

I. SOCIOECONOMIC

Comment I-1

p. 17— para. 2 — The incremental tax revenue between the City and schools should always be separated because the only revenue available to offset any additional costs due to the proposed action are those paid directly to the City not the school district, since no school children are generated from the development. Similarly, the indication of \$9 million of total tax with incremental benefit of \$1.5 million to be generated should be broken down by City and school district.

p. 237 — In discussing all incremental tax revenues from any source, the amounts generated to the city versus that to the school district should be separated. Please indicate all separate amounts for all tax sources for clarification purposes.

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-1

From a taxpayer standpoint, the incremental increase in school tax revenue is just as beneficial to City of Yonkers taxpayers as City tax revenue since both impact property burdens. To be more specific, the additional school tax revenue from the redeveloped Shopping Center would positively impact Yonkers residents' school tax bill which is part of the overall property tax bill.

However, the breakdown of incremental tax revenue between City and school coffers is relevant from a municipal finance perspective and is provided as follows:

- *The revamped Cross County Shopping Center will produce \$1.57 million in property tax revenue for the City of Yonkers on an annual basis and another \$2.7 million in tax revenue for Yonkers Public Schools. The incremental property tax revenue for the City is estimated at \$250,000, while the incremental tax revenue for schools is nearly \$440,000.*

- *The project yields a net surplus since total tax revenue (the sum of property tax, sales tax and earnings tax revenue) significantly outweighs estimated increases in municipal expenditures, with a positive net fiscal benefit of about \$6.4 million¹ annually for the City of Yonkers. The project also yields a positive net benefit of \$2.7 million annually for the School district. The incremental benefit of the revamped Center over the existing one is \$1.25 million for the City, and just under \$440,000 for Yonkers Schools.*

Comment I-2

p. 67. Last bullet- Explain what 68 person-years of employment means.

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-2

The proposed modifications to the shopping center will generate 1,381 person-years of construction and construction-related employment for Westchester County. The redevelopment will also generate an additional 68 person-years of employment in professional services (i.e., architectural and engineering services; legal services; and remediation services) associated with the redevelopment.

Person-years of employment is a standard way of expressing construction employment and other short-term employment generated by one-time expenditures related to a development project. Person-years of employment is defined as the number of people expected to be employed in a given sector multiplied by the number of years for which that they will be employed. Therefore, the term can be expressed as follows:

$$\text{Person-Years of Employment} = (\# \text{ of Jobs}) \times (\# \text{ of Years Employed})$$

¹The positive net fiscal impact to the City of Yonkers of the redeveloped Cross County is slightly higher than stated in the DEIS, as is the incremental benefit to the City. The reason for this increase is that the sales tax revenue projections are in fact slightly higher for the redeveloped center than originally stated since the DEIS calculation (mistakenly) did not include sales tax revenue on taxable supermarket sales. This change is discussed in depth in later responses.

In this case, the 68 person-years of employment refers to additional employment in professional services generated by the Center's redevelopment as expressed as the product of jobs x years. For example, this computation may refer to 68 jobs for one year or 34 jobs for two years, or any variation thereof.

Comment I-3

p. 8. Last bullet—It is stated that the project will generate 614 full time equivalent jobs in retailing. How many part-time jobs does this represent? How many full time? Break the part time jobs into year round and seasonal part-time jobs.

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-3

The revamped shopping center is expected to generate a total of 3,929 full-time equivalent jobs, of which 614 are net, new permanent full-time equivalent jobs in retail. The later calculation was reached by applying a standard industry multiplier of 2.5 employees per 1,000 square feet of retail space² to the additional 245,375 square feet of retail space of the revamped shopping center. It is not possible to establish the breakdown of new retail jobs according to their full-time and part-time status (or to further breakdown part-time employment into seasonal versus year-round part-time jobs) without undertaking an additional study, in and of itself. A further explanation as to why this projection is difficult is provided in the following paragraphs.

One way to determine this breakdown would be to use the ratio of full-time to part-time jobs for the existing retailers at the shopping center and then, apply the same ratio to the new retail space. However, this ratio is not readily available from the retailers at the existing center.

² Development Assessment Handbook, Urban Land Institute, 1997, p.265.

Another possible method for projecting the likely breakdown of full-time to part-time jobs at the redeveloped shopping center would be to look at industry standards for retail employment at similar shopping centers. Major sources for retail statistics include the Urban Land Institute (ULI) and the International Council of Shopping Centers (ICSC), which publish several industry handbooks. Based on an intensive search, neither of these organizations provides data regarding full-time versus part-time employment in the retail sector. The Bureau of Labor Statistics also provides data on employment in the retail trade sector but this is generally limited to number of employees, average wages and average hours per week. The relatively low average number of hours per week worked in retail nationally (approximately 30 hours, seasonally adjusted) as compared with other major sectors suggests a higher ratio of part-time employees in the retail sector, as is widely recognized. However, this data does not allow us to draw any conclusions about the breakdown between full and part-time workers in the retail industry.

Additionally, the Center for Urban Policy Research (ULI's source for the multiplier, 2.5 employees per 1,000 square feet of retail space) was contacted. An expert on development impact assessment at the Center confirmed that there are no available "off-the-shelf" resources which address the breakdown of full-time and part-time employment generated by shopping centers or for the retail industry generally. Thus, for the purposes of the FEIS, it is not possible to differentiate the incremental increase in jobs generated by the Cross County redevelopment beyond the projection of an additional 614 full-time equivalent jobs in retail.

Comment I-4

p. 240 - Table IV.J-1 — The total assessed valuation of \$468,920,656 should be for Residential and Non-residential, not just Non-residential as indicated in the chart.

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-4

The total assessed valuation of residential and nonresidential properties in the City of Yonkers is \$468,920,656, as illustrated in the revised table below.

Table I-4

Revised Table IV. J-1

Breakdown of the Tax Base by Property Classification
City of Yonkers, 2005

<u>Type of Property</u>	<u>Assessed Valuation</u>	<u>% of Taxable</u>
Residential	301,832,511	64.37%
Apartment	89,096,804	19.00%
Commercial	65,833,895	14.04%
Industrial	12,157,446	2.59%
Total Residential and Non-residential	468,920,656	100%
Other Properties*	50,586,177	
Total City Taxable	519,506,833	

*Vacant, Utilities, Miscellaneous and Special Franchise Properties

Sources: Yonkers Assessor's Office; Phillips Preiss Shapiro Associates, Inc.

Comment I-5

p. 241 - Is the frontage fee a fee paid to the City of Yonkers? Please indicate.

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-5

The frontage fee is a tax paid to the City of Yonkers. It is assessed based on the lot size of a parcel. Since the revamping of the Cross County Shopping Center does not entail acquisition or dispossession of any parcels, the frontage fee paid to the City of Yonkers is anticipated to remain unchanged after redevelopment from the current \$42,466 total charged for all the parcels comprising the shopping center.

Comment I-6

p. 251 & 252 — Please give a better explanation of the adjustment taken and its rationale to derive projected sales tax revenue of \$528,030 and how this is greater than current sales tax generated to the city.

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-6

Due to a sales tax increase in June 2005 and a minor oversight in calculating sales tax revenue for the redeveloped shopping center in the DEIS, a revised table of sales tax revenues is provided below for background. Revised sales tax revenue figures only vary slightly from those listed in the DEIS.

Table I-6
Revised Annual Estimated Sales Tax Revenue
Generated From the Redeveloped Cross County Shopping Center

	<u>Total</u> <u>Sales Tax Revenue</u>	<u>Incremental</u> <u>Sales Tax Revenue</u>
Total Taxable Sales	\$388,337,511	
NY State Sales Tax Revenue	\$ 15,769,271	\$ 2,877,576
Westchester County Sales Tax Revenue	\$ 5,913,477	\$ 1,079,091
City of Yonkers Sales Tax Revenue	\$ 9,855,794	\$ 1,798,485
MTA Sales Tax Revenue	\$ 1,478,369	\$ 269,773
Total Sales Tax Revenue	\$ 33,016,911	\$ 6,024,924

In the analysis on page 251 of the DEIS, there was no adjustment made to the increased sales tax revenue projected to be generated to the City of Yonkers by the redeveloped Cross County Shopping Center, since the revamped center is not expected to directly compete with other shopping destinations within the City of Yonkers. There is a significant amount of retail leakage within the primary trade area in most retail store categories, so there is an opportunity to increase the retail capture rate within the City through the additional retail space at the Cross County (i.e., not just shifting the geographic distribution of sales tax revenue generated within the City but actually increasing overall revenue). Plus, only an estimated 31 percent of the Cross County Center's sales are from Yonkers residents. Thus, the increase in sales tax revenue for the City of Yonkers is anticipated to be the entire incremental amount of \$1.8 million over tax revenue from sales at the existing center.

The \$528,030 amount cited on page 252 of the DEIS refers to the adjusted incremental sales tax revenue for Westchester County anticipated to be generated by the redeveloped shopping center. Based on the changed sales tax revenue figures in the above table, this figure should be slightly revised to \$575,156 (as calculated below).

The incremental tax revenue adjustment for the County reflects an attempt to remain conservative in the fiscal analysis by accounting for the fact that the redeveloped shopping center may potentially cause some increased competition with other shopping

destinations within the County (i.e., attracting those shoppers already residing and shopping in the County). Although there is a significant absolute increase in the sales tax revenue projected for the County of over \$1 million, we assume that only a percentage of this figure accounts for entirely new sales within the County. Therefore,

	<u>Projected</u> <u>Sales Tax Revenue</u>	<u>Projected</u> <u>Sales Tax Revenue</u>	<u>Projected</u> <u>Incremental</u>	<u>Projected</u> <u>Adjusted</u> <u>Incremental</u>
	<u>Existing Center</u>	<u>Redeveloped Center</u>	<u>Sales Tax Revenue</u>	<u>Revenue</u>
Westchester County	\$ 4,834,386	\$5,913,477	\$1,079,091	\$575,156
City of Yonkers	\$8,057,309	\$9,855,794	\$1,798,485	\$1,798,485

the \$1,079,091 in total projected incremental sales tax revenue for the County is multiplied by that portion of the shoppers expected to come from outside the County, as they are not likely to be currently completing their shopping in the County and thus represent new retail sales to the County. According to the intercept survey data, approximately 53.3 percent of shoppers at the existing center come from outside the county. Assuming that the proportion of visitors remains the same after the center's expansion, the projected adjusted incremental revenue to the County is \$575,156 or 53.3 percent of the total incremental sales tax revenue. A summary of these adjustments to incremental sales tax revenue projections (i.e., that portion which represents net new sales tax revenue) is provided in the above table.

Furthermore, since nearly all of the Cross County's current shoppers are drawn from within New York State, we conservatively assume that the State will not receive any net new sales tax revenue, as the total retail spending of New York State residents within New York State is not likely to change with the expansion of the Cross County Mall.

Comment I-7

p. 255-Provide one table that compares Table IV.J-16 page 255 to Table IV.J-11 on page 251 to aid in understanding the full fiscal impacts of the redeveloped center.

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-7

To provide a more complete summary of the full fiscal impacts of the redeveloped center, it is first necessary to revisit the sales tax rates used to calculate the projected sales tax revenue generated from Cross County Shopping Center sales. Since the calculations of sales tax revenue were originally completed in April 2005, there have been minor changes to the sales tax rate overall, yet not for those portions of the rate that accrue to the City of Yonkers and Westchester County. In June 2005, the New York State sales tax rate decreased from 4.25 to 4.0 percent, while the sales tax rate for the MTA increased slightly from .25 to .375 percent. The changes in the sales tax rate are illustrated in the following table.

Table I-7.1
Yonkers Sales Tax Rate
Summary of Rate Changes in 2005

<u>Government Entity</u>	<u>Rate Prior to June 2005</u>	<u>Rate Effective June 2005</u>	<u>Rate Differential</u>
<i>New York State Sales Tax</i>	4.25%	4.00%	-0.250%
<i>Westchester County Tax</i>	1.50%	1.50%	0.000%
<i>City of Yonkers Sales Tax</i>	2.50%	2.50%	0.000%
<u>MTA Sales Tax</u>	<u>0.25%</u>	<u>0.375%</u>	<u>+0.125%</u>
	8.5%	8.375%	-0.125%

Source: Phillips Preiss Shapiro Associates, Inc.

The slight changes to the State and MTA sales tax rates warrant a recalculation of Table IV. J-5 and Table IV. J-11, found within the DEIS, which summarize the projected annual sales tax revenue generated by the existing center and the redeveloped center, respectively. Revised versions of the tables are provided below. They indicate slightly lower sales tax revenue for the State of New York and slightly higher sales tax revenue for the MTA than originally estimated. It should be noted that the DEIS calculation of sales tax revenue for the revamped center mistakenly did not include grocery store taxable sales. Therefore, the fiscal impact to the City of Yonkers is slightly impacted by the recalculation (resulting in an increase) of sales tax revenue.

Table I-7.2
Revised Table IV. J-5
Annual Estimated Sales Tax Revenue
Generated From Existing Cross County Shopping Center

<i>Total Taxable Sales</i>	\$322,292,376
<i>NY State Sales Tax Revenue</i>	\$12,891,695
<i>Westchester County Sales Tax Revenue</i>	\$ 4,834,386
<i>City of Yonkers Sales Tax</i>	\$8,057,309
<i>MTA Sales Tax Revenue</i>	\$1,208,596
<i>Total Sales Tax Revenue</i>	\$26,991,987

Source: Phillips Preiss Shapiro Associates, Inc.

Table I-7.3
Revised Table IV. J-11
Projected Annual Sales Tax Revenue to be
Generated From the Redeveloped Cross County Shopping Center

	<u>Total</u> <u>Sales Tax Revenue</u>	<u>Incremental</u> <u>Sales Tax Revenue</u>	<u>Adjusted Incremental</u> <u>Sales Tax Revenue</u>
Total Taxable Sales	\$388,337,511		
NY State Sales Tax Revenue	\$ 15,769,271	\$ 2,877,576	\$ -
Westchester County Sales Tax Revenue	\$ 5,913,477	\$ 1,079,091	\$ 575,155
City of Yonkers Sales Tax Revenue	\$ 9,855,794	\$ 1,798,485	\$ 1,798,485
MTA Sales Tax Revenue	\$ 1,478,369	\$ 269,773	\$ 269,773
Total Sales Tax Revenue	\$ 33,016,911	\$ 6,024,924	\$ 2,643,413

Source: Phillips Preiss Shapiro Associates, Inc.

Using the updated version of Table IV.J-11, it is possible to combine the information from Table IV.J-16 and Table IV.J-11 in one table so as to aid in understanding the full fiscal impacts of the redeveloped center. However, it is important to note that they are not comparative tables: Table IV. J-16 actually builds on Table IV.J-11 by incorporating the City of Yonkers Sales Tax Revenue into the total revenue amount accruing to the City of Yonkers. A combined summary table listing the projected fiscal impacts of the redeveloped Cross County Shopping Center is provided below. Information from Table IV.J-15, which sums the municipal revenue streams generated by the revamped shopping center, is also included in the table for a more comprehensive overview.

Table I-7.4
Summary of the Projected Fiscal Impacts
of the Redeveloped Cross County Shopping Center

	<u>Annual Revenue</u>	<u>Annual Costs</u>	<u>Net Fiscal Impact</u>
City of Yonkers			
Property Tax Revenue	\$1,572,116		
Sales Tax Revenue	\$9,855,794		
Frontage Fee	\$42,466		
Income Tax Revenue	\$77,500		
Total City	\$11,547,876	\$5,166,635	\$6,381,241
<i>Incremental to City</i>	\$2,061,594	\$807,380	\$1,254,184
Yonkers Public Schools	\$2,748,193	0	\$2,748,193
<i>Incremental to Schools</i>	\$440,000	0	\$440,000
Combined City/Schools Surplus	\$14,296,069	\$5,166,635	\$9,129,434
<i>Incremental to City/Schools</i>	\$2,500,379	\$807,410	\$1,692,969
New York State			
NY State Sales Tax Revenue	\$15,769,271		
<i>Incremental to State</i>	\$ 2,877,576		
<i>ADJUSTED Incremental to State</i>	\$0		
Westchester County			
County Tax Revenue	\$5,913,477		
<i>Incremental to County</i>	\$1,079,091		
<i>ADJUSTED Incremental to County</i>	\$575,155		
MTA			
MTA Sales Tax Revenue	\$1,478,369		
<i>Incremental to MTA</i>	\$269,773		

Source: Phillips Preiss Shapiro Associates, Inc.

Comment I-8

p. 255 para 2 - With regard to the exemption from sales and use tax that is being sought from the Yonkers Industrial Development Agency, what governmental entity or entities will lose the projected 5.2 million dollars.

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-8

<u>Government Entity</u>	<u>Sales Tax Rate</u>	<u>Cost of Construction Materials</u>	<u>Forgone Revenue Estimate</u>
New York State	4.0%	\$63,000,000	\$2,520,000
Westchester County	1.50%	\$63,000,000	\$945,000
City of Yonkers	2.50%	\$63,000,000	\$1,575,000
<u>MTA</u>	<u>0.375%</u>	<u>\$63,000,000</u>	<u>\$236,250</u>
	8.375%	\$63,000,000	\$5,276,250

The sales and use tax exemption being sought from the Yonkers Industrial Development Agency would apply to materials and equipment purchased to be used in construction and redevelopment of the Cross County Shopping Center. Approximately \$63 million of the project costs are attributable to construction materials.

Applying the current sales tax rate of 8.375 percent³ to the cost of construction materials, the sales and use tax exemption is estimated to be \$5.28 million. Of this total, the City of Yonkers would forgo just below thirty percent of this tax revenue at \$1.5 million. The following table provides a summary of the estimated revenue that would be relinquished through the proposed IDA exemption, broken down by affected government entity.

Table I-8
Projected IDA Sales Tax Exemption for Construction Materials
Categorized by Affected Government Entity

Source: Phillips Preiss Shapiro Associates, Inc.

³ Earlier calculations in the socioeconomic portion of the DEIS had assumed a 8.5% sales tax rate, which was accurate at the time of the preparation of the document in April 2005. In June 2005, the New York State sales tax rate decreased from 4.25 to 4.0 percent, while the sales tax rate for the MTA increased slightly from .25 to .375 percent.

Comment I-9

p. 256.para. 2 - There appears to be a missing line in the middle of the paragraph beginning with: "Additionally, the City of Yonkers will receive....."

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-9

The redevelopment of the Cross County Shopping Center will entail a total projected investment of over \$265 million. The bulk of the project budget is attributable to actual construction costs totaling \$242.4 million between site work, off-site intersections, landscape/hardscape, parking, renovations, new buildings and tenant fitout. Redevelopment-related professional services—architectural and engineering; legal; and waste management and remediation—make up the remainder of the project costs. Additionally, the City of Yonkers will receive one-time building permit fees of approximately \$800,000.

Using the Regional Input-Output Modeling System developed by the U.S. Department of Commerce, it is possible to project the short-term earnings and employment impacts associated with the mall's redevelopment. This modeling system, known as RIMS II, uses a series of economic multipliers to project the direct and indirect economic activity related to the Cross County Shopping Center redevelopment. The model measures the direct and indirect impacts (or ripple effects) associated with changes in final demand in industries located within a defined area (in this case, the two-county region of Bronx and Westchester Counties and New York State as a whole).

Comment I-10

p. 262 para 2 - What is the incremental portion of the \$3.1 in annual revenues to the school system?

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-10

The \$3.1 million in annual revenues to the school system to be generated by the revamped shopping center, cited on p. 262, paragraph 2, reflected an earlier iteration of fiscal analysis and is incorrect. The correct amount is \$2.74 million in annual revenue for the school district. The incremental portion of this revenue is estimated to be \$440,000.

Comment I-11

p. 263 – Is the Kimball and Mile Square Road intersection referred to correct?

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-11

The Kimball Avenue and Mile Square Road intersection was correctly referred to in the description of the commercial character of the surrounding area, as confirmed through aerial photography and field notes. This intersection has a few service and convenience retail establishments centered around it, mostly fronting Kimball Avenue, which comprise a very small, neighborhood-oriented retail cluster. There are three small deli-style groceries, a pub, a sporting goods store, a pizza shop, a dry cleaners, a medical office and a gas station.

Comment I-12

p. 269 - Describe what an intercept survey is and how it is conducted? Has a copy of the survey been included in the appendix? What types of questions were asked?

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-12

A shopper intercept survey is a short, structured questionnaire which is conducted by intercepting the target shopper population at the shopping destination being studied. Trained interviewers will generally be placed in variety of locations around the shopping destination at different days of the week and times of day to yield a representative sample. The questionnaire is generally quite brief (conducted within 5 to 15 minutes), and includes questions regarding customer origin, frequency of visits, favored destinations, demographics, preferences and other relevant data, depending on the nature of the study.

The intercept survey used in conjunction with the socioeconomic analysis consisted of the following five questions:

- *How often do you visit the Cross County Shopping Center? (Choose one: Once a week or more; 2-3 times a month; Once every 1-2 months; A few times a year; or Once a year or less)*
- *What are the retailers you shop at most often at the Cross County Shopping Center? (Name up to three)*
- *What is your home zip code?*
- *What is your work zip code?*
- *Do you most often travel to the mall from home or work?*

A copy of the intercept survey was not included in the DEIS, but is provided as an appendix item for the FEIS (Appendix WW). Interviewers conducted the surveys over the course of several days in March 2005. Over 300 surveys were completed, representing shoppers at different times of day, days of the week and locations within

the shopping center. The data was tabulated and analyzed to inform various elements of the socioeconomic analysis, particularly the demarcation of the primary and secondary trade areas for the existing shopping center (using shopper origin data).

Comment I-13

p. 271 - Figure IV.J-2 does not highlight the primary trade area. A new map should be prepared.

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-13

Figure IV.J-2 had indicated the existing primary trade area with light green shading. The shading did not read as clearly on grayscale copies of the map. The following is a revised version of Figure IV.J-2 (Figure I-13.1) that indicates the existing primary trade area with diagonal line hatching to allow for a more unambiguous and comprehensible demarcation of the existing primary trade area. (Note: Secondary and Future Trade Area maps were also modified accordingly).

Comment I-14

p. 284 – Sanford Boulevard in Mount Vernon is not identified on the Shopping center map.

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-14

The Competing Shopping Centers and Retail Corridors Map, Figure IV. J-4 (Figure I-14), has been revised to include Sanford Boulevard in Mount Vernon. Additional retail destinations in Yonkers, Getty Square and South Broadway, were also added to the map, bringing the total number of mapped shopping corridors and centers (including the Cross County Shopping Center) to fifteen destinations.

Comment I-15

p. 284 – Vernon Hills should not be characterized as a mall because it is an open-air center.

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-15

Located on White Plains Road in Eastchester, Vernon Hills is not an enclosed mall but rather an open-air shopping center. It can be best categorized as an upscale comparison shopping destination. This open-air shopping center is anchored by a Lord and Taylor department store. Junior anchors include a high-end home store, Banana Republic, Gap, Border Books, Talbots and Ann Taylor. Other in-line tenants are also considered more upscale retailers.

Comment I-16

p. 285 para 2 - Under anticipated retail redevelopment, it is stated, “one new 20,000 square foot stand-alone building will be part of the redevelopment and that this will include a new junior anchor tenant. If the remainder of the analysis is based on this rather than the correct understanding that total square footage of 245,375 feet will be added (as correctly stated) than the remainder of the analysis should be revised. As depicted throughout the DEIS, the proposed plan includes, several places that could accommodate

junior anchors including the new Buildings E-1 and E-2 each 40,000 square feet, plus Retail Building A of 80,000 square feet on two levels and Retail Building G of 25,000 square feet.

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-16

The Cross County redevelopment will introduce a net increase of 245,375 square feet of new retail and restaurant space. Most of the existing in-line tenants are anticipated to remain while the size of the department stores and the number of junior anchors, in-line tenants and restaurant options will expand. In particular, the redevelopment will increase the size and capacity of the major anchors – Sears by additional 11,400 square feet and Macy’s by 50,000 square feet (which excludes the 18,200 square foot Macy’s stockroom addition, which does not contribute to increasing Macy’s footprint nor its retail selling space). The redevelopment configuration also includes a total of 180,000 square feet of mid-sized retail space in four buildings which are likely to attract new junior or mid-sized anchor tenants of unknown store-type.⁴ However, it is impossible to pinpoint exactly how many new junior anchor tenants the redeveloped shopping center will attract since the developer will consider dividing or adapting this space to accommodate more than one tenant in each building, based on market demand. The remaining new space will increase gross leasable area for in-line tenants. At present, the actual mix of new retail tenants by store type category which will occupy the leasable area for both mid-sized (i.e., junior anchor) and in-line tenants remains unknown.

⁴ The socioeconomic impact analysis in the DEIS incorrectly states that one junior anchor tenant could be accommodated at the 20,000 square foot stand alone pad (i.e., Building 13). However, it appears that several new junior anchor or mid-sized retail tenants could potentially be accommodated at the revamped Cross County. The specific locations likely to attract junior anchor tenants are listed as follows:

<u>BUILDING</u>	<u>SIZE in Square Feet</u>
Building 13	20,000 (on two floors)
E-1	40,000 (upper floor)
E-2	40,000 (upper floor)
Building A	80,000 (on two floors)
Total	180,000

Building G of 25,000 square feet is not expected to attract a mid-sized retail tenant since the building will be multi-tenanted, with a configuration catering to smaller in-line tenants. Therefore, up to 180,000 square feet of retail space in four buildings could accommodate new junior anchor tenants.

For the purposes of the socioeconomic impact analysis in the DEIS, it was assumed that new retail space resulting from the mall's redevelopment (except for known department store expansions) would be filled by a mix of retailers that is representative of the current classification. Although it is a flawed assumption, it remains the most reasonable basis for projecting sales based on store-type. Admittedly, given the fact that the redevelopment will introduce an unknown number of new junior anchor tenants, projecting a proportional increase in store type based on the existing retail mix will likely be somewhat inaccurate since the incremental retail mix will be skewed towards the types of stores which end up occupying the 180,000 square feet of mid-sized retail space. Still, the original assumption based on the existing retail mix has its merits. Most importantly, by taking this methodological approach we are able to calculate sales projections by retail store category, with associated capture rates (see Tables IV.J-30 and 31). Since the number and type of junior anchor tenants at the redeveloped Cross County remain unknown and there exists a great number of potential combinations of retail store type/size which could fill the new mid-sized retail space, attempts to further refine assumptions about retail mix become extremely complicated, and would likely contain similar shortcomings. Furthermore, there are no industry standards for proportional retail mix by store type category which could be employed in lieu of the proportional mix at the existing center. In sum, although the premise that new retail space will be filled by a mix representative of the existing retail mix at the shopping center is a flawed supposition, it continues to be the most reasonable basis available for performing the ensuing analysis. As such, there are no changes to be made to the remainder of the analysis.

Comment I-17

p. 286 – Figure IV. J-5 needs clearer shading of the future trade area.

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-17

Figure IV.J-5 (Figure I-17) had indicated the future trade area with light yellow shading. Like the map indicating the primary trade area, the shading did not read as well on grayscale copies of the future trade area map. The following map is a revised version of Figure IV.J-5 that indicates the future trade area with horizontal line hatching to allow for a more unambiguous demarcation of the future trade area (in line with the revisions to the primary and secondary trade area maps).

Comment I-18

p. 288 – Since so large a portion of the retail mix, particularly small stores, of Cross County is non-national brands, is it correct to assume that the additional large retail spaces will be filled with the same proportional tenant mix as opposed to weighting it in the direction of large national retailers? Would this changed assumption have a significant effect on the projections that follow?

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-18

As previously stated, the Cross County redevelopment will introduce a net increase of 245,375 square feet of new retail and restaurant space. Most of the existing in-line tenants are anticipated to remain while the size of the department stores and the number of junior anchors, in-line tenants and restaurant options will expand. In particular, the redevelopment will increase the size and capacity of the major anchors – Sears by additional 11,400 square feet and Macy's by 50,000 square feet. The redevelopment configuration also includes a total of 180,000 square feet of mid-sized retail space in four buildings which are likely to attract new junior or mid-sized anchor tenants of

unknown store-type.⁵ However, it is impossible to pinpoint exactly how many new junior anchor tenants the redeveloped shopping center will attract since the applicant will consider dividing or adapting this space to accommodate more than one tenant in each building, based on market demand. The remaining new space will increase gross leasable area for in-line tenants. At present, the actual mix of new retail tenants by store type category which will occupy the leasable area for both mid-sized (i.e., junior anchor) and in-line tenants remains unknown.

For the purposes of determining future sales at the Cross County in the DEIS, it was assumed that the additional gross leasable area will be filled by a tenant mix proportional to the current distribution of store types except for the known 62,400 square feet of department store expansions. As suggested in earlier responses, the redevelopment will introduce an unknown number of new junior anchor tenants. Therefore, projecting a proportional increase in store type based on the existing retail mix is likely to be somewhat inaccurate since the incremental retail mix will be skewed towards the types of stores which end up occupying the 180,000 square feet of mid-sized retail space. However, since the number and type of junior anchor tenants at the redeveloped Cross County remain unknown and there exists a great number of potential combinations of retail store type/size which could fill the new mid-sized retail space, attempts to further refine assumptions about retail mix become extremely complicated, and would likely contain similar shortcomings. Therefore, although flawed, the supposition that new retail space will be filled by a retail mix representative of the existing breakdown at the shopping center (in terms of retail store category) provides the most reasonable basis for the ensuing store-level analysis.

⁵ The socioeconomic impact analysis in the DEIS incorrectly states that one junior anchor tenant could be accommodated at the 20,000 square foot stand alone pad (i.e., Building 13). However, it appears that several new junior anchor or mid-sized retail tenants could potentially be accommodated at the revamped Cross County. The specific locations likely to attract junior anchor tenants are listed as follows:

<u>BUILDING</u>	<u>SIZE in Square Feet</u>
Building 13	20,000 (on two floors)
E-1	40,000 (upper floor)
E-2	40,000 (upper floor)
Building A	80,000 (on two floors)
Total	180,000

Building G of 25,000 square feet is not expected to attract a mid-sized retail tenant since the building will be multi-tenanted, with a configuration catering to smaller in-line tenants. Therefore, up to 180,000 square feet of retail space in four buildings could accommodate new junior anchor tenants.

Taking this first assumption about retail mix for granted, the subsequent process for determining sales figures is not biased in terms of retailer size or ownership type (i.e., national or non-national retailers). The retail sales projections for both the existing and redeveloped center are based on industry standards for sales by store type category for retailers at shopping centers similar in type and size to the Cross County. The industry sales estimates per square foot (which were multiplied by the additional retail store square footage in Table IV-J-30, page 289) represent median sales figures for each store category, across independent, local and national chains.⁶ Thus, for the purposes of the projections, a “blended” ownership-type sales estimate per square foot was employed for each store category. Introducing the idea that there will likely be some larger, national retailers at the revamped center only has implications for the overall projection of the proportional retail mix (for which we have established that the existing retail categorization still provides the most reasonable basis for projecting tenant type) but not for the later method of projecting sales and capture rates by store type. In sum, the sales portion of the analysis is sensitive to retail type and not national/non-national categorization. Thus, calculations were fundamentally based on sales by store type category, not size and ownership.

Finally, it is important to note that there are no absolute comparisons to be drawn between national and non-national retailers in terms of sales. In the applicant’s experience, sales data from shopping centers do not indicate that national chains categorically realize higher sales per square foot than regional chains or independently-owned establishments (or vice-versa) in the same store type category. In fact, it is quite possible for a regional chain to outperform a national chain in the same store type category at a given shopping center.

Hence, despite the increase in mid-sized retail tenants or national chains, the crux of the analysis remains the same.

⁶ Sales estimates were derived from Dollars & Cents of Shopping Centers: 2004, Urban Land Institute, 2004.

Comment I-19

p. 295 - The impact of the renovated center on Sanford Boulevard commercial uses is tied to the type and number of junior anchor tenants to be included in the Center. Clearly state which new buildings are intended to attract junior anchors and quantify the total number and number of square feet.

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-19

The socioeconomic impact analysis in the DEIS incorrectly states that one junior anchor tenant could be accommodated at the 20,000 square foot stand alone pad (i.e., Building 13). In fact, several new junior anchor or mid-sized retail tenants could potentially be accommodated at the revamped Cross County. The specific locations likely to attract junior anchor tenants are listed as follows:

BUILDING	SIZE in Square Feet
Building 13	20,000 (on two floors)
E-1	40,000 (upper floor)
E-2	40,000 (upper floor)
Building A	80,000 (on two floors)
Total	180,000

Building G of 25,000 square feet is not expected to attract a mid-sized retail tenant since the building will be multi-tenanted, with a configuration catering to smaller in-line tenants. Therefore, up to 180,000 square feet of retail space in four buildings could accommodate new junior anchor tenants. However, it is impossible to pinpoint exactly how many new junior anchor tenants the redeveloped shopping center will attract since the developer will consider dividing or adapting the above locations to accommodate more than one tenant in each building, based on market demand.

The increase in the potential number of junior anchor tenants (versus the original analysis) does not substantially change the projected competitive impact on Sanford

Boulevard given the extent of retail leakage within the trade area. Thus, it is likely that the increase in junior anchor-based retail will result in increasing capture rates versus cannibalizing retail in competing centers and corridors like Sanford Boulevard. The type of retail does, however, remain of particular import, since the introduction a home appliances or electronics store (e.g., Best Buy) could potentially increase competition with Sanford Boulevard, given the current importation of spending in this category.

Comment I-20

p. 296 -. Indicate any current or proposed initiatives by the City of Yonkers to improve the image of Central Park Avenue.

(Memorandum from Saccardi & Schiff, Inc., dated 11/01/2005)

Response I-20

According to the City of Yonkers planning and engineering staff, current or proposed initiatives to improve the image of Central Park Avenue are limited to the following:

- *Ongoing landscaping and maintenance of the median along Central Park Avenue carried out by the Parks Department; and*
- *A streetscape project to enhance plantings, sidewalks, lighting and signage along Central Park Avenue from the Bronx border to Greenburgh. This project is currently in the design stage and is estimated to cost \$4 million, to be supported by TEA 21 funding and a City of Yonkers capital fund match.*

In recent years, other projects have affected this corridor. Traffic engineering improvements have been made to several intersections on the strip; however, these efforts were geared solely at improved circulation and traffic flow. Several years ago an application to create a Business Improvement District (BID) for Central Park Avenue was submitted, but failed. No subsequent attempts have been made to create a BID on this retailer corridor.

Furthermore, there is also the potential for securing additional public amenities and enhanced aesthetics for the corridor through the site plan review process.

Comment I-21

PURPOSE AND SCOPE OF RENOVATION

The draft EIS notes that the renovated shopping center will be better positioned to serve the adjacent densely populated neighborhoods. It states that the retail expansions will allow the existing department stores on the site to remain competitive and the upgrade of the site in general will help attract new anchor tenants “to reinforce the Center’s position in the market as an important retail destination and to retain a loyal customer following.” The investment in infrastructure, site layout, site appearance and the addition of new retail space has been cited by the applicant as a means to enhance Cross County’s long-term economic viability.

According to the draft EIS, the new retail square footage is intended specifically to strengthen the concept of the two outdoor pedestrian malls which cross each other to form two perpendicular axes. Much of the new retail construction is intended to fill in gaps which currently exist along each mall, as well as to expand the length of the north-south mall. By adding additional retail space to the site, Cross Center would become the largest shopping center in the region, as summarized in the chart below:

Shopping Center	Retail Floor Area (square feet)
Cross County Center	1,558,936
Danbury Fair Mall	1,300,000
Ridge Hill Village (proposed)	1,300,000
The Galleria at White Plains	884,734
Stamford Town Center	861,000
The Westchester	823,930
Cortlandt Town Center	772,580
New Roc City	650,000
Jefferson Valley Mall	579,959

Greater economic viability for Cross County will produce jobs, economic activity and tax revenues benefits. The redevelopment also has the potential to be a model for responsible development in the region. We have identified several aspects that the City can address to ensure the redevelopment serves a comprehensive scope of economic and community interests.

(Letter from Westchester County Planning Board, dated 11/15/2005)

Response I-21

Comment noted. The County's other comments and responses to these comments are incorporated within the FEIS.

Comment I-22

Page 3

Will IDA funding “for sales and use tax exemption” require a P.I.L.O.T on the Center?
 Has the economic and tax impact analysis in the DEIS taken into account the P.I.L.O.T.?
 What is the likely variance between full taxation and payments under a P.I.L.O.T?

(Memorandum from City of Yonkers Planning Bureau, dated 11/18/2005)

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Listed SEQRA actions mention the Yonkers IDA. Will there be a P.I.L.O.T. sought? Will it alter the fiscal impacts of the project?

(Memorandum from City of Yonkers Planning Bureau, dated 11/18/2005)

Response I-22

The sales and use tax exemption being sought from the Yonkers Industrial Development Agency would apply to all construction materials, supplies and equipment purchased during the construction period, as well as an exemption from the mortgage recording tax. IDA funding is being sought to enable the Cross County Shopping Center to remain economically competitive versus other major Yonkers projects like Ridge Hill. Approximately \$63 million of the project costs are attributable to construction materials. Applying the current sales tax rate of 8.375 percent⁷ to the cost of construction materials, the sales and use tax exemption is estimated to be \$5.28 million. Of this total, the City of Yonkers would forgo just below thirty percent of this tax revenue at \$1.5 million.

A P.I.L.O.T. (Payment In Lieu of Taxes) on the Shopping Center is required by law as part of the IDA exemption but has not yet been negotiated. The P.I.L.O.T is expected to provide for the full payment of real estate property taxes (likely through a lease/lease-back agreement). As such, the City can expect to receive full property tax revenue (in the form of a P.I.L.O.T), as well as all sales tax revenue generated from Cross County retail sales during the construction period. Therefore, the P.I.L.O.T was not considered as part of the economic and tax impact analysis in the DEIS. For the City of Yonkers, the likely variance between full taxation and payments under a P.I.L.O.T. is equal to the forgone sales tax revenue of \$1.5 million on the materials and equipment explained above.

⁷ Earlier calculations in the socioeconomic portion of the DEIS had assumed a 8.5% sales tax rate, which was accurate at the time of the preparation of the document in April 2005. In June 2005, the New York State sales tax rate decreased from 4.25 to 4.0 percent, while the sales tax rate for the MTA increased slightly from .25 to .375 percent.

Comment I-23

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Clarify, by placing in chart format, the Socio-economic impacts of the project.

Show existing payments, projected payments and annual increase expected.

Show expected municipal costs and net surplus projected.

(Memorandum from City of Yonkers Planning Bureau, dated 11/18/2005)

Response I-23

Table I-23
Summary of Estimated Impacts of the
Existing and Redeveloped Cross County Shopping Center

	EXISTING SHOPPING CENTER			REDEVELOPED SHOPPING CENTER		
	<u>Annual Revenue</u>	<u>Annual Costs</u>	<u>Net Fiscal Impact</u>	<u>Annual Revenue</u>	<u>Annual Costs</u>	<u>Net Fiscal Impact</u>
City of Yonkers						
Property Tax Revenue	\$1,321,106			\$1,572,116		
Sales Tax Revenue	\$8,057,309			\$9,855,794		
Frontage Fee	\$42,466			\$42,466		
Income Tax Revenue	\$65,400			\$77,500		
Total City	\$9,486,281	\$4,359,225	\$7,436,464	\$11,547,876	\$5,166,635	\$6,381,241
<i>Incremental Increase to City</i>				<i>\$2,061,594</i>	<i>\$807,380</i>	<i>\$1,254,184</i>
Yonkers Public Schools	\$2,309,408	0	\$2,309,408	\$2,748,193	0	\$2,748,193
<i>Incremental Increase to Schools</i>				<i>\$440,000</i>	<i>0</i>	<i>\$440,000</i>
Combined City/Schools Surplus	\$11,795,689	\$4,359,225	\$7,436,464	\$14,296,069	\$5,166,635	\$9,129,434
<i>Incremental to City/Schools</i>				<i>\$2,500,379</i>	<i>\$807,410</i>	<i>\$1,692,969</i>
New York State⁸						
NY State Sales Tax Revenue	\$12,891,695			\$15,769,271		
<i>Incremental to State</i>				<i>\$ 2,877,576</i>		
<i>ADJUSTED Incremental to State</i>				<i>\$0</i>		
Westchester County						
County Tax Revenue	\$ 4,834,386			\$5,913,477		
<i>Incremental to County</i>				<i>\$1,079,091</i>		
<i>ADJUSTED Incremental to State</i>						
MTA						
MTA Sales Tax Revenue	\$1,208,596			\$1,478,369		
<i>Incremental to MTA</i>				<i>\$269,773</i>		

Source: Phillips Preiss Shapiro Associates, Inc.

⁸ Note: New York State and MTA sales tax revenue figures reflect calculations based on new rates effective as of June 2005.

Comment I-24

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3,929 employees are estimated. Is there an estimate of net employment? Are there any impacts projected upon smaller stores that might be impacted?

(Memorandum from City of Yonkers Planning Bureau, dated 11/18/2005)

Response I-24

The revamped shopping center is expected to generate a total of 3,929 full-time equivalent jobs, of which 614 are net new permanent full-time equivalent jobs in retail. The later calculation was reached by applying a standard industry multiplier of 2.5 employees per 1,000 square feet of retail space⁹ to the additional 245,375 square feet of retail space of the revamped shopping center.

No negative impact is expected in terms of employment at smaller stores, since the existing number of smaller stores or in-line tenants is anticipated to increase somewhat overall due to redevelopment. However, given the increased proportion of new retail space for junior anchor tenants and department store expansion, it is likely that a larger portion of the net new jobs will be at department stores and mid-sized retailers as compared with smaller stores.

⁹ Development Assessment Handbook, Urban Land Institute, 1997, p.265.

Comment I-25

Income tax revenue

What is the basis for the assumption of the 50/50 split of resident/non resident workers?

(Memorandum from City of Yonkers Planning Bureau, dated 11/18/2005)

Response I-25

This estimate was based on actual employee residence data provided to the applicant by the two department store anchors at the Cross County Shopping Center, Macy's and Sears. The data indicated that approximately half of all workers at both establishments are residents of the City of Yonkers. As the two largest employment generators at the Cross County, the employee residence ratio derived from these establishments was applied to the entire worker population at the Shopping Center.

Comment I-26

Project "real" property tax valuation as well as conservative approach. The applicants have a number that they are seeking for their financial return.

(Memorandum from City of Yonkers Planning Bureau, dated 11/18/2005)

Response I-26

One way to project "real" property tax valuation for the redeveloped shopping center is to focus on total construction costs associated with the redevelopment to determine the incremental increase in property value over the existing assessed property value. The Cross County redevelopment will entail an investment of over \$265 million (see Table IV.J-17), including estimated investments to the property expected to be made by tenants themselves.

Taking the total investment of \$265 million and applying the City of Yonkers equalization ratio of 3.89 for commercial property, we arrive at an incremental assessed value of about \$10.3 million. Adding this increment to the current assessed property value of \$7.78 million, the revised assessed property valuation of the redeveloped center is estimated at \$18 million. This assessed value is nearly \$9 million or two times greater than the assessed value reached using the conservative approach. Therefore, the resulting projected property tax revenues to be generated are approximately double those that were projected in the DEIS. Using the higher property valuation, revised projections for annual property tax revenues to be generated by the redeveloped Cross County are provided in the following table.

Table I-26
REVISED Annual Projected Property Tax Revenues
Generated by the Redeveloped Cross County Shopping Center, 2004

All Tax Lots	Property Valuation	City Tax	School Tax	Frontage Tax	Total City & School Taxes	County Taxes
2004	\$7,781,280	\$1,321,106	\$2,309,408	\$42,466	\$3,675,402	\$880,051
Redeveloped Center	\$18,089,780	\$3,071,283	\$5,368,866	\$42,466	\$8,440,149	\$2,000,187
Total Incremental Revenue	-	\$1,750,177	\$3,059,458	\$0	\$4,764,747	\$1,120,136

Comment I-27

The ICSC standards are used several times in place of actual sales. Why is a national average used instead of generating specific information and validating it against the ICSC numbers? It is common for shopping center rents to be set on a basis of store sales. Is this done at CCSC? Is information about gross sales available? Any such information would be aggregated and would not reveal information about individual tenants.

(Memorandum from City of Yonkers Planning Bureau, dated 11/18/2005)

Response I-27

In the applicant's experience, tenant sales have not formed the principal basis for setting rents in shopping centers. As such, rents at the Cross County Shopping Center are not directly determined by store sales. Sales data, where available, simply functions as an indicator of whether a store is likely to be capable of paying a certain rent. Discussion of store sales is only a starting point in the rent negotiation process

As noted in the question, ICSC data for sales estimates were used to project total sales at both the existing and redeveloped Cross County Shopping. The capture rates for the Cross County Center and its future sales have also been estimated using an industry source, ULI, for median sales volumes for such shopping centers. The analysis indicates

that the trade areas in which the Cross County is located are significantly underserved for retail. When an area is underserved, this typically registers in two ways: leakage of retail dollars outside of the area, and above normal sales volumes for retailers within the area.

Proprietary gross sales figures are available for some, but not all, of the existing Cross County tenants. This limited sales data was not employed to derive an average to project sales due to the likelihood that this sales average would be skewed towards those store categories for which the data is available. However, based on the available sales data, there is evidence that the current tenants are exceeding national averages in terms of sales volumes on a per square foot basis. With the increase of the size of the Center, it can be expected both that leakage out of the trade areas will be reduced, and there will be some reduction in sales volumes for retailers within the trade areas, as these above normal volumes are reduced through natural market competition. This applies to retailers both within and outside of the Cross County Center.

The implications for the analysis are two-fold:

- First, to the extent that sales of existing and future tenants have been underestimated, the sales tax impact projects are likewise underestimated.*
- Second, the analysis of the impacts on competing retail areas is largely unchanged. The purpose of the trade area and capture rate analysis has been to assess potential impacts on the tenancy and character of existing retail areas, specifically to see if the enlarged Center undermines the viability of these districts. The estimates of leakage by store category are based on estimated actual sales and spending within the trade areas, not the ICSC figures. The projected incremental increase in sales at the Cross County, for categories experiencing significant leakage, is orders of magnitude smaller than these leakage amounts. Even if the sales at the Cross County are double the projections, the conclusions of the analysis would be unchanged (see tables J-24 and J-30).*

Finally, the use of sources such as the ICSC and ULI numbers is a standard and accepted practice in retail analysis.

Comment I-28

Is the IDA \$5.2 million sales tax exemption on construction materials needed to induce the project or is the project viable without the exemption?

(Memorandum from City of Yonkers Planning Bureau, dated 11/18/2005)

Response I-28

The applicant judges this exemption necessary to remain competitive with other Yonkers competitors, particularly Ridge Hill, that are receiving Yonkers IDA funding.

Comment I-29

Getty Square and South Broadway

These are two separate shopping areas. There is a South Broadway arm that is a part of Getty Square, but South Broadway, from Highland Avenue, south to the city line with the Bronx should have been reviewed separately.

(Memorandum from City of Yonkers Planning Bureau, dated 11/18/2005)

Response I-29

The South Broadway corridor was not reviewed in the DEIS, and therefore, an analysis of this shopping area is provided below. The Competing Shopping Centers and Retail Corridors Map, Figure IV. J-4 (Figure I-14), was also revised to reflect inclusion of this corridor.

South Broadway Corridor

The South Broadway corridor is a neighborhood shopping district in Yonkers that spans from the Bronx border north to Highland Avenue. This stretch of South Broadway is a double-loaded, pedestrian-oriented retail corridor and is organized as a Business Improvement District or BID, as is evidenced in the new lighting, distinctive street signage, and (some) heated bus stops. It is dominated by a mix of convenience-oriented retail, including banks, florists, cleaners, nail salons, barber shops, hair salons, hardware stores, delis, mini-markets, bars, liquor stores and modest restaurants, as well as a number of discount variety stores (dollar/\$.99 stores). There are also a handful of comparison-oriented shopping destinations offering “streetwear” clothing, shoes, electronics and home furnishings. A few scattered used-car sales establishments and gas stations also dot the corridor. Nearly all businesses are independently-owned establishments or local chains. There are few vacancies within the South Broadway BID.

The shopping area appears to cater primarily to a local, walk-in crowd of nearby residents, although it is well served by bus and can be reached by transit-riders. As a neighborhood-oriented shopping area with few comparison shopping destinations, South Broadway does not compete directly with the Cross County Shopping Center.

Comment I-30

Competition with Cross County Square Mall.

To what extent could lowering barriers (pedestrian and auto) between the two centers result in positive synergistic results? If added together do the two centers result in a new category size that might benefit both? Are there any actions that reasonably could be taken to affect this?

(Memorandum from City of Yonkers Planning Bureau, dated 11/18/2005)

Response I-30

The applicant notes that each mall is under separate ownership, and there is a concern that with a perceived superior parking condition at Cross County Center, any lowered barriers with the Mall at Cross County will encourage Mall customers to utilize the spaces at Cross County. Therefore, the raised pedestrian walkway proposed across South Drive from the Mall at Cross County is judged sufficient lowering of barriers by the applicant.