

June 26, 2009

Mr. Ryan Courtien, Supervisor
Members of the Town Board
Town of Dover
126 East Duncan Hill Road
Dover Plains, NY 12522

Re: Knolls of Dover project; Dover Knolls Development Company II, LLC; former Harlem Valley Psychiatric Center, Route 22, Dover, New York.

Dear Mr. Courtien:

I am writing on behalf of the Nature Conservancy to share our concerns regarding the proposed redevelopment of the former Harlem Valley Psychiatric Center. The Knolls of Dover project appears to offer many benefits to the Town of Dover, including the adaptive reuse of the existing facility and a design incorporating many aspects of appropriate planning and design. This project also presents an opportunity for the Town of Dover to set high standards for large scale development, perhaps the largest the town will ever review, thus the project requires careful review and scrutiny.

Of particular interest to the Nature Conservancy is the project location in the Great Swamp. The Nature Conservancy and many other organizations have worked for many years raising public awareness of the importance of the wetland and working to protect critical areas of the watershed. Recognition of the state wide value of the Great Swamp is evidenced by the designation of the Swamp as a Critical Environmental area under SEQRA by the Dutchess County Legislature in 1991. Further recognition came from the Audubon Society through it's designation as an Important Bird Area in 1997 and a Priority Wetland by the US Fish and Wildlife Service in 1990. The Swamp also provides habitat for 19 rare plant species, 10 rare bird species and 8 rare reptile and amphibian species. In addition the Swamp is an important ground water recharge area and offers unique recreational and outdoor educational opportunities. This concentration of species and resources provides the basis for our comments.

Some specific concerns include the following:

Project Scale – A project of this size will have numerous impacts on the natural environment. The meandering design of the residential areas creates extensive disturbed areas adjacent to areas designated for protection. This not only fragments existing habitats, but also tends to degrade adjacent natural areas. Examples of these effects include the spread of invasive species from maintained landscapes and impacts of pets on flora and fauna, cats and birds in particular.

Project Design – We support the use of “smart design” and New Urbanism”, but question the commitment to these principles in this landscape. Rather than clustering new development near existing disturbed and developed areas, the project appears to locate new development on areas with minimal environmental constraints and maximizes development in those locations. While

this approach reduces impacts on steep slopes and wetlands, it results in a highly fragmented landscape and sets aside only those areas that probably couldn't otherwise be utilized for development.

Growth Inducing Impacts – One of the major sources of impacts to the health of 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?

Climate Change – The project location adjacent to mass transit is a positive aspect of the development and can help reduce the transportation related carbon dioxide emission impacts of residential sprawl. At the same time the adjacency of some residential areas to wetlands and hydric soils raises questions as to the potential effects of altered hydrologic regimes due to climate change. One possible result of this is the increased potential for flooding.

Several recommendations we would like to see incorporated in the plans for the site include:

- Requiring the use of native vegetation for all landscaping
- Use of the most advanced, low impact lighting to minimize light pollution and light effects on nocturnal species.
- Maximize wetland buffers and avoid all wetland filling and destruction.
- Avoid disturbance to marble knolls and any other unusual natural features.
- Permanently protect all undeveloped areas through conservation easements.
- Minimize habitat fragmentation through a more compact design and reduction in the scale of the project.

Thank you for the opportunity to comment on this project.

Sincerely,

Mark King
Director of Protection Programs