

TOWN CLERKS OFFICE  
TOWN OF DOVER

COPIED FOR:

Supervisor   
Town Board   
Others

TO: TOWN OF DOVER TOWN BOARD

FROM: TOWN HISTORIAN DONNA P. HEARN

RE: COMMENTS TO THE TOWN OF DOVER TOWN BOARD ON THE REVISED  
DOVER KNOLLS DRAFT ENVIRONMENTAL IMPACT STATEMENT (RDEIS)

DATE: JUNE 3, 2009

*Planner*  
*Highway*  
*Cemetery*  
*Dover Knolls*

## **Historic Buildings and Resources**

### **Historic Buildings:**

The discussions of the historic buildings were not done, only the NYS document shown. Where are the discussions?

Where are the views of the historic buildings after 'Adaptive Reuse'?

Since the beginning, the Town of Dover Master Plan called for an adaptive reuse of the campus buildings. I don't remember seeing what the buildings looked like when rehab was completed.

### **Cemeteries:**

Tom O'Clair, Family Affairs Specialist and Office of Recipient Affairs at OMH called this afternoon. They control the site and were actually in a meeting with DK in April about the cemeteries. OMH plans to use NAMI and other volunteers to begin work on the upper cemetery this year. They will be clearing the road to the Gates of Heaven and cleaning the area of weeds and debris. The lower cemetery will receive work next year.

I told Mr. O'Clair that Cemeteries on site should be protected by adequate fencing or stone walls. Historic stone walls removed from elsewhere could be reconstructed around these two sites.

As Historian, I am requesting that any old stone walls removed from a construction areas be rebuilt around the cemetery areas to preserve their identity and privacy.

### **Historic Structures:**

Any old stone walls or historic structures should be identified, documented and retained or reused. If stone walls in one area are to be removed, reuse the stones in walls around the two cemeteries.

### **Historic Subdivisions with Old 'paper roads'**

These are associated with the HVPC occasionally show up on adjacent parcel maps. A statement should be made in the DEIS that old 'paper roads' are no longer viable.

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FROM: DONNA P. HEARN, RESIDENT AND TAXPAYER  
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According to the applicant, Dover Knolls partnership has had a binder on this property or owned this property since October of 1993. (DK DEIS, ESA. p.4/1394) That is over 15 years. In the beginning, impacts on water, surrounding wells, the Harlem Valley Aquifer, the Swamp River and Great Swamp CEA, and onsite C&D disposal, visual resources, steep slopes and town economic impacts were concerns. Today, in June of 2009, impacts on water, surrounding wells, the Harlem Valley Aquifer, the Swamp River and Great Swamp CEA, and onsite C&D disposal, visual resources, steep slopes and town economic impacts are still concerns.

In all fairness to the applicant, these are never easy issues to answer. However, the applicant did not have a mere six months, or a year or even three years to work on the questions, but over 15 years; that is over 780 weeks, over 4,500 days to work on the very same questions, issues and potential solutions that SEQRA mandates.

In an era when the rest of the country and much of the world on focused on saving places and going green, it would seem that preservation of Dover's most valuable environmental resources should be our highest priority.

~~Dover Knolls Master Development Plan, posted 05/29/09-----  
10 days after DEIS is voted Complete!~~

~~How can the Lead Agency vote the Dover Knolls DEIS complete when the Dover Knolls Master Development Plan, containing the proposed zoning amendments and zone changes, buffer reductions and limit restrictions was not even part of the consideration?~~

#### ~~Agricultural Soils:~~

~~The western portion of the project contains an area of agricultural soils. The applicant was requested to leave that area as open space to protect the soils and provide the opportunity for agricultural use if ever needed. This 'green' request is renewed.~~

#### Steep Slopes

Slope limits the use of the land and influences the rate of stormwater runoff and soil erosion. Development constraints increase as slope increases. Slopes greater than 15% present severe development constraints.

First, steep slopes shed more surface water at higher velocities than level areas do. These runoff characteristics accelerate erosion when the land is disturbed or cleared, stripping the slopes of valuable soil and adding to the sediment load of downstream waters.

Second, steep slopes in Dutchess County tend to be covered by shallow soils that cannot filter septic wastes properly.

A third factor limiting the use of steep slopes is cost. Developing and maintaining such areas in ways that limit erosion, provide adequate waste treatment, and preserve natural features, is expensive. Roads, utilities and building construction in rough terrain can require excessive cutting, filling and grading. Maintenance costs also increase in steeply sloped areas. Road surfaces deteriorate, roadside ditches erode, and downstream culverts fill with sediment. These conditions can be fixed only temporarily, and at public expense.

Local governments should not permit slopes between 10 and 25 percent to be developed, unless extreme care is taken to protect these upland areas. Specific design standards should be required of such developments, and standards strictly enforced to prevent soil erosion, septic failures, slope subsidence, water pollution and other forms of environmental degradation. Slopes greater than 25 percent should not be disturbed.

This RDEIS indicates development on steep slopes will take place. The applicant should be made to use a higher town estimate for roads upkeep and repair costs for the project, knowing their design will contribute to a higher cost maintenance.

### **Visual Resources and Viewsheds associated with steep slopes**

The varied slopes and elevations of Dutchess County contribute greatly to the diversity of the county's land uses and the beauty of its landscapes. (DCDP and DCEMC. Dutchess County, New York, Natural Resources. DC Cooperative Extension Association, 1985, pp. 47- 50.)

Studies on the Harlem Valley area, (Town, County, State and privately funded studies), have all concluded that scenic views and vistas are vitally important on a local and regional level and should be preserved. The steep slopes of the Harlem Valley have been identified as having great visual appeal as well as being environmentally sensitive areas. Building on the steep eastern slopes of the site in an important viewshed area does not conform to that mandate to preserve the views and vistas.

The applicant was given a compilation of visual resource information in 2006, which highlighted the visual appeal and environmental sensitivity of our steep slopes. Our visual resources should be respected. If they need another copy, let me know and I'll get the Town Historian to give you another copy.

The Scoping Document asked for ANY nearby area that has substantial views into the site. "Provide color perspective renderings and line-of-sight drawings showing the proposed buildings in the context of the site from any location from which substantial views of the site are possible"

Show what the stacked townhouses and the proposal looks like from: Hoag's Corners Road, Old Pawling Road near Wheeler Road, County Route 21 near base of Wingdale Mountain?

What will the eastern slope look like with all the trees gone as a result of the construction? The project is drawn with mature trees present- the applicant will not plant mature trees- they take years to grow. The early views will be drastically different from the view seen decades later.

### Dover Knolls Water Use/ Wastewater Projections

The original DEIS proposed well water usage of a million gallons per day. What if there is not enough water to proceed past phase I, even using all the proposed wells.

In the revised DEIS, the developer now proposes to use the wells and the Reservoir, the Swamp River and the Ten Mile River as backups. Keep in mind that the Reservoir functions best when full, so water from somewhere will have to be constantly pumped up there if groundwater doesn't keep it full.

Local and area concerns regarding low water capacity have been noted on numerous occasions since 1982, up to and including such the DK original and present scoping meetings and Planning Board meetings. Those concerns were voiced at the Planning Board meetings on DK remediation issues as a consequence of the Stop Work Order issued in July, a couple of years ago. At that time, Dover Knolls assured the neighbors that there was plenty of water and that their concerns would be addressed. Since we now know there is not as much water as anticipated, I formally request that those Planning Board meeting minutes for Dover Knolls Remediation SWO and E&S permits be added to these Dover Knolls materials to document numerous local concerns regarding well water availability for surrounding neighbors.

Some wells may not be able to be used. Perhaps the 'ash pile well,' drilled through the coal debris and ash near the Swamp River will be one of them. That means less water from the wells and an even greater need for water from the alternate sources. Does this mean the alternate sources of the Reservoir, the Swamp River and the Ten Mile River will actual sources? The Swamp River and Great Swamp are a Critical Environmental Area. The Ten Mile River is a trout stream, not to mention any tapping near the Riverview Tavern (which is where it was tapped during the 1957 drought) is less than 1/2 mile below the Sewage Disposal Plant of the Ragan's Mill Sewer.

The Town Board needs to proceed with caution- we (Pawling, Dover, and Amenia) all drink from the same aquifer, and we all need it.

### Dover Knolls Water Disposal Projection

Water USE = Water DISPOSAL

Original DEIS proposed well water usage of a million gallons per day. However much is pumped, the use amount roughly equates to the disposal amount for each day.

The RDEIS proposes graywater use for the golf course and irrigation. How will this affect the Great Swamp CEA? The whole site is sitting IN the WATER TABLE for The Great Swamp. How will waste disposal affect the Swamp River and Great Swamp CEA?

But, there are options for the developers; SDS impacts to the CEA and Aquifer protection can be done. The Planning Board recently allowed a development for only 28 units over the aquifer- by requiring a redundant septic disposal system for greater removal of nitrates, phosphates, etc. to keep the water pure. The board also mandated the Dutchess County Water and Wastewater Authority take it over. The results, long term protection for the Harlem Valley Aquifer underneath. This is the same Harlem Valley Aquifer as in Dover Plains- the answer is easy. Make the applicants do the same in Wingdale to protect it!

### **Great Swamp and Swamp River Critical Environmental Area:**

Remember the Harlem Valley Campus was built in the swamp water table..... What effect will the graywater on the golfcourse and irrigation, septic outflow for the project, stormwater runoff, erosion and soil load from steep slope construction, and burial of waste concrete and brick waste material IN the Great Swamp CEA water table have on the Great Swamp CEA itself? What effects will continue into the Ten Mile River and the Housatonic River. How much will the Swamp River flow be affected by the addition of project water outflow? What species will be affected by the water changes? More time is needed to understand this issue.

### **Drought issues:**

During the drought in 1957, the Utica Observer Dispatch and the Binghamton Press reported on July 27, 1957, that about four days of water supply were left at Harlem Valley. The Hospital Director reported water usage measures were being taken at the HVPC facility. Laundry was done elsewhere and limited baths and showers were a part of the water conservation program.

In the Report Of The Board Of Visitors to the Commissioner of Hygiene in 1958, it was noted that "The water supply during the long dry spell in the summer months became precarious, necessitating assistance from Civil Defense in the form of piping and pumps two bring water from a river two and a half miles away. (Thirty-Fourth Annual Report Of The Board Of Visitors Of Harlem Valley State Hospital, Wingdale, New York To The Department Of Mental Hygiene For the Fiscal Year Ended March 31, 1958. Utica: State Hospital Press.)

The Plant Maintenance section notes that an additional 15 million gallons of water was pumped from the Ten Mile River to the reservoir during the month of August. (Thirty-Fourth Annual Report Of The Board Of Visitors Of Harlem Valley State Hospital, Wingdale, New York To The Department Of Mental Hygiene For the Fiscal Year Ended March 31, 1958. Utica: State Hospital Press, p. 14.)

DK Comments06032009,taxpayer

If Dover Knolls taps from all the resources, i.e. Swamp River, Ten Mile River and the Reservoir, what will happen when we do have a drought? What about the rest of the area?

**Dam Issues:**

The Swamp River Dam should be evaluated to determine if the discharge from wastewater treatment plus runoff will handle the extra load