

George Latimer
County Executive

July 10, 2023

Greg Cutler, Director of Planning and Development
Village of Mamaroneck
169 Mt. Pleasant Ave. 3rd Floor
Mamaroneck, NY 10543

**County Planning Board Referral File MMV 23-001
Village of Mamaroneck Comprehensive Plan Update**

Dear Mr. Cutler:

The Westchester County Planning Board has received a draft copy of the 2023 Village of Mamaroneck Comprehensive Plan, which is intended to update the current plan that was adopted in 2012. The proposed update focuses on six goals and objectives:

- Protect the Village from storms, floods, and rising sea levels.
- Make streets safe for walking and bicycling.
- Preserve existing affordable housing and create new affordable housing.
- Protect and improve the environment.
- Update the Zoning Code and maintain a walkable village form.
- Support business development and revitalize the corridors.

Each of these goals are discussed throughout the Plan, which is divided into eight chapters. Recommendations for land use, environmental protection, transportation systems, sustainability, and Village-owned properties are presented at the end of each of their respective chapters, and are listed in an implementation table index.

We have reviewed the Comprehensive Plan under the provisions of Section 239 L, M and N of the General Municipal Law and Section 277.61 of the County Administrative Code. We commend the Village's efforts to update its comprehensive plan, and offer the following comments for the Village to consider as it finalizes this important document:

1. Consistency with County Planning Board policies.

The proposed comprehensive plan is generally consistent with 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. We appreciate the plan's focus on environmental protection, resiliency, affordable housing, and pedestrian safety. We encourage the Village to adopt the proposed comprehensive plan and to work towards implementing the various goals and strategies, while considering our suggestions below.

2. Affirmatively Furthering Fair Housing (AFFH).

We support the comprehensive plan's recommendations to increase affordable housing opportunities in the Village, and appreciate the plan including reference to the 2019 *Westchester County Housing Needs Assessment*. We are also pleased to note that the plan calls for an analysis of the County's [Model Ordinance Provisions](#) as a means to provide more affordable housing in the Village. We note that work has already begun on adopting new affordable housing regulations through a Zoning Text Amendment, for which we provided comments in a referral letter in May (MMV 23-002).

We recommend that the Village moves forward with the implementation strategies presented in the plan, including the restoration of the Infill Housing Provision and the creation of an affordable housing overlay zone. We caution, however, that stipulating specific zones as affordable housing locations may concentrate affordable housing to singular areas, which is not an appropriate practice. We believe that any affordable housing overlay zone should be applicable in a wide variety of locations throughout the Village. We also urge the Village to consider adoption of the remaining portions of the County Model Ordinance that have yet to be included within the Village Code.

3. Climate change and stormwater management.

We commend the Village for including a Sustainability Action Plan within the comprehensive plan and for providing recommendations regarding environmental protection and flood mitigation, as climate change is an important issue which will subject substantial impacts on waterfront communities. We support the comprehensive plan's recommendation to consider a floodplain overlay district to better oversee new and existing development within the floodplains. **We would recommend that this proposed district be used to defer development away from the floodplains, perhaps by permitting transfer of development rights to areas nearby that are not within the floodplain. We note that special consideration should be provided to the Washingtonville and northern Mamaroneck Avenue neighborhoods, as these locations tend to experience the worst of flooding events while also hosting families with the lowest income in the Village. As these neighborhoods largely permit multifamily land uses, consideration should be made into determining possible zoning changes to ensure new development is guided away from the floodplains.**

We support the proposal for a parkland buffer along the Mamaroneck River and Phillips Park Road, as well as the proposed resiliency initiatives at Harbor Island Park and other costal locations. Providing space adjacent to water bodies that is designed to flood during heavy stormwater events is an important management technique to protect developed areas from flooding. We agree with the Village that stormwater runoff from I-95 should be analyzed for its contribution to flooding, as well as the recommendation that the Village be included in the SEQR process for development proposals within upstream municipalities.

4. Transportation systems.

The proposed comprehensive plan contains a robust discussion about bicycle and pedestrian mobility in Mamaroneck, focusing on Complete Streets practices and Vision Zero initiatives that seek to eliminate traffic casualties. The plan acknowledges that although the Village commercial and service centers are

within walking and biking distance to many of the residential neighborhoods, pedestrian and bicycle infrastructure is lacking.

We commend the Village for including recommendations within the Comprehensive Plan to begin studies for providing enhanced pedestrian and bicycle infrastructure. The Plan calls for the preparation of specific studies regarding Complete Streets, bicycle facilities and pathways, walkability and pedestrian safety, Vision Zero, and car and bike sharing systems. The plan also includes reference to the East Coast Greenway, which passes through the Village and if provided further investment could become a major asset connecting the Sound Shore communities. We note that the Village is aware of the County's ongoing *Mobility & Transit Plan*, which seeks to redesign the Bee-Line bus system, and is prepared to acknowledge any changes.

We recommend that the comprehensive plan include reference to the County's new *Transportation Demand Management Toolkit*, which has recently been completed. This document serves to provide guidelines for municipalities to incorporate Transportation Demand Management techniques within their zoning codes, in order to reduce single-occupancy vehicle trips, lower congestion, and reduce total miles traveled in automobiles.

To further accommodate bicycle usage within Mamaroneck, we recommend the Village consider adopting an ordinance that would require the provision of bicycle parking in commercial and multifamily residential developments. Multifamily buildings in particular should provide an indoor bicycle storage room for residents. To be consistent with the comprehensive plan's policies with respect to electric vehicle charging stations, bicycle parking areas should also provide the ability to charge e-bicycles. New Rochelle, Port Chester, and New Paltz are local communities with bicycle parking provisions in their local ordinances that can act as reference regulations.

5. Parking regulations.

We appreciate the Village including recommendations in the plan for better connecting existing parking lots to the downtown, as we agree there is a mismatch between the perception of parking availability and actual spaces available due to the lack of wayfinding and pedestrian connections. We recommend the Village also consider adding a system of credits for parking management practices, instead of using straight parking ratios, when determining parking requirements in the future. One example of this is the "unbundling" of the cost of a parking space from market-rate residential rent, so a tenant only pays for a parking space that they need. Providing parking spaces that are included in market-rate rent incentivizes a tenant to keep additional cars on site, even though they may not need them, because parking is "free". (Note that under the County's *Model Ordinance*, unbundling practices should not apply for affordable AFFH units.)

The County Planning Board's policies aim to reduce unnecessary driving of single-occupancy vehicles and to reduce housing costs so that more housing options are affordable to people who live and work in Westchester. Using parking management incentives can help meet both goals and could potentially allow municipalities to lower parking requirements, which can have positive benefits in reducing land disturbance and stormwater runoff. Developing Transportation Demand Management regulations, as noted above, could also help provide solutions such as shared parking arrangements, ridesharing programs, and other means to help manage parking demand.

6. Historic preservation.

We recognize that the Comprehensive Plan includes a subsection regarding historic preservation, which recommends the adoption of a new preservation ordinance, designating the Village as a Certified Local Government through the State Historic Preservation Office, and designating new landmarks and historic districts. We appreciate the desire to establish protections for historic sites and neighborhoods that provide character to the Village and promote a sense of identity, especially as development pressures are felt across the County. We caution, however, against the use of historic district regulations to entirely prohibit new development within neighborhoods, as infill development and targeted density allowances can be used responsibly to provide needed housing. We suggest that the Village create a design guidelines document in tandem with any historic district designations, in order to provide a means for new development and adaptive reuse to match the established character of the neighborhood while contributing to the healthy growth of the Village.

7. County sewer impacts.

As new development occurring within the Village will increase sewage flows and add to the volume requiring treatment at a Water Resource Recovery Facility operated by Westchester County, we recommend the comprehensive plan includes a reference to the longstanding policy of the County Department of Environmental Facilities (WCDEF) that municipal governments require development applicants to identify mitigation measures that will offset the projected increase in flow from residential development. The best means to do so is through the reduction of inflow and infiltration (I&I) at a ratio of three for one for market rate units and at a ratio of one for one for affordable AFFH units.

8. Universal design.

We encourage the Village to consider the principles of Universal Design in all future development, and to consider referencing universal design standards within the comprehensive plan. Universal Design standards allow all residents and visitors to fully engage in our public and residential spaces. Universal Design is also an important means of allowing household residents to age in place as well as to provide access for persons with mobility issues.

Please inform us of the Village's decision so that we can make it a part of the record.

Thank you for calling this matter to our attention.

Respectfully,
WESTCHESTER COUNTY PLANNING BOARD

By:



Blanca P. Lopez
Acting Commissioner