

# AVRUTINE & ASSOCIATES, PLLC

ATTORNEYS AT LAW

HOWARD D. AVRUTINE

E-MAIL: [hda@avrutinelaw.com](mailto:hda@avrutinelaw.com)

575 UNDERHILL BOULEVARD

SUITE 140

SYOSSET, NEW YORK 11791

TELEPHONE (516) 677-9400

FAX (516) 677-9405

April 4, 2017

**By email [troach@whiteplainsny.gov](mailto:troach@whiteplainsny.gov)**

Thomas M. Roach, Mayor

City of White Plains

City Hall

255 Main Street

White Plains, New York 10601

Re: French-American School of New York ("FASNY") v. Mayor Thomas Roach and the  
Common Council of the City of White Plains  
Supreme Court of the State of New York, Westchester County  
Index Number: 2067/2015  
Hon. Joan B. Lefkowitz

Dear Mayor Roach:

As you know, this office represents The Gedney Association (hereinafter "the Association") in connection with certain issues which have arisen in the context of the above-referenced lawsuit.

As you are also aware, the Association is steadfastly opposed to the application submitted by the French-American School of New York (hereinafter "FASNY") seeking approvals to construct and operate a private middle and upper school serving a regional demographic on the property formerly owned by the Ridgeway Country Club.

The purpose of this letter is to transmit to your office as well as to the Members of the Common Council of the City of White Plains (hereinafter "Common Council") a traffic study and analysis of the "Alternative Plan" submitted by FASNY which will be the subject of a public hearing before the Common Council scheduled for April 5, 2017. Enclosed herewith is a traffic study and analysis dated April 3, 2017 prepared by Mary Manning, P.E. (hereinafter "Manning Report"). Ms. Manning is a civil engineer who has concentrated extensively in traffic engineering during her distinguished career as a professional engineer. Ms. Manning also participated on behalf of the Association in connection with FASNY'S original application to the Common Council.

It is of paramount importance to stress at the outset that the Manning Report confirms in no uncertain terms what the Association and many in the community have feared regarding FASNY's "Alternative Plan". This plan (a) will **significantly** increase traffic volumes on narrow streets which are not designed to handle such volumes; (b) create sight distance dangers; and (c) create extensive traffic congestion on streets in the surrounding community. **These increased traffic volumes and congestion will cause hazardous and dangerous traffic conditions to**

## AVRUTINE & ASSOCIATES, PLLC

Thomas M. Roach, Mayor

April 4, 2017

Page 2

**motorists, bikers, school children and pedestrians and will necessarily result in increased response times for emergency service providers.**

For example, the Manning Report states, at page 3, that traffic volumes on Hathaway Lane will increase from 84 during the AM peak hour to over 500—with absolutely no mitigation proposed to address the obvious impacts. Those impacts will be severe and will impact everyone who uses the streets in the area. With all due respect, it does not require the expertise of a traffic engineer to conclude that to allow this development to proceed as proposed with absolutely no mitigation will be a disaster for the community.

In this regard, FASNY has suggested that families of students as well as students with driver's licenses will sign a contract stating that they will not utilize local streets in travelling to and from the school. Firstly, such agreements are impossible to enforce. Secondly, mitigation measures must be absolutely certain to have any effect. Voluntary compliance with a proposed restriction simply cannot work. Further, this hollow offer by FASNY fails in any manner to consider the vast number of trips to and from the premises by those who are not students or family members of students. These include visitors, commercial and noncommercial deliveries and any others who may come to the school.

It is also extremely important to note that the Manning Report reveals numerous significant errors contained in FASNY's traffic analysis prepared by AKRF, Inc. dated October 31, 2016 (hereinafter "AKRF Report"). Most importantly, the AKRF Report vastly underestimated anticipated trip generation as the result of a mathematical error (Manning Report at pp. 1, 2-3). It also overestimated anticipated school bus usage (Manning Report at p. 6) in an effort to improperly claim a reduction in traffic volumes. The AKRF Report also used a purported two (2) hour peak AM traffic period rather than the industry standard one (1) hour peak AM traffic period. FASNY's improper methodology in this regard further served to artificially suppress true anticipated traffic volumes. Numerous other failures, inaccuracies and omissions within the AKRF Report are detailed on pages 2-10 of the Manning Report.

A review of the Manning Report leads to one inescapable conclusion—the FASNY "Alternative Plan" is unsafe and no mitigation whatsoever is proposed to alleviate the clear and present hazards and dangers that will be created. As a result, for this reason alone, the FASNY application must be denied in accordance with all applicable law.

The Manning Report also identifies, in great detail, numerous significant deficiencies in the traffic analysis offered by FASNY in support of its "Alternative Plan", including a failure to adhere to numerous directives contained within the adopted Findings Statement under the New York State Environmental Quality Review Act issued by the Common Council in 2013. Those obvious deficiencies also clearly demonstrate that the application cannot be approved.

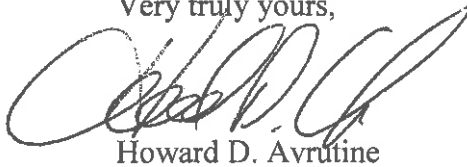
**AVRUTINE & ASSOCIATES, PLLC**

Thomas M. Roach, Mayor  
April 4, 2017  
Page 3

The Association also respectfully requests that you and the Members of the Common Council personally inspect all of the local neighborhood streets that will be impacted by the FASNY proposal as part of your deliberations in connection with this very important matter.

Thank you for your kind attention.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Howard D. Avrutine', written over a light blue horizontal line.

Howard D. Avrutine

HDA/cr

cc: Hon. Nadine Hunt-Robinson (by email [nhrobinson@whiteplainsny.gov](mailto:nhrobinson@whiteplainsny.gov))  
Member of White Plains Common Council  
Hon. John Kirkpatrick (by email [jkirkpatrick@whiteplainsny.gov](mailto:jkirkpatrick@whiteplainsny.gov))  
Member of White Plains Common Council  
Hon. Dennis E. Krolian (by email [dkrolian@whiteplainsny.gov](mailto:dkrolian@whiteplainsny.gov))  
Member of White Plains Common Council  
Hon. Milagros Lecuona (by email [milagroslecuona@gmail.com](mailto:milagroslecuona@gmail.com))  
Member of White Plains Common Council  
Hon. John M. Martin (by email [jmartin@whiteplainsny.gov](mailto:jmartin@whiteplainsny.gov))  
President of White Plains Common Council  
Hon. Beth N. Smayda (by email [bsmayda@bethsmayda.com](mailto:bsmayda@bethsmayda.com))  
Member of White Plains Common Council  
Anne M. McPherson (by email [cityclerk@whiteplainsny.gov](mailto:cityclerk@whiteplainsny.gov))  
City Clerk of the City of White Plains

April 3, 2017

Gedney Association  
P.O. Box 134  
White Plains NY 10605

Dear Members of the Gedney Association:

The following is my report on the Revised Plan that the French American School of New York (FASNY) has submitted to the Common Council for approval including: Special Permit and Site Plan approval Letter, Oct 31, 2016, Full Environmental Assessment Form, Oct 31<sup>st</sup> 2016, Environmental Analysis, AKRF, Oct 31 2016 and Amended Transportation Management Plan, AKRF, 2016. I have also reviewed and reported on prior submissions by FASNY including the December 2013 Findings. The City of White Plains has had previous submittals reviewed by a third party traffic engineer. I have not seen the third party review for this October submission. I have a Bachelor of Science in Civil Engineering and 30 years of experience in the industry. My curriculum vitae are previously included in the record.

**Executive Summary:**

**The Alternate FASNY plan proposes to change the vehicular access to the school from North Street an arterial road, to Hathaway Lane, a local neighborhood street via Ridgeway, a Collector Street . In the earlier application the Common Council found Ridgeway to be an unacceptable means of access to the school for various reasons.**

**The Applicant states that the revised proposal represents a significant reduction from the previous proposal, however this is false with respect to peak hour traffic generation and parking supply. Further, the Applicant fails to address numerous and serious safety issues pertaining to Ridgeway, Hathaway Lane and the roads and streets in the vicinity of the proposed school complex. It is my opinion, therefore, that the Alternate Plan presents multiple safety hazards. Unrestricted access to multiple minor streets in the immediate vicinity will result in innumerable safety hazards that cannot be mitigated without changing the nature and character of the affected neighborhoods.**

**The Applicant has not proposed any mitigation measures to rectify the multiple safety hazards. The traffic analysis included in the Revised Plan is not complete or accurate. The following highlights the major concerns and a detailed summary follows.**

- **Revised Trip Generation Estimates are Low:** Due to a calculation error and using a higher than minimum bus usage, the traffic analysis does not reasonably estimate the number of AM Peak hour vehicles (402 vs revised calculated 512- see calculation following on page 3). This is not a significant reduction as is claimed in the Special Permit and Site Plan approval Letter, Oct 31, 2016,
- **Safety Impacts at Hathaway Lane and Ridgeway intersection:** The insufficient intersection sight distance (ability to see right or left when pulling out of Hathaway Lane onto Ridgeway) and the

stopping sight distance along Ridgeway were not addressed in the revised traffic analysis. This safety concern was raised in the DEIS and the Applicant proposed a traffic signal and then a roundabout. There is no current proposal to address the safety issue associated with traffic pulling out onto Ridgeway. (See photos in Appendix A). Traffic pulling out of Hathaway Lane and turning onto Ridgeway is expected to increase significantly over existing conditions. Several of these are expected to be high school drivers. Further, Hathaway Lane is a narrow, 22 foot wide local street that was not designed to accommodate significant traffic generators.

- **The revised traffic analysis is not complete:** The traffic analysis fails to consider traffic peaking factors associated with traffic arriving in a cluster around a specific time (school start time) vs. spread more evenly over the peak hour. It also does not evaluate impacts, signal timing change needs and available queue storage lengths at all study area intersections. The Traffic Analysis does not estimate trip generation and/or analyze for the PM peak hour, a FASNY special event, summer camp or for an event when the facility is rented by others. The Applicant has not demonstrated that they are using the actual AM peak hour for this latest proposal.
- **Parking supply is not significantly reduced.** The parking supply has not been significantly reduced. The 348 spaces has been reduced to 248 spaces but there is an additional 75 spaces proposed as land banked bringing the total to 323 spaces. The Applicant states another 200 spaces located on fields for event or other parking needs, increasing the potential to 523 parking spaces.
- **Pedestrian/Bicycle/Mass Transit usage:** The modified site plan does not provide for or promote pedestrian, bicycle or mass transit use to access the site. There are currently no sidewalks on Hathaway Lane and limited sidewalks on Ridgeway and the increased traffic levels presents a pedestrian safety concern especially with the existing roadway widths of Ridgeway and Hathaway Lane.

The following is a detailed summary of the review.

**Environmental Analysis, AKRF, October 31, 2016:**

**AM Peak Hour Trip Generation Estimates** – There is a significant mathematical error in the Applicant's revised plan. It appears that the number of students arriving by car was divided by 2.65 vs 1.65. (2.65 is the number of persons in each vehicle dropping off at the school – 1 adult driver and 1.65 students per car). Below is an estimate based on 50% bus utilization (proposed minimum in the Transportation Management Plan) and a corrected calculation.

*Total Students.....640 students*  
*2 percent absent....628 students on a typical day*  
*50% take bus.....314 students at 15 per bus is 21 buses*  
*314 students arrive in car (50 drive themselves, 264 are in cars driven by parent/other)*  
*264 students with 1.65 students per car (carpooling assumption by FASNY) is 160 vehicles*  
*125 staff... FASNY estimates 100 arrive in peak hour*

**This translates to:**

**Traffic In/entering (21+50+160+100) = 331**

**Traffic out/exiting (21+160) = 181**

**Total 331+181=512 trips. (This is a significant math error resulting in 512 vehicles instead of 413 in the peak hour).**

The actual peak hour trips could be higher if the carpooling goal of 1.65 students per vehicle is not met or if bus utilization is below 50%. It is my understanding that the nearby German School actual experience was 1.30 students per car which is 21.2% less than the FASNY estimate of 1.65. In addition the peak hour trip estimates do not account for visitors, deliveries, etc.

**Two hour Traffic Volume vs. Peak Hour Traffic Volume** –The Applicant claims that the Revised plan presents a reduction in AM trips from 715 vehicles to 413 (512 with correction). The 715 represents a two (2) hour volume total not the one peak hour. The AM peak hour (1 hour total) will not be reduced significantly. (The previous plan was 530 cap, now 512). It is standard in traffic impact analysis to measure and evaluate the peak one hour for traffic impacts.

**Increase of Traffic on Hathaway Lane at Ridgeway** –The Alternative plan fails to describe the increase of traffic on Hathaway Lane at the Ridgeway intersection. (AM peak hour increase from 84 vehicles on Hathaway Lane to 499 vehicles (596 with correction). This is a significant increase (six-fold) over existing conditions and would change the character of how this intersection functions today. This increase will result in significant increases in delay and substantial safety impacts.

**Safety Impacts at Ridgeway and Hathaway Lane** – The increase in traffic volume associated with the Plan presents substantial public safety risks to vehicular, bicycle and pedestrian traffic. There is insufficient intersection sight distance at the Hathaway Lane and Ridgeway intersection. (Intersection sight distance means the ability to see right or left when pulling out of Hathaway onto Ridgeway). A vehicle stopped at the stop sign/stop line southbound on Hathaway Lane cannot see to the right or left to pull out into traffic on Ridgeway. Rather, traffic must stop at the stop line/sign and then pull up again to obtain a view of traffic on Ridgeway. This lack of adequate sight distance is significant for the anticipated large increase of traffic that will need to use Hathaway Lane to access Ridgeway. Several of these drivers will be of High School age. The additional start-stop maneuver on Hathaway Lane causes further delay than reported and a heightened potential for rear end collisions. Further, the stopping sight distance along Ridgeway (vehicles travelling on Ridgeway but not seeing vehicle stopped on Ridgeway waiting to turn onto Hathaway) was not addressed in the revised analysis. See Photos in Appendix A.

In the December 2013 Environmental Findings, the Council rejected the proposal due to potential significant adverse traffic impacts of the MPP/Ridgeway not being mitigated by FASNY.

**Hathaway Lane** – This road serves as a local low volume road; there is no existing yellow centerline (pavement marking). The section south of Gedney Esplanade is not designed to accommodate the proposed level of volumes and types of vehicles (school buses) in a safe and efficient manner. The latest proposal does not include any mitigation to account for this. Hathaway Lane is narrow (22 feet) just north of Ridgeway. Recall in the Findings (MPP/Ridgeway plan), the Applicant proposed to widen Hathaway Lane to provide one 12-foot travel lane in each direction to accommodate project generated trips. However, the Council rejected this modification in Finding J-10. The Common Council found that the widening of only a portion of this block of Hathaway Lane could create a potentially hazardous traffic condition due to the sudden change in geometry and traffic patterns. Will Hathaway Lane near the intersection with Ridgeway be able to accommodate a bus entering while another bus is departing?

**Ridgeway** – This road from Old Mamaroneck Road to North Street is 1.6 miles in length. It serves as a Collector Street for the numerous minor streets (17 in total) that intersect within this section of the road. It also includes curb cuts for 68 residential driveways. Additionally, there is a condominium complex (Gedney Commons) consisting of 75 residences with their only access on Ridgeway in close proximity to the Ridgeway/Mamaroneck Avenue intersection. There are 10 other driveways and access drives on Ridgeway serving Ridgeway Elementary School, the golf course properties, Ridgeway Alliance Church, a nursery, and a White Plains firehouse. The total number of streets, driveways or access drives that intersect with Ridgeway from Old Mamaroneck Road to North Street is 98 ( 78 driveways and access drives and 17 neighborhood streets and 3 other avenues – Old Mamaroneck Road, Mamaroneck Avenue and North Street).

In the 2013 Findings Resolution made the following:

- Finding F-5 stated that “The adverse visual and community character impacts have not been mitigated with the entrance to the Project Site coming off Ridgeway as this is inconsistent with Ridgeway’s character as a Collector Street as described in the Comprehensive Plan and has an additional adverse impact on the Old Ridgeway School residence”.
- Finding H-13 stated that “The potential significant adverse impacts on public infrastructure of the MPP/Ridgeway as proposed cannot be mitigated”.
- Finding J-8 stated that “None of the Ridgeway access mitigation measures address the unmitigated significant adverse impact that full access to the Project Site from Ridgeway and Hathaway Lane has on the role of Ridgeway as a Collector Street, not as an arterial roadway, as identified in the City’s Comprehensive Plan”.

The City of White Plains Subdivision Regulations defines a Collector Street as “a street the primary purpose of which is to collect a moderate amount of traffic from minor streets and carry it from arterial streets”. The Subdivision Regulations define an Arterial as “a street which carries large amounts of traffic with a high volume of through traffic and connects to regional highways”.

In November of 2012 Susan Habel, Planning Advisor to the City and former Commissioner of Planning reported that “ to the extent any development occurs on Ridgeway it should not be permitted to detract from the primary purpose of this roadway or the role of minor streets accessing Ridgeway”. Ms. Habel when reviewing the initial proposal to use Ridgeway as the access to the school reported that “The proposed vehicular circulation may cause significant adverse impacts.

- Impacts to the operation of Ridgeway as a Collector road as defined in the City’s Subdivision Regulations.
- Impacts to traffic flow into and out of the downtown on both North Street and Mamaroneck Avenue due to signal timing and adjustments.
- Impacts to pedestrians using Ridgeway which does not have sidewalks along its length from the Proposed Project to North Street.
- Impacts on local neighborhood streets due to cut-through traffic to avoid congestion on the major arterial streets and particularly on Ridgeway during AM and PM drop-off and pick-up periods.”

In November 2012 in a communication to the Common Council Thomas Soyk, Commissioner, Department of Traffic for White Plains said:

- “While Ridgeway is a Collector road and does not provide for significant east/west access in this area I would most definitely characterize it as a “residential” collector which should not be modified in any significant way except at intersections with arterial roads”.
- “The City of White Plains has always tried to maintain overall peak hour LOS C (Level of Service) as a standard for the more residential intersections and where there are exceptions, the intersections are either close to the more commercial areas or there is another reason for the exception.”

The significant additional volume on Ridgeway will exacerbate the adverse safety conditions including vehicles backing out from the various driveways and the limited sight distances at the local intersections similar to that at Hathaway Lane. The roadway has a single travel lane in each direction (no marked shoulders), is less than 30 feet wide in the site environs and has several horizontal and vertical curves, one of the most severe just east of the Hathaway Lane intersection. Vehicles travelling westbound have limited stopping sight distance. The increase in traffic volume associated with the latest proposal will adversely impact the safety, function and character of Ridgeway. There are three locally identified historic resources located on Ridgeway: Westchester Hills Golf Club, the Women’s Club and Old Ridgeway School House. In the Environmental Findings, the Council found that the volumes of traffic on Ridgeway had significant adverse impact on the primary purpose of Ridgeway.

**Access to serve the Site** – The Revised Proposal is expected to generate 512 vehicles in the AM peak hour via a main driveway off a low volume local residential street (Hathaway Lane) that is accessed from



a collector street (Ridgeway). The previous proposal had a 530 peak hour vehicle cap with main access via a signalized driveway off an arterial (North Street). This is a significant change in the level of access but not the level of traffic volume. Other schools in the area (White Plains High School for example) have access off arterial roadways. Typically large and significant traffic generators have access from higher functional classification streets or have multiple access points to avoid inundated one street and intersection with all of the traffic.

**Impacts to the Traffic Network** – Impacts on the traffic network are reviewed on page 12. The report concludes the project would not have any significant adverse impacts to the traffic network. This conclusion is incomplete as it is only based on a level of service analysis at three (3) of the study area intersections and does not consider the other study area intersections. The Traffic analysis did not include an evaluation of the proposed site drive to small parking lot at Ridgeway (west of Hathaway Lane). It also does not consider queues and queue storage lengths at the study area intersections. There is also no analysis or indication if the previous or other signal timing adjustments are needed at any of the study area intersections.

**Bus Utilization Rate** – Page 13 indicates that a bus utilization rate of 60% was used. The TMP indicates that a 50% bus utilization is the minimum with a 60% being a goal. All analysis should be done with the allowed (50%) rather than the goal (60%) as it is more conservative and the appropriate utilization to evaluate for potential impacts.

**AM Peak Hour** – Page 13 indicates that peak hour of 7AM-8AM was analyzed since FASNY is now proposing an 8 AM start time. The 7-8 AM may not be the actual peak hour (generated traffic plus existing background traffic) as the Applicant failed to collect enough data to validate this assumption. The actual peak hour is not necessarily the peak hour of the generator. Peak hour determination considers the existing or background street traffic volumes by time period. FASNY only recounted intersections in 2016 from 7AM-8 AM – so it cannot be concluded that the correct peak hour was used for analysis. It is possible that the actual peak hour is 7:15-8:15 AM especially if background traffic is higher during the 8:00 – 8:15 timeframe vs. the 7:00-7:15 timeframe. In the same manner, the actual peak hour could also be 7:30 – 8:30 AM. Analysis utilizing the actual peak hour is critical to determining traffic impacts. The actual peak hour for the revised proposal needs to be determined based on field count data. (As indicated in the TMP, FASNY is also proposing to raise the entrance gate beginning at 7:30 AM, another indication that they expect the majority of the morning traffic to arrive after 7:30 AM).

**Study Area Intersections** – The analysis for the revised proposed project does not include assessing impacts at all of the study area intersections but rather at three (3) nearby intersections and one of the site drives. All site access points and all study intersections should be analyzed with the validated peak hour to adequately identify if there are any significant traffic impacts. The revised proposed project is expected to generate traffic at all of the study area intersections.

**Time Periods Analyzed** – The Proposed project does not include analysis of the PM peak hour or for other scenarios (FASNY Special Event, Summer Camp or an event when the FASNY campus is being

rented by an outside use) which is essential. The Council should require the Applicant to provide this analysis so the traffic generation and potential impacts can be disclosed. It is important to consider these other scenarios as there is the potential to generate more traffic than on a typical FASNY school day especially given the amount of potential parking on site. Although the school afternoon dismissal time does not coincide with the PM commuter hour, it is not unreasonable to expect the school to generate traffic during this time with after school activities and programs. The original plan included evening instruction for adults and an IB program. The latest documentation does not indicate if these programs are included or have been removed.

**June 2016 Updated Traffic counts** – The updated counts were conducted on June 2, 2016. This day did not represent typical volume of traffic on Ridgeway because most school in the vicinity of the proposed FASNY site were not operating on a normal schedule: Seniors had already graduated from the German School and Archbishop Stepinac High School. The White Plains High School senior prom was held on Wednesday June 1, 2016 and Regents exam preparation was underway. It is also my understanding that examinations were underway at Our Lady of Sorrows. No adjustments were made to the background count data to account for these revised school schedules.

**Build Year** – FASNY used 2019 as a Build year. The revised proposal indicates that the project will not be complete for up to 7 years later. Standard practice for a build year is to evaluate the year expected for the entire project to be complete, not just the initial phase. FASNY should use a 2026 build year.

**Trip Generation Assumptions**- These assumptions are shown in Table 4 on page 14. As previously stated, a 60% bus utilization is assumed however the TMP indicates that 50% is the minimum and 60% is a goal. Trip generation should be based on the 50 % minimum proposed by FASNY. Table 4 also indicates that 7% of the staff will arrive by Bus/Shuttle. Who is providing a shuttle and how/when will it operate? Table 4 also indicates that there will be 40 High School drivers but then in the foot note it says this has been changed to 50. The trip generation and table should be updated to reflect the current proposed 50 high school drivers.

**Build Conditions Traffic Analysis** – This issue is discussed on page 15 and presented in Tables 6 and 7. The analyses need to be redone to account for reasonable trip generation (512 vehicles) and validated peak hour traffic volumes. FASNY impulsively concludes that since there is no impact at the three intersections studied that all previously identified mitigation at other intersections are also not needed. This needs to be based on actual analysis. The analysis needs to be done to fully disclose and be able to compare the revised proposed plan with previous FEIS/Findings versions. The former impact at Ridgeway and Mamaroneck Avenue should be re-evaluated with these revised trip generation numbers and the validated peak hour. The City of White Plains had expressed concern over impacts at this intersection with respect to safety and the close proximity of Ridgeway Elementary School. There are no results reported for the proposed site drive (smaller parking area) on Ridgeway.

**Level of Service (LOS) Analysis** – Page 16 provides a summary of the capacity and LOS analysis. The results indicate that the overall LOS for the Mamaroneck Avenue at Ridgeway intersection drops from LOS C (No Build) to LOS D in the Build condition. The northbound thru/right movement's volume to capacity ratio increases from 0.77 to 0.94. At the Hathaway Lane and Ridgeway intersection, the southbound LOS drops from LOS B (No Build) to LOS D in the Build condition. (Note this analysis was

performed with the 412 vehicles vs. the 513 trip generation and the existing peak hour factors. With the additional volume, delay and v/c ratio is expected to increase). In the White Plains Traffic Department review of the DGEIS (November, 2012, Thomas Soyk) page 2 states "It is stated that for both signalized and unsignalized intersections, peak hour LOS D operations are considered to be acceptable. This statement is too general in nature and can potentially justify what can essentially be unacceptable operations. The City of White Plains has always tried to maintain overall peak hour LOS C as a standard for the more residential intersections and where there are exceptions, the intersection are either close to the more commercial areas or there is another reason for the exception."

**Ridgeway at Mamaroneck Avenue** – The Applicant needs to re-analyze this intersection with the appropriate trip generation volumes and capacity analysis assumptions to determine if mitigation is needed for the northbound right turn. Recall that Finding H-12 states "the proposed roadway improvement, for MPP/Ridgeway at the corner of Ridgeway and Mamaroneck Avenue, of a right turn lane within the existing paved right of way will have an unmitigated significant adverse impact on pedestrians crossing Mamaroneck Avenue on the south side of Ridgeway, adversely affecting safety and sight distances, as well as adversely impacting bicycle access along this portion of Mamaroneck Avenue. In 2012, TRC, a consultant to the City, reported that this intersection, due to the identified number of accidents, is considered to be a high accident location.

**Ridgeway at Old Mamaroneck Road** – This intersection, especially the short radius for right turn movements from Old Mamaroneck Road to Ridgeway should be considered for impacts.

**Internal Site Circulation** – Page 17 indicates that the vehicle and bus queuing area would be swapped from the previous proposal under the revised plan. The provided vehicle storage length needs to be increased. FASNY estimates a maximum queue of 44 cars (which may be increased with revised trip numbers) yet there is only enough vehicle storage for 39 vehicles. This may also not be sufficient for 160 vehicles to pull up curbside and drop off in the morning. The revised analysis does not disclose what is the expected bus queue length is, rather the report indicates that an additional 80 feet is provided in the northern parking lot. For pedestrian safety, bus queue areas should not be located in parking lot areas. Anticipated bus queue storage should be provided in the dedicated bus queue area.

**Pedestrian and Bicycle Use** - Hathaway Lane is narrow (22-24 feet) with no sidewalks or provisions for bicycles. A six fold increase in vehicular trips in the morning peak hour, which includes dozens of buses will substantially increase the safety risks to pedestrian and bicycle traffic on Hathaway Lane south of Gedney Esplanade. In the Environmental Findings, Finding A-2.11 (3), the Council states that any Ridgeway access plan must "provide adequate protection of local pedestrian and vehicular movements on the segment of the local street Hathaway Lane between Ridgeway and Gedney Esplanade due to traffic entering and leaving the Project Site..."

**Left turn restrictions from proposed site drive onto Hathaway Lane** – FASNY Indicates that left turns will be restricted from the site drive to head north on Hathaway Lane but proposes nothing to prohibit left turns such as a No Left turn sign or modifications to the island at the entrance to channelize traffic to make right turns out only and prohibit the left turn movement. At a minimum, these modifications are needed for enforcement. However, it is doubtful that these limited restrictions will be enough to discourage drivers when the intersection at Hathaway Lane is congested with vehicles leaving the FASNY site.

**Diversion of Existing Hathaway Lane traffic** – The substantial increase in volume at Hathaway Lane and Ridgeway will likely cause diversion of traffic from Hathaway lane south of Gedney Esplanade to other local streets including Gedney Esplanade, Hotel Drive and Murchison Avenue. Traffic generated on weekends by guests of vendors renting the FASNY facility can also choose to travel these neighborhood streets. Gedney Esplanade, Hotel Drive and Murchison Place will be impacted by increased traffic volumes. The roads are narrow with cars often parking on the street and thus cars bypassing Hathaway Lane will result in conditions that will make accommodating two-way traffic difficult and therefore unsafe for pedestrians and bicyclists. Given the narrowness and curves it is not desirable for safety reasons to add additional traffic. The intersection of Hotel Drive and Gedney Esplanade has restricted sight lines for turning vehicles. There is also a cross walk at the Ridgeway and Murchison Place intersection. See photos in Appendix A.

**Diversion of FASNY Traffic into Other Local Streets** - The addition of 512 trips on Ridgeway will likely, at times of congestion, encourage vehicles to cut-through local streets in the vicinity to reach the FASNY complex exposing narrow local streets to substantial increases in traffic volume. Besides affecting streets in the immediate Gedney Farms area streets in Rosedale and Reynal Park neighborhoods could also face increased cut-through traffic. The increase of vehicles on these streets will present safety concerns for local neighborhood vehicular traffic, pedestrians and cyclists. Generally, there are no sidewalks in these neighborhoods.

**Diversion of Traffic to Ridgeway**- Several area residents have mentioned that they believe there is increased traffic use on Ridgeway as a result of traffic apps like "waze" and "google" rerouting traffic from nearby congestion on the Hutchinson River Parkway.

**Micro Simulation using VISSIM** – The simulation needs to be redone with the corrected trip generation rates and peak hour factors. (The Synchro outputs provided in attachment B show that the PHF are the same for the existing, No Build and Build Conditions). The PHF should be adjusted to accommodate the peak flow associated with school arrivals (i.e. the majority of the traffic arrives just before the start of school). The peak hour factor accounts for this surge of traffic during the hour. FASNY even point this out in the TMP by stating that the gate will not be lifted/held in the open position till 7:30 AM. The VISSIM should also be rerun based on counts performed when other area schools were in regular session/full attendance time frame. The simulation should also be based on the true peak hour (Background traffic plus school traffic) – not just the hour before school starts.

**Construction Vehicles and Access** – there was no analysis or discussion of the number of dump trucks or construction vehicles generated during the construction phase. How will construction vehicles access the site and what is the expected work hours and arrival and departure times? Will the amount of heavy vehicles/construction vehicles impact the Hathaway Lane and Ridgeway intersection? This was not considered in the latest revised plan.

**Attachment A Traffic Counts** – The traffic counts were only conducted during the 7-8 AM time frame. Counts should have been collected until 8:30 AM to be able to determine what the street peak hour is. It is possible that the build condition (background traffic plus school traffic is actually higher in the 7:15 to 8:15 AM time frame). Also the counts were not done on a typical school day for the area. It seems that some schools did not have full regular attendance on that day in June. A PM peak hour count and analysis is essential. Although the school traffic will be spread out in the afternoon – the back ground traffic is typically higher in the PM hours. In this latest proposal, FASNY is also planning to rent the fields

and facility to outside vendors/groups. A weekend count and analysis should be done to disclose any potential impacts associated with this newly proposed activity.

**Attachment B Synchro Outputs** – The analysis fails to consider the school arrival peaking characteristics in the Build condition. (The phf is the same for all study area approaches in the existing, no build and build conditions). The intersection of Ridgeway/Hathaway does not include/consider pedestrian activity or adjust for the inadequate sight distance for vehicles exiting. There are no Synchro outputs for the other study area intersections including the proposed site drive at Ridgeway. There is no analysis for a special event, summer camp or event hosted by renter. The Build condition was analyzed for 2019 when the expected project completion is actually up to 7 years out. A later build year should be used.

**Amended Transportation Management Plan** - The proposed Plan is insubstantial and not strict enough in its data analysis and reporting frequency (proposed to be annually) to be able to quickly identify a problem and require FASNY to implement lasting corrective measures in a timely manner. This document as proposed does not protect the City of White Plains or the neighborhood.

**Conclusion:** The proposed development generates a significant amount of traffic on the adjacent local and collector residential streets. Ridgeway and Hathaway Lane were not designed to handle this volume of traffic. The proposed use is not compatible with the City's Comprehensive Plan and with the significant number of intersections with neighborhood streets, residential driveways and other curb-cuts along the 1.6 mile stretch of Ridgeway.

The proposed access via Ridgeway to the site drive on Hathaway Lane is not suited to serve this level of development/trip generation.

In the event of congestion or other impediments to movement of vehicles on Ridgeway, FASNY drivers could access the school via the numerous narrow residential minor streets, thus interfering with the neighborhood traffic. This cut-through traffic would increase adverse safety impacts. The Applicant's proposed Transportation Management Plan to prohibit FASNY students and staff from using local streets by private agreement would not be enforceable by existing City traffic regulations. Potential use of these neighborhood streets by FASNY vehicular traffic would increase safety concerns for neighborhood pedestrians, cyclists and cars that utilize them. The fact that the Applicant proposes private agreements with the students and staff prohibiting usage of local streets underscores FASNY's appreciation of the hazards and dangerous conditions that such usage would create.

The Applicant has not evaluated or offered any mitigation measures pertaining to the associated traffic and multiple safety impacts with the latest proposal (Alternative Plan) including:

- Significant reduction in peak hour traffic volumes
- Significant reduction in parking supply
- Safety concerns (sight distance) at the Ridgeway and Hathaway Lane intersection
- Safety concerns (road width) on Hathaway Lane
- Access from an appropriate functional classification roadway
- Change in function/character to Ridgeway and Hathaway Lane
- Complete traffic analysis to consider PM peak hour, Summer Camp and weekend facility rental by others
- Accurate traffic analysis including corrected trip generation, validated peak hour time, and peak hour factor adjustment to consider intensity of school arrival traffic.
- Complete traffic analysis to include all previously analyzed intersections
- Site design to accommodate anticipated buses and student pick ups
- Provisions for bicycle and pedestrian access

The Common Council needs to take a hard look at these outstanding issues many of which were identified in various departmental reports and consultant reports earlier and in its 2013 Findings which found that Ridgeway/Hathaway Lane could not be satisfactorily mitigated.

Please contact me with any questions.

Very Truly Yours,



Mary A. Manning, P.E.

Cc: file

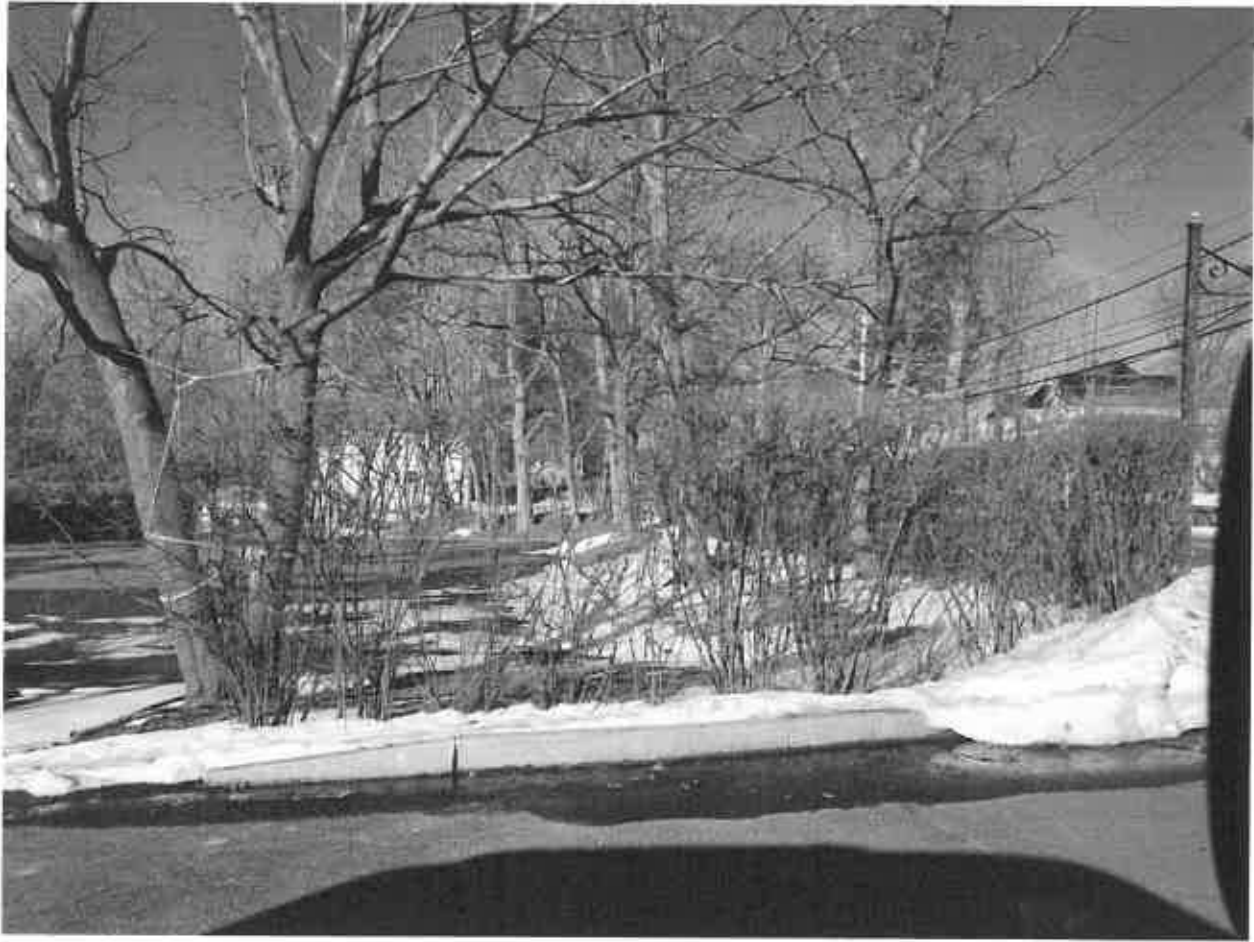
# Appendix A

Hathaway Lane at Ridgeway – stopped at stop sign – looking westbound





Hathaway Lane at Ridgeway - looking eastbound from the stop sign/stop line



Hathaway Lane –southbound approaching stop sign/stop line



Hathaway at Ridgeway looking westbound – vehicle pulled up beyond stop bar into the intersection. Note. Limited sight distance



Hathaway at Ridgeway looking eastbound – vehicle pulled up beyond stop bar into the intersection. Note. Limited sight distance



Example of poor sight distance along Ridgeway

