



June 30, 2009

Mr. Ryan Courtien, Supervisor  
Town of Dover Town Board  
126 East Duncan Hill Road  
Dover Plains, NY 12522

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TOWN CLERKS OFFICE  
TOWN OF DOVER

Dear Supervisor Courtien:

The DEIS for Knolls of Dover has been reviewed by MTA Metro-North Railroad (MNR). MNR recognizes that Transit-Oriented Development in the vicinity of our Railroad stations, as embodied in the proposed Conceptual Development Plan for the Knolls of Dover, may have great benefits if planned appropriately. The proposed action to redevelop the site with residential and commercial development can stimulate ridership at MNR's Harlem Valley Wingdale Station, increasing ridership and reducing vehicle miles travelled. These are objectives that MNR supports.

However, we do have specific concerns on this proposal and comments regarding the project's potential impacts on the Railroad:

1. The developer's plan relocates the existing station commuter parking to a new parking lot just south of the station platform as part of the proposed action. The timing, cost and funding of this action are not addressed, which potentially puts the station and its access at risk. MNR cannot allow the loss of a New York State asset that is critical to transportation in the region. The proposed action seems to assume that MNR would make a significant capital outlay to replace its own parking and even relocate the station. This is not an option. MNR does not intend to expend capital funds to relocate stations and parking in order to facilitate a private development. If we approved such an action, we would expect this cost to be borne by the developer.
2. The plan proposes to build a new train station building and relocate the existing platform to the west side of the tracks and it is apparently expected that MNR would pay for the capital cost of these improvements as well. These improvements are not needed or required for Railroad operations. Given the severe economic constraints presently confronting the MTA and the Railroad, MNR is not in the position to make any commitments to these projects.

3. MNR could potentially support the project if the Railroad is kept whole and our operations are not negatively impacted. This could be accomplished by a commitment from the developer to assume all of the costs involved in implementing their proposed plans.

4. In light of the issues raised in # 1 and #2 above, we request that the Alternatives Analysis section of the EIS be modified to include an alternative that leaves the station parking and platform in place.

5. Although MNR has a train station and commuter parking lots located within the proposed project area and its Railroad right-of-way bisects the project, MNR is not listed as either an Involved or Interested Agency. We request that the Final EIS reflect MNR's interest and involvement.

Sincerely,

A handwritten signature in black ink, appearing to read 'Linda Corcoran', with a long horizontal flourish extending to the right.

Linda Corcoran  
Deputy Director  
Business Development, Facilities & Marketing Department

**CC:**

R. Fleischer, MNR  
M. Mannix, MNR  
J. Sedore, Jr., MTA  
K. Timko, MNR  
Building Inspector, Town of Dover Building Department  
Dutchess County Department of Health  
Dutchess County Water and Wastewater Authority  
Dutchess County Department of Public Works  
Highway Superintendent, Town of Dover Highway Department  
NYSDOT Region 8  
NYS Depart. Of Environmental Conservation, Region 3  
NYS Attorney General Office  
Town of Dover Architectural Review Board  
Town of Dover Town Board  
Town of Dover Planning Board  
Town of Dover Zoning Board of Appeals  
Town of Dover Conservation Advisory Council  
US Army Corps of Engineers