

September 24, 2008

Town of Dover Planning Board
Historic Tabor Wing House
3128 Route 22
Dover Plains, NY 12522

To the Planning Board:

Thank you for the opportunity to comment on the Wind Rose Project Draft Scoping Document. As Lead Agency, you will probably engage consultants to review the materials for several aspects of the project, we request that you also engage your own consultants for the biological/ecological information and impact assessment.

The Draft Scoping Document is, in general, quite comprehensive and indicates that the Applicants will include in their impact studies, coverage of the resource topics with which *Friends of the Great Swamp* are most concerned. The Sustainability Goals itemized in the documents are consistent with the standards we emphasize in projects being proposed for the Great Swamp Watershed. We also appreciate the relative openness and perceived candor with which we have been treated by project staff. Our comments mainly deal with specifics we feel need to be addressed, but which might be overlooked.

- Wetlands are a major focus of our concerns because of their intrinsic value and vulnerability, as well as their importance to the integrity and health of the Great Swamp. Protecting their biota and ecological functions needs to be a primary focus for Wind Rose staff in following the ‘conservation philosophy’ as expressed in public meetings and documents. Wherever the plan compromises this standard, it should be clearly indicated and explained with suitable mitigation indicated.
- Wetlands are most sensitive to changes in hydrology and chronic input of pollutants, such as nitrates, phosphates, and silt. Buffers, surface runoff, groundwater withdrawals, and isolation from other wetlands are some of the major concerns raised by a golf course/housing project such as Wind Rose. These concerns are especially significant in a geological setting such as the Harlem Valley due to the prevalence of marble bedrock and glacial till; ground water seepage here may support rare calcareous fen wetlands. These special wetlands and their specialized biota are very sensitive to nutrient enrichment and alteration of the ground water/surface water hydrological patterns. These wetlands are critical habitat for the State-Endangered,

Federally-Threatened Bog Turtle, and are to be protected as potential habitat, even if no Bog Turtles have been found there.

- Fertilization and pesticide application of golf course greens and fairways is a major problem so associated activities need to be located at least 300 feet away from calcareous fens with intervening 'natural' vegetation buffers.
- Overall, use of fertilizers and pesticides should be minimized and sophisticated integrated management implemented to achieve that objective.
- The use of swales, detention basins, and other important stormwater control features indicated in the Document, play important roles in wetland maintenance because the infiltration supplements ground water and helps maintain water table levels adequate for wetland persistence, as opposed to channeling water away from the site. They also allow purging the water of nutrients and pesticides by soil and microbes. They must be located outside the buffer zones of the wetlands.
- Wells withdrawing water from aquifers may alter the ground water input to wetlands so it is especially important to assess the probability of this outcome with respect to calcareous fens. Wells must be located in areas that do not affect the water sources of these wetlands.
- Tertiary treatment of waste and the use of gray water and other recycled water for irrigation are projected in the Sustainability Goals; we strongly encourage/support these strategies and request the impact assessment specifically account for shortfalls in reaching these goals. The low turnover rate of the Swamp River makes it especially vulnerable to nutrient-rich secondary treatment discharges; the application of 'recycled' water to the golf course reduces aquifer withdrawal and supplements ground water.
- Visual impacts are to be addressed according to the Draft, however, it is important to also include the Route 22 viewshed in this analysis.

We look forward to working with the Project Staff and the Planning Boards of Dover and Pawling to facilitate a true 'conservation development' as this project moves through the next stages.

Respectfully submitted,

James Utter, PhD
Chairman
Friends of the Great Swamp