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**To:** PublicComment <[PublicComment@mynewcastle.org](mailto:PublicComment@mynewcastle.org)>  
**Subject:** letter for public comment

From: Suzanne Chazin  
(REDACTED)  
Chappaqua, NY (23-year resident with 1 child still in school district)

To the New Castle Town Board:

Assumptions matter.

They provide a framework for raw data. Without the right assumptions, two people can measure water levels on a beach and conclude it's low tide.

Or they can look up and realize that a tsunami is headed to shore.

Our community will have its own tsunami if the form-based code is passed in its current four-story iteration that allows development "as of right." That's because, despite the volumes of data generated so far, the numbers have been based on three faulty assumptions:

## **1. Allowing 4-story buildings and massed density will not significantly alter our community**

Walk the town and look up. See those hills? Those vistas? Well, you won't soon. If we'd had open public sessions with detailed design charrettes from the start (considered vital to any properly executed FBC, according to the Form Based Codes Institute), the visuals would have been obvious. Residents would have objected.

The Downtown Working Group knew this and wanted to keep residents unaware of just how transformative the code would be. During the 7-17-19 Downtown Working Group session, Town Board member Lisa Katz admitted that showing residents a slide of what the Memorial Plaza train station might look like developed would "freak out the public." <https://vimeo.com/349090193> (see video at 3:10 mark).

The #1 goal of the 2017 New Castle Comprehensive Plan is to "Preserve the bucolic residential character of the community's neighborhoods." The FBC will undermine this. As the Planning Board said itself in its 12/23/20 public comment, "There is a fundamental difference between a one/two story townscape and four/five story one...the change moves the hamlet from an exurban/suburban one to a more urban one."

The problems won't only be building height. The hamlet has no excess parking capacity. Therefore, the town will need to build multi-level garages and consider robotic stacked parking to meet demand. In addition, overnight parking will need to be allowed on most in-town streets. I lived in Mount Kisco in the early 1990s when the town voted to allow overnight parking on most residential streets. Within weeks, the entire character of neighborhoods changed as cars clogged both sides of streets day and night, narrowing thoroughfares and creating dangerous conditions for pedestrians and problems with emergency responses and snow removal.

The FBC will also bring more traffic and gridlock, with new intersections and turn lanes, again changing the "bucolic" character of our town. Demolition of small buildings in favor of massed four-story structures will result in years of increased noise and air pollution and will again disrupt commerce in our hamlet, potentially killing off the few mom-and-pop businesses that managed to survive the double whammy of 2 ½ years of downtown construction followed by a worldwide pandemic.

This kill off of businesses will further accelerate residential development, as developers cry that they can't attract businesses because of construction and ask for first-floor residential instead.

As other public commenters who have more real estate expertise than I do have already shown, three-story development DOES produce a healthy ROI for investors. There is no need for our town to destroy itself simply for developers to realize profits over and above what can be realized under current code.

## **2. In a town with a nationally recognized school system, developers will choose to primarily build one-bedroom units**

The notion that 72% of new multi-family units will be one bedroom units or studios is wishful thinking unsubstantiated by hard data.

Ask your neighbors, your friends, *yourselves*, why you moved here. Within the first two sentences, the words, “excellent schools,” are likely to pop up. Even the Conifer/Hunts Lane affordable housing brochure to prospective tenants makes mention of Chappaqua’s “nationally renowned school district.”

People move to Chappaqua for the schools—plain and simple. They can find shorter commutes, more amenities and cheaper rents elsewhere. That’s why town birth rates are a poor prognosticator of future enrollment. People primarily move here when they have families, and they need the bedrooms to accommodate them.

### **Which means, for developers to maximize profits, they are going to build more 2-bedroom units than 1-bedrooms and studios.**

Just look at the recent properties that have been built and you will see this borne out. Conifer has seventeen 2-bedrooms and only eleven 1-bedrooms. 91 Bedford has eight 2-bedrooms and six 1-bedrooms with a den (which is a second bedroom without a closet for less rent). The RD cupola building has 29 one bedrooms, 30 two bedrooms and 5 three bedrooms—and this is only part of a development of 91 two- and three-bedroom townhouses.

In a search of recent residential construction projects in Westchester, I found no market-rate construction projects (other than senior housing) that didn’t have more 2-bedroom units than 1-bedroom units. (And this wasn’t even factoring in that many 1-bedrooms, like 91 Bedford, have a den, which is a second bedroom without a closet).

A simple comparison of NY state educational district data and census figures shows just how prominently Chappaqua’s public schools figure into the reason people live here (see details below). Currently, we are at our lowest enrollment since the 2008 recession. And yet, even at this rate, more than 1 in 5 (21%) of Chappaqua school district residents is a school-age child attending our public school system.

Compare this to some of the towns our Town Board Supervisor has claimed are “comparable” to our community. Ossining School district (14.5% of residents attend the public schools). Yorktown (16%). Tarrytown/Sleepy Hollow (13%). The towns closest to our percentage of public school-attending children are Scarsdale (25%) and Byram Hills School District/Armonk (19%). And yet the Byram Hills and Scarsdale school districts are never mentioned by the Town Board as “comparable” when looking at student projections.

Good school systems cost money. Again, a look at the 2020-2021 per capita expenditures of districts on students will tell you where the good schools are:

Chappaqua: \$35,721

Scarsdale: \$35,423

Byram Hills: \$41,773

Now, let’s look at the cost-per-student in towns that people don’t necessarily move to for the school system:

Port Chester: \$22,263 (has a form-based code)

Mamaroneck: \$25,548 (has a form-based code)

Tarrytown/Sleepy Hollow: \$28,137

Yorktown: \$29,000 (form-based code is in the works)

A simple look at the math illustrates 2 things:

### **1. Good schools districts cost more money per student**

## 2. Good school districts attract a higher percentage of students-per-resident.

This is the reality. Developers in Chappaqua will develop for families—whatever the Town Board's DGEIS optimistically speculates.

Our district is so prized, it's entirely possible that many of our one-bedroom units will be rented by families (or multiple families) who simply want an address in Chappaqua so their kids can attend the school district. This is common in other districts like New Rochelle with plenty of apartments. It may become a problem for us with more apartments available.

Some other things to note: unlike most lesser-regarded school systems, the number of public school age children in Chappaqua rises through the years, such that 11<sup>th</sup> and 12<sup>th</sup> grades have more students than primary school grades. This is very different from districts like New Rochelle, Mount Vernon and White Plains where attendance falls after 9<sup>th</sup> or 10<sup>th</sup> grade.

What all of this means is that developers will favor building units that accommodate children. **Nothing in the DGEIS or FBC says they can't.**

**Consequently, any projected enrollment figures that are predicated on the current assumption that 72% of units will be one bedroom or studios, will not produce an accurate accounting of the number of children the new construction will add to our district.**

Here's what we do know:

\*Using the multipliers from the Board of Education's consultants, we can estimate that our current new construction will soon yield an additional 53 students in the school district (from the Reader's Digest Cupola apartments, Chappaqua Crossing Townhouses, 91 Bedford and Conifer).

\*COVID has created a seller's market, causing a large turnover of empty-nester homes in the district, leading to a likely boom in school-age children in our district without any other new construction.

\*Now add in construction of new multi-family housing—which builders can configure into primarily 2- or 3-bedroom units if they choose—and the number of additional school age children in the district could easily be triple current estimates.

Also, this all assumes that only 10 % of units are AFFH affordable housing. If the total mix goes higher, the number of school-age children rises **per bedroom**, since affordable units have more children per bedroom than market-rate units. (Planners use a larger multiplier when figuring out children-per bedroom in affordable units).

## **3. Those nearly 2,000 extra residents and nearly 1,000 extra multi-family units that will be built under the FBC, concentrated in one small part of the town, won't have a serious impact on schools and services**

The current cost-per-year to educate a student in the district is: \$35,721. Those costs rise on a one-to-one basis such that each additional child adds to the district's burden.

The math isn't kind to single-family homeowners.

Owners of single-family homes in the Chappaqua Central School District typically pay anywhere from \$13,000-\$25,000 a year in school taxes (87% of the total property tax bill.) Yet the typical owner of 3-bedroom condo in the district pays anywhere from \$5,300-\$8,500 in school taxes—**roughly 40% of what single-family homeowners pay** (taxes can't be separated out in rents, but usually track condo costs more than single-family home costs).

These numbers mean that a large influx of children into the school district from newly built apartments and condos will create a shortfall in revenue, forcing the district to either cut school funding or raise taxes.

**In essence, single-family homeowners will bear the costs of educating this new influx of students.**

This concentration of housing on the eastern side of town—coupled with the added housing already from Conifer, 91 Bedford and the Chappaqua Crossing apartments and townhouses, will put a disproportionate burden on Grafflin and Bell (and to a lesser degree, Roaring Brook), resulting in overcrowded schools and a diminished quality of education.

Other services besides schools will also be impacted. Multi-family buildings will concentrate the need for emergency services, (fire and EMS), traffic remediation, parking, and school transportation. There will be more wear-and-tear on roads and greater pollution.

The DGEIS fails to take a hard look at whether the increase in population will generate enough increased revenue to cover these costs. The Planning Board has expressed the same concerns, noting in their 12/23 public comment that, “rental and condo housing, with its smaller tax contribution will not necessarily cover costs... It is critically important that the GEIS provide a comprehensive commercial / residential tax revenue analysis compared to the costs of community services.”

In short, the form-based code will completely alter the small-town feel of our community, obliterating the bucolic spirit that was the #1 goal of the 2017 Master Plan. It will clog our narrow roads, turn our town into a parking nightmare and burden our schools and resources without the commensurate tax base to support these changes.

The DGEIS relies on erroneous assumptions and fails to measure the true costs of this plan—both in dollars and in community character. I respectfully ask that the Town Board consider how thoroughly it has departed from the wishes of most residents and pause, amend and scale back this plan before the wave is upon us and it's too late.

Sincerely,  
Suzanne Chazin

## **% of district population that attends the public school and cost-per-student**

### **District name/ school enrollment/ total district population/ % of residents in public school/\$ per student**

Chappaqua	3556	16,652	21%	\$35,721
			(lowest enrollment in 10 years)	
Ossining	5,050	34,725	14.5%	\$27,129
Yorktown	3,438	21,251	16%	\$29,000
Tarrytown/ Sleepy Hollow	2,900	21,558	13%	\$28,137
New Rochelle	10,727	79,067	13%	\$26,475
Scarsdale	4,593	18,342	25%	\$35,423
Byram Hills	2,263	11,772	19.2%	
	\$41,773			
White Plains	7,004	58,040	12%	\$33,268
Port Chester	4,914	32,174	15 %	\$22,263
Mamaroneck	5,582	29,035	19%	\$25,548