

**Naromi Land Trust  
Sherman CT 06784**

June 29, 2009

Mr. Ryan Courtien, Supervisor  
Mr. Christopher Galayda, Councilman  
Ms. Catherine Frame, Councilwoman  
Mr. Richard Hawthorne, Councilman  
Ms. Kathryn Palmer House, Councilwoman  
Town of Dover  
Dover Town Hall  
126 East Duncan Hill Road  
Dover Plains, New York 12522

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

Naromi Land Trust is based in Sherman, Connecticut, a neighbor of the Town of Dover, and a downstream recipient of water from the Swamp River, the Ten Mile River and the Housatonic River. The subsequent comments are addressed to ecological concerns and based in part on my knowledge of the campus during eighteen years as Director of Program Evaluation of HVPC.

The proposed project has an admirable goal of a neighborhood core which is important for allowing pedestrian access and public transportation for more distant travel. It can be seen by the clustering of the many hospital buildings that its concept was similar. It worked well for many decades. Intensive use was centered near Route 22 and the train station. This in turn allowed for preservation of the open farm land and the forest around the reservoir.

Watershed protection must be a high priority for any development and preservation of arable land with the potential for future agriculture should also be a priority. The golf course has kept open much of the former dairy and cropland. Continuation of open land will give flexibility for the future if locally grown food or recreational space is needed.

The wild areas along the Great Swamp (Swamp River) are important as buffers for water quality affecting downstream uses and habitat. Sensitive areas and rare species and habitats have been identified by experts in other reports. It is important to have large contiguous undisturbed swaths of land near wetlands to provide sufficient filtration and flood control as well as to sustain the overall ecology. Clustering and siting houses away from sensitive areas should be a goal of the development. The usual 100 feet of totally undisturbed riparian buffer from stream courses and wetland edges should be considered a minimum; more may be needed in some locations. If ground water or water from the river is needed in the future you want to be sure that it will not be contaminated.

This is true also in the upland forest on the eastern hillside of the property. Houses must be sited well away from the reservoir to ensure its availability and purity as a water source both now and in the future. In the years during which Harlem Valley Psychiatric Center was in existence the reservoir was the drinking water supply for nearly 6,000 patient and another 1,000 staff, many of whom also lived on the property. This resource must be among the highest priorities of the project. No development should be allowed on any slope over 15 degrees. The safest solution would be to put the reservoir and surrounding forest and fields into permanent conservation.

Undisturbed forest along the eastern ridge also serves as a privacy buffer for any new homeowners, and is part of a much larger ecological area encompassing the Appalachian Trail land and private properties. This section of unfragmented forest should be kept intact.

The important resource areas of the property: prime agricultural soils, drinking water supply, aquifers, forest support areas, steep slopes, and ridgeline view sheds, should all be permanently protected in the development which the Town of Dover ultimately approves. Permanent easements with appropriate rights and restrictions will ensure that future owners of any individual house sites and the overall development will also care for such important aspects of the property.

Permanent designation is especially key in a long term development such as this one. It may take many years and several owners to see a full build out of a planned development such as this one. The Town of Dover needs to ensure that its Master Plan goals are incorporated in clear and enforceable language. Simply adding more single family homes on the fringes of the property will not bring the economic cohesiveness and prosperity to Wingdale that all would like to see. The revenue producing aspects of the Plan need to occur.

The campus of HVPC functioned well, but construction is done differently now than in the early 1900's. The problems inherent in taking over old structures must be addressed clearly. Environmental hazards and the high expense of demolition were evident even in 1981 in a study that the hospital undertook of possible alternatives uses for the campus. It is unclear at this point how the Benjamin Company will deal with these issues in both the buildings, and in the utility tunnels and passageways connecting the many buildings,

all of which carry wiring and piping with various hazards, especially asbestos and lead. The Dover Knolls plan speaks of preserving/restoring some buildings, but those named are either small houses or of fairly recent construction. The many large older brick administration and patient ward buildings along Route 22 and Hutchinson Avenue will need to be demolished and the hazardous materials removed. This must be done prior to creating a business and housing cluster near Route 22 and the train station. The development plan and DEIS should be required to address these in detail and with a time frame that is acceptable to the Town.

Sincerely,

Margery Josephson  
President, Naromi Land Trust

Cc: Dover Planning Board