

May 7, 2020

Comments on the proposed site plan for 555 Tuckahoe Road/UPS Distribution Center.

Dear Mayor Spano,

Thanks for taking the time to personally listen to our community express their concerns on the UPS facility at 555 Tuckahoe Road.

The facility's proposed operations represent significant changes to the historical operations at this site, which presents the community with significant environmental changes worthy of serious study by declaring a Positive Declaration of environmental impact and requiring a full Environmental Impact Statement.

From Western Electric, Saks, QualCom (?), Pop Displays, all these prior tenants were good neighbors, with operations wholly inside the building and low volumes of traffic, and compliant with the permitted use of a light manufacturing facility with warehouse.

The proposed UPS facility is a Distribution Center, which by its very nature, is NOT a warehousing operation, and no light manufacturing will be taking place, to our knowledge.

The prior tenant's warehousing operations required low intensity truck traffic and other support services, with minimal community impact.

The proposed distribution center is a very intense operation with thousands of packages arriving and leaving every day.

Hundreds of trucks a day will be required, and during peak hours, truck traffic will be much more intense on an hourly rate. Hundreds of worker vehicles, arriving and leaving in shifts, increasing average day traffic rates to even higher hourly traffic rates. Numerous tractor-trailers will be arriving and leaving each day as well as fuel tanker trucks carrying thousands of gallons of fuel.

The general environmental impacts include:

- Noise
- Traffic & Air pollution
- Light

The proposed site plan includes non-permitted uses such as Refueling and non-allowed fuel storage in above grade tanks.

Noise

We have not had the opportunity to review the noise report, however we did hear the noise consultant's presentation at the Planning Board meeting. We have questions with respect to the technical assumptions and models used in the analysis.

Are the assumptions realistic and true to expected noise sources and operations conditions? The presentation did not present findings with respect truck backup beepers, which are very loud and piercing.

Was the sound computer model tool calibrated to local site conditions at noisy, moderate and quiet times of day?

Traffic and Air

As stated above, the nature of this distribution center will necessitate hundreds of truck and vehicles moving in and out of the site each day, on average. The intensity of vehicles per hour greatly increases during peak operations days and hours.

UPS is even asking for a new Eastbound left turn lane east of East of East Grassy Sprain Road. This will add an additional traffic light; that would be three lights from East Grassy Sprain Road to Mountaindale Road! If UPS is suggesting this additional left turn lane to be incorporated into Eastbound Tuckahoe Road without a traffic light, that is simply setting up the conditions for numerous accidents as trucks racing back to the facility will cross in front Westbound traffic, hundreds of times a day.

The traffic can get congested to the extent of causing secondarily induced localized air pollution conditions from vehicle emissions even if the vehicles meet tailpipe emissions standards, National Ambient Air Quality Standards could be exceeded.

We have yet to review the traffic study, but we would be especially interested in the accuracy and appropriateness of the various assumptions utilized in the study. Do they truly represent the various ambient traffic conditions and UPS operations, low, average and peak vehicle movements?

Light Pollution

Light pollution can be a significant quality of life issue. Poorly placed lighting and especially LEDs, (which are very intense) can be an everyday irritant to the community and ruinous to a suburban environment, especially to the residents on Bonnie Briar Road. Everyone has experienced the blinding glare of on-coming car LED headlights. Many people are now wearing driving glasses at night. Will the UPS be lit up and glowing like Yankee Stadium, causing homeowners to be impaired from the pleasant use of their backyards? Not too long ago the residents of some buildings on the westside of Manhattan sued a NJ Hudson River waterfront community and golf driving range over light pollution, from a mile away! I experienced that lighting condition, and it was quite the spectacle. The light pollution issue should be taken very seriously, and the Planning Board may need a lighting engineer to assist in the site plan review with respect to lighting.

Refueling

The UPS is proposing a refueling operation with above grade fuel storage tanks. Firstly, refueling is not a permitted use in CM zones. Refueling is not a must have operation for distribution centers. FedEx refrains from on-site refueling stations and fuel storage operations. UPS buys fuel in bulk and prefers on-site refueling and fuel storage at some facilities. So, refueling and fuel storage is NOT a given appendage of distribution centers.

Secondly, UPS is proposing above grade fuel storage of diesel and highly flammable GASOLINE!! Gas stations have underground fuel storage. Why? To avoid a fire catastrophe. Gas Station underground fuel storage tanks are double walled with interstitial leak detection monitors and the tanks are required to be registered with NYSDEC and subject to annual reporting.

However, note that Yonkers' code requires below grade fuel storage for motor vehicle uses and specifically requires below grade fuel tanks at Motor truck freight terminals and distribution centers.

43-37 Supplemental regulations for all motor vehicle uses.

In addition to the requirements for certain specific motor vehicle uses specified in § 43-38 below, all motor vehicle uses shall comply with the following requirements

B. All fuel, oil, gasoline or similar substances shall be stored underground

C. Motor truck freight terminals and distribution centers

(3) All fuel, oil, gasoline or similar substances shall be stored underground

UPS has not provided any reason why fuel storage CAN NOT be compliant with the code.

UPS is proposing on-site refueling, apparently as an accessory use for refueling vehicles assigned to this facility. Refueling is not a permitted use, the term accessory does seem to seem to be in these codes with respect to refueling.

Members of the community have reason to believe that UPS may be planning to use the Tuckahoe Road facility for refueling of trucks and vehicles NOT assigned to this facility. If this is true, then the site will have TWO primary uses, one as a Distribution Center and another as a Refueling Depot. Dual uses was not approved to our knowledge.

Mayor Spano,

The community encourages the city Planning Board to declare a Positive Declaration and require a full Environmental Impact Statement to be prepared considering the risks to the environment, safety and quality of life issues associated with operating the 555 Tuckahoe Road site as a Distribution Center and Refueling Depot.

Respectfully,

Lowell Kachalsky, PE
Resident