

V. ALTERNATIVES

Several alternatives have been evaluated and compared with the Proposed Action. The studied alternatives are detailed below and summarized in a table 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 project 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 project site 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. This 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 project 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 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 disturbance near the Power Plant, Storehouse, and the running track has 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.

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

With no plan for future use and without significant redevelopment of the project 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 by the elements and vandalism. Without implementation of the 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, the facility would continue to exert a blighting influence on the surrounding

community and the overall 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.

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 project site in accordance with the use and density requirements of the underlying zoning districts. The Project 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 site; Hamlet Residential (HR), located in the northeastern section and southern section of the Project site; Rural (RU), located in the eastern portion of the Project

site; and, Suburban Residential (SR), located in the western portion of the Project site. (See Exhibit III.A-3 for location of districts.)

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 an 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 |

As shown in Table V-1, the requirements of the existing underlying zoning could accommodate approximately 996 residential units and approximately 892,000 square feet of commercial development. As detailed below, this is not a feasible development program since it could not be supported by the market and could not enable the rehabilitation of the site. 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 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 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 storehouse and power plant area. 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 4 spaces 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, which is unrealistic and would be devastating to other regional business, as 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

The general areas of disturbance for this alternative would be largely the same as those for the proposed project, since the site's available buildable areas are largely determined by environmental constraints, such as the extensive wetlands. However, 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, 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 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 somewhat, the expansion of the commercial use would increase the 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. 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.

Cultural Resources

Potential impacts to historic or archaeological resources would be the same as for the proposed project.

Stormwater Management

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

While reducing the residential program by 380 units, this alternative would increase the commercial component beyond that provided in the proposed 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 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 project. Therefore, noise levels would be expected to be somewhat higher than with the Proposed Action.

Hazardous Materials

Identified environmental conditions within the project 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 project, no adverse impacts on utility capacity would be expected from this alternative.

C. Existing Zoning with MC Overlay Extension

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. 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 |
| Extension - SR | 83 | 13 | 70 | 63 | 126 |

| Zone | Gross Acres | Deductions | Net Acreage | Base Allowable Density | Density w/MC Bonus |
|--------|-------------|------------|-------------|------------------------|----------------------------|
| 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 |

This Alternative could include up to 1,587 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 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 66% 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), and which was deemed inconsistent with the Town’s objectives by the 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 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, this is not a reasonable and feasible alternative for consideration.

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-1 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 its members, and the majority preferred that the course remain a nine-hole course.

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 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.

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 project, and maintain the same overall traditional neighborhood design character. As indicated on Exhibit V-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 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 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. 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% 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% compared to the proposed project, and reduce the number of residential units by approximately 7.7%. 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 | \$1,042,067 |
| 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 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% 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 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 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% and 34% of the proposed 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 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 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 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 8%, 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 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.

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 greater 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-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.