

May 9, 2008

Written Comments to the:

Dover Town Board,

Dover Planning Board

Dover Zoning Board

And all interested parties

For the Dover Knolls SEQRA scoping session of May 10, 2008

The proposed redevelopment of the Harlem Valley Psychiatric Center as set forth in the application Dated March 3 2008, submitted by Dover Knolls Development Company II, LLC will result in significant adverse impacts to the Swamp River, the Great Swamp and eastern upland forested slopes. The Swamp River is listed as a Class I NYSDEC public fishing stream with a forested floodplain along the Rt. 22 corridor.

The NYSDEC Environmental Resource Mapper (<http://www.dec.ny.gov/ismaps/ERM/viewer.htm>) lists NY State regulated wetlands, rare plants, rare animals and significant natural communities within the boundaries and buffers of the proposed development. East of Rt. 22 the flood plain rises to upland forested slopes to a ridgeline elevation of 914'. The north - south orientation of the slope is divided by an order 1 stream which is the outflow of the reservoir and wetland DP 35 lying within a forested upland basin at elevation 780' to the east of the 914' ridgeline. The stream continues its westward flow down slope to the Swamp River floodplain, through a culvert under Rt. 22 where the terminus is wetland DP 22, The Great Swamp at elevation 420'. NYS Wetland DP 30 at el 420' is to the north of the ball field and receives runoff from the continuous north-south slopes at Boice Park with a ridgeline elevation of 1126'. The Duell Hollow Critical Environmental Area and the Appalachian Trail are contiguous to the eastern boundary of the proposed development. The Great Swamp and the Swamp River are the lowest point of the drainage for the eastern slopes. The eastern portion of the site adjacent to Rt. 22 currently experiences flooding during heavy rains. The proposed addition of roads, parking lots, driveways, commercial and residential buildings and the clearing of forested eastern slopes up to 25% will create conditions that are optimal for flooding. The volume and velocity of storm water will increase significantly as gradients of roadways and cleared slopes increase above 10%, creating a greater

potential for soil erosion, stream sedimentation and habitat loss. 98% of storm water will runoff of impervious surfaces such as roads, driveways, parking lots and rooftops. Increasing impervious cover in the lower elevations of the flood plain will decrease the area for infiltration of surface water and hydraulic restriction such as pipes, culverts and catch basins will increase flooding. One determining factor is the very slow moving Swamp River; the USGS map shows the Swamp River with a drop in elevation of one foot in two miles from the Wheeler Rd Bridge at 420' and to the North Chippewalla Rd Bridge at 419'. Storm water from residential and commercial development sources typically contain pollutants such as oil, gasoline, sediments, bacteria, pesticides, nitrates, phosphorous and chloride. Clearing of forested slopes will cause an adverse impact to aquifer recharge rates resulting in increased surface runoff and "flashier" floods.

It is likely that substantial flooding will increase and cause adverse impacts without a storm water management and low impact/resource based development plan in place. Keeping roadways and residential/commercial construction to areas of 10% slope and less would help mitigate flooding. Better site design practices should be incorporated in the planning stages to improve storm water management with smaller clusters of housing and resourced based planning. Adverse impacts to the biodiversity of rare plants, rare animal populations and significant natural habitat areas in the steep slopes and wetland buffer areas contiguous to the Duell Hollow CEA should be avoided. Bobcats are present in the Duell Hollow CEA and typically require 5,000 acre ecosystems to support biodiversity. Amphibian communities will have adverse impacts from loss of forested area contiguous to lowland and upland wetlands. Remaining slopes over 10% could be incorporated into contiguous conservation areas and conservation easements to protect the water resources and biodiversity of the Harlem Valley.

Low cost and long term mitigation efforts to reduce adverse impacts should include an ongoing public awareness campaign promoting sound watershed stewardship. Educational materials and educators are available through local and national organizations: Dutchess County Soil and Water Conservation District [www.dcswcd.gov](http://www.dcswcd.gov) in Millbrook 845-677-8011, Cornell Cooperative Extension Environmental Education Program [www.ccedc.org](http://www.ccedc.org) 845-677-8223, The Housatonic Valley Association [www.hvatoday.org](http://www.hvatoday.org) 845-789-1381. Friends of the Great Swamp [www.frogs.org](http://www.frogs.org), the Center for Watershed Protection [www.cwp.org](http://www.cwp.org), NYSDEC <http://ny.dec.gov> and [www.epa.gov](http://www.epa.gov)

Elevations given are from the USGS Dover Plains-CT 1998 map boundaries revised 2000

Thank you,

