opposition to the proposed request for a special permit to enable residential use at the Greenwich American Center. The town should be encouraging commercial tenants as the site was originally intended. The site is already developed for that purpose. The developers should be working with our state and federal legislators to attract viable businesses instead of overdeveloping a fragile ecosystem.

> The request for a special permit and the project as proposed should be rejected in it's entirety.

>

> The project as proposed is in direct line of the landing strip for Westchester Airport. I question whether there are additional approvals need from the FAA or whether Westchester Airport management have been consulted and have weighed in with any concerns. For example, will lighting from the proposed 50 story buildings interfere with the landing strip used? Are there others considerations, such as noise from overhead planes landing or taking off, that have not been taken into account?

>

> Additionally, the reports of lack of fire coverage is simply not true. Round Hill and Glenville Fire Stations can and do respond. There has been no townwide adoption of acceptable response times and the conclusion that there is no fire coverage is erroneous. The main concern is the availability of water in that area to fight fires. If you intend to approve this development, P&Z should require sprinklers, as well as sufficient water supply for fire suppression, similar to what has been done for other structures in the area. As a person who survived the attacks on September 11th I know what

it's like to walk 57 stories down to safety in adverse conditions. This should be a huge concern for you but please focus on the facts when considering this project. This amount of density does not belong in this location 24/7.

> Further, scrutiny should be given to the waste management systems available for such a massive development. My understanding is North Castle is concerned with this aspect as well.

>

> Finally, if families with school aged children will be living there will there be the appropriate school bus service to area schools available to them or will there be a need to take the kids to school by car, increasing the number of drop offs at schools?

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TOWN OF NORTH CASTLE
WESTCHESTER COUNTY
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Armonk, New York 10504-1898

TOWN BOARD
Michael J. Schiliro
Supervisor

Telephone: (914) 273-3000
www.northcastleny.com

April 4, 2022

Margarita T. Alban, Chairperson
Planning & Zoning Commission
Town of Greenwich
101 Field Point Road
Greenwich, CT 06830

Re: Greenwich American Center – Preliminary Comments from the Town of North Castle

The Applicant proposes to develop 456 new residential units on approximately 150 acres within the Greenwich American Center site at 1 American Lane. The site is zoned as BEX-50 (50 Acre Executive Office) and the Applicant is seeking approval to permit residential use on the site. Given the site's location at the extreme northwest corner of Greenwich and the fact that the site can only be accessed via New York roads, it is likely that development impacts will be borne by the Town of North Castle and the Armonk Hamlet. Specifically, the site is located 1 mile from the Armonk Hamlet (5 min. drive to North Castle Town Hall) and 6.5 miles from downtown Greenwich (18 min drive to Greenwich Town Hall).

The Town of North Castle appreciates the opportunity to comment on the proposed development at this early stage. It is our hope that the Planning & Zoning Commission takes our concerns into consideration when reviewing the requested zoning amendments and site plan development.

Potential Significant Adverse Impacts

Based upon the Town's review of the preliminary development concept plan, North Castle believes that the proposed development may have the following significant adverse impacts:

1. The potential for significant impacts related to land use, zoning, and public policy. The proposed development would change the allowable uses in the BEX-50 Zoning District from its current office campus to add residential uses.
2. The proposed development would result in excavation and other disturbance on 100 acres of currently undeveloped land.

3. Increased stormwater runoff and erosion resulting from site disturbance and construction of new impervious surfaces in the form of structures, access roads, and residential uses may impact surface water, specifically the nearby Kensico Reservoir which is part of the New York City watershed system. In addition, surface water and groundwater may be impacted by the introduction of fertilizers and pesticides associated with new residential uses.
4. The proposed development would result in an increased demand on water supply sewage disposal systems.
5. The proposed development may impact the habitat of species that have been identified as species of special concern, endangered and/or threatened (including the bald eagle).
6. The proposed development would occur within an area identified as potentially sensitive for archaeological resources.
7. A small portion of the site is located in an area between the 60 DNL and 65 DNL noise contours for Westchester County Airport.
8. The proposed development would result in an increase in daily vehicle trips, which may impact the surrounding roadway network.
9. The proposed development would result in an increase in on- and off-street parking demand in the Armonk Hamlet, which may negatively impact parking availability in the Armonk Hamlet.
10. The potential for significant impacts related to stormwater runoff. The proposed construction will add new impervious surfaces requiring stormwater quality and quantity management.
11. The potential for significant design/visual resource impacts and neighborhood character impacts.

Requested Areas of Study

1. The Applicant is proposing significant changes to the BEX-50 Zoning District to permit residential uses in an existing office district. In an effort to spur occupancy of existing vacant office space, there is a clear rationale to permit other compatible uses. However, the rationale for permitting new residential dwellings is less clear. Sec 6-108 of the Greenwich Municipal Code states that “the purpose of the BEX-50 Zone is to provide an area for low density, business executive office use in the triangle of land in northwest Greenwich which is separated from and denied access to the remainder of the Town by Interstate 684. It is the additional purpose of this zone to encourage a campus-like landscaped setting which is protective of open space and environmental values, and produces a traffic impact commensurate with the capability of the road system to satisfactorily absorb it.” The proposed addition of residential uses within the BEX-50 Zoning District does not appear to be consistent with Section 6-108 of the Greenwich Municipal Code. Additionally, given the site’s proximity to Westchester County Airport the site may not be suitable for new residential development as Westchester County receives a large number of aircraft noise complaints from residents in Purchase and Armonk.

Furthermore, the concept of placing new residential development in a relatively remote location runs counter to good planning practice. Typically, higher density residential development is located closer to public transit, shopping and services that can accommodate the new residents (see comment 14).

2. The Applicant should be required to discuss the recommendations for the site and surrounding area as set forth in the Town of Greenwich Plan of Conservation and Development.
3. The proposed development is proposed to significantly increase the density permitted at the site. The proposed zoning change would permit over 2 million square feet of floor area on a site that currently contains 586,295 square feet of floor area. The BEX-50 Zoning District permits a FAR of 0.09 excluding accessory buildings constructed before 1/1/91 and a FAR of 0.005 for any buildings constructed subsequently. Given the proposed FAR of 0.3, the Applicant is proposing a 233% increase in density as compared to the existing 0.09 FAR and a staggering 5900% increase in density as compared to the 0.005 FAR. It is noted that the surrounding office uses in NY have maximum FAR in the range of 0.12 to 0.15. The Applicant should be required to provide the rationale for requesting such large increases in proposed density and explain how the proposed density would be compatible with surrounding properties.

4. The Applicant should be required to assess changes to the BEX-50 district's dimensional regulations with respect to the maximum allowable building height. It is noted that the existing height permitted in the BEX-50 Zoning District, as well as surrounding properties in NY, is 3 stories/45 feet. The Planning & Zoning Commission should evaluate whether any proposed increase in height will be discernable from locations where buildings can be observed, such as from NYS Route 120, I-684 and adjacent properties and that the proposed building height does not negatively impact development within the surrounding neighborhood and is in keeping with the existing character of the King Street corridor.
5. Generally, the NYS Route 120 corridor is defined by heavily wooded frontages and rising topography. It is requested that the Planning & Zoning Commission determine whether the visual impacts of the proposed action are acceptable. If not, the Planning & Zoning Commission may wish to require additional mitigation measures including the relocation of buildings, providing larger setbacks, reducing building height, or providing additional screening.
6. The Applicant should be required to evaluate whether the proposed residential building setbacks are appropriate. Surrounding property in NY reflect the existing corporate campus development principles and require a front yard setback of 150', a side yard setback of 300' and a rear yard setback of 300'. The Planning & Zoning Commission should give consideration to preserving the existing 200-foot front, side and rear setbacks currently required in the BEX-50 Zoning District.
7. Access to the property is provided over easements located on the Citi Conference Facility. The Applicant should be asked to provide the easement agreement for review and demonstrate that the easement would permit access for the proposed development.
8. The Applicant should be required to provide mitigation measures including, but not limited to, methods such as site configuration and design, use of buffers and screening and building design to reduce impacts on the surrounding community. In addition, the Applicant should be required to take into consideration the cumulative impact of other development proposals that are currently planned or proposed for the area surrounding the subject site.
9. The Applicant should be required to address the cumulative loss of vegetation. The Applicant should also be required to address preserving vegetation at critical buffering locations, such as the site's property lines.

10. The Applicant should be required to provide a schematic landscape plan for the subject site showing proposed planting areas, as well as their design intent and function (e.g., visual buffer, wetland enhancement, wildlife, street trees, slope stabilization, formal garden, etc).
11. The Applicant should be required to describe the location, condition, and capacity of the water withdrawal infrastructure serving the proposed development. Identify the current yield of the on-site water supply system. Include any aquifers shared by adjoining properties where water supply is drawn. The Applicant should be required to analyze the potential impact of the proposed development's water withdrawals on the adjacent Swiss Re site and Airport Campus site as well as other neighboring wells and aquifers.
12. The Applicant should be required to identify existing wastewater treatment facilities to be used and capacity to accept additional sanitary waste from the project.
13. The Applicant should be required to describe the roadway characteristics in the area surrounding the proposed development (number of lanes, posted speed limits, travel-way width, surface treatment and condition, horizontal and vertical curves, grades, drainage, parking, traffic controls, vehicle classification restrictions and general character) . For the weekday AM and PM Peak Hours (weekday morning - 7:00 to 9:00 A.M. , weekday afternoon - 4:00 to 6:00 P.M., and lunch document and show on a figure, the existing traffic volumes using historical data and manual turning movements traffic counts at the following intersections (i.e., "Study Area"):
 - King Street/Main Driveway/American Lane
 - King Street/Cooney Hill Road
 - King Street/New Right-In and Right-Out Site Driveway associated with proposed Airport Campus project
 - King Street/Gateway Lane
 - NYS Route 120 (King Street) at New King Street
 - King Street at IBM/Swiss Re Access Drives
 - King Street at Route 22 (both signalized intersections)
 - NYS Route 120 at Airport Access Road/Interstate 684 connecting road and Interstate 684 ramps

Conduct capacity analysis (Level of Service) for each of the above intersections.

Identify pending improvements in the study area in the future without the proposed project, their status for design and completion.

Summarize the existing Levels of Service in tabular format.

Provide a summary description of existing public transportation facilities in the vicinity of the site.

Provide Accident History Update or new data for each of the intersections listed for the most recent three-year period.

Describe the Bee-Line bus routes (Westchester County Bus System) and stops adjacent to the proposed development.

Address, generally, traffic for along King Street (NYS Route 120).

Estimate traffic volumes in the Study Area in the future without the proposed development (i.e., “No Build”) in a future design year utilizing:

- Estimated traffic volumes resulting from full occupancy of the two existing Greenwich American Center office buildings on the Site.
- A background growth factor based on historical data
- Estimated traffic volumes from other pending or approved projects in the area, if any, as identified and provided by the Town and Town of North Castle.

Calculate the Design Year No-Build traffic volumes for each of the peak hours and show on a figure.

Conduct capacity analysis (Level of Service) for each of the above intersections for the Design Year No-Build condition.

Summarize the Levels of Service in tabular form for the Design Year No-Build condition.

Estimate Site Generated Traffic based on the information published by the Institute of Transportation Engineers (ITE) as contained in their report entitled *Trip Generation, 10th Edition, 2017*. Assign the Site Generated Traffic Volumes to the roadway network based on the anticipated arrival and departure distributions.

Combine the Site Generated Traffic Volume with the Design Year No-Build traffic volumes to obtain the Build Traffic Volumes for each of the peak hours and show on a figure.

Conduct capacity analysis (Level of Service) for each of the above intersections for the Build condition.

Provide intersection sight distance analysis of any new site access drives.

Describe known changes to the Bee-Line bus routes and stops adjacent to the proposed development that are expected to occur in the future with and without the Proposed Project.

Describe effects on traffic flow/congestion on King St., NYS Route 120 and NYS Route 22.

Based on the results of the traffic analyses, identify improvements to the traffic and transportation system where necessary, the status, and the entity responsible for construction.

King Street (NYS Route 120) is a State highway. The Planning & Zoning Commission should forward a copy of the application to NYS DOT to identify any required permits for the proposed project and to evaluate potential traffic impacts to King Street.

14. The Applicant should be required to analyze the impact of the proposed development on parking in downtown Armonk. This project, along with other proposed projects near the Armonk Hamlet, may create unacceptable traffic, parking and congestion impacts within the hamlet area. Given the large number of residents associated with the proposed development, and the likelihood that those residents will shop in the Armonk Hamlet, the Town is concerned that increased parking demand cannot be met with the existing limited supply of parking in the hamlet. This is a critical issue of concern for the Town of North Castle.
15. The Applicant should be required to provide analysis of the existing visual character of the subject site as viewed from surrounding roads and surrounding properties, based upon use of photographs, site line diagrams and/or cross-sections, as appropriate. Include, NYS Route 120, I-684, American Lane and Cooney Hill Drive. The Applicant should be required to describe measures aimed at reducing visual impact, preserving existing trees, ensuring appropriate height of structures and proposed landscaping.
16. The site is located in close proximity to the Kensico Reservoir. The proposed development will entail site disturbance during construction and will result in the creation of new impervious building and parking lot surfaces. Preparation of a sediment and erosion control plan as well as a Stormwater Pollution Prevention Plan are of critical importance.

The New York City Department of Environmental Protection notes that the Applicant will be required to send NYCDEP the application information for comment (pursuant to CT State Wetland/Watercourses Regulations) concerning wetlands impacted by the proposed development. NYCDEP notes that it has no specific regulatory authority as NYC's Watershed Regulations do not extend across state lines.

17. The Applicant should be required to describe historic archaeological resources on the subject site and discuss how the project would impact historic, cultural or archaeological resources on, or in the vicinity of the project site.
18. The Applicant should be required to study noise level contours for the nearby Westchester County Airport. Discuss appropriateness of this site for residential uses.

Town of North Castle Town Board

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