

June 30, 2009

Town of Dover Town Board  
126 East Duncan Hill Road  
Dover Plains, New York 12522

**Re: Referral: SQ 09-223, Knolls of Dover DEIS  
Parcels: 7059-00-555750, -814768, -502949, and 7159-00-162702**

Dear Members of the Town Board:

Our Department is in receipt of the Draft Environmental Impact Statement for the Knolls of Dover proposal submitted by Dover Knolls Development Company II, LLC. This Department has previously offered comments on the project, including the Redevelopment Application and Zoning Amendment Applications to accommodate a Mixed Use Institutional Conversion Overlay District (MC), and on the Scoping Document submitted for the coordinated environmental review of the proposal.

The Department recently addressed the proposed Local Law incorporating the former Dykeman Farm parcel into the MC Overlay and the Knolls of Dover Master Development Plan in a letter to the Town Board dated June 10, 2009 (attached). Rezoning the historic Dykeman Farm property represents a significant concession by the Town on behalf of the Knolls of Dover proposal. The Town is entitled to a substantive discussion of the issues that have been raised during the DEIS review, including the phasing of construction and demolition on the east side of Route 22, the proportion of outlying single family homes to centrally located attached housing units, potential impacts on water resources, and a realistic assessment of the long-term viability of the proposal.

We continue to support the evolution of this Plan from its original "suburban-style development" toward a community based on transit-oriented development principles and traditional neighborhood design guidelines. We see the incorporation of more compact hamlet-scale development forms with neighborhood parks as focal points, the mixed-use main street, 10% workforce housing, Swamp River boat launch, coordination with Metro-North parking needs, new station building, and detailed design guidelines as positive aspects of the proposal. The following recommendations are intended to make the project more consistent with those goals.

## **Project Phasing**

Of primary concern at this time is the proposed phasing described in the DEIS. In the Phasing Plan Exhibit II-44, we are encouraged by Phase 1A directly around the train station, but Phase 1B should also include the north side of the main street past the U-Building. This entire development is premised on its “Main Street” character—all illustrations show pedestrians in tree-lined, sidewalked settings with development—commercial and residential—on both sides of the street. Without commercial and residential development on both sides of Main Street east of Route 22, this area will appear and function as a car-oriented big box shopping center with no main street character, and no destinations for pedestrian activity out on sidewalks. No additional expensive demolitions are necessary to include this section of the mixed-use main street into Phase 1B (page II-26). By delaying the development of both sides of the street, the applicant risks undermining its primary marketing theme.

One of the more positive aspects of this proposal has been the rehabilitation and conversion of existing institutional structures and their integration into the mixed use neighborhood proposed for the east side of Route 22. Of equal importance to the Town is the demolition of deteriorating institutional infrastructure. The current proposal calls for demolition of 4 institutional buildings during Phase 1b (within 4 years), and demolition of agricultural structures during Phase 1C (year 5). A total of 18 institutional buildings are not scheduled for demolition until Phases 2A (years 6-8) and 2C (years 9-10). Under the best of circumstances, this schedule allows continued deterioration of these already dismal structures that would seem counterproductive to creating vibrant and welcoming neighborhoods, businesses, and community facilities in their midst.

Additionally, in the event that, despite the intentions and assurances of the applicant that all phases of the proposal will be completed, the development is delayed or halted prior to completion of Phases 2A, B, and C, the Town would be left to contend with the derelict campus. We would strongly suggest that a much greater proportion of demolition be incorporated into Phase 1 to insure that the extraordinary site and the development of the proposed community are not compromised.

We also suggest that the historic farmhouse at the west end of Wheeler Road be retained and perhaps a portion of the barn-silo complex as a reminder of the past farming uses on the property.

## **Distribution of Residential Development**

Also of concern is the continued placement of isolated housing clusters well beyond the reasonable 1/2-mile walking distance to the train station and main street center. Only 68% of the total housing units are within central walking range (page II-14), making the project less transit-oriented than desirable and more likely to create excess traffic and parking demands. We recommend against the long dead-end road in the southwest corner of the site, which is separated from the rest of the project, is not ideal from an emergency access perspective, and directly infringes on the environmentally sensitive area ES-1 shown in Exhibits II-4 and II-9.

Instead of these isolated residential clusters in sensitive areas, which are too small to be labeled as separate hamlets in Exhibit II-10, the required Alternative should consider a stronger mix of attached units in the town center area. Only 137 units, 10% of the total for the entire property, will be flats or apartments that are not age-restricted (page II-9). More such units should be available for singles from the community and young couples or professionals that will be attracted to a true transit-oriented development with direct connections to White Plains and NYC.

To accommodate higher density in the central neighborhoods, the Town should consider allowing four-storey mixed use structures within the center on both sides of Route 22, especially along the Wheeler Road frontage. This would allow greater flexibility in the configuration of apartments and encourage greater density within walkable range of the commercial, community, and transportation facilities.

## **Traffic and Parking**

The Route 22 and main street sections shown in Exhibit II-14 and 15 are too wide to help naturally slow traffic down through the town center. We suggest 11-foot travel and turning lanes with no median off-sets for Route 22 and 10-foot lanes with 7 or 8-foot parking on the main street. The Greenway Guides recommend street tree spacing at 20-30 feet on average in centers, not the proposed 40 feet (page II-20).

We recommend reduced parking requirements in transit-oriented development districts, at or close to 1 per unit in the town center. The overall parking and traffic calculations should also factor in a deduction for transit-oriented walkability and should include a shared parking credit for a mixture of uses (page III. J-19).

## **Conclusion**

Again, we commend the Town for its guidance of this proposal toward an innovative transit-oriented development based on traditional neighborhood forms. We appreciate the opportunity to provide comments on the Knolls of Dover DEIS and hope that the above suggestions are helpful in developing the final Plan and the Final Environmental Impact Statement.

Roger P. Akeley, Commissioner  
Dutchess County Department of Planning & Development

By

Noela Hooper  
Senior Planner