

GI. Growth Inducing and Cumulative Impacts

Comment 1

The *Growth Inducing and Cumulative Impacts* chapter of the DEIS focuses on potential development and economic impacts that may accrue due to construction of the project, and casts these potential impacts in a mostly positive light. No discussion is provided of potential cumulative impacts to natural resources. The discussion of cumulative impacts should be substantially expanded to discuss potential impacts to natural resources, including species, both within and beyond the border of the 937-acre site. The discussion should include potential impacts from all large scale proposed developments along the Route 22/55 corridor, and must include a discussion of species, habitats and fragmentation and/or connectivity of habitats throughout the Route 22 corridor and Great Swamp. The discussion should include, but not necessarily be limited to, the following large-scale projects:

- Ketcham's Corners (Dover, NY)
- Country Squire (Dover, NY)
- Stony Brook (Dover, NY)
- Furnia Subdivision (Dover, NY)
- Wind Rose (Dover, NY)
- Carvel (Pine Plains, NY)
- Brady Brook (Pawling, NY)
- Madison Woods Development Company (Pawling, NY)
- Deerfield Estates (Pawling, NY)
- Jucca Company/Castagna Realty/Westage Company (Pawling, NY)
- Silo Ridge (Amenia, NY)
- Keane Stud Ridge (Amenia, NY)

(Scott Ballard, Environmental Analyst, NYSDEC, Letter, 6/30/09, Pg. 12)

Response 1

Unlike most of the proposed projects listed above, the Knolls of Dover project entails the redevelopment of an existing facility rather than the development of undisturbed raw land. The site development plan has been modified to pull development away from the sensitive habitats on the site and concentrate development in previously disturbed portions of the site. A majority of the currently-undeveloped areas of the site will remain as open space, including portions of the site which presently serves as important habitat and dispersal corridors for wildlife and migratory birds. It is not known whether the other proposed projects listed in the comment are adhering to the same development practices that are being utilized at the Knolls of Dover site, given the variety of project locations, and individual site conditions.

Comment 2

One of the major sources of impacts to the health of the Great Swamp Watershed is the Route 22 corridor. The highway effects air quality, water quality and the quality of life for residents of the region, both human and nonhuman. Regulators and the developer must consider the traffic and offsite development impacts of a project of this size. Will the project eventually necessitate the expansion of the Route 22 corridor to handle increased traffic?

(Mark King, Director of Protection Programs, The Nature Conservancy, 6/26/09, Pg. 2)

Response 2

The traffic study presented in the DEIS studied 12 intersections along the Route 22/Route 55 corridor for the AM, PM, and Saturday peak hours, projecting traffic volumes to the year 2020. One of the traffic analyses considered future traffic conditions with traffic for 11 projects in the project's vicinity, including the proposals for Carvel, Silo Ridge and Wind Rose developments. The results of the analyses include recommendations for intersection improvements and adjustments to signal timing at the Route 22/Wheeler Road and Route 22/Pleasant Ridge Road intersections, along with monitoring for potential future signalization at the additional intersections in the Route 22 corridor. The traffic study does not call for widening of Route 22, except where necessary (e.g., at Wheeler Road) to provide separate turning lanes.

Comment 3

The integrity of the Great Swamp and its habitat corridor is compromised every time development along its perimeter occurs, but the impacts of dense housing along its margin are especially detrimental because this focuses long term human activity in the most vulnerable zone. The degradation that results includes reducing the effective buffer of the wetland system upon which we depend.

(James Utter, Chairman, Friends of the Great Swamp, Letter, 6/30/09, Pg. 1)

Response 3

The Applicant has worked to balance the directives from the Town, other groups and planning experts to concentrate the proposed development around the existing train station with the directives to provide the necessary buffers for the sensitive environment that exists along that same train line. The requested Town Center at the intersection on Route 22 lies in close proximity to the Great Swamp and its floodplain. The majority of the proposed development is located in areas where former HVPC buildings exist. Outside these areas, environmental resources are protected to the maximum extent practicable.

Comment 4

A pervasive problem is that small impacts raise no alarm. But small impacts occurring at several locations, often including different types of impacts, none of which may be significant when considered separately, add up and interact in ways that cumulatively cause serious degradation of the system.

Consider the Great Swamp, the landscape integrator for Dover, Pawling, Patterson and Southeast. This 20 mile long wetland runs through the center of Dover Knolls. Small intrusions into wetland buffer zones at several points, withdrawal of groundwater by four wells into the aquifer, discharging of treated sewage effluent into the Swamp River, increasing stormwater runoff into the system as impervious surface is increased, adding more road salt to streams from deicing more roads on steep slopes, and increasing the human activity along its edge, none of these will 'do in' the Great Swamp the DEIS asserts, at least not over the short term. But taken

cumulatively, these proposed actions may result in serious degradation of this Critical Environmental Resource.

Once it is acknowledged that Dover Knolls is not proposed in a development vacuum, but is taking place at a time Dover has at least two other major projects in the Great Swamp Watershed on the “drawing boards,” the potential arises for a plethora of unanticipated environmental impacts due to the cumulative effects. Consider water withdrawal from the aquifer – each project proposes withdrawing nearly a million gallons of water per day. What will be the impact? Especially in light of all the other types of accompanying actions.

If the DEIS assesses such cumulative impacts, either on site or watershed-wide, I missed it. But such an evaluation is essential and a requirement of SEQRA.

(James Utter, Chairman, Friends of the Great Swamp, Letter, 6/30/09, Pg. 1-2; James Utter, Chairman, Friends of the Great Swamp, Public Hearing Transcript, 6/3/09, Pg. 215-216)

Response 4

The Project is a redevelopment project on a site that was extensively and intensively used for a very long time, unlike a project proposed on greenfields. Many aspects of the redevelopment improve the situation that resulted from the closure of the State facility with some new project impacts being less than those incurred from the 70 year state operation. The Applicant has discussed the impacts outlined in the Scoping Document as required under SEQRA, including cumulative impacts.

Comment 5

Each type of potential impact needs to be minimized since cumulative and synergistic interactions are not always easy to predict. In the case of Dover Knolls, examples include:

- Requiring tertiary treatment of sewage effluent to significantly reduce nutrient input to the Great Swamp; and
- Eliminating the row of housing units on the wetland buffer line north of Wheeler Road.

(James Utter, Chairman, Friends of the Great Swamp, Letter, 6/30/09, Pg. 2; James Utter, Chairman, Friends of the Great Swamp, Public Hearing Transcript, 6/3/09, Pg. 216)

Response 5

Tertiary treatment will be provided. The housing units described above were within the limits of FEMA’s proposed 100-Year Floodplain boundaries and therefore have been relocated in the modified plan presented in the FEIS.