# V. ALTERNATIVES

Several alternatives have been evaluated and compared with the Proposed Action. The studied alternatives are detailed below and summarized in ~~a t~~Table V-7~~ at the end of the Section:~~

Alternative A. No Action

Alternative B. Development Under the Existing Underlying Zoning

Alternative C. Development Under the Existing Zoning with MC Overlay Extended onto the Dykeman Parcel

Alternative D. Lower Density Development including 18-hole golf course and reduction in residential/land disturbance

Alternative E. Increased Commercial Development

Alternative F. Adaptive Reuse of the Existing HVPC Buildings

## A. No Action

Under the No Action alternative, the ~~p~~Project ~~s~~Site would not be redeveloped and it is anticipated that the property would remain in its current, largely vacant and deteriorated condition.

*Land Use and Community Character*

Under this alternative, the ~~p~~Project ~~s~~Site and the overwhelming majority of the existing buildings would remain ~~essentially~~ vacant. Many of the buildings suffer from significant deterioration, and in the Applicant's opinion exert a blighting influence on the surroundings. Without redevelopment, the buildings would continue to deteriorate, compounding the negative perception and further exerting a blighting influence on surrounding uses.

In addition, this alternative would not advance the goals of the Town's Master Plan and the purposes of the MC District Overlay, which recommend the establishment of compact mixed-use development on the site to create a new definable hamlet or village center. By forgoing concentrated development around an existing train station that could accommodate growth in a responsible manner, the pressure for development and conversion of greenfield sites throughout the rest of the town would be increased. Additional pressure for strip commercial development along Route 22 would also be a likely result. This No Action alternative would also result in continued limitations on the types of housing available in the Town and County, and limitations on retail shopping options for Dover residents that could reduce the travel distance required to meet basic necessities and conveniences.

*Visual Resources*

As described above, the ~~p~~Project ~~s~~Site would remain in its existing configuration. However, it would be expected that time and the elements would continue to take a toll, with conditions of the buildings worsening and further impacting the visual quality of the site. This impact

would be particularly apparent along Route 22, which serves as the Town's major north-south highway, and which contains a series of former HVPC buildings along its frontage.

*Geology*
As there would be no development, this alternative would not include any additional land disturbance.

*Natural Resources*
As there would be no development, this alternative would not include any additional land disturbance.

*Water Resources and Wetlands*
As there would be no development, this alternative would not include any additional land disturbance. However, it is noted that the some of the site wetlands have been degraded by previous site activity. The existing 9-hole golf course, for example, encroaches on a NYSDEC wetland along Wheeler Road~~, and d~~ Disturbance near the Power Plant, Storehouse, and the running track has also encroached on wetlands near Route 22. This No Action alternative would not include the potential for wetland mitigation and enhancement activity.

*Community Services*
Since there would be no change to existing uses or increase in population, there would be no change in the level of community services required to service the site. The current level of trespassing and vandalism on the site would remain the same or potentially worsen.

*Economic Conditions*
Property tax revenues would remain the same as under the existing conditions, representing substantial underutilization and lost potential. There would be no increase in employment opportunities. There would be no increase in the pool of potential patrons for surrounding businesses, no business activity on site (including the potential for a mixed use Town Center), and no sales tax generation. As discussed below, there would be no construction jobs under this scenario.

*Cultural Resources*
Remediation of existing hazards located on-site, including, but not limited to, asbestos and lead paint, would be costly. With no plan for future use and without significant redevelopment of the ~~p~~Project ~~s~~Site to help offset the substantial costs of rehabilitation required to address remediation of existing hazards~~, including but not limited to asbestos and lead paint, necessary to make the buildings safe for occupancy, and to adapt them to new uses,~~ it is unlikely that any activity to preserve any buildings on the site would be undertaken. It is also likely that the buildings would continue to degrade. The HVPC was largely shut down around 1994. Since that time of abandonment, notwithstanding the Applicant's efforts to stabilize the site, the campus buildings have been severely ~~impacted~~ affected by the elements and vandalism. Without implementation of the ~~p~~Project, the buildings would remain subject to additional damage and deterioration from water intrusion, vandalism, and vegetative overgrowth. It is also anticipated that the rate of deterioration would accelerate as

time progresses and the condition of the buildings worsens, with the buildings eventually falling into ruin. ~~In this situation, t~~The facility would continue to exert a blighting influence on the surrounding community and the overall ~~t~~Town image. As the conditions of the campus buildings deteriorate, it is anticipated that the blighting influence would grow.

*Stormwater Management*
Under this alternative there would be no change in the amount of impervious surface on the site and no modifications to the drainage system.

*Traffic and Transportation*
Under this alternative, no new development would take place. Trip generation from the site would remain the same, although volumes in the area would be expected to increase due to increases in traffic generated by other projects in the vicinity. The site would not provide increased resident and employee populations in proximity to the Wingdale station that could support and encourage mass transit usage. There would be few, if any, new parking facilities at the railroad station. The 275 spaces included as part of the proposed development would probably not be realized without the public/private partnership contemplated by the Proposed Plan.

*Air Quality*
Since there would be no changes or new activity, there would be no change to air quality.

*Noise*
Since there would be no changes or new activity, there would be no change in the amount of noise generation.

*Hazardous Materials*
The site currently contains a number of underground storage tanks, former dump sites, and petroleum spill sites. Under this alternative, timely remediation activity to address existing environmental hazards would not occur. Potential soil and groundwater contamination, as well as asbestos and lead paint in the existing buildings, would remain unremediated.

*Construction*
This alternative would not include any demolition or new construction. Therefore, there would be no potential for short-term impacts on noise, air quality or traffic circulation related to construction activity. There would also be no potential for the expansion of job opportunities during the construction period.

*Infrastructure and Energy*
Since there would be no facility changes or new activity, there would no change in utility demand. Some of the existing infrastructure elements, including the existing water and sewer mains are deteriorated and not functioning optimally. With no rehabilitation work, the infrastructure systems would be anticipated to deteriorate further.

## B. Existing Underlying Zoning

This alternative assumes development of the ~~p~~Project ~~s~~Site in accordance with the use and density requirements of the underlying zoning districts. The Project ~~s~~Site's underlying zoning districts consist of: Commercial/Industry/Office-Mixed Use (CO), which is located on both sides of Route 22 north of Wheeler Road; Hamlet Mixed Use (HM), located generally in the center of the Project ~~s~~Site; Hamlet Residential (HR), located in the northeastern section and southern section of the Project ~~s~~Site; Rural (RU), located in the eastern portion of the Project ~~s~~Site; and, Suburban Residential (SR), located in the western portion of the Project ~~s~~Site. ~~(See Exhibit III.A-3 for location of districts.)~~Exhibit V-1 shows the location of these districts. Although the MC Overlay encourages comprehensive site planning for the site, which disregards these underlying districts, it is possible that a plan could be devised for separate developments in each underlying district.

Single-family and/or multifamily residential uses are permitted by right or special permit in all of the underlying districts. Office, retail, light industry and warehouse uses are permitted by right or special permit in the HM, HR and CO districts. In order to develop a statistical~~n~~ estimate of the amount of development under this alternative, an analysis was performed assuming residential development in all zones except the CO, and commercial development in the area of the site zoned CO.

**Table V-1**
**Alternative B**

| Zone | Gross Acres | Deductions | Net Acreage | Base Allowable Density |
|---|---|---|---|---|
| SR | 217 | 83 | 134 | 121 |
| HM | 33 | 1.5 | 31.5 | 206 |
| HR | 87 | 14 | 73 | 477 |
| RU | 296 | 153 | 143 | 129 |
| Extension – SR* | 83 | 13 | 70 | 63 |
| CO | 221 | 109.5 | 111.5 | 892,000 sf |
| Totals | 937 | 374 | 563 | 996 units & 892,000 sf |

*Dykeman parcel

As shown in Table V-1, the requirements of the existing underlying zoning ~~e~~would ~~accommodate~~ generate approximately 996 residential units and approximately 892,000 square feet of commercial development. This includes 63 units on the Dykeman parcel, which is approximately the same number for that site if developed under current zoning (i.e., without the MC overlay). See Exhibit V-2.

As detailed below, this type of disjointed plan is not a feasible development program since it could not be supported by the market, and ~~e~~would not enable the rehabilitation of the site. For example, the areas in the underlying districts zoned for CO commercial use include an approximately 200 acre area north of Wheeler Road to the east and west of Route 22. Of this

total, approximately 100 acres are potentially buildable. With very limited access to Route 22, it is unlikely that a large amount of commercial development could be realized in this locale, despite its CO zoning.

Notwithstanding the underlying zoning, ~~I~~it is also noted that the MC Overlay district was specifically enacted to facilitate redevelop of the site after years of promotion by the Town and the Harlem Valley Partnership had failed to attract any interest in redevelopment under the existing zoning regime. The MC Overlay was designed to encourage a more comprehensive approach to the development planning of the site, including locating a realistic amount of commercial development in close proximity to Route 22. ~~The adoption of the MC District effectively acknowledged that development under the existing zoning is not a reasonable or feasible alternative. This is in contrast to the Proposed Action plan that presents a marketable and economically viable program (see ERA materials in the Appendix).~~

*Land Use and Community Character*

The SR district in the underlying zoning does not allow multifamily dwellings. As a result, the bulk of the west side of the project would be limited to single or two-family dwellings. A limited amount of multifamily use would be permissible in the ~~s~~Storehouse and ~~p~~Power ~~p~~Plant area which is zoned HM. ~~. This~~However, this would not provide for diversity of housing types in each neighborhood, nor would it effectively capitalize on the site's proximity to the train station by providing appropriate and transit-supportive densities within walking distance of the train. On the east side, areas of permissible higher residential density would be located in the HM and HR districts. A large portion of the HR, and, therefore, a likely significant proportion of the multifamily residential units, would be located towards the north end of the property, relatively distant from the train station and Town Center. This configuration ~~which~~ would be ~~somewhat~~ inconsistent with typical land use planning principles.

Assuming suitable market conditions existed, this alternative would also include massive commercial development located along the core of the east side along Wheeler Road and Hutchinson Avenue, and behind the sewage treatment plant on the west side. With four (4) parking spaces required per 1,000 square feet, this alternative would also require approximately 70 acres of surface parking to support the commercial development. Given competition from existing retailers outside the retail trade areas and anticipated future retail competition nearby, relatively limited vehicular access to the site from Route 22, and relatively low population density in eastern Dutchess County, the project site faces a challenging environment for retail development. An alternative with such a large commercial component could not realistically be supported by the market and actually realized on this site. As noted in the ERA market study (see Appendix), existing spending within the entire retail trade area (which extends into central Dutchess County and western Connecticut) could support approximately 1 million square feet of retail. This alternative would represent almost complete absorption of this spending in one isolated location. This~~, which~~ is unrealistic and would be devastating to other regional business.~~, as i~~It would require severe cannibalization of existing businesses. In addition, the quantity of commercial

development would overwhelm the existing character of Dover, and frustrate development of a community at a scale consistent with other traditional communities in the region.

*Visual Resources*

Given the site's environmental constraints, most of the area of ~~The general areas of~~ disturbance ~~for~~ under this alternative would be ~~largely~~ the same or similar to~~as~~ ~~those~~ that for the proposed ~~p~~Project, since the site's available buildable areas are largely determined by environmental constraints, such as the extensive wetlands. The uses and densities allowed in certain portions of the site, such as the CO zoned area in the northern portion of the site, is likely not feasible given its existing limited access. ~~However, i~~It is likely that with the restriction on multifamily use in the SR and larger minimum lot sizes, the development clusters would be less compact and would require encroachment into internal open spaces or the golf course. Even when using the existing zoning's clustering provisions (flexible subdivision), minimum lot size in the RU and SR districts is 0.5 acres. This lack of flexibility would also likely result in a more typical suburban character on the west side of the site and in the area around the reservoir and hillside. The scale of the commercial development and associated parking would be inconsistent with traditional development patterns found in other communities along the Harlem Valley and would be anticipated to negatively affect the visual character of the site.

*Geology*

As the general areas of disturbance would be largely the same, no significant changes related to impacts on geologic conditions would be expected.

*Natural Resources*

As the general areas of disturbance would be largely the same as the proposed Project, no significant changes related to impacts on natural resources would be expected, although the rigidity of the existing bulk requirements could result in some increases in disturbance.

*Water Resources and Wetlands*

As the general areas of disturbance would be largely the same, no significant changes related to impacts on water resources or wetlands would be expected.

*Community Services*

As with the proposed ~~p~~Project, this alternative would create a new community at the site that would require service from local community services. While the reduction of 380 units would decrease the residential population by approximately 1,000 persons,~~somewhat,~~ the expansion of the commercial use would increase the ~~p~~Project's employee population. Assuming a ratio of 3 employees per 1,000 square feet of floor area, the theoretical commercial program could support up to 2,676 employees, an increase of approximately 810 employees from the proposed Project.~~.~~ Again, however, a commercial program at this magnitude is unrealistic.

*Economic Conditions*

As detailed above and in the supporting ERA market study included in the Appendix, the market cannot support 892,000 square feet of commercial space at this location. Therefore, this is not a viable alternative. While significantly greater than the proposed Project by approximately 300 percent, the theoretical tax revenues from this alternative would not be realized given the economic realities of the site, its access, environmental constraints and the market area.

*Cultural Resources*

This alternative might have greater adverse impacts on historic and archaeological resources as the proposed Project. In order to achieve its densities, this alternative could require additional demolition of historic buildings, including, some of the buildings proposed for adaptive reuse along Route 22 in the proposed plan. ~~Potential impacts to historic or archaeological resources would the same as for the proposed project.~~

*Stormwater Management*

Given the increased amount of commercial and the parking that would be associated with the square footage of development, the amount of impervious area ~~The general areas of development~~ would likely be greater than the ~~largely the same as the~~ proposed ~~p~~Project., ~~and~~ It would necessitate implementation of a similar, yet longer, ~~type of~~ stormwater management system.

*Traffic and Transportation*

While reducing the residential program by 380 units, this alternative would increase the commercial component beyond that provided in the proposed ~~p~~Project by approximately 646,500 square feet. This would result in a dramatic net increase in trip generation during the AM and PM peak hours. The table below provides a comparison of trip generation rates for various uses. Assuming that the increased commercial space would be split between retail and office space, this alternative would increase the number of trips by approximately 667 in the AM peak hour and 1,497 in the PM peak hour.

**Table V-2**
**Trip Generation Comparison**

| Component | Units | AM Peak | | PM Peak | |
|---|---|---|---|---|---|
| | | Trip Gen Rate | Trips | Trip Gen Rate | Trips |
| Residential Condo/Townhouse | 380 | 0.44/dwelling unit | 167 | 0.52 | 197 |
| Shopping Center | 323,250 sf | 1.03/1,000 sf | 333 | 3.75/1,000 sf | 1,212 |
| Office | 323,250 sf | 1.55/1,000 sf | 501 | 1.49/1,000 sf | 482 |
| Net Change | | | 667 | | 1,497 |

Source: Trip Generation, 7th edition, Institute of Transportation Engineers.

*Air Quality*

Anticipated traffic generation would be increased with this alternative, compared to the proposed ~~p~~Project. As a result, the potential generation of air pollutants from mobile source emissions would be increased.

*Noise*
Anticipated traffic generation would be increased with this alternative, compared to the proposed ~~p~~Project. Therefore, noise levels would be expected to be somewhat higher than with the Proposed Action.

*Hazardous Materials*
Identified environmental conditions within the ~~p~~Project ~~s~~Site would be handled in same manner as for the Proposed Action.

*Construction*
This alternative would likely generate short-term noise and air quality impacts typically associated with construction activity, and similar to those of the Proposed Action.

*Infrastructure and Energy*
This alternative would reduce the number of residential units by approximately 28%, which would result in a corresponding reduction in water flows of approximately 127,405 gpd (gallons per day). However, the expanded commercial component would increase flows by approximately 64,650 gpd (646,500 sf X 0.1 gpd = 64,650 gpd.) The result would be a net decrease of 62,755 gpd compared to the Proposed Action. Wastewater generation would be estimated to closely approximate water demand. These flows are slightly less than the Proposed Action, and since sufficient capacity exists to accommodate the proposed ~~p~~Project, no adverse impacts on utility capacity would be expected from this alternative.

## C. Existing Zoning with MC Overlay Extension onto the Dykeman Parcel (Statistical Analysis of MC Overlay and Previously Submitted Plan)

This alternative examines the potential development scenario utilizing the existing MC Overlay District requirements, ~~and~~ with the MC Overlay District extended onto the former Dykeman parcel. It evaluates the potential development statistically, based on the MC Overlay zoning controls, and a plan previously submitted by the Applicant in 2004.

### Development Potential Based on Zoning Controls

The table below presents a potential development scenario generated by applying the MC Overlay bonus to the base allowable unit count as detailed in Alternative B.

**Table V-3**
**Alternative C**

| Zone | Gross Acres | Deductions | Net Acreage | Base Allowable Density | Density w/MC Bonus |
|---|---|---|---|---|---|
| SR | 217 | 83 | 134 | 121 | 242 |
| HM | 33 | 1.5 | 31.5 | 206 | 309 |
| HR | 87 | 14 | 73 | 477 | 716 |
| RU | 296 | 153 | 143 | 129 | 194 |

| Zone | Gross Acres | Deductions | Net Acreage | Base Allowable Density | Density w/MC Bonus |
|---|---|---|---|---|---|
| Extension ~~–~~ SR* | 83 | 13 | 70 | 63 | 126 |
| CO | 221 | 109.5 | 111.5 | 892,000 sf | 1,338,000 sf |
| Totals | 937 | 374 | 563 | 996 units & 892,000 sf | 1,524 units & 1,338,000 sf |

*Dykeman parcel

Based on the MC Overlay zoning, ~~T~~this Alternative ~~e~~would include up to 1,52487 residential units and approximately 1,338,000 square feet of commercial development. However, as discussed earlier, the existing MC District regulations include formulas related to the mix of commercial and residential development. In particular, under the present Code, no more than 50% of the gross floor area of all development may consist of residential development, except that age-restricted senior housing shall be excluded from this calculation. In addition, the existing Code requires that no more than 30% of the floor area of all development may consist of residential units with three or more bedrooms. Assuming an average floor area of -2,500 square feet per unit, this alternative would require (1,338,000 / avg unit size 2,500 sf= 535) that approximately ~~1,052~~989 of the residential units be age-restricted with the remaining 535 units having no occupancy restrictions. In this scenario, age-restricted units would account for approximately 6~~5~~6% of the units. This alternative would be similar to the proposal for the site initially presented in 2004, ~~(~~which proposed 1,457 dwelling units and approximately 1.3 million square feet of floor area designated for commercial and institutional uses~~.);~~ It ~~and which~~ was deemed inconsistent with the Town's objectives by the previous Town Board. In addition, the balance of age-restricted housing would be above the levels the market study indicates could be supported, and would preclude the establishment of a diverse community consistent with traditional neighborhood design principles.

Most importantly, this zoning alternative suffers from the same defects as the Existing Underlying Zoning alternative in relation to the amount of commercial development, but to an even more severe degree. This alternative would significantly exceed the entire amount of potential space throughout the entire trade area that could be supported by the existing trade activity, as documented by the ERA market study included in the Appendix. As a result, this alternative could not be realized on this site. ~~Therefore, t~~This is not a reasonable and feasible alternative for consideration.

**The 2004 Plan**

The 2004 plan submitted by the Applicant applied the MC Overlay zoning to actual site conditions. The result was a development plan (see Exhibit V-3), with 1,338 dwelling units (889 age-restricted) and 600,000 square feet of commercial development. The commercial development included a Main Street Village Center, plus a large format store of 125,000 square feet. It also included adaptive reuse of the former hospital building as a hotel and conference center. In addition, the hillside area in the northern portion of the Project Site, just south of Boyce Park, would be developed as a townhouse community, with buildings and roads extended throughout some steep topography. On the west side of the site, the plan

called for a suburban-style community, with townhomes surrounding the 9-hole golf course. Adjacent to the Village Center on the east side of Route 22, generally along Hutchinson Avenue, the plan included a residential community, largely based on traditional neighborhood design principles.

This alternative plan was developed without the benefit of a market study. The ERA Market Study provided realistic estimates of commercial and housing demand, which acted as a solid basis for the Proposed Action plan, and highlighted the flaws in the 2004 Plan.

*Land Use and Community Character*

The alternative based on the 2004 Plan would result in certain of the same land use relationships as the proposed Project, including, provision of an overall traditional neighborhood design character for the area to the east of Route 22. As indicated on Exhibit V-3, the large-format retail building would be oriented away from Route 22, and include a buffer of commercial and retail shops to limit the visual impact of the bulk of the building. On the west side of Route 22, the 2004 Plan proposed a suburban-style development with townhomes clustered around the 9-hole golf course. The Town Board rejected this plan, and called for a plan with traditional neighborhood design elements on both the east and west sides of Route 22.

*Visual Resources*

Given the suburban-style golf course community to the west of Route 22, the Town Board determined that this alternative would unacceptable vary from the overall design character envisioned for the project. The development of townhouse units and the adaptive reuse of the hospital building on the east side of the site would both be visible from Route 22 and other roads in the area. This is another important difference between the alternative and the proposed Project. This alternative would have greater visual impacts than the proposed Project.

*Geology*

This alternative would not significantly differ from the proposed Project's overall limit of disturbance. However, the additional density of development in the northern portion of the site in this alternative would affect steep slopes, while also increasing the need for root removal.

*Natural Resources*

This alternative would not significantly change the Project's overall limit of disturbance. Therefore, no significant change related to impacts on natural resources would be anticipated.

*Water Resources and Wetlands*

This alternative would not affect the Project's overall limit of disturbance particularly as it relates to water resources and wetlands. Therefore, no significant change related to impacts on wetlands would be anticipated.

*Community Services*

This project would result in a population of 3,100 persons and 256 school age children. The number of school age children totals about half the number in the proposed Project. The total number of age-restricted units in this plan is not realistic according to the market study undertaken for the proposed Project (see the Appendix).

As with the proposed Project, this alternative would generate an increased demand for emergency services. Given that, on balance, the overall scale of development is comparable to the proposed Project, no significant variation in community service demands is anticipated.

*Economic Conditions*
This alternative would expand the commercial component through the inclusion of a large-format retail space and a hotel/conference center, neither of which are considered to be economically viable according to the market study prepared as part of the proposed Project.

*Cultural Resources*
As concluded by the Phase 1B archaeological investigation, based upon the results of the field testing, the construction of the development would not result in any significant adverse impacts to potentially significant archaeological resources. As this alternative would not affect the limit of disturbance, no potential impacts on archaeological resources would be anticipated. This alternative would also require the same amount of demolition of existing buildings identified as eligible for the State and National Historic Registers.

*Stormwater Management*
This alternative would employ a stormwater management system similar to the proposed Project for most of the site. Additional stormwater management facilities would be required for the proposed development in the northern area, where a greater amount of impervious surface would occur.

*Traffic and Transportation*
Traffic generation for this alternative would be far greater than traffic generation for the proposed Project given additional commercial uses.

*Air Quality*
Anticipated traffic generation would be greater than the proposed Project given higher peak hour traffic, resulting in greater air quality impacts.

*Noise*
Anticipated traffic generation would be greater with this alternative than the proposed Project, resulting in greater noise impacts.

*Hazardous Materials*
Potential issues relating to environmental hazards would be the same for both this alternative and the proposed Project.

*Construction*

This alternative would likely generate short-term noise and air quality impacts of a nature similar to the proposed Project.

*Infrastructure and Energy*
This alternative would reduce the number of residential units by approximately 15 percent. This would result in a corresponding reduction in water demand. The expanded commercial component would increase demand. The result would be a net increase of 75,000 gpd of water compared to the proposed plan. Wastewater generation would be estimated to closely correspond to water demand.

## D. Lower Density Mixed-Use

This alternative examines a scenario including an 18-hole golf course and a reduction in the amount of area devoted to residential development. Exhibit V-41 presents a conceptual plan indicating the approximate additional land area that would be required to accommodate an 18-hole golf course. (Note that this plan is schematic and does not represent an actual golf hole routing plan, but rather is intended to provide a reasonable indication of the land requirements for a course). As can be seen, expansion of the golf course would necessarily require the elimination of some of the areas that would be devoted to residential development under the Proposed Action. This includes the neighborhood in the northwest corner, a significant portion of the neighborhood on Wheeler Road near the bridge, and a portion of the neighborhood near the intersection of Hoags Corners Road. In total, this would be anticipated to result in a reduction of approximately 200 units on the west side of the property. This would result in a total unit count of approximately 1,176, with no change in the commercial program.

The cost to construct an 18-hole golf course is estimated at approximately $7 million. This would increase the Applicant's already substantial site development and infrastructure costs while reducing the potential for revenue generation with 200 fewer units, which would otherwise help to absorb these costs. This alternative would provide a level of residential development comparable to that available under the existing zoning, and which has historically, given the lack of activity under the existing zoning, proved to be insufficient to facilitate redevelopment of the site. Add the costs necessary to double the size of the golf course to those economics and, in the Applicant's opinion, this is not a reasonable and feasible alternative for consideration. It should also be noted that increasing the golf course to 18 holes may also place the continued affordability of play in jeopardy. The greens fees for an upgraded 18-hole course would be significantly increased. In 2006, the Harlem Valley Golf Association polled it members, and the majority preferred that the course remain a nine-hole course.[1]

The scoping document also required that this alternative consider a reduction in the number of housing units and removing units from environmentally sensitive areas, and regulatory buffers. However, the conceptual site plan developed for the Proposed Action, and adjusted

[1] See the attached Golf Survey located in the Appendix.

during the preparation of this DEIS, already has taken into account the required regulatory buffers, as well as identified sensitive habitat areas.

The project has also clustered residential development within those buildable areas within a ½ mile radius of the train station to the maximum extent practicable without increasing building heights to four stories or greater. However, the extensive wetlands associated with the Great Swamp and the need to avoid development in those areas competes to some degree with typical transit-oriented design principles, which seek to focus intense development within a five to ten minute walk from mass transit stations. As a result, it is the Applicant's opinion that the many of the site planning and design considerations from this alternative have already been folded into the conceptual site plan for the Proposed Action.

*Land Use and Community Character*
This alternative would have similar overall land use relationships as the proposed Project, with the exception of the larger area set aside for the golf course and its relationship to on-site and off-site areas to the west of the Swamp River. Some of the traditional neighborhood development along Wheeler Road would be eliminated. This is an area that is within easy walking distance to the Metro North Station.

*Visual Resources*
The general areas of disturbance for this alternative would be largely the same as that for the proposed Project, since the site's available buildable areas are largely determined by the environmental constraints, such as the extensive wetlands, most of which would be preserved. The residential area to the west of the Swamp River would be a suburban-style golf course community, with town homes spread throughout the area. This pattern would differ from the rural residential areas to the north and west. In this alternative the northwestern hamlet in the proposed Project would be removed and replaced with additional golf holes.

*Water Resources and Wetlands*
As the general areas of disturbance would be largely the same, no significant changes related to impacts on water resources or wetlands would be expected.

*Community Services*
As with the proposed Project, this alternative would create a new community at the site. It would require service from local community services. The reduction of approximately 200 units would decrease the residential population of this alternative to 3,150 persons compared to 3,700 with the proposed plan. The reduction in residential units would result in a corresponding reduction in property tax generation.

*Economic Conditions*
With fewer residential units, this alternative would result in fewer tax dollars than the proposed plan. The reduced density and additional development costs associated with the golf course development would make it economically infeasible from the Applicant's perspective.

*Cultural Resources*
Potential impacts to historic or archaeological resources would be the same as for the proposed Project.

*Stormwater Management*
Except for the units on Wheeler Road and the Dykeman parcel that would be lost to facilitate a larger golf course, the general areas of development would be largely the same as the proposed Project, and would necessitate implementation of a similar type of stormwater management system.

*Traffic and Transportation*
Traffic volumes would be approximately 200 PM peak hour trips less than the proposed Project given the lesser number of dwelling units.

*Air Quality*
The potential generation of air pollutants from mobile source emissions would be similar to the proposed Project.

*Noise*
Noise levels would be expected to be similar to the proposed Project.

*Hazardous Materials*
Identified environmental conditions would be handled in same manner as for the proposed Project.

*Construction*
Additional land contouring would be required for 9 new golf holes. Other construction related impacts would be similar to these impacts for the proposed Project.

*Infrastructure and Energy*
This alternative would reduce the number of residential units by approximately 15 percent, which would result in a corresponding reduction in water flows, not including additional water for golf course irrigation.

## E. Enhanced Commercial Mixed-Use

This alternative examines a configuration that maintains the project's mixed-use character, with a variety of residential, commercial and civic uses, but with an increase in the amount of commercial square footage. In order to accommodate an increase in commercial space, a conceptual site plan has been developed that would include a large-format retail building to the south of the Administration Building. This building would be situated opposite the proposed grocery store, across an expanded shared surface parking area. The inclusion of the additional retail space would result in a reduction of approximately 106 residential units in the Town Center area. In total, this alternative would include approximately 1,270 residential units and 378,400 square feet of commercial space.

*Land Use and Community Character*
This alternative would generally have the same land use relationships as the proposed ~~p~~Project, and maintain the same overall traditional neighborhood design character. As indicated on Exhibits V-5 and V-6 ~~-2~~, the large-format retail building would be oriented away from Route 22, and include a commercial liner to limit the visual impact of the building's bulk.

*Visual Resources*
As described above, this alternative would not change the overall design character of the project, nor would it introduce new development outside of the proposed ~~p~~Project's limit of disturbance. As a result, the overall project would not be expected to have a greater degree of visibility or result in a significant change in the proposed community character. The primary visual change would be the inclusion of a large-format retail building towards the south end of the Town Center. However, the building would be setback from Route 22 and would include commercial liners to break up the perceived mass of the building.

*Geology*
This alternative would not affect the project's overall limit of disturbance. Therefore, no significant change related to impacts on geologic conditions would be anticipated.

*Natural Resources*
This alternative would not change the project's overall limit of disturbance. Therefore, no significant change related to impacts on natural resources would be anticipated.

*Water Resources and Wetlands*
This alternative would not affect the project's overall limit of disturbance. Therefore, no significant change related to impacts on wetlands would be anticipated.

*Community Services*
As with the proposed ~~p~~Project, this alternative would generate an increased demand for emergency services. Given that, on balance, the overall scale of development is comparable to the proposed ~~p~~Project, no significant variation in community service demands is anticipated.

*Economic Conditions*
This alternative would expand the commercial component through the inclusion of a large-format retail space. This format was selected since the market study indicated that the greatest unmet retail potential comes from the comparison goods trade area, which reflects a larger region and includes households that would be most likely to travel longer distance to make purchases which require a comparison of products and prices at a variety of stores (i.e., goods such as electronics and clothing, for which shoppers are willing to travel further to get the right product or price). Within the comparison goods trade categories, the largest proportion of the identified unmet retail potential is for large-format general merchandise space. Since the closure of the Ames department stores in Amenia and Pawling, there are no existing large-format retailers within the project's retail trade area. As a result, large-format retail appears to offer the type of retail most likely to be supported by the market and that

could be captured at the site. The increase in commercial space would require the project to capture 20~~%~~ percent of the projected unmet retail potential in the comparison goods trade area.

The large-format store could have an adverse effect on the ability to attract small retail uses on the project's Main Street. This would be dependent, in part, on the type of retailer and the goods and services offered in a large store.

This alternative would increase the commercial space by approximately 54.2~~%~~ percent compared to the proposed ~~p~~Project, and reduce the number of residential units by approximately 7.7~~%.~~ percent. The table below provides an estimate of anticipated property tax revenue from this alternative, assuming a proportionate change in tax generation.

**Table V-4**
**Alternative E Property Tax Generation**

| Component | Town | School District | Fire District | Library District | Dutchess County |
|---|---|---|---|---|---|
| Residential | $844,545 | $5,940,428 | $232,596 | $82,147 | $1,042067 |
| Commercial | $158,826 | $1,116,408 | $43,176 | $15,420 | $195,834 |
| Total | $1,003,371 | $7,056,836 | $275,772 | $97,567 | $1,237,901 |

This alternative would result in a slight reduction in property tax generation compared to the proposed ~~p~~Project. The 106 unit decrease would result in a minor reduction in resident population and school children. The lost units would include a mix of townhouses, single-family homes, and duplexes. Assuming a 7.7~~%~~ percent reduction in overall school children generation, this alternative would be expected to generate approximately 496 school children at full build-out. Using the per pupil program cost paid by the local property tax estimate of $6,962, the local cost to educate the project-generated school children from this alternative would be approximately $3,453,152. This is substantially less than the amount of school district taxes that would be paid by the project, creating a significant positive fiscal impact of approximately $3.6 million annually for the public schools.

*Cultural Resources*

As concluded by the Phase 1B, based upon the results of the field testing, the construction of the development would not adversely impact any potentially significant archaeological resources. As this alternative would not affect the limit of disturbance, no potential impacts on archaeological resources would be anticipated. This alternative would also require the same amount of demolition of existing buildings identified as potentially eligible for the State or National historic registers.

*Stormwater Management*

This alternative would employ a stormwater management system similar to the proposed ~~p~~Project.

*Traffic and Transportation*

The increase in the commercial development would result in an increase in the generation of peak hour traffic compared to the proposed ~~p~~Project. The difference in project-generated trips resulting from the increase in commercial area and the reduction in residential units

from this alternative is summarized in the table below. The net increase would be approximately 87 trips in the AM peak hour and 444 in the PM peak hour. These represent increases of approximately 11~~%~~ percent and 34~~%~~ percent of the proposed ~~p~~Project's total trip generation.

**Table V-5**
**Trip Generation Comparison**

| Component | Units | AM Peak | | PM Peak | |
|---|---|---|---|---|---|
| | | Trip Gen Rate | Trips | Trip Gen Rate | Trips |
| Residential Condo/Townhouse | 106 | 0.44/dwelling unit | 47 | 0.52 | 55 |
| Free-Standing Discount Superstore | 133,000 sf | 1.84/1,000 sf | 245 | 3.87/1000 sf | 515 |
| Net Change | | | 198 | | 460 |

Source: Trip Generation, 7th edition, Institute of Transportation Engineers.

*Air Quality*
Anticipated traffic generation would be higher with this alternative than the proposed ~~p~~Project, raising the potential for increased generation of air pollutants from mobile source emissions.

*Noise*
Anticipated traffic generation would be higher with this alternative than the proposed ~~p~~Project, raising the potential for increased noise.

*Hazardous Materials*
Potential issues relating to environmental hazards would be the same for this alternative and the proposed ~~p~~Project.

*Construction*
This alternative would likely generate short-term noise and air quality impacts of a nature similar to the proposed ~~p~~Project.

*Infrastructure and Energy*
This alternative would reduce the number of residential units by approximately 8~~%,~~ percent, which would result in a corresponding reduction in water flows of approximately 36,907 gpd. However, the expanded commercial component would increase flows by approximately 64,650 gpd (133,000 sf X 0.1 gpd = 13,330 gpd.) The result would be a net decrease of 23,607 gpd compared to the Proposed Action. Wastewater generation would be estimated to closely approximate water demand. These flows are slightly less than the Proposed Action, and since sufficient capacity exists to accommodate the proposed ~~p~~Project, no adverse impacts on utility capacity would be expected from this alternative.

## F. Adaptive Reuse of the Existing HVPC Buildings

This alternative required consideration of the preservation and adaptive reuse of the existing buildings on-site in order to accommodate the redevelopment project. The Applicant's design team considered the potential for building reuse during the creation and refinement of the conceptual site plan, and ultimately identified several of the significant existing buildings that are proposed to be protected and restored as part of the project. These include two of the I-buildings, the Administration building, the Storehouse, the Power Plant, the U-building north of Wheeler Road, the Director's Residence, Smith Hall, and some of the smaller staff residences. The large campus buildings which would be retained and protected are along the highly visible Route 22 frontage, and would maintain the site's historic presence and preserve the key public historic visual component of the former HVPC facility. These buildings serve as organizing elements and are compatible with the project's overall urban design concept, which is intended to create an active downtown core along a new "Main Street" surrounded by compact, walkable residential neighborhoods at a scale consistent with other traditional settlements in the region.

Unfortunately, the large, and at times forbidding, institutional buildings towards the rear of the campus conflict with this urban design concept and their retention would damage the functional viability of the overall site plan. For example, the large H-shaped buildings which served as patient dormitories and Division for Youth detention facilities are oriented at angles that would not reinforce activity along the new downtown Main Street. In addition, their unusual floorplates and individual building configurations are not conducive to reuse for either residential or active commercial uses, such as a grocery store, which has been identified as a community priority. Their configuration would also impact the ability to create an open community, where residents are connected more closely to neighborhood street life through individual entrances, porches, and smaller village-scale architecture. The somewhat massive and looming scale of the larger institutional buildings (and potential stigma attached with the dormitories) would be inconsistent with the creation of the desired neighborhood feel. Retaining the current campus configuration would also restrict the ability to develop the convenient parking necessary to support significant residential or commercial redevelopment within the existing buildings. Exhibit V-7 shows the land planning implications of a hypothetical plan where the H and I-buildings would be adaptively reused for housing. It is estimated that these buildings could be reconfigured to include approximately 245 townhomes and stacked town home units. Parking would be an issue in this scenario because the large size of these buildings leaves little space for resident or visitor parking.

These buildings were selected for hypothetical reuse in this alternative since the removing of major buildings that are eligible for the State and National Register are already proposed for adaptive reuse in the proposed Project. Given their removal from the list of historic buildings by SHPO in 1996, the HVPC buildings to the east of Hutchinson Avenue are not included for potential reuse in this alternative.

This alternative plan would adversely affect the traditional neighborhood design concepts for the proposed development, given the awkwardly placed and odd-angled H buildings. Moreover, keeping these building would eliminate space needed for off-street parking in the area behind the two I-buildings on Route 22, which are planned for adaptive reuse in the

proposed Project. Therefore, there would be no off street visitor or resident parking for the 245 units and there would be no parking for Smith Hall or the Lady of Solace Church.

In addition to the architectural design and land planning considerations, as part of the plan development and DEIS process, the Applicant also tasked its economic consultants, ERA, with analyzing the financial feasibility of additional building reuse (see Adaptive Reuse Potential memorandum in the Appendix). The analysis included both an evaluation of the marketability of adaptive reuse properties relative to new product, and an analysis of the financial feasibility of adaptive reuse relative to new construction. Overall, the analysis yielded the conclusions that residences in adaptive reuse buildings would be likely to trade at a discount to new product, and that the additional costs associated with adaptive reuse projects would not be market supportable at the site.

There are significant design challenges associated with adaptive reuse. It is difficult to achieve modern residential floor plans from the floor plates, interior spaces, and corridor alignments of historic buildings. Design compromises often result in undesirable living spaces, inefficient space usage, and inadequate natural light. Furthermore, the inclusion of integrated garage space is difficult in many historic structures, particularly those on this site. As a result, new residential products generally achieve a pricing premium over adaptive reuse products. This is supported by the findings of a case study of the price differentials for a group of comparables within the metropolitan New York region, which indicated new product sales values ranging up to 30 percent great than the adaptive reuse product (see Adaptive Reuse Potential memorandum in the Appendix).

Besides the physical planning and design concerns, the reuse analysis also considered the financial feasibility of adaptive reuse. The table below presents the financial feasibility calculation for a typical 1,115 square foot multifamily residential unit. As shown, adaptive reuse is likely to result in negative gross profit (i.e., a loss) for the redeveloper.

**Table V-6**
**Financial Feasibility of Adaptive Reuse Versus New Construction**

| | Adaptive Reuse | | New Construction | |
|---|---|---|---|---|
| | **Per Unit** | **Per sf** | **Per Unit** | **Per sf** |
| **Net Unit Size (sf)** | 1,115 | | 1,115 | |
| **Revenue** | $295,475 | $265 | $295,475 | $265 |
| **Expenses** | | | | |
| Construction | $223,000 | $200 | $167,250 | $150 |
| Soft Costs | $44,600 | $40 | $33,450 | $30 |
| Land and Site Work | $56,865 | $51 | $61,325 | $55 |
| Remediation | $55,750 | $50 | $0 | $0 |
| **Total Expenses** | $380,215 | $341 | $262,025 | $235 |
| **Potential Profit or Loss** | (84,740) | ($76) | $33,450 | $30 |

As described above, the average 1,115 square-foot multifamily unit would result in a loss of nearly $85,000 for the redeveloper. The loss is attributable to the higher construction costs and remediation costs associated with adaptive reuse. Based on this analysis, reuse of the existing buildings to accommodate the project is not a viable redevelopment alternative.

The marketability of adaptive reuse product was another important factor during the design and analysis process. While it is possible that there would be a market for some residential product in the I-buildings and U-buildings, it is unlikely that there would be enough buyers for units in the large, three-story H-buildings, for example. As shown on Exhibit V-8~~3~~, the I-buildings and U-building could be configured into townhouse units and their reuse results in approximately 34 unique adaptive reuse units. The six H-buildings are significantly larger and have a much more unusual shape, making adaptive reuse more difficult. Units in these large buildings might be marketable in more urban locations (e.g., SoHo in New York City), but would be questionable in Dover.

Notwithstanding the economic problems with this alternative, the plan shown on Exhibit V-7 was compared to other alternative plans and the proposed Project. The loss of units in the area south of Wheeler Road, where the H and I buildings would be reused, and the relocation of the grocery store and commercial to an area north of Wheeler would result in a development yield with approximately the number of units and commercial square footage as the proposed Project. The site disturbance, impervious area and percentage of open space would also be approximately the same as the proposed Project, along with various other impact factors. The most important difference, however, would be the disruption of the proposed Village Center and traditional neighborhood design concept for a significant area on the east side of Route 22 and its replacement with 245 units of housing in adaptively reused buildings that would not be marketable or economically feasible.

The following Table is a summary of the alternatives:

**Table V-7**
**Analysis of Selected Quantitative and Qualitative Impact Factors for Alternative Plans**

| | Proposed Action | A. No Action | B. Existing Zoning | C. Previous Plan | D. Reduced Density | E. Expanded Retail | F. Additional Adaptive Reuse |
|---|---|---|---|---|---|---|---|
| **Quantitative Factors** | | | | | | | |
| Dwelling Units | 1,376 | * | 996 | 1,338 | 1,176 | 1,270 | 1,376 |
| • Family Units | 938 | O | 996 | 449 | 802 | 866 | 938 |
| • Age Restricted Units | 438 | O | O | 889 | 374 | 404 | 438 |
| • Workforce Housing | 10% | O | O | 2% | O | O | O |
| Commercial SF (000) | 245.5 | O | 892 | 600 | 245.5 | 378 | 245.5 |
| | | | | | | | |
| Traffic (PM Trips) | 1,293 | O | 2,790 | 1,800 | 1,105 | 1,753 | 1,293 |
| Water (gpd) | 874 | O | 811 | 885 | 747 | 850 | 874 |
| Population | 3,701 | O | 3,486 | 3,125 | 3,152 | 3,404 | 3,404 |
| School Age Children | 534 | O | 568 | 256 | 457 | 494 | 494 |
| | | | | | | | |
| Approx. Percent Open Space | 65% | O | NA (No Plan) | 60% | 75% | 65% | 65% |
| | | | | | | | |
| **Qualitative Factors** | | | | | | | |
| Use of TND Principles | ● | O | O | ◒ | ◒ | ◒ | ◒ |
| Adaptive Reuse of Existing Buildings | | | | | | | |
| • Route 22 Frontage | ● | O | O | ● | ● | ● | ● |
| • Other Areas | ◒ | O | O | ◒ | ◒ | ◒ | ◒ |
| Natural Resource Protection | | | | | | | |
| • Wetlands and Waterways | ◒ | O | O | ◒ | ◒ | ◒ | ◒ |
| • Habitats | ● | ◒ | O | ● | ◒ | ● | ● |
| • Steep Slopes | ◒ | ● | O | ◒ | ◒ | ◒ | ◒ |
| Economics | | | | | | | |
| • Taxes | ● | O | O | ◒ | ◒ | ● | O |
| • Jobs | ● | O | O | ● | ● | ● | ● |
| • Market | ● | O | O | ◒ | ◒ | ◒ | O |

* Does not include temporary housing for correctional officers

O Does not successfully address this factor

◒ Partially addresses this factor

● Fully addresses this factor

Quantitative Factors utilized: Based on proportioned relationships to the Proposed Plan. The approximate amount of open space is based on a review of the Alternative maps. For Alternate F the number of potential units in the H and I buildings would be 245, (10 for each I building and 39 for each H building) if adaptively reused as townhomes and stacked townhomes. This is approximately the same number that would be removed from the proposed plan the south of Wheeler Road and also to the north of Wheeler where the grocery store and commercial uses would be relocated.