



HVA March
2010

Housatonic Valley Association

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24,

Mr. Ryan Courtien, Town Supervisor
Mr. Christopher Galayda, Deputy Supervisor
Ms. Catherine Frame, Councilwoman
Ms. Lorraine Perri-O'Neill, Councilwoman
Ms. Kaye Surman, Councilwoman
Town of Dover
Dover Town Hall
126 East Duncan Hill Road
Dover Plains, New York 12522

RE: Final Environmental Impact Statement Pursuant to Dover Town Law 61-4 and the State Environmental Quality Review Act (6 NYCRR 617)

Knolls of Dover Proposed Redevelopment of the Former Harlem Valley Psychiatric Center Campus Route 22 and Wheeler Road, and Former Dykeman Parcel, Pleasant Ridge Road, Wingdale, New York

Dear Mr. Courtien and Council Members:

HVA BACKGROUND

The Housatonic Valley Association (HVA), founded in 1941 is the oldest non-profit watershed conservation organization in the nation, and is dedicated to preserving and protecting the natural character and environmental health of the Housatonic River and its 1,948 mile watershed, which includes the Tem Mile River watershed in New York. Our work in surface and groundwater protection issues is extensive.

HVA reviewed the Final Environmental Impact Statement (FEIS) prepared for this project and offers the following comments and recommendations for your consideration.

1. Stormwater and sedimentation and erosion control plans are critically important and should be made available to the Town Board during this SEQR proceeding and not deferred to the site plan approval phase. We request the Town Board note in its Findings Statement that the stormwater management and sedimentation and erosion control drawings are incomplete and insufficient to determine the environmental impact of the project.

The stormwater report in the Appendix describes where and what type of stormwater management technique will be constructed. It contains approximately 860 pages of calculations and about 20 pages

of tables describing, in detail, how the levels of specific pollutants would be managed in each stormwater basin. However, this narrative without detailed drawings cannot give the Town a complete picture of how the project will not impact wetlands, streams and the Swamp River. Specific information, including the types and locations of all stormwater management structures and swales along with all piping and discharge points, not just the large detention ponds and swales, is needed to determine the potential stormwater impacts.

2. The Town Board should ask the applicant to provide specific information, in a narrative and on drawings, about how the project will employ Low Impact Development (LID) techniques to attenuate and infiltrate stormwater.

With the exception of the large stormwater basins and swales this information is not drawn on the maps in the FEIS and seems to indicate that the applicant is not planning to utilize low impact techniques. Of the greatest concern is the proposed redevelopment adjacent to the Swamp River.

What percentage of the parking lots and other pavement will be porous surfaces? Are there plans to use porous paving or gravel on the edges of parking lots or roads? Where will the swales and rain gardens be installed? What native plants will be used for general landscaping, swales, or rain gardens? Are there plans to employ green roofs?

3. The proposed Road S will traverse a slope equal to or greater than 25 percent. The site plans and drawings do not show how erosion will be controlled during construction or how stormwater will be managed.

The road would require many drainage structures to prevent damage during storm events. During the winter months many truckloads of sand and salt will be needed to keep the road passable. These materials will ultimately flow into wetlands. Additionally, hundreds of feet of driveways will also shed polluted runoff onto the road, requiring additional capacity for roadside stormwater structures.

4. The FEIS shows that stormwater basin E10A drains to the water supply reservoir.

When the state owned the property no structures were located in the area to be drained by stormwater basin E10A. What is the potential impact to the water quality of the reservoir should it be needed for water supply? Will stormwater discharges render the reservoir unfit for human consumption? What upgrades to the water treatment plant will be required to compensate for these discharges?

5. The site plans show numerous wetland crossing but provide no information about what structures will be used.

The most common problems associated with impediments to fish passage are perched culverts. Over time erosion, flooding, and freeze/thaw cycles scour the stream bottom below the base of the culvert, creating a barrier for fish passage.

Many small streams support fish populations, but often these populations become fragmented and blocked due to culverts. Consequently, fish are unable to reach critical feeding, spawning or refuge areas necessary for their survival. Amphibians also travel along streambeds and wetlands. Although bridges provide the best passage buried box culverts, constructed correctly, allow fish and amphibians, particularly salamanders, to pass along the streambed.

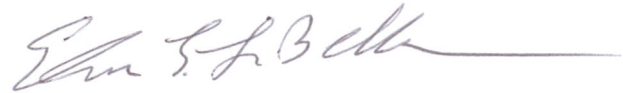
6. The Findings Statement should describe how will the applicant ensure that Mile-a Minute Vine and other invasive plants not be transported off the site.

Will there be tracking pads installed designed to brush off soil and vegetation from construction trucks and vehicles? Will it be necessary to wash off the trucks and wheels to prevent off site transport?

CONCLUSION

The FEIS HVA believes that this project can provide great benefits to the community, but we urge the Town Board to find that the FEIS stormwater and sedimentation and erosion control, road construction and invasive removal plans are incomplete and additional information is necessary to determine the full environmental impact of this project. HVA appreciates the opportunity to comment on this project.

Sincerely,

A handwritten signature in dark ink, appearing to read "Elaine E. LaBella", followed by a horizontal line extending to the right.

Tonia Shoumatoff
New York Watershed Manager

Elaine E. LaBella
Director of Land Protection