



Kenneth W. Jenkins
Westchester County Executive

Westchester County Planning Board Referral Review

Pursuant to Section 239 L, M and N of the General Municipal Law and
Section 277.61 of the County Administrative Code

July 15, 2025

Diana L. Quast, Town Clerk
Town of Yorktown
363 Underhill Avenue
Yorktown Heights, NY 10598

County Planning Board Referral File YTN 25-012 – Hidden Valleys 3000 Navajo Street Zoning Map Amendment

Dear Ms. Quast:

The Westchester County Planning Board has received a proposed local law to amend the Yorktown Zoning Map to include the property at 3000 Navajo Street (SBL 6.14-1-2) within the LO-PDDOZ – Lake Osceola Planned Designated District Overlay Zone. The site is currently zoned R1-80 – Single Family Residential. The 49.6-acre property currently hosts the Yorktown Sports Complex, consisting of athletic fields and associated structures. The site lies at the northwest corner of the Town, sharing borders with the Town of Somers to the east and the Town of Carmel to the north. Vehicular access is provided from Navajo Street to the south and Mahopac Street to the west. The eastern portion of the site is wooded, and various streams and wetlands cross the site.

Should the zoning amendment be approved, the applicant proposes to construct a new mixed-use development consisting of 242 multi-family residential units, a 5,500 square foot clubhouse, a 23,000 square foot indoor athletic facility, 4,700 square feet of commercial space, and reconstruct a portion of the existing athletic fields. The applicant also proposes to add the site to the Peekskill Sewer District, and construct a new sewer line along Mahopac Street and East Main Street to an existing sewer line on Hill Boulevard, which could be used to connect other properties along the route.

We have no objection to the Yorktown Town Board assuming Lead Agency status for this review. We note that as the developer intends to expand the County's Peekskill Sewer District, the Westchester County Board of Legislators should be identified as an Involved Agency and supplied with Lead Agency notification.

We previously received a referral of this zoning action and responded with a letter dated November 14, 2023 (YTN 23-011). We have reviewed the submitted Full Environmental Assessment Form under the provisions of Section 239 L, M and N of the General Municipal Law and Section 277.61 of the County Administrative Code, and we offer the following additional comments:

1. Affirmatively Furthering Fair Housing (AFFH).

The submitted materials do not indicate if any of the proposed 242 residential units are to be developed as affordable Affirmatively Furthering Fair Housing (AFFH) units. The acute shortage of affordable housing in Westchester County has been documented in the County's *Housing Needs Assessment* and it is critical for all of Westchester's municipalities to play a role in meeting this need, particularly since

the economic and social impacts of the affordable housing shortage are spread throughout the County. As the Town seeks to increase development opportunities through measures such as the LO-PDDOZ district and the expansion of the sewer line, it is vital that affordable units be included in order to provide housing opportunities for all potential residents. We continue to urge the Town to re-adopt the Model Ordinance, specifically the section requiring:

Within all residential developments of 10 or more units created by subdivision or site plan approval, no less than 10% of the total number of units must be created as affordable AFFH units. In residential developments of five to nine units, at least one affordable AFFH unit shall be created.

This provision was established to ensure that all multifamily development sites contribute towards meeting the need for affordable housing. Approving this development without including a provision for a minimum set-aside of 10% for affordable AFFH would run contrary to County affordable housing policies.

2. Transportation demand management.

As we stated in our previous letter, we appreciate that the Town is considering the addition of a mixed-use development with 242 residential units, which would add much needed housing to the region. However, we note that care should be taken when establishing increased density within a neighborhood that is currently automobile-oriented and distant from commercial centers. The site lies approximately two miles from the Jefferson Valley and Baldwin Place centers, which, while connected by the Bee-Line bus service, remain reliant on private automobile trips. In addition, the location of four of the buildings on the side of a hill, separated from the other on-site uses and neighboring properties by additional slopes and wetlands, and without a sidewalk connection, would only further promote the usage of automobiles.

As the County Planning Board's long-range planning policies set forth in ***Westchester 2025—Context for County and Municipal Planning and Policies to Guide County Planning***, adopted by the Board on May 6, 2008, amended January 5, 2010, and its recommended *strategies* set forth in ***Patterns for Westchester: The Land and the People***, adopted December 5, 1995 recommends the addition of higher density residential development near transit access and within walking distance of commercial centers, the Town should consider a comprehensive approach to the redevelopment of this corner of Yorktown. As the Town reviews the site plan for this development, the implementation of Transportation Demand Management policies should be included in order to better facilitate the needs of residents living within a higher-density site. The County's *Transportation Demand Management Toolkits* provide strategies for municipalities, employers, and developers to reduce the need for single-occupancy vehicle commutes, which could help the applicant avoid the economic and environmental costs of including excessive parking on the site. These strategies also establish a means to lessen the impact of development on vehicular traffic and the street network within the area. We recommend that the Town and applicant review these *Toolkits* to determine policies and practices that would reduce the site's dependency on single-trip automobiles. The site design should also be conceptualized to foster intermobility, through congregating buildings and including pedestrian pathways.

3. NYS DOT review.

Mahopac Street (NYS Route 6N) is a State highway. Should the zoning amendment pass and a site plan for this development be created, the town should forward a copy of the site plan application to NYS DOT to identify any required permits for the proposed project and to evaluate potential traffic impacts to Mahopac Street, as well as US Route 6, which while not directly adjacent to the site could also see traffic impacts via Navajo Street.

4. Construction on steep slopes.

We note that the concept plan includes four structures that are located within an area of steep slopes. County Planning policy promotes the preservation of steep slopes and recommends against the excessive removal of rock from our ridgelines. Intense regrading practices not only alters the character of a neighborhood, but also increases the risks of flooding, erosion, and ground destabilization. We are concerned that the proposed location of these buildings could have negative effects on the surrounding neighborhood. The Town should ensure that potential environmental impacts, for instance an increase in downhill stormwater runoff, the potential for landslides, and the reduction of vegetation, are studied as the plan progresses.

5. Construction within a regulated stream/wetland buffer.

The proposed development would involve the disturbance of wetlands and wetland buffer areas. The County Planning Board consistently recommends that construction and alteration of land within regulated wetlands and stream/wetland buffers should be avoided. This recommendation extends to the siting of stormwater management facilities. As the site plan process progresses, we recommend that the Town and the applicant work to ensure that wetland and buffer disturbance is minimized to the furthest extent possible, and any disturbance that does occur be properly mitigated.

6. Sewage flows

The proposed development will increase sewage flows from this site into the existing infrastructure. The increased flow will add to the volume of sewage flow requiring treatment at a Water Resource Recovery Facility operated by Westchester County. Since 2010, it has been the policy of the County Planning Board that municipal governments require the applicant to identify mitigation measures that will offset the projected increase in flow. The best means to do so is through reductions in inflow/infiltration (I&I) at a ratio of three for one for market rate units and a ratio of one for one for affordable units.

The County Planning Board further recommends that the Town implement a program that requires inspection of sewer laterals from private homes for leaks and illegal connections to the sewer system, such as from sump pumps. These private connections to the system have been found to be a significant source of avoidable flows. At a minimum, we encourage the Town to enact a requirement that a sewer lateral inspection be conducted at the time property ownership is transferred and any necessary corrective action be enforceable by the municipal building inspector.

Please inform us of the Town's decision so that we can make it a part of the record. Should the zoning amendment be approved, we await a future referral of the site plan application.

Thank you for calling this matter to our attention.

Respectfully,
WESTCHESTER COUNTY PLANNING BOARD

A handwritten signature in black ink, appearing to read "Bernard Thombs".

Bernard Thombs
Chair, Westchester County Planning Board

BT/mv

cc: Blanca Lopez, Commissioner, Westchester County Department of Planning
Vincent Kopicki, Commissioner, Westchester County Department of Environmental Facilities
Craig Lader, Director of Transportation Planning, Westchester County Department of Planning
Anne Darelus, NYS Department of Transportation, Region 8
Christopher Lee, NYS Department of Transportation, Region 8
Paul Januszewski, Vice President - Project Executive, MTA Construction and Development (TOD)