



Memorandum

TO: Village of Tarrytown Planning Board

FROM: Katherine Zalantis

CC: Bob Galvin,

DATE: March 22, 2019

RE: Review of SDEIS for Artis Senior Living of Tarrytown

Introduction:

Upon reviewing the SDEIS for the proposed Artis Senior Living project for the Village of Tarrytown Planning Board dated February 11, 2019, our office recommends that the Planning Board review the issues discussed below and consider requiring the Applicant to address these issues before the SDEIS should be accepted as complete. Below are some general comments on the SDEIS overall and its consistent issues throughout as well as various specific issues. The comments below are in addition to the comments included in the memorandum from the Village Consulting Planner, Bob Galvin, dated March 20, 2019.

General Comments:

The Scoping Document requires that any conclusory or opinionated statements in the SDEIS should either not be included or the SDEIS should be clear that such conclusions or opinions are those of the Applicant. There are still numerous instances within the SDEIS that include such conclusions.

Also, there are several recurring issues throughout the SDEIS pertaining to the Appendix. First, throughout the DEIS, there are several instances in which the SDEIS cites the wrong appendix. The drafter should ensure that any citation to an appendix in fact refers the reader to the correct appendix. Also, several instances in the DEIS either cite documents in the appendix that are not existent or should be cited and supported by a document in an appendix but are not. It is also unclear when sections and quotations from appendices have been inserted into the text of the document. The drafter should make that clearer. I have flagged some of the issues in the discussion of specific sections below, but

the drafter should ensure that all documents referred to in the text are provided and all statements requiring cites or support are cited or supported.

Moreover, there are grammatical and formatting issues throughout, such as missing and additional punctuations and headings that appear as though they are the text of the document. The drafter should ensure that these issues are review and revised accordingly.

Specific Issues:

Below are specific issues that should be addressed prior to this SDEIS being accepted as complete. To the extent possible, this memorandum references the page and paragraph (and occasionally sentence) that contains an issue to be addressed. These page and paragraph references are based on the document dated February 11, 2019 as it was provided to this firm.

Chapter 1 - Executive Summary:

Page 13, ¶ 2: Last sentence is conclusory.

Page 14: The SDEIS is a Planning Board document and as such it should be written from the Planning Board's perspective not as "The Boards will weigh the positives and negatives ...".

Page 21, ¶ 1: Second sentence is conclusory.

Page 21, ¶ 2: Third sentence is conclusory.

Page 21, ¶ 4: First sentence is incomplete.

Page 22, ¶ 2: Second sentence is conclusory.

Page 23, ¶ 2: First sentence is conclusory.

Chapter 2 - Project Description:

Page 26, ¶ 1: Second sentence is conclusory.

Page 29, ¶ 4: Please include the recording information with the attached recorded easement (Appendix O).

Page 30, ¶ 1: Cite correct Appendix for Findings Statement

Page 43, ¶ 1: Third sentence is conclusory.

Page 45, ¶ 2: First sentence appears to be a description of what the section should be. Should be removed.

Page 46, ¶ 3: Please include a citation to the Alzheimer’s Foundation statistics or attach as appendix.

Page 47, ¶ 2: Conclusory statement.

Page 48, ¶ 1: Second sentence is conclusory.

Page 50, ¶ 3: Add the word “ago” at the end of the first sentence.

Page 62: Please add the letter from Paul Folger as an appendix and cite to it here.

Page 63, ¶ 5: Cites the wrong appendix.

Page 64, ¶ 1: Please include “The Applicant” or “Artis” instead of “They expect that some ...”

Chapter 3 – Existing Conditions, Potential Impacts and Proposed Mitigation:

Page 67: The Initial Construction Management Plan dated February 7, 2019 by Donal Walsh of Development Strategies Co., LLC should be included as an appendix.

Page 72, ¶ 1: Incorrect appendix cited.

Page 74, ¶ 1: Include wetland report by Tim Miller Associates dated October 2018 in appendix.

Page 75, ¶ 1: Second sentence is conclusory.

Page 75: Last sentence/paragraph is incomplete, no update included. Any update quoted or referenced should be included in the appendix.

Page 76, ¶ 1: Include the Development Strategies Company, LLC report in the appendix.

Page 77, ¶ 4: Incorrect citation to appendix.

Page 78, ¶ 1: No citation or context for this paragraph.

Page 79, ¶ 2: Include July 2018 tree survey in appendix.

Page 84, ¶ 3: Conclusory statement.

Page 103, ¶ 2: Unclear what this means.

Chapter 4 – Adverse Environmental Impacts

Page 108, ¶ 6: SDEIS is written from the Board's point of view, therefore, statement about approval bodies making a decision should be re-written.