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Memorandum

To: Neil Wilson, Esq., Director of Municipal Development
From: Nina Peek, AICP
Date: November 2, 2016
Re: Hudson Heritage Project
40509 Project File
cc: David Cooper, Esq. – Zarin + Steinmetz
Andy Learn, PE – Morris Associates

In accordance with our contract to provide special project municipal consulting services to the Town of Poughkeepsie, AKRF, Inc. has reviewed materials submitted to the Town relative to the Hudson Heritage Project (3532 North Road – US Route 9, Poughkeepsie, NY 12601), Tax Parcel IDs: 134689-6163-03-011149-000 and 133200-6163-03-025314-0000).

The Applicant for the Proposed Project is: EFG/DRA Heritage, LLC

The Proposed Action includes:

- Amendment of the Town of Poughkeepsie Zoning Code regulations applicable to the Historic Revitalization Development District (Town Board approval);
- Development Master Plan pursuant to §210-30 Historic Revitalization Development District and §210 – 66: Development Master Plan Approval (Town Board approval);
- Site plan approval (s) and subdivision approval from the Town of Poughkeepsie Planning Board (the “Planning Board”).

Specifically, AKRF, Inc. has reviewed the following pDEIS drafts:

- May 16, 2016;
- September 15, 2016; and
- October 27, 2016

We have coordinated our review with the Town’s consulting engineer: Morris Associates and the Town’s Special Counsel: Zarin + Steinmetz. Attached are the completeness memos submitted to the Applicant. As of the writing of this memorandum, the Applicant has adequately addressed completeness comments offered on the pDEIS.

No	Chapter	Type	pDEIS Page #	Comment
1	General	Scope		The numbering system used throughout the pDEIS should be revised to match the numbering in the approved Scoping Document.
2	General	Scope	Cover	Page 3 of the adopted Scoping Document requires that the cover sheet include the location of the Proposed Action by address and tax parcel number.
3	General	Scope	Cover	Page 3 of the adopted Scoping Document requires that the cover sheet include name, email address and phone number of the primary preparers of the DEIS.
4	General	Scope	Cover	Please update the contact information for the Lead Agency
5	General	Scope	Inside Cover	Page 3 of the adopted Scoping Document requires that the cover sheet include name, email address and phone number of the project sponsor's consultants involved in preparing the DEIS.
6	General	Scope		Per page 3 of the adopted Scoping Document: "When describing the Proposed Action and its potential impacts, the DEIS will use the word "would" rather than "will". This needs to be revised throughout the pDEIS document.
7	General	Scope		While it is true that some of the extant buildings on the site have been determined by the Applicant to be unsalvageable, this is not true for all of the buildings as is asserted to support the need for complete demolition. The pDEIS includes a structural conditions report as part of Appendix I for buildings 23, 61, 147, 148 and 149 - but structural analyses for the remaining buildings is not included and therefore the assertion that they are not salvageable is unsubstantiated. In the absense of this analysis, we would suggest that the language throughout the pDEIS be revised to indicate that some of the buildings are deteriorated beyond repair, while others will be demolished because their reuse would not meet the objectives of the Applicant.
8	General	Scope		In some sections the pDEIS states that the "Kirkbride" Administration building will be adaptively reused, while in others the narrative states either "a portion of" or the "central portion/main wing. We suggest that this statement be revised, throughout, to indicate "a portion" of the Kirkbride Administration will be adaptively reused.
9	General	Scope		The figures in the DEIS, and all the engineering plans, should show the limits of the two solid waste areas on the site.
10	General	Scope		The DEIS should be expanded to better discuss the impacts related to the waste areas regarding leaving them in place, removing them, remediating them, drainage to, over and within the waste areas, and proposed construction over or adjacent to the waste areas, including fill and limitations based on the current covenants and restrictions.
11	General	Scope		The DEIS should include a map of the areas in Tables 3.17.1, 2.3 and 4 and Table 3.17.5. The DEIS shall also explain how weigh tickets for waste disposal will be obtained (i.e. where the certified scale will be) and show that all waste removal is properly accounted for.
12	General	Scope		The DEIS should include confirmation from the County that the County will allow the proposed trail and connections within the County owned R-O-W in the southeasterly part of the site. The DEIS should also include confirmation that the County will accept any drainage revisions affecting its R-O-W within the site and continuing to Fulton Street.
13	General	Scope		All easements on site should be shown, including the gas and telephone easements. (The DEIS should also discuss whether or not the site will connect to the natural gas line.) The County property shall be consistently identified as a R-O-W, not an easement (e.g. on Figure 2.2.3, box 4 is not an easement). It appears the private spur extending to the power house has been abandoned. The landfill restricted use areas shall be properly, consistently, and completely shown. Minimum dimension 30' or per Town Code for all easements.
14	General	Scope	Site Plan	Identify the initial demolition phase. Show wetland flag locations for southerly wetland/stream limit on engineering plans. Clarify demolition information distinguish or label Building or Pavement to remain.
15	General	Scope	Site Plan	Label additional features on Site Plan including: Retaining Walls, Garage Parking (Building J2 seems to be either all garage or storage), underground detention areas and lighting. Key Map and/or match lines should be provided on each sheet. Clarify limits of disturbance (L-O-D) and silt fence placement. In regard to the road profiles, vertical curve length is below standard distance of 100'. Some road grades are less than the standard of 1%.
16	General	Scope	Site Plan	In regard to the road profiles, vertical curve length is below standard distance of 100'. Some road grades are less than the standard of 1%.
17	1.0 Executive Summary	Scope		1 The numbering in this chapter should be revised to match the adopted scoping document (1.A.1.a, etc).
18	1.0 Executive Summary	Scope	pps 8/9	Section I.H. of the adopted scoping document requires a table comparing the impacts of the Proposed Action with various alternatives
19	1.0 Executive Summary	Scope	8	Regarding construction impact: Outline both waste areas on all plans. Assess impact from regrading. Asses impact from loading waste areas, ie., squeeze out more contaminated water, on-going maintenance to keep parking area drainage functional, assure no building are built over waste.

No	Chapter	Type	pDEIS Page #	Comment
20	2. Description of the Proposed Action and Project	Scope	10	2.1.1 The narrative explains the existing HRDD zoning regulations: "require that the Applicant for development master plan approval assess all buildings on site for potential adaptive reuse." The zoning requires consideration of adaptive reuse of the buildings, but it does not specifically require it. Given that a structural analysis for all the buildings has not been completed, we suggest that this section be revised to indicate that some of the buildings are deteriorated beyond repair (in the Applicant's opinion), while others will be demolished because their reuse would not meet the objectives of the Applicant. The true focus for the requested zoning text amendment are the current HRDD density, use and threshold requirements, which would render the Proposed Project infeasible.
21	2. Description of the Proposed Action and Project	Scope	10	2.1.3 Please describe which uses "may also require" special use permit approval from the ZBA. The MDP must include all proposed uses.
22	2. Description of the Proposed Action and Project	Scope	10	2.1.3 Please confirm whether subdivision of the site is part of the Proposed Action, in which case it should be discussed/described as part of the project for which the Applicant is seeking approval from the Planning Board.
23	2. Description of the Proposed Action and Project	Scope	26	The statement "The Project will therefore not have an adverse stormwater impact on adjacent or downstream properties or receiving water courses" is not substantiated herein. Please provide additional narrative to support this statement.
24	2. Description of the Proposed Action and Project	Scope	10	The numbering system in this Chapter (2.1.1, 2.2.) does not match that in the adopted Scoping Document or the convention used in the other pDEIS chapters (3.1.A, B, etc.).
25	2. Description of the Proposed Action and Project	Scope	10	The Figures should be numbered sequentially in the order they appear in the document and should have page numbers for ease of identification and location.
26	2. Description of the Proposed Action and Project	Scope	11	The Regional Site Context Figure should represent the project site in the region. We would suggest a map that matches the scope as described in the text.
27	2. Description of the Proposed Action and Project	Scope	10	2.1.1 The adopted Scoping Document requires a description of the approvals process required to effectuate the components of the Proposed Action.
28	2. Description of the Proposed Action and Project	Scope	10	The document should acknowledge that part of proposed trail system is in the County owned parcel (Tax ID 072030); and demonstrate County acceptance of trail proposal.
29	2. Description of the Proposed Action and Project	Scope	12	The adopted Scoping Document requires a map of the tax parcels.
30	2. Description of the Proposed Action and Project	Scope	12	Please correct entry 4 - CSX property is part of County owned r-o-w, not an easement. Add gas easement shown on plan. Add telephone easement shown on plan. Add two landfill areas as restricted use areas (and/or easements).
31	2. Description of the Proposed Action and Project	Scope	12	Utilities - add discussion of gas easement and will site use natural gas?
32	2. Description of the Proposed Action and Project	Scope	12	The adopting Scoping document requires a description of the utilities serving the project site, please provide a summary of how the new proposed systems will connect to existing off-site infrastructure.
33	2. Description of the Proposed Action and Project	Scope	15	The description of existing HRDD zoning should include discussion of density bonuses in Section 210-30(D)
34	2. Description of the Proposed Action and Project	Scope	15	Section 2.5 (should be Section II.B.7) - The adopted Scoping Document requires a description of the State Historic District, Federal Historic District and National Historic Landmark structures and landscape features. Currently, this section provides only a cursory discussion of the Administration Building and the Great Lawn.
35	2. Description of the Proposed Action and Project	Scope	15	Last bullet - describe in more detail where the contaminated soils are, the volume to be removed, and the disposal site.
36	2. Description of the Proposed Action and Project	Scope	15	Existing Uses and Structures (should be Section II.B.8) - The adopted Scoping Document requires a description of all existing uses and structures on the project site, including buildings to be removed and retained and their current physical condition. Currently, this section includes a reference to the Hartgen Archeological Report and a summary of the asbestos abatement process (which is out of place here). We suggest a narrative describing all on site uses, a table and associated map, listing and numbering each existing building, its condition as verified by a qualified structural engineer, and the proposed disposition for each building.
37	2. Description of the Proposed Action and Project	Scope	15	Site Remediation Plan (should be Section II.B.9) - The adopted Scoping Document requires a discussion of the site remediation plan and schedule (phases, entire site at once, etc.). The Town has already granted demolition permits for 5 on-site buildings, and we understand that remediation for several other buildings is pending. Further, we understand that some portion of the funding for these activities will be provided by the State. This section should describe the process, schedule and outside funding sources for all known site remediation activities and an anticipated schedule for future site remediation activities.
38	2. Description of the Proposed Action and Project	Scope	16/17	The narrative indicates: "These retail spaces will likely be leased by.... retailers." Please clarify what kind of retail is anticipated in this area.
39	2. Description of the Proposed Action and Project	Scope	17	"A _____ foot wide concrete/brick/asphalt pedestrian walkwaywould be provided along the western edge of the commercial areas." The location of this walkway is not evident on 2.1.4 or 2.1.2. Is it the sidewalks or in the west buffer?
40	2. Description of the Proposed Action and Project	Scope	17	The narrative indicates that the hotel will be completed in the second phase, is this concurrent with the residential uses with the same expected completion date?

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41	2. Description of the Proposed Action and Project	Scope	17	During which phase is the adaptive reuse of the Director's Residence proposed?
42	2. Description of the Proposed Action and Project	Scope	17	The narrative (and the table in 2.1.3) indicate that parking for the 225 townhomes, 500 apartments and 25 single family homes will be provided "on-street, in lots for the apartment buildings, and on driveway for the townhomes and single family homes." However, the illustrative plans do not indicate any on-street parking and it is difficult to ascertain whether there is sufficient off-street parking. A parking plan would be very useful.
43	2. Description of the Proposed Action and Project	Scope	18	The narrative refers to "community facilities" - please clarify what uses are contemplated, where they are located and who they will serve.
44	2. Description of the Proposed Action and Project	Scope	18	The description of the proposed adaptive reuse for the Administration building describes an: 80,000 sf hotel, that would include a 15000 sf - 60 seat restaurant, 12000 sf spa, and 13000 sf common area. Using these assumptions, that leaves 40K sf for 80 hotel rooms = 500 sf room (not accounting for hallways, elevator areas, kitchen, etc.), which does not seem sufficient. Please provide additional discussion on the hotel use - (short stay/long term/time share), proposed parking and location of the parking required for each component, proposed use of the "common area". Please clarify whether the restaurant be open to the public, hours of operation, etc.
45	2. Description of the Proposed Action and Project	Scope	18	The Director's Residence (how big is this building) is identified as the new site for the Dutchess County Historical Society or a Bed and Breakfast or another similar use. (1) During which phase would this occur; (2) has the Historical Society expressed interest; (3) Has the building been evaluated for reuse as a bed and breakfast and has this use been factored into the utility load? (4) The Illustrative Site Plan does not show any parking associated with this building.
46	2. Description of the Proposed Action and Project	Scope	18	Entertainment Hall - what are the proposed uses for this building? There does not appear to be any parking associated with this use, the Avery Chapel or the Library, please identify where parking would be located.
47	2. Description of the Proposed Action and Project	Scope	18	North Green Buffer - will this private, community owned amenity be programmed with outdoor events restricted to community residents only?
48	2. Description of the Proposed Action and Project	Scope	18	Please clarify the use of the Entertainment Hall, Avery Chapel, and Library will be limited to residents of the Proposed Project.
49	2. Description of the Proposed Action and Project	Scope	18	Please clarify the proposal for "innovative recharge and infiltration techniques" - what will be used, and where these will be located within the Proposed Project Site.
50	2. Description of the Proposed Action and Project	Scope	19	Installation of bicycle racks - Please provide a plan with the location of the bicycle racks and that demonstrates adequate roadway width for bike lanes (or specify that bicycle circulation would be limited to the trail network and specify which trails)- and where these lanes would be located, how they would connect to the adjacent (external) roadway network.
51	2. Description of the Proposed Action and Project	Scope	19	Please clarify how compliance with DEC stormwater management requirements constitutes Sustainable Design
52	2. Description of the Proposed Action and Project	Scope	19	Please provide a Figure indicating the location of rain gardens, and a description of their design/functionality.
53	2. Description of the Proposed Action and Project	Scope	19	Section II.C.d 4/5/6 of the adopted Scoping Document have not been addressed
54	2. Description of the Proposed Action and Project	Scope	19	Please clarify the location of the Great Lawn "lookout", what will be located there, is it open to public?
55	2. Description of the Proposed Action and Project	Scope	19	The adopted Scoping Document requires "Graphics presenting streetscape design (including frontage along Route 9) and amenities.
56	2. Description of the Proposed Action and Project	Scope	19	Please provide details on which roads are proposed for public dedication, which are proposed to be private and a section/elevation for each road type - including proposed landscaping, sidewalks, parking, bicycle paths, lighting, etc.
57	2. Description of the Proposed Action and Project	Scope	Figure 2.1.3	The circulation/loading/driveway/access/egress for the hotel building deliveries would appear to be via the front door. Please clarify.
58	2. Description of the Proposed Action and Project	Scope	20	Please clarify the proposed flexibility in "building configurations" - does this mean flexibility in building height, length, setback?
59	2. Description of the Proposed Action and Project	Scope	20	Please clarify the proposed flexibility in "unit type distribution" - does this mean flexibility in apartment/townhome/single family home, or flexibility in the number of bedrooms proposed for these units or both? Please confirm that the program analyzed in the pDEIS (specifically with regard the # of bedrooms) represents the largest (worst case scenario) residential build out for the project site.
60	2. Description of the Proposed Action and Project	Scope	20	How many apartment buildings are proposed?
61	2. Description of the Proposed Action and Project	Scope	20	Are the townhomes individual structures - or are the attached in clusters and if attached, how many townhome buildings are proposed?
62	2. Description of the Proposed Action and Project	Scope	20	We suggest that the number of units by type, number of bedrooms for each type, dimensional requirements for each unit type, parking ratio and parking provided be presented in a table.
63	2. Description of the Proposed Action and Project	Scope	20	The apartment buildings are proposed to be 3 and 4 stories with max height of 50 feet; the townhomes are proposed to be 2 and 3 stories with a max height of 50 feet and single family homes are proposed to be 2 stories with a max height of 50 feet. Please clarify.

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64	2. Description of the Proposed Action and Project	Scope	20	The narrative states both that the buildings will be close to the property line to create "walls" with and also "Buildings will be separated from the sidewalks by foundation plantings and shallow front yards/gardens." Five foot setbacks are not sufficient to accommodate foundation plantings/yards/gardens. Please clarify.
65	2. Description of the Proposed Action and Project	Scope	21	It is presumed that "street" trees would be provided within the sidewalk (public right of way). Please provide details on the width of sidewalks for both roads to be dedicated to the Town, and those that would be privately owned/maintained. Please also provide details on ownership/maintenance of sidewalks for each unit type as required by the adopted Scoping Document.
66	2. Description of the Proposed Action and Project	Scope	21	The narrative states that the "Applicant will work with the Town to provide an attractive streetscape design and public amenities that will create a retail destination." The adopted Scoping Document requires the provision of graphics and a description of public and private recreation areas, conceptual landscaping plan, trail width, amenities and surface materials for all recreation trails.
67	2. Description of the Proposed Action and Project	Scope	21	The narrative states, " The HRDD regulations do not include bulk or dimensional requirements for commercial uses, except maximum aggregate density (floor area)." This is correct, however, both the adopted Scoping document and the HRDD regulations require that the MDP detail bulk and dimensional requirements (flood area, building height, setbacks, parking) for the commercial uses. These have not been provided as required by Section II.C.1.f.(2) of the adopted Scoping Document.
68	2. Description of the Proposed Action and Project	Scope	21	As required in the adopted Scoping Document, please provide setbacks for the various commercial components.
69	2. Description of the Proposed Action and Project	Scope	21	Please clarify the façade design details for the commercial buildings (particularly those in the B, C, D, E blocks, which have multiple "frontages")
70	2. Description of the Proposed Action and Project	Scope	21	Please provide details on the proposed sidewalk widths throughout the commercial area - particularly with reference to the areas proposed for outdoor cafes
71	2. Description of the Proposed Action and Project	Scope	21	Please clarify the proposed "flexibility" for the building configuration of the "large scale commercial building" -- is this flexibility in size, height, location, footprint? Please also reference in the narrative that this building is represented as "A1" on Figure 2.1.2.
72	2. Description of the Proposed Action and Project	Scope	21	Are the "three connected smaller scale commercial buildings" the "B" block on Figure 2.1.2? If so we recommend referencing this in the text.
73	2. Description of the Proposed Action and Project	Scope	21	What is proposed for Building A2? What is proposed for Building A3?
74	2. Description of the Proposed Action and Project	Scope	21	Are the "restaurant and pad buildings" the C, D and E block buildings (including E3/E4 and E5) on Figure 2.1.2? If so, we recommend referencing this in the text.
75	2. Description of the Proposed Action and Project	Scope	22	The adopted Scoping Document requires "typical hours of operation for each anticipated commercial use."
76	2. Description of the Proposed Action and Project	Scope	22	The circulation/loading/driveway/access/egress for buildings C, D, and E and the adaptive reuse of the Director's Residence is not clear.
77	2. Description of the Proposed Action and Project	Scope	22	Please provide additional detail regarding "typical business hours". What are the proposed hours of operation for the restaurants/café as compared to the big box retail. Is it anticipated that all uses will be open 7 days/week and what is the anticipated closing time?
78	2. Description of the Proposed Action and Project	Scope	22	Please reconcile this with the anticipated potential shared parking for outdoor events on the Great Lawn.
79	2. Description of the Proposed Action and Project	Scope	22	How does the lighting plan "take into consideration minimizing glare and "dark sky issues"?
80	2. Description of the Proposed Action and Project	Scope	22	Please clarify why it is not possible to use energy efficient lighting throughout?
81	2. Description of the Proposed Action and Project	Scope	22	"Walking trails and paths will also be lit fixtures that are compatible..." Please clarify.
82	2. Description of the Proposed Action and Project	Scope	22	Please clarify how the "conceptual landscaping of the site" will respect the original landscape design theme of the Great Lawn and Hospital campus." What does this mean?
83	2. Description of the Proposed Action and Project	Scope	22	Please clarify how "open spaces will reflect design themes of the original Great Lawn at more intimate scales." What are these design themes and how will be they be reflected?
84	2. Description of the Proposed Action and Project	Scope	23	The narrative states, " a single row of deciduous street trees will be planted along the driveway entrances to enhance..." Is this referring to a specific driveway entrance or all driveway entrances? Please clarify.
85	2. Description of the Proposed Action and Project	Scope	23	Where the narrative references "buffer areas" to be planted with a mix of ornamental, coniferous, etc. to provide visual separation.. " Does this refer specifically and exclusively to the north, south, east and west buffers as show on the Figure? If so, the narrative should be revised as such.
86	2. Description of the Proposed Action and Project	Scope	23	The adopted scoping document requires a Conceptual Landscape Plan.
87	2. Description of the Proposed Action and Project	Scope	23	Please define an "access collector road".
88	2. Description of the Proposed Action and Project	Scope	23	Winslow Gate Road already provides access to the Mid-Hudson Plaza. Please clarify.
89	2. Description of the Proposed Action and Project	Scope	23	Does the Project propose realignment of Hudson View Drive to connect to Paint Shop Road - or would it follow its current alignment? Please provide additional detail on the roadway design (width, number of lanes, circulation, on-site parking, direction, bicycle lanes, public/private, etc.). We would suggest this is provided in a Figure.

No	Chapter	Type	pDEIS Page #	Comment
90	2. Description of the Proposed Action and Project	Scope	23	The narrative states that the Project includes "vehicular and pedestrian connections from the site to the Mid-Hudson commercial plaza... which then connects to Marist College... trail connection from the site to the CSX railroad r-o-w.." but it is not clear how this will be executed. Does the dotted line on Figure 2.1.4 represent an offsite trail connection that the Applicant is building, paving, striping?
91	2. Description of the Proposed Action and Project	Scope	23	The adopted Scoping Document requires discussion of the connection to Marist College. This has not been provided.
92	2. Description of the Proposed Action and Project	Scope	23	Where is the nearest Dutchess County Loop bus stop? Where does the loop bus go? How often does it run?
93	2. Description of the Proposed Action and Project	Scope	23	Does the Project propose a shuttle bus for use by residents of the proposed development?
94	2. Description of the Proposed Action and Project	Scope	23	The adopted Scoping Document requires a discussion of proposed on-site parking.
95	2. Description of the Proposed Action and Project	Scope	24	Recreation and Open Space - This section is incomplete. The adopted Scoping Document requires a description and graphics for public and private recreation spaces, and amenities, and a conceptual landscaping plan.
96	2. Description of the Proposed Action and Project	Scope	24	The adopted Scoping Document requires a description of the trail width and surface materials
97	2. Description of the Proposed Action and Project	Scope	24	Please clarify how the proposed on-site trail would connect to Quiet Cove Park? and the Dutchess County Rail Trail? (later the narrative states that the connection to the DCRT "could be redeveloped by another entity") We recommend combining the section labeled "Trails" with the section labeled "Main Trail" and "Secondary Paths" for clarity and consistency.
98	2. Description of the Proposed Action and Project	Scope	24	Please provide additional narrative on who will maintain the trails? Will they be open year round? Will they be plowed and if so, where will snow storage be located?
99	2. Description of the Proposed Action and Project	Scope	24	Is linear park usable along Route 9 usable? Is a walking trail proposed? Where is this "linear park" located relative to Route 9 in elevation?
100	2. Description of the Proposed Action and Project	Scope	24	Please clarify the locations and design for the proposed overlooks, what views they provide, how they are accessed and by whom?
101	2. Description of the Proposed Action and Project	Scope	24	Additional Private and Hotel Amenities - please clarify which buildings would accommodate each proposed use
102	2. Description of the Proposed Action and Project	Scope	25	The adopted Scoping Document requires graphically presenting on-site and off-site infrastructure (reference to the Engineering Plan set is not sufficient).
103	2. Description of the Proposed Action and Project	Scope	25	Since there was a powerhouse, there is discussion elsewhere about tunnels to the various buildings. Discuss how to abandon the steam tunnels. Discuss changes to existing drainage system in areas of new construction.
104	2. Description of the Proposed Action and Project	Scope	26	Please support the necessity to regrade 63.2% of the project site.
105	2. Description of the Proposed Action and Project	Scope	26	Please clarify what is meant by a 3H: 1V slope
106	2. Description of the Proposed Action and Project	Scope	26	The adopted Scoping Document requires the stormwater management system to be shown graphically. This graphic should depict previously referenced sustainable/LID/green infrastructure practices including: rain gardens and other innovative stormwater management techniques.
107	2. Description of the Proposed Action and Project	Scope	28	The description of the Applicant's objectives is not consistent with the language proposed to be added to the "Purpose" of the HRD District in the Zoning Code - for example: the references to new urbanism have been removed
108	3.A. Land Use	Scope	31	The DEIS states that the property has one Tax ID number, but it falls in two municipalities. Is this correct?
109	3.A.1 Land Use	Scope	NA	No Figures are provided in this chapter. The scope requires a "Description and mapping of current project site land use, including the Great Lawn and Calvert Vaux landscape, National Register listed buildings, and current building condition (including description of any relevant easements or other rights of use by others)." While an existing land use map was provided in the project description chapter, it only shows off site land uses. There are no maps showing the current condition of on site land uses as required by the scope.
110	3.A.1 Land Use	Scope	31	The adopted Scoping Document requires description of current conditions of all on site buildings
111	3.A.1 Land Use	Scope	31	The adopted Scoping Document requires a description of access
112	3.A.1 Land Use	Scope	31	The adopted Scoping Document requires a description of easements
113	3.A.1 Land Use	Scope	NA	The scope requires "...mapping of land uses within a one-half (1/2) mile radius of the project site including public and private open space areas." Figure 2.4.1 has this information, and should be replicated in this chapter.
114	3.A.1 Land Use	Scope	31	Under existing conditions, the scope requires a discussion of the "relationship of the Project to the adjoining county/state mental health facility immediately east of the project site." The DEIS states that there will be no relationship between the proposed project and existing facilities to the east. However, since this is the existing conditions section, any existing relationships (if any) should be disclosed.
115	3.A.1 Land Use	Scope	32	In addition to describing the no build projects in the vicinity, the "Future without the Proposed Project" should also describe the future of the project site without the proposed project.

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116	3.A.2. Zoning	Scope	39	The proposed mitigation section states that the "proposed Project is generally consistent with current HRDD regulations." However, no direct comparison between the existing regulations and the specifics of the proposed project has been provided. In addition, a number of zoning text amendments are proposed. As such, this statement is not supported by the information provided.
117	3.A.2. Zoning	Scope	39	The proposed mitigation section should more clearly describe how the proposed zoning would "mitigate" any land use or zoning impacts.
118	3.A.2. Zoning	Scope	36	Table 3.2.1 should be revised to include a summary of the permitted and special permit uses in the HRDD Zoning District.
119	3.A.2. Zoning	Scope	37	As per the scope, the future without the proposed project should "discuss the development of the project site under current HRDD zoning (without the proposed amendments to the HRDD regulations)." This section, as currently written, is more appropriate for the purpose and need section. This discussion should be revised to more fully explain the potential development of the site under the existing regulations.
120	3.A.2. Zoning	Scope	38	The scope requires a description of "the process for review of the Proposed MDP, and process for review and approval of site and subdivisions plans for the Project." While this is briefly discussed in a bullet on page 38, it would improve readability to have this discussion more fully elaborated on in its own section. This discussion should include a description of the proposed amendment to Section 210-30.C(7).
121	3.A.2. Zoning	Scope		No figures are provided in this chapter. The scope requires "...mapping of zoning districts within a one-half (½) mile radius of the project site and permitted uses in each of the identified zoning districts." This information is provided in Figure 2.4.2 in the project description, and should be replicated here.
122	3.A.3 Public Policy	Scope	52	The DEIS states that no mitigation is required. This statement should be substantiated.
123	3.A.3 Public Policy	Scope	52	Because the Master Plan specifically refers to the residential density, the DEIS should discuss whether amendment to the Master Plan to accommodate the proposed Project would be necessary.
124	3.A.3 Public Policy	Scope	NA	The Master Plan identifies the Project Site as being in an Empire Zone (see Master Plan pg 29). The relevance of this to the Proposed Project should be discussed. This should be identified in the Existing Conditions section and then analyzed in the Future with the Proposed Project section.
125	3.A.3 Public Policy	Scope	44	The discussion of greenspace and trails should be expanded. The Master Plan specifically identifies a portion of the former Hudson Valley Psychiatric Hospital as providing public access to the Hudson River (see Master Plan pg 17 & 43). Any connections between this site and the Proposed Project should be discussed in the context of public access to the Hudson River. Any potential trail connections should also be further discussed in the context of the discussion found in the Master Plan on pg 45.
126	3.A.3 Public Policy	Scope	NA	The Master Plan also identifies the Fairview Center project and traffic calming measures along Rout 9. It states, "New development in the northern section of Poughkeepsie should instead be focused around the existing and potential centers in Fairview (including the former Hudson River Psychiatric Center campus), the lands to the east of the former Alfa-Laval industrial property and the existing commercial properties at Rochdale Road , and the emerging center at Salt Point Turnpike and Bedell Road." (pg 57) This should be identified and discussed in the DEIS.
127	3.A.3 Public Policy	Scope	NA	Instances where the Project Site is specifically addressed in the Master Plan should be identified and discussed in the DEIS. The Master Plan states, "As an example of applying these principles to an emerging center along Route 9, a design concept map depicting a scheme to link the commercial Fairview Center with surrounding residential and mixed use properties has been included. The proposed largescale mixed use redevelopment of the former Hudson River Psychiatric Center (HRPC), the creation of a County park on the waterfront land to the west, the recent development of the Mid-Hudson Plaza, and the ongoing construction of Marist College housing to the east of Route 9 make this area ripe for coordinated planning as a designated commercial center. In particular, the main buildings and central grounds of the HRPC are a National Landmark Historic District, deserving historically sensitive redevelopment. But this beautiful historic property contains almost one million square feet of existing buildings, many in a serious state of disrepair. A mix of housing types with additional retail, office and service uses in a village-like on the HRPC property would create a walkable northern neighborhood to support the commercial Fairview Center, while generating enough revenue and tax base to support the successful restoration of many of the historic structures." (pg 66)
128	3.A.3 Public Policy	Scope	NA	See also Master Plan page 67. "Alternatives to the automobile are also stressed by closely integrating the proposed development on the southern section of the HRPC property and the Marist East Campus section along Fulton Street into a pedestrian-oriented, mixed-use center concept. " (pg 67)

No	Chapter	Type	pDEIS Page #	Comment
				The Master Plan includes a zoning recommendation to "Establish a base density of 300 units, and an additional incentive density of up to 150 units, for the entirety of the HRDD property." (pg 83)The compatibility of the Proposed Project with this specific density requirement should be identified and discussed. This density recommendation is further discussed on page 86. "The former State Psychiatric property located north of the proposed commercial Fairview Center will also include a mix of residential and commercial types within a center-like setting. The potential residential densities allowed within the former State Psychiatric property (referred to in the Zoning Law as the "Historic Revitalization Development District" or "HRDD") would allow development of up to 300 new units as part of a mixed use center, with the potential for an additional 150 units provided that the development plan preserves the ±18 acre "Great Lawn" west of the main historic buildings and provides for the adaptive reuse of the remaining ±269,099 square feet of the National Landmark Building. Based on the potential of 550 units within the HRDD property the effective residential density is approximately one unit for each 0.28 acres of land." (pg 86)
129	3.A.3 Public Policy	Scope	NA	
130	3.A.3 Public Policy	Scope	41	The LWRP specifically identifies the Project Site in several locations. Any specific recommendations with regards to this property should be identified and discussed.
131	3.B Community Character and Visual Impacts	Scope	Viewpoint 1 Photo 5	The visual simulations seem to illustrate that the commercial component of the Proposed development would be less visible in the leaf off condition, than in the leaf-on condition reflected in Viewpoint 1, Photo 2 - is the color of the Proposed development different?
132	3.B Community Character and Visual Impacts	Scope	53	Please quantify "most" of the remaining buildings and structures...
133	3.B Community Character and Visual Impacts	Scope	53	Please clarify this statement, "The 18 acre former Great Lawn, which was subsequently converted.." Subsequent to what?
134	3.B Community Character and Visual Impacts	Scope	56	Please clarify how/why "lighting for the Project will not shine directly upon neighboring residential properties."
135	3.B Community Character and Visual Impacts	Scope	57	The chapter notes mitigation measures, including particular lighting standards, consistency with existing historic design. As such the chapter should include a description of the standards, and consistency with historic design.
136	3.B Community Character and Visual Impacts	Scope	53	Paragraph 2 - Please expand narrative to describe existing conditions/visual imagery of immediate adjacent sites, urban design character and context and description of Marist and CIA. (B.1.a)
137	3.B Community Character and Visual Impacts	Scope	53	Please provide existing conditions photographs of the Great Lawn/landscape elements
138	3.B Community Character and Visual Impacts	Scope	B.1.b	The adopted Scoping Document requires narrative re: Quiet Cove Park
139	3.B Community Character and Visual Impacts	Scope	B.1.c	The adopted Scoping Document requires discussion of the NYSDOS Scenic Areas of Statewide Significance, etc.
140	3.B Community Character and Visual Impacts	Scope	53 (B.1.d)	Please define 'sensitive receptors' and demonstrate on a graphic/figure the location of identified sensitive receptors.
141	3.B Community Character and Visual Impacts	Scope	53 (B.1.d)	Figure 3.4.1 shows results of GIS analysis. Additional discussion of methodology would be helpful.
142	3.B Community Character and Visual Impacts	Scope	53	Please clarify this statement: "From certain locations on Route 9" by providing specific detail on from which locations along Route 9 the referenced buildings are visible.
143	3.B Community Character and Visual Impacts	Scope	56	The narrative would benefit from a description of what will be replacing the most visible structures (Cheney Building, Smokestack, etc.) in the Future with the Project.
144	3.B Community Character and Visual Impacts	Scope	56	Please provide additional detail for what is meant by "modern fixtures."
145	3.B Community Character and Visual Impacts	Scope	56	Please provide additional detail regarding how walking trails and paths will be lit.
146	3.B Community Character and Visual Impacts	Scope	56	The narrative states, "The Project will comply with all relevant Town lighting standards.." and also references section 210-81 of the Zoning Ordinance. Please confirm that the Project will meet all the lighting standards listed in the code, and if not, which would be considered "relevant."
147	3.B Community Character and Visual Impacts	Scope	56 (B.3.c)	The adopted Scoping Document requires additional discussion of lighting fixtures, foot candles/exposure, etc.
148	3.B Community Character and Visual Impacts	Scope	56	Note 2: Please clarify that only a portion of the Administrative Building will be reused.
149	3.B. Zoning	Scope	34	The third paragraph on page 34 should elaborate on the requirements and reasoning of Section 210-30.D of the zoning code as it relates to area and bulk requirements. In addition, this section should disclose the density requirements specified in Section 210-30.D(1) and (2).
150	3.C. Geology, Soils, Topography and Steep Slopes	Scope	64-65	The DEIS should include a figure to show potential rock excavation areas. The DEIS should confirm that all earthwork quantities include both site grading and underground (pipe) infrastructure construction and any structure foundation excavation. Both earth and rock should be included in the cut-fill estimates.
151	3.C. Geology, Soils, Topography and Steep Slopes	Scope	63	Prepare a Figure or modify Figure 3.5.2 to show areas of potential rock excavation, verify that rock excavation has been included in previous project earthwork (cut/fill) quantities.

No	Chapter	Type	pDEIS Page #	Comment
152	3.D. Subsurface & Surface Water Resources	Scope	64	Figure 3.6.1 - show streams as depicted on the existing conditions drawing and the proposed grading plans. Correct the stream location along the southerly side to show its current location between the site and the Home Depot fill (it does not cross under the Home Depot parking lot as drawn). Show the unnamed stream along the easterly side of the former CSX r-o-w and continuing behind the Home Depot in the former CSX r-o-w. Identify as piped any portion of the stream not an open channel; on-site, under US 9, and off-site on Marist. On this or any other figure, show the 100-year flood plain referenced in the SWPPP.
153	3.D. Subsurface & Surface Water Resources	Scope	64	Show the Town wetlands and buffers on Fig. 3.6.1
154	3.D. Subsurface & Surface Water Resources	Scope	66	Possible impacts related to development in the 100-year flood plains seem to be understated.
155	3.D. Subsurface & Surface Water Resources	Scope	66	The Town required buffers along streams and wetlands should be shown in the DEIS and on the plans. The conflicting statements regarding flood plains on-site should be resolved. The firm panel identifies a flood plain on-site. The conclusory statement about aquatic resources impact is not acceptable. A full evaluation, in conjunction with drainage revisions, is required.
156	3.E. Stormwater Mgmt	Scope	68	The DEIS and SWPPP stream locations, floodplain, wetlands and drainage conditions should be updated.
157	3.E. Stormwater Mgmt	Scope	66	The floodplain referenced in the SWPPP should be included in the DEIS narrative and figures. The changes made by the Mid Hudson Plaza development may have altered the floodplain, and the floodplain delineation shall be confirmed or a perhaps a LOMA should be made part of the application. That would also require changes to the involved agency list and the approvals list.
158	3.E. Stormwater Mgmt	Scope	66	All Town required aquatic resource buffers should be shown on the plans and described in the DEIS narrative. The wetland delineations should be revised to show the changes at the southeasterly corner of the site and on the adjoining offsite County property.
159	3.E. Stormwater Mgmt	Scope	68	All drainage outfalls from the site to the relocated steam should be shown on a figure within the DEIS (and on a plan sheet made part of SWPPP).
160	3.E. Stormwater Mgmt	Scope	68	The drainage outfalls shown within the waste disposal site "Area 6" should be corrected (see 3.17) since they were changed when the waste area was capped. The existing conditions drainage analysis and the proposed drainage design should be revised as needed. The site connections to the NYSDOT drainage should be clearly shown, and the drainage revisions at Winslow Gate Road made by the Mid Hudson Plaza development should be updated for the Hudson Heritage plans and analysis.
161	3.E. Stormwater Mgmt	Scope	66	The conclusory statement regarding aquatic resources impacts is not acceptable. A full evaluation, in conjunction with drainage revisions, is required.
162	3.E. Stormwater Mgmt	Scope	66	A full evaluation, in conjunction with drainage revisions, is required.
163	3.E. Stormwater Mgmt	Scope	App H	The DEIS and the SWPPP should include as a minimum the HydroCAD routing diagram and a figure and map showing the drainage areas and outfalls, all updated and revised to resolve the related comments above.
164	3.E. Stormwater Mgmt	Scope	App H	The DEIS should discuss and show on a figure, and the SWPPP should be revised to include, additional disturbance areas beyond the laydown and topsoil stockpile locations now only shown on Figure 3.20.1 on a preconstruction plan. Drawings showing the site under construction should be prepared. An area for a construction manager office trailer and employee and visitor parking should be shown, along with required erosion controls. A reasonably sized area for contractors' office trailers, equipment parking, equipment maintenance and worker parking should be shown, along with appropriate stormwater pollution prevention measures. The office and yard areas should be part of the 5 acre disturbance area of every phase until the project work is complete.
165	3.E. Stormwater Mgmt	Scope	68	The outfalls/design points listed should be shown on a drainage map. The apparent outfalls within the capped landfill limits should be modified to match the as-built condition upon closure of the landfill (Area #6). The SWPPP should fully explore all outfalls and the impact from outfall revisions and changes to outfall flows.
166	3.F. Water	Scope	Appendix A	Under Section 5.0 Projected Water Demand, any proposed irrigation facilities and associated irrigation demands should be included in the total water demands.
167	3.F. Water	Scope	Appendix A	A capacity analysis should be included in Section 6.3 in order to demonstrate that the proposed project will require no capital improvements to the Town Wide Water District.
168	3.F. Water	Scope	Appendix A	The capacity analysis should include an analysis of existing and proposed average and maximum day demands, along with a review of the source, storage and pumping/distribution system capacities and requirements based upon the 2012 edition of Recommended Standards for Water Works. The source analysis should be done on the Town of Poughkeepsie portion of the total plant capacity (45% of total) and current Town flows. The pumping capacities for the Fairview Pump Station should be revised to reflect the current (upgraded) pumping capacities.
169	3.F. Water	Scope	Appendix A	The Water Distribution Conceptual Layout map, as referenced in Section 7.2, was missing and will need to be included in the DEIS. This section also noted a conflict requiring the relocation of existing water main. This will need to be discussed in the DEIS, including any current or recent work performed to address this conflict.

No	Chapter	Type	pDEIS Page #	Comment
170	3.F. Water	Scope	Appendix A	The Section 7.4.2 on fire flows should specifically state that the proposed distribution facilities will be designed to provide for both domestic supply and fire flow capacity.
171	3.F. Water	Scope	Appendix A	The proposed project mitigations to reduce identified impacts and water consumption should be included in a separate section of the DEIS.
172	3.F. Water	Scope	71	The adopted Scoping Document requires a discussion of the 2005 MOU
173	3.G. Wastewater	Scope	P 74	G.1.a Provide a description of the 4th Ward Sewer Improvement Area.
174	3.G. Wastewater	Scope	P 74	G.1.c Identify the parties to the 2005 MOU.
175	3.G. Wastewater	Scope	P 74	G.2. Provide a map showing the existing sewage system and ownership/easements, whether it is currently in use (Town or private), the size/type of pipe and its age and condition.
176	3.G. Wastewater	Scope	P 74	G.3.e Clarify on a map the ownership and maintenance responsibilities.
177	3.G. Wastewater	Scope	P 75	G.1.e Provide a description of the off-site infrastructure. Include a discussion on the condition and adequacy of the meter.
178	3.G. Wastewater	Scope	P 76	G.3.d Discuss consistency/compliance with the referenced policy documents.
179	3.G. Wastewater	Scope	74	The adopted Scoping Document requires a discussion of the 2005 MOU
180	3.H. Solid Waste	Scope	p. 80	The discussion of private haulers use of the "Town transfer station" is incorrect and shall be revised. Similarly, the description of waste being delivered to DCRRA and then to Seneca Meadows does not seem consistent with actual current disposal practices.
181	3.H. Solid Waste	Scope	p. 80	The discussion of potential use of the Recycle Depot as a final disposal destination for demolition related debris is incorrect as that facility has very limited capacity to process large amounts of waste at any given time.
182	3.H. Solid Waste	Scope	p. 78	The DEIS refers to the Site Management Plan (SMP) and the related Figure 2 for the locations of existing landfill areas. The locations should be depicted on a figure and site plans within the DEIS.
183	3.H. Solid Waste	Scope	p. 78	The DEIS should have a direct reference to the SMP and include it as a separate appendix. As presently configured, the SMP is an appendix to the Final Engineering Report (FER) and is difficult to locate in a search of the Table of Contents or Index.
184	3.H. Solid Waste	Scope	p.80	There is only a brief discussion related to the arrangement of waste collection and/or disposal facilities to be located throughout the site for both residential and commercial means for collection or separation of recyclables should be added.
185	3.H. Solid Waste	Scope	p. 81	There is only a brief discussion related to the possible crushing and processing of brick and concrete for possible re-use on site. This aspect requires much more in terms of details for stockpile management, dust suppression, noise abatement, equipment types, etc.
186	3.I. Vegetation and Wildlife	Scope		All Attachments and Figures are missing from Appendix J: "Endangered and Threatened Species and Natural Resources Assessment Report". These include the Ecological Solutions LLC report, agency correspondence, breeding bird assessment, site photos, etc. AKRF cannot complete its review until these are provided.
187	3.I. Vegetation and Wildlife	Scope		The DEIS should present an existing versus proposed built surface comparison (acres/sf of all buildings, roadways, parking), as this is one important measure of ecological impacts and the added "intensity" of the proposed use. Unlike lawns/meadows, the proposed built surfaces would offer no habitat value.
188	3.I. Vegetation and Wildlife	Scope		Page viii of Appendix J indicates there is no need to coordinate with NYSDEC on Indiana bat and northern long-eared bat as they have no record of occurrence. NYSDEC should be kept informed of all correspondence to the USFWS on this matter as they co-regulate these species.
189	3.I. Vegetation and Wildlife	Scope		Page viii of Appendix J indicates bald eagle nesting onsite is unlikely, although the species is listed in the project site's IPaC report. More certainty of potential bald eagle nests onsite is necessary because the buffer distances listed in the Bald and Golden Eagle Protection Act may encroach on the project site if any eagles currently nest nearby. Up-to-date communication with the USFWS/NYSDEC on this species is necessary and should be made part of the DEIS.
190	3.I. Vegetation and Wildlife	Scope		Appendix J, Table 4 should be revised to indicate whether any species are NYS or Federally listed as "threatened, endangered, rare, or exploitably vulnerable". We note that all ferns are "exploitably vulnerable" in NYS. Also, AKRF, Inc. has identified the NYS-endangered Monarda clinopodia, a member of the Mint Family (Lamiaceae), in similar habitat (meadow edge within ½ mile of the Hudson River) in Dutchess County.
191	3.I. Vegetation and Wildlife	Scope		The Town should retain its own wetlands ecologist to verify the delineated wetland boundaries onsite (Town Code Chapter 116 Aquatic Resource Protection).
192	3.I. Vegetation and Wildlife	Scope		Page 11 of Appendix J indicates the "Hudson River Deepwater Habitat" is the Significant Natural Community mapped by the NYSDEC. However, review of the NYSDEC online mapper says the Significant Habitat is "Tidal River".
193	3.I. Vegetation and Wildlife	Scope		The eastern box turtle (Terrapene carolina carolina) is a NYS "special concern" species. The approximate location where the individual of this species was found onsite should be disclosed and provisions to provide for the species' continued use of the undeveloped areas of the site should be explored in more detail.

No	Chapter	Type	pDEIS Page #	Comment
194	3.J. Vegetation and Wildlife	Scope		Considering the substantial increase in development density as compared to the current condition and former hospital use, the DEIS should provide a discussion of the means and methods the project will use to minimize noise and light pollution for the protection of wildlife.
195	3.J. Traffic, Transportation Pedestrians and Transit	Scope		Please provide the backup to justify the use of a 0.25%/year growth rate utilized in the No Build analysis.
196	3.J. Traffic, Transportation Pedestrians and Transit	Scope		Please confirm which on site uses in the residential area will also be open to the public and confirm whether parking to accommodate these uses would be provided.
197	3.J. Traffic, Transportation Pedestrians and Transit	Scope	87	Please confirm the impact of inclusion of a spa use on traffic/parking demand analyses?
198	3.J. Traffic, Transportation Pedestrians and Transit	Scope		Please identify any planned roadway projects in the study area that would be completed by the future analysis year (2035).
199	3.J. Traffic, Transportation Pedestrians and Transit	Scope		The Traffic Impact Study (TIS) mentioned that NYSDOT is improving the efficiency of the traffic signals along the study area corridors. The upgrades would involve the installation of Adaptive Traffic Signal (ATS). Please provide the NYSDOT Project Identification Number (PIN), a detailed description of the work (e.g., type of ATS technology, the locations, schedule, etc.). Also, would any of the new traffic signals to be installed as part of the project or recommended as mitigation be ATS?
200	3.J. Traffic, Transportation Pedestrians and Transit	Scope		The location, traffic volumes and peak hours from Automatic Traffic Recorder (ATR) counts should be summarized in the TIS.
201	3.J. Traffic, Transportation Pedestrians and Transit	Scope	92	Please confirm the impact on anticipated trip generation of including a spa.
202	3.J. Traffic, Transportation Pedestrians and Transit	Scope		The accident data should be summarized by location and any trends identified. Where necessary identify improvement measures to address safety issues.
203	3.J. Traffic, Transportation Pedestrians and Transit	Scope		Was Journey to Work (JTW) data used to develop the residential arrival and departure patterns? If not why?
204	3.J. Traffic, Transportation Pedestrians and Transit	Scope		The TIS needs to clearly state the methodology for identifying project related traffic impacts. These locations should be highlighted in the level of service (LOS) tables. Also, all locations should be identified where the project applicant would be responsible for the mitigation measure implementation (including the cost).
205	3.J. Traffic, Transportation Pedestrians and Transit	Scope	96	Please confirm the impact on anticipated parking demand of inclusion of a spa.
206	3.J. Traffic, Transportation Pedestrians and Transit	Scope		The discussion regarding the jitney needs to be expanded. The TIS should identify at what stage in the development would the applicant commit to the jitney. The number of vehicles, the route and the number of stops should be identified.
207	3.J. Traffic, Transportation Pedestrians and Transit	Scope		The vehicle classification count sheets should be provided in the appendix of the TIS.
208	3.J. Traffic, Transportation Pedestrians and Transit	Scope		Please provide the backup for the linkage credits utilized in the trip generation analysis.
209	3.J. Traffic, Transportation Pedestrians and Transit	Scope		Please provide conceptual schematics of all the project site driveways.
210	3.J. Traffic, Transportation Pedestrians and Transit	Scope		The adopted scoping document requires a discussion of queuing at each of the study area intersections for all conditions analyzed.
211	3.J. Traffic, Transportation Pedestrians and Transit	Scope		Please provide a disk with the Synchro files.
212	3.J. Traffic, Transportation Pedestrians and Transit	Scope		Please provide a graphic that shows all pedestrian and bicycle improvements associated with the proposed project and the connections to the surrounding area (off-site).
213	3.J. Traffic, Transportation, Pedestrians and Transit	Scope		The TIS needs to include a discussion regarding parking -- number of spaces, estimated demand, shared parking, etc.
214	3.J. Traffic, Transportation, Pedestrians and Transit	Scope		Were emergency services contacted regarding site access and circulation? If so, please provide a discussion of this correspondence and include all letters, call logs in the Appendix.
215	3.J. Traffic, Transportation, Pedestrians and Transit	Scope		The TIS needs to discuss in more detail on-site circulation and traffic control devices to be employed at internal intersections.
216	3.J. Traffic, Transportation, Pedestrians and Transit	Scope		Please include in the appendix the minutes from any meetings with NYSDOT.
217	3.J. Traffic, Transportation, Pedestrians and Transit	Scope		This chapter should be significantly revised to provide a narrative summary of the results of the TIS. References to the TIS - in lieu of providing any substantive discussion is not adequate for the purposes of public review.
218	3.J. Traffic, Transportation, Pedestrians and Transit	Scope	87	Under existing conditions, please provide a map of the various roads serving the project site. Additionally, provide a description of where these roads are located relative to the project site.
219	3.J. Traffic, Transportation, Pedestrians and Transit	Scope	88-91	The existing roadway names should be numbered/renamed so they are consistent with the adopted Scoping Document and the names in the TIS.
220	3.J. Traffic, Transportation, Pedestrians and Transit	Scope		Please clarify how the manual/ATR counts collected in 2014, were "grown" to represent " the 2015 Existing Traffic Volumes."
221	3.J. Traffic, Transportation, Pedestrians and Transit	Scope	91	The paragraph that begins: "Traffic data are provided in Appendix A": Per the adopted Scoping Document, a summary of the analysis is required to be provided within the chapter. Simply providing a reference to the TIS is not sufficient. The paragraph that begins: "Traffic data are provided in Appendix A" is not sufficient to describe
222	3.J. Traffic, Transportation, Pedestrians and Transit	Scope	91	For the sentence that begins: "Note that at other intersections" - please clarify what "other intersections" are being referenced.
223	3.J. Traffic, Transportation, Pedestrians and Transit	Scope	91	For the sentence that begins, "Along Route 9G, two (2) bicycles were observed.." please be more specific as to where along 9G.
224	3.J. Traffic, Transportation, Pedestrians and Transit	Scope	91	For the sentence that begins, "The bicycle activity along Route 9 was very limited at the time of the counts..." please be more specific re: the time of the counts.

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225	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	91	Please clarify from which sources the accident data were compiled, particularly Town of Poughkeepsie and Town of Hyde Park. Is this police departments, other environmental review documents?
226	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	91	The chapter must provide a summary of the accident data. The narrative currently states, "there are a variety of accidents by location. The accidents vary by location and are due to a variety of factors. The summary tables are categorized by location to indicate any patterns." This narrative is too general and vague and therefore not sufficient to provide any meaningful understanding of this data.
227	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	92	The narrative explains, "many of the listed bus stops would not be easily or readily walkable for many living on the Site." but later the narrative concludes, "Residents and patrons' public transportation needs will be met through a local bus route loop.... The vicinity is already serviced by the Dutchess County Loop Bus ... " Please reconcile.
228	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	92	The adopted scoping document requires a discussion of the relevant goals from the referenced adopted Planning and Policy documents. This discussion has not been provided.
229	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	92	Please provide additional discussion/location of "the tunnel."
230	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	92	Regarding pedestrians crossing at the various Marist entrances to the various Mid-Hudson Plaza entrance, please clarify when "pedestrians were observed.."
231	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	92	Please clarify "at the time of the traffic counts.." is this the same time at the pedestrian counts? At the same locations?
232	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	92	Please clarify " in the vicinity of Quiet Cove Park" - can it be concluded that there was no pedestrian activity entering/exiting the park, because there is no safe means of passage?
233	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	92	Future without the Proposed Project - per the adopted Scoping Document, a discussion/analysis of the conditions in the Future without the Project must be provided. This section refers the reader to the TIS.
234	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	92	Per the adopted Scoping Document, provide a discussion of the impacts.
235	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	93	Please clarify approximately 5%, 10% and 15% of what?
236	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	93/94/95	Please clarify the LOS by the temporal distribution.
237	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	95	Please provide a comparison of the historic utilization to the utilization of the site with the Proposed Project.
238	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	95	Please provide a summary discussion of the ETC+10 analyses for the two principal phases. A reference to the TIS is not sufficient.
239	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	96	The Parking Strategies section is unsubstantiated and vague. Please provide additional discussion regarding HOW the layout of the commercial area is a "park once" strategy. Why is it feasible and inviting to park in one location?
240	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	96	Please locate and quantify on-street parking spaces. Are these spaces available 24/7/365 to anyone - year-round? What about snow plow access/street cleaning? Please clarify whether the development will allow non-residents to park on the street.
241	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	96	Please locate on a map and quantify the number of parking spaces to be located in the referenced surface parking lots.
242	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	96	Please confirm that there will be free parking throughout the project site.
243	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	96	Please locate on a map quantify parking spaces to be provided for the hotel and restaurant uses
244	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	96	Please provide a map for the pedestrian/bicycle plan, including striping/bicycle storage/rack locations, etc.
245	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	96	The narrative states the roadway and sidewalk "system" provides connectivity between the [Proposed Project] and Route 9 and other commercial areas to the South of the site. However, the plans do not demonstrate any connections.
246	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	96	The discussion of the potential trail connections to the Walkway Over the Hudson and CSX lines is convoluted and difficult to understand. Please clarify, provide a graphic, and a mechanism/process for this connection to be accomplished.
247	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	96	Please provide a clear parking plan/strategy for the proposed Project.
248	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	97	Please clarify how "pedestrian paths are expected to make use of the area adjacent to the former CSX r-o-w."
249	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	97	Please clarify how the "site plan has also been designed to accommodate future LOOP bus stops..." where? And how?
250	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	97	As required by the adopted Scoping Document, please describe how the proposed Project complies with each of the referenced adopted Planning and Policy documents.
251	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	97	As required by the adopted Scoping Document, provide a summary of all proposed mitigation measures.
252	3.J.Traffic, Transportation, Pedestrians and Transit	Scope	97	Sections 4a.b.c.d of the adopted Scoping Document have not been addressed.
253	3.K. Demographics	Scope	108	Please substantiate the assumption that the Project would absorb the expected 477 person increase in the Town that is projected to occur even without the Proposed Project?
254	3.K. Demographics	Scope	99	Please include a description of the following demographic factors in the existing conditions, future without the Proposed Project, and potential impacts of the Proposed Project sections: age and income.
255	3.K. Demographics	Scope	99	The scope contemplated a discussion of the School District's budget in this Chapter. However, this Chapter referred to the Fiscal Impacts chapter for that discussion. Therefore, the completeness review of that analysis can be found in that Chapter.

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256	3.K. Demographics	Scope	100	Please include any recreational facilities located in the Town of Hyde Park that are proximate to the Project Site in the discussion of open space resources.
257	3.K. Demographics	Scope	100	Please include a description of trails and their connectivity to each other and to the recreational resources described in the Chapter.
258	3.K. Demographics	Scope	101	The text refers to a map of the Hyde Park Central School District. However, the map does not appear in the PDF version of the Chapter.
259	3.K. Demographics	Scope	103	Please describe the LOOP routes and stops in proximity to the Project Site, including their origins, destinations, and notable connections.
260	3.K. Demographics	Scope	109	Please calculate the projected number of school-age and public-school age children using the methodology outlined in the scope.
261	3.K. Demographics	Scope	110	Please describe, even conceptually, the type of open space and recreational resources that are planned for the Project Site; both publically accessible and private.
262	3.K. Demographics	Scope	110	Using the information about the Project Site's planned recreational resources, together with the description of the proximate off-site recreational resources, please provide an analysis of the potential impacts on parks, playgrounds and other active and passive recreational space in the Town from the Proposed Project.
263	3.K. Demographics	Scope	110	The scope requires a discussion of potential impacts to community facilities and services based on information provided by each service provider. That information is not presented in this Chapter.
264	3.L. Human Health	Scope	111	Please provide a source for the factual statements regarding the Police and Fire Department's existing conditions, including staffing levels, response times, and equipment.
265	3.L. Human Health	Scope	112	What is the ratio of fire versus EMS calls to the Fire District.
266	3.L. Human Health	Scope	113	The DEIS lists the projected number of on-site employees as 27. Please clarify if this is for the 'no-build' projects. If not, this number seems very low given the proposed SF of commercial space. Please clarify/substantiate.
267	3.L. Human Health	Scope	114	Please indicate which population estimates were derived from multipliers and which were derived from other sources.
268	3.L. Human Health	Scope	116	Is there any literature on which to base the assumption of an equal number of residential and commercial police calls?
269	3.L. Human Health	Scope	117	Please provide a direct comparison of the increase in police calls attributable to the no-build projects and the Proposed Project.
270	3.L. Human Health	Scope	117	Please describe how 35 additional day-time fire district calls was estimated from the Project's commercial component.
271	3.L. Human Health	Scope	111	The scope contemplated a discussion of the Police Department's budget in this Chapter. However, this Chapter referred to the Fiscal Impacts chapter for that discussion. Therefore, the completeness review of that analysis can be found in that Chapter.
272	3.L. Human Health	Scope	120	The discussion of how tax revenues generated by the Project will mitigate the impacts to the police and fire departments should be summarized in this Chapter and should respond to the required elements of the scope
273	3.L. Human Health	Scope	120	As required by the scoping document, please describe the proposed internal roadway network for access for emergency service providers.
274	3.M. Fiscal and Economic	Scope		When discussing "variable" revenue or expenses, please explain, in an appendix, how and why those budget line items were determined to be variable based on population. The tables in the Chapter should summarize the bottom lines of those revenues and expenses and not present each line item.
275	3.M. Fiscal and Economic	Scope		The chapter should clearly present rationale for applying differing population projections to different jurisdictions and please source those population projections. It may be due to the fact that the jurisdictions have different geographies, but that is unclear, particularly with respect to the population projections for the police and fire department analyses, which differs from the methodology for other departments/jurisdictions. It appears that the "second scenario" is more conservative than the "first scenario" (which appears to be the scenario applied elsewhere). Why not apply the more conservative scenario, showing growth based on planned projects, for all analyses? Please apply the same more conservative "second scenario" approach to all analyses, or provide a clear rationale in the chapter for the varying population projections.
276	3.M. Fiscal and Economic	Scope		Do the tables that present the municipal cost/revenue for the "Future With the Proposed Project" include the "no-build" condition? The change from the existing to no-build to build should be clearly shown and described in one table/analysis.
277	3.M. Fiscal and Economic	Scope	120	Why are the various funds within the Town's budgets presented separately? For informational purposes? Also, please state why the Town-wide water district and fourth ward sewer improvement area were removed from the Town's budget and discussed separately.
278	3.M. Fiscal and Economic	Scope	124	With regard to Table 3.15-9, the main purpose of this table appears to be to list the population-dependent budget items in the Town's budget. It would be more informative to include some rationale for how these line items were chosen in an appendix, and simply present the total of these expenses.

No	Chapter	Type	pDEIS Page #	Comment
279	3.M. Fiscal and Economic	Scope	125	With regard to Table 3.15-10, the same comments are made. Also, please explain what "variable revenue" is and why it was calculated.
280	3.M. Fiscal and Economic	Scope	126	Table 3.15-11. Same comments as 3.15-9 with regard to details included. Similarly, we question whether including only population increases is appropriate.
281	3.M. Fiscal and Economic	Scope	132	For Hyde Park Central School District enrollment projections, were the NYS Center for Rural Schools/Cornell University projections vetted locally, and were there any local (i.e., School District) projections available? While population age cohort shifts may explain it, it seems odd that there are increases in population predicted for other studies but a fairly dramatic reduction in public school kids over the same period.
282	3.M. Fiscal and Economic	Scope	133	Table 3.15-25: Same comments as 3.15.9. Please also explain why only decreasing those items, and not decreasing others or increasing others, is appropriate.
283	3.M. Fiscal and Economic	Scope	135	Throughout the "Impacts of the Proposed Project" section, we have the same comment with respect to how the population-dependent budget line items were determined and presented in the Chapter.
284	3.M. Fiscal and Economic	Scope	144	Why is it assumed that the firefighters and building expansion would not be needed until the Build Out of Phase 2 of the Project.
285	3.M. Fiscal and Economic	Scope	148	Please provide the mill rate used in Table 3.15-51.
286	3.M. Fiscal and Economic	Scope	149	Please discuss the methodology used to calculate total assessed value of the Project. Was the Town's assessor contacted to provide an estimated assessed value?
287	3.M. Fiscal and Economic	Scope	152	The analysis of the distribution of County Sales Tax Distribution assumes that there is no population growth anywhere else in the County.
288	3.M. Fiscal and Economic	Scope	160	It is not clear how 872 'direct' jobs are estimated as a result of the Project when previously, 636 jobs were stated as the number of direct jobs. Please describe where the other 'direct' jobs were generated. Please also describe how the 87 'indirect' jobs were estimated.
289	3.M. Fiscal and Economic	Scope	158	Please confirm that with an average household income of \$60,000, more than \$40,000 per household is estimated to be spent per year on expenses exclusive of the cost of rent and taxes.
290	3.M. Fiscal and Economic	Scope	134	We recommend moving Tables 3.15-27 to 29 to the appropriate subsections within the "Future Without the Proposed Project" section.
291	3.M. Fiscal and Economic	Scope	135	Please summarize the changes in costs and revenues to each district in the same section. It is confusing to have to go back and forth in the Chapter to understand the impacts to one district.
292	3.M. Fiscal and Economic	Scope		The section regarding the taxes and fees currently paid to the various taxing/special districts by the Project Site should be moved to, "A: Existing Conditions."
293	3.M. Fiscal and Economic	Scope		The discussion of the makeup of the various municipal/district budgets is, in some cases, too detailed. The discussion should focus on the details of the budgets that are salient for the analysis. In addition, historical trends in budgets should be discussed and should be considered for the basis of the no-build analysis.
294	3.M. Fiscal and Economic	Scope	121	In the "Town-wide Water District" section, the DEIS states that the assessment is determined based on "usage characteristics of individual parcels." Please explain what that means. Please also clarify what the "F Fund" is in Table 3.15-3.
295	3.M. Fiscal and Economic	Scope	121	Please explain how "sewer rents and charges" are levied within the Fourth Ward Sewer Improvement Area.
296	3.M. Fiscal and Economic	Scope	123	How were population-dependent "variable" expenses of the Town determined? Are other methodologies (historic growth rate, tax cap, etc.) not appropriate here? It seems that you may be underestimating future no-build increases in the Town budget by only increasing certain line items 1.1% over 10 years and not increasing any other line items for any other factors.
297	3.M. Fiscal and Economic	Scope	126	The Future Without the Proposed Project discussion of the Police Department uses two methodologies: 1) historical population growth; and, 2) inclusion of no-build projects. Why are only the police and fire departments analyzed using these two methodologies? It may be appropriate, but it should be explained.
298	3.M. Fiscal and Economic	Scope	130	Please confirm that the "second scenario" list of pending/proposed projects does NOT include this proposed project.
299	3.M. Fiscal and Economic	Scope	131	The estimated need for two additional firefighters from the no-build projects should be explained. It does not appear to be included in Chapter 3.14.
300	3.M. Fiscal and Economic	Scope	132	Should the estimated public school age children from the no-build projects be included here? Similarly, should their property tax revenues?
301	3.M. Fiscal and Economic	Scope	134	The Future Without the Project section does not address the Water or Sewer Districts
302	3.M. Fiscal and Economic	Scope	135	Please describe or provide a cross reference to the description of what Project roads are being dedicated to the Town.
303	3.M. Fiscal and Economic	Scope	135	It is not clear how the population and assessed value of the Proposed Project were used to project impacts to the Town's budget.
304	3.M. Fiscal and Economic	Scope	135	It is not clear how the change in assessed value of the Project was estimated.

No	Chapter	Type	pDEIS Page #	Comment
305	3.M. Fiscal and Economic	Scope	137	Table 3.15-33 is confusing. How were the population and assessed value of the Project used to estimate increases in various line items.
306	3.M. Fiscal and Economic	Scope	137	Please include the future without the Project as a column in these tables. Impacts of the Project should be understood in that context.
307	3.M. Fiscal and Economic	Scope	139	The comments above also apply to Table 3.15-35. The meaning and derivation of the data of these tables should be further explained.
308	3.M. Fiscal and Economic	Scope	140	Please edit Table 3.15-36 in accordance with previous comments.
309	3.M. Fiscal and Economic	Scope	144	Please provide some context for the discussion of the new/expanded fire department building. If necessary, please provide a cross-reference to another DEIS Chapter. Also, please explain any differences between the estimates used in the DEIS and the CGR report.
310	3.M. Fiscal and Economic	Scope	145	Table 3.15-46 may need to be revisited if the methodology used to estimate the number of public school age children is modified.
311	3.M. Fiscal and Economic	Scope	146	Should the rows in Table 3.15-47 and 48 indicate the Change WITH the project or WITHOUT?
312	3.M. Fiscal and Economic	Scope	152	Please discuss the impacts to the sewer district.
313	3.M. Fiscal and Economic	Scope	153	The potential impacts of potential tax abatements or historic tax credits are not discussed in this Chapter.
314	3.M. Fiscal and Economic	Scope	154	Please include a map of the trade area that clearly shows how the area was delineated (i.e., those areas within a 15 minute drive, those areas to the east without major retail centers, etc.).
315	3.M. Fiscal and Economic	Scope	157	Please describe why it was assumed that one third of all construction spending will be sourced from the Town.
316	3.N. Historic and Cultural Resources	Scope	161	Overall, the existing conditions text for historic resources does not make clear what are the boundaries of the historic district designation and where the project site is in relations to the historic district boundary. A figure showing this relationship would be helpful.
317	3.N. Historic and Cultural Resources	Scope	161	Regarding the October 23, 2015 SHPO letter (paragraph 5), 5 buildings are referenced as being retained with their retention approved by SHPO. Missing in this discussion is the Freestanding North Tower north of North Wing of Administration Building, referenced as building #2 in a letter sent from EFG/DRA Heritage, LLC to SHPO on October 22, 2015, where this building is included as a structure to be renovated and incorporated into the master plan of development. SHPO's October 23, 2015 response letter indicates that they are "encouraged to see that your team has committed to the retention and possible restoration of the Olmsted Great Lawn and the North Tower." Therefore, please provide a discussion of whether the North Tower is being retained as part of the project. If not, please describe why not - and clarify whether additional consultation with SHPO regarding this building has occurred.
318	3.N. Historic and Cultural Resources	Scope	165	Under Section D. "Proposed Mitigation," it is stated that the project has the potential to result in adverse effects to historic resources. As noted above, an impacts determination was not provided under Section C. "Potential Impacts of the Proposed Project."
319	3.N. Historic and Cultural Resources	Scope	161	This chapter should start with an introduction that provides the regulatory context of the SHPO's review. A July 16, 2015 SHPO letter indicates their review is pursuant to SEQRA. An April 14, 2016 review indicates the review is pursuant to Section 14.09, as a result of the DEC permit. Please clarify under what statute the SHPO has reviewed the project.
320	3.N. Historic and Cultural Resources	Scope	161	The introduction should include the identification of the APE for archaeological and historic resources analysis, and should consider the potential for indirect impacts to historic resources located outside of the project site boundaries if appropriate. If there are proximate historic resources beyond the project site that could be indirectly affected (e.g. changes to setting), the APE should be expanded to consider these resources.
321	3.N. Historic and Cultural Resources	Scope	Figure	Figures 3.16.1 and 3.16.2 should show the APE boundary
322	3.N. Historic and Cultural Resources	Scope	161	Pursuant to the adopted Scoping Document, Section N.1 (d), summaries should be provided of the Higgins and Quaesbarth and Larson Fisher Associates reports. Relevant information in the reports regarding the identification and S/NR status of historic resources should be discussed. The chapter should reference that the 2005 Higgins & Quaesbarth reports is contained in Appendix N. The Larson Fisher Associates report should be provided as part of the PDEIS review and as it is referenced in the PDEIS, it should be included in an appendix to the PDEIS.

No	Chapter	Type	pDEIS Page #	Comment
				The text should clarify the status of the buildings on the project site. Pursuant to the Final Scoping Document, Section N.1. (e), consultation with SHPO should be undertaken to confirm the National Register eligibility of the buildings and structures on the project site. Table 3.16.1 provides columns with different headers for S/NR status, which are keyed to different years determinations were made, yet it isn't clear if the 2015 NYSOPRHP eligibility Assessment column contains the final determination of S/NR status of the buildings. Also it should be specified if the "State Register Boundary" column refers to a S/NR listed or S/NR eligible historic district. SHPO's CRIS database identifies certain other buildings (beyond the Administration Building, the NHL) on the hospital campus as S/NR eligible.
323	3.N. Historic and Cultural Resources	Scope	161	
324	3.N. Historic and Cultural Resources	Scope	161	With respect to SHPO consultation about historic resources, only the October 25, 2015 SHPO letter is referenced (paragraph 5). But there is previous correspondence from SHPO, including letters of July 16, 2015 and August 11, 2015 that provide detail about the historic status of the buildings on the campus. The relevant correspondence in these letters should be summarized, with the letters included as part of Appendix M.
325	3.N. Historic and Cultural Resources	Scope	163	The recommendations of the 2004 Phase 1B survey completed by Louis Berger should be summarized herein and supplemented with a discussion of that survey's conclusions to clarify why additional archaeological analysis was required only in the location tested by Hartgen in 2016 and not across the remainder of the site.
326	3.N. Historic and Cultural Resources	Scope	163	All of the relevant conclusions and recommendations of the Phase 2 evaluation completed by Hartgen should be summarized in the chapter (only some of the conclusions of the Phase 2 are summarized in the "Phase 1B" section).
327	3.N. Historic and Cultural Resources	Scope	164	Pursuant to adopted Scoping Document, Section N. 3(c), the discussion with respect to impacts should state clearly what will happen to all the buildings located on the project site as part of the proposed project. The text should state specifically, which buildings are being demolished on the site, which are being retained, and the buildings should be referenced by building number as they appear in Table 3.16.1.
328	3.N. Historic and Cultural Resources	Scope	164	The PDEIS makes no impacts finding for historic resources. An impacts determination should be provided under SEQRA, per Section N.3 (a) of the adopted Scoping Document.
329	3.N. Historic and Cultural Resources	Scope	164	Pursuant to the adopted Scoping Document, Section N.3(b), the narrative is required to provide additional information as to why buildings proposed to be demolished cannot be retained (from the Adaptive Re-use Assessments).
330	3.N. Historic and Cultural Resources	Scope	165	In the last paragraph on page 165, the Section 14.09 consultation process should also be described, as the DEC SWPPP permitting falls within the 14.09 purview, and the process by which consultation will occur for the DEC action pursuant to 14.09 should also be described. This last paragraph should also be moved to the "introduction" section of the chapter, as suggested in a previous comment.
331	3.N. Historic and Cultural Resources	Scope	165	Under Section D. "Mitigation," include the timing for reclaiming the time capsules located in the cornerstones of on-site buildings pursuant to Section N.4(b) of the adopted Scoping Document.
332	3.N. Historic and Cultural Resources	Scope	165	Under Section D. "Proposed Mitigation," the process by which continued consultation with SHPO will occur, as requested in their letter of October 23, 2015, should be described.
333	3.N. Historic and Cultural Resources	Scope	165	As per Section N.4 (e) of adopted Scoping Document, discuss the review of archaeological and historic issues during preparation of the SWPPP.
334	3.O. Hazardous Materials	Scope	166	In second paragraph, explain to the reader the scope of a Phase I ESA, i.e., a paper study to determine known or potential environmental conditions and the meaning of a REC
335	3.O. Hazardous Materials	Scope	166	In second paragraph, explain whether the Phase I ESA addressed the entire project site or a different area
336	3.O. Hazardous Materials	Scope	171	The various studies/reports that support the building hazardous materials should be cited, and appended to the DEIS.
337	3.O. Hazardous Materials	Scope	172	Clarify whether the discussion and testing relates to LBP (0.5% or more) or LCP (any amount).
338	3.O. Hazardous Materials	Scope	174	In first paragraph, explain what regulatory program Class A refers to
339	3.O. Hazardous Materials	Scope	175	In third paragraph, there needs to be a more detailed discussion of the activities which would have to be conducted including those related to the VCP, BCP (if any), tanks, sewage leaks, ACM maintenance, etc.
340	3.O. Hazardous Materials	Scope	175-7	In Sections A, B and D, the portions of the site not subject to the BCP or other regulatory programs should be addressed. State whether the Phase I findings the need for Phase II testing (and if so when this would be done and under what program) or explain if existing BCP data is sufficient to characterize the remainder of the site. In Section D, is it the intention that all or certain BCP requirements would be followed, e.g., with respect to air monitoring and capping? what would be the mechanism for ensuring the work in this area is performed assuming it is not subject to a regulatory program?

No	Chapter	Type	pDEIS Page #	Comment
341	3.O. Hazardous Materials	Scope	175	In Section C, there needs to be a discussion of required activities that would be associated with the proposed project, e.g., demolition, excavation/soil disturbance for new construction, and rehab of existing buildings, and how each of these can present hazards unless the proposed project includes a range of measures before, during and after construction. These measures should then be set out (probably in bullet form) in Section D with reference to regulatory requirements, as appropriate. It should be made clear which measures are site-wide and which apply only to limited areas. The existing organization of Sections c and D is confusing - D should include both already required work and work associated with the proposed project. It is suggested that it be organized into pre-demolition, demolition, construction-phase and post-construction phases.
342	3.O. Hazardous Materials	Scope	176	In Section D clarify the capping requirements, for the BCP area and elsewhere. Which SCOs will be used? Will areas not needing disturbance for the proposed project also be tested? And capped if they exceed SCOs?
343	3.O. Hazardous Materials	Scope	176	Address the need for (or provision of) vapor controls in new construction and remaining buildings.
344	3.O. Hazardous Materials	Scope		The DEIS should describe how the abandoned steam tunnels (shown on Figure 3.17.1) will be left in place or removed. Along with removal of any residual sewage from a reported overflow.
345	3.O. Hazardous Materials	Scope		The DEIS appears to refer to page 26 (in the Description of the Proposed Project) to the Cut-Fill Plan (Sh C144) but that should be clarified. It appears that Phase 1 will export earthwork instead of stockpiling the material for use in Phase 2 that requires a large amount of imported earth. Using the surplus from Phase 1 would appear to reduce the earth import amount for Phase 2 by about 40%. The DEIS should expand on the quantity shown on plan sheet C144 as 27,000 CY of material for soil covering/capping activities. The DEIS should clarify how such work will conform to the Declaration of Covenants and Restrictions for the Area 6 landfill and possibly the other waste disposal area on site.
346	3.O. Hazardous Materials	Scope		The DEIS should include a map of the areas in Tables 3.17.1, 2.3 and 4 and Table 3.17.5. The DEIS shall also explain how weigh tickets for waste disposal will be obtained (i.e. where the certified scale will be) and show that all waste removal is properly accounted for.
347	3.P. Noise	Scope	182	Chapter states that HVAC systems will cause minor increases in noise without explaining why this conclusion was made, or explicitly stating that the HVAC equipment will meet the Town's noise code. A not-to-exceed noise level to avoid noise impacts should be established for HVAC equipment.
348	3.P. Noise	Scope	185	Chapter does not address noise exposure at the proposed new residential development on the project site as compared to NYSDEC recommended noise levels for residential use. It is approached in the second bullet point of optional mitigation measures, but the NYSDEC recommended noise levels for residential use should be compared to the predicted 2035 Build levels to determine whether the levels on site would be in the acceptable range according to NYSDEC criteria.
349	3.P. Noise	Scope	185	Chapter does not state whether the predicted levels of construction noise constitute a significant impact.
350	3.P. Noise	Scope	185	We would like to review backup of the noise study (including TNM model info, traffic data used as input for TNM, field notes for noise survey).
351	3.P. Noise	Scope	179	Please confirm that the measured sound levels in Table 3.18.2 are shown in dB(A) (rather than dB as shown), and label as such
352	3.P. Noise	Scope	181	Please confirm that the measured sound levels in Table 3.18.4 are shown in dB(A) (rather than dB as shown), and label as such
353	3.P. Noise	Scope	182	Please provide support for the assertion that the proposed HVAC systems will cause minor increases in noise either in the form of a calculation based on equipment manufacturer's noise data, or by back-calculating a not-to-exceed noise emission level that will not result in impact and providing a commitment to meet that level.
354	3.P. Noise	Scope	182	The referenced noise levels from construction equipment are instantaneous maximum levels (i.e., Lmax), whereas the noise impacts should be evaluated using 1-hour equivalent noise level (Leq). The construction equipment levels should be converted to Leq using usage factors (found in FHWA's RCNM guidance manual, or FTA's Transit Noise and Vibration Impact Assessment manual. The Leq from each piece of simultaneously operating construction equipment should be combined to determine the total level of construction noise.
355	3.P. Noise	Scope	183	Please confirm that the measured sound levels in Table 3.18.5 are shown in dB(A), and label as such
356	3.P. Noise	Scope	184-185	How will commitments to noise control measures (DEC and FHWA) be enforced?
357	3.Q. Air Quality	Scope	188	The Chapter does not clearly present the intersections considered for the mobile source screening analysis. Specifically, the EPM capture criteria, the increments compared to the EPM capture criteria, and the intersections that fail the capture criteria.
358	3.Q. Air Quality	Scope	189	The Chapter states that HVAC systems will not cause significant air quality impacts without explaining why this conclusion was made. A qualitative assessment of these systems is required.
359	3.Q. Air Quality	Scope	189	The Mobile Source Screening analysis should compare total traffic volumes to the Volume Threshold Analysis for any intersection that fails any of capture criteria in all time periods (in the Saturday MD time period as well as in the weekday PM time period).
360	3.R. Construction	Scope	Site Plan	Identify the initial demolition phase.

No	Chapter	Type	pDEIS Page #	Comment
361	3.R. Construction	Scope	Site Plan	Clarify demolition information distinguish or label Building or Pavement to remain.
				The DEIS should discuss and show on a figure additional disturbance areas beyond the laydown and topsoil stockpile locations now only shown on Figure 3.20.1 on a preconstruction plan. Drawings showing the site under construction should be prepared. An area for a construction manager office trailer and employee and visitor parking should be shown, along with required erosion controls. A reasonably sized area for contractors' office trailers, equipment parking, equipment maintenance and worker parking should be shown, along with appropriate stormwater pollution prevention measures. The office and yard areas should be part of the 5 acre disturbance area of every phase until the project work is complete.
362	3.R. Construction	Scope	P. 192	
363	IV. Alternatives	Scope	195	Alternative 1: The pDEIS states that 300 residential units are allowed without incentive bonuses. Please clarify whether this means under the existing HRDD more than 300 units are possible if the Project makes use of incentive bonuses. If so, please revise the total number of units allowed and adjust the analysis accordingly.
364	IV. Alternatives	Scope	196	For Alternatives 1 & 2, please discuss relative impacts to traffic and school age children as compared to the Proposed Project.
365	IV. Alternatives	Scope	197	Please describe the purpose for the connector road and why it is being considered as an alternative. How and when would it be built/completed? What would impacts to traffic be from this connector?
366	IV. Alternatives	Scope	197	Why is there a reduction in commercial square footage associated with Alternative 4? Is it not possible to reconfigure the commercial area and/or site to accommodate the full build of the program?
367	IV. Alternatives	Scope	197	For Alternative 4, what are the 'slightly reduced' traffic impacts and how were they determined? How are the economic benefits similar, if there is a 30% reduction in commercial space?
368	IV. Alternatives	Scope	197	The last paragraph may need to be edited. Impacts to those environmental categories can and should be evaluated. For AQ and noise, they may be similar to the Proposed Project owing to their relationship to traffic, building program, and building footprint. Impacts to visual and community character may be similar to the Proposed Project owing to a likely similar overall concept site plan. And impacts to vegetation and wildlife, excepting TES, are generally also a function of overall disturbance.
369	IV. Alternatives	Scope	198	How were the number of public school age children for the various alternatives estimated? Were they estimated using the methodology outlined in the scope?
370	IV. Alternatives	Scope	198	How were the water/wastewater figures calculated? Please show calculation steps/tables, either in Chapter or Appendix?
371	IV. Alternatives	Scope	198	How were the tax impacts calculated? Please show calculation steps/tables, either in Chapter or Appendix, including methodology for arriving at assessed value.
372	IV. Significant Impacts That Cannot Be Avoided	Scope	198	The visual impacts analysis concludes: "There are no adverse visual impacts anticipated..." however this section identifies increased visibility of structures from various vantage points in Town. A discussion of the mitigation measures would be helpful.
373	IV. Significant Impacts That Cannot Be Avoided	Scope	198	This section should list and describe demolition/short term impacts/ long term/permanent impacts in separate sections.
374	IV. Significant Impacts That Cannot Be Avoided	Scope	198	This section should describe impacts during demolition/construction/and operation. For example, the project will result in short and long term lighting impacts, though the nature of these impacts will be quite different during construction than during operation. As such, additional discussion is required to understand and differentiate the impacts.
375	IV. Significant Impacts That Cannot Be Avoided	Scope	198	Noise generation should be described for both short and long term (e.g. short-term noise impacts resulting from construction and long-term from use of property).
376	IV. Significant Impacts That Cannot Be Avoided	Scope	198	The last sentence: "Loss of historical but structurally unsound buildings..." should be qualified to note that some buildings were determined to be structurally unsound, while others will be demolished because their reuse does not meet the goals of the Applicant.
377	IV. Significant Impacts That Cannot Be Avoided	Scope	198	This is where a table of mitigation measure may be helpful.
378	IV. Significant Impacts That Cannot Be Avoided	Scope	198	Discussion of flora/fauna impacts should be included.
379	IV. Significant Impacts That Cannot Be Avoided	Scope	198	Discussion of flora/fauna impacts should be included.
379	IV. Significant Impacts That Cannot Be Avoided	Scope	198	Please clarify how pedestrian movement on foot is an impact.
380	IV. Significant Impacts That Cannot Be Avoided	Scope	198	Please clarify what is meant by "other personal devices."
381	VI. Growth Inducing Aspects	Scope	199	Per the adopted Scoping Document, this section requires a description and analysis of short and long term, primary and secondary impacts and mitigation.
382	VI. Growth Inducing Aspects	Scope	199	Per the adopted Scoping document, please describe the impact of new residents to the Town and what are the proposed mitigation measures, if any.
383	VI. Growth Inducing Aspects	Scope	199	There is a big inconsistency in the job generation estimates provided herein and those described in earlier sections of the pDEIS. Please reconcile
384	VI. Growth Inducing Aspects	Scope	199	Per the adopted Scoping Document, please describe the primary and secondary impact of new short term/construction and permanent employees on the Town of Poughkeepsie.

No	Chapter	Type	pDEIS Page #	Comment
385	VII. Effects on the Use and Conservation of Energy Resc	Scope	200	Please describe the proposed "sustainable design techniques, selection of energy efficient and environmentally sensitive construction materials and mechanical systems" to be incorporated into the project in both the short and long term
386	VII. Effects on the Use and Conservation of Energy Resc	Scope	200	Because the Applicant has committed to conservation practices, the narrative must address how project/procedures will address unnecessary uses of energy both during construction (beyond practice in accordance with NYS Energy System) and long-term operation.
387	VIII. Irreversible and Irretrievable Commitment of Reso	Scope	201	The Project proposes development/impervious coverage in previously undisturbed areas. Please quantify.
388	VIII. Irreversible and Irretrievable Commitment of Reso	Scope	201	Per the adopted Scoping Document, please fully describe impacts to and mitigation for resources to be impacted. For example, please quantify impacts to (and describe mitigation for) vegetation and wildlife habitats, soils, etc.
389	VIII. Irreversible and Irretrievable Commitment of Reso	Scope	201	Please quantify the water and energy resources proposed to be expended and describe conservation measures to be incorporated into the project to mitigate impacts. al context?

No	Chapter	Type	pDEIS Page #	Comment
1	General	Analysis	Site Plan	Alternate road design requires waiver(s) from Town Code. Alternate road design requires input from Town Highway Superintendent.
2	1.0 Executive Summary	Analysis		1 The fourth paragraph indicates the project includes "demolition of the structurally unsound buildings remaining on the former HRPC". The pDEIS includes structural evaluation (Appendix I) for buildings 23, 61, 147/8/9 in support of the demolition application. However, structural evaluation for the 50 other buildings has not been provided. We would suggest either providing the structural evaluation for all buildings proposed for demolition, or revising this language (throughout the pDEIS) to indicate "X number of the 50 buildings have been identified by a qualified structural engineer (and provide name, firm and relevant credentials) as structurally unsound and therefore be demolished. The remaining X of the 50 buildings, while not structurally unsound, will be demolished because adaptive reuse of these structures do not meet the Applicant's redevelopment goals."
3	1.0 Executive Summary	Analysis		2 Second full paragraph - ". More than the five buildings now proposed for adaptive reuse may have been salvageable. However with the passage of time, this is not longer the case..." See comment above regarding supporting this statement.
4	1.0 Executive Summary	Analysis		2 Fourth paragraph should be clarified to describe how a "typical" suburban development pattern compares to the proposed residential density?
5	1.0 Executive Summary	Analysis		2 The note (1) describing the calculation for existing and proposed impervious surface is confusing. We strongly suggest that the analyses throughout the pDEIS- and all narrative describing the analyses throughout the pDEIS - be revised to quantify calculation of existing impervious coverage and proposed impervious coverage consistent with the definition in the Town code 210-9{134}.
6	1.0 Executive Summary	Analysis		9 Alternative 4 - The narrative states the connector road would be a through-street with traffic traveling at "higher speeds" and using the road only for connection purposes." Please clarify higher than what? Additionally, it is not clear why this Alternative was analyzed with a high speed roadway, rather than speed limits that would be appropriate for a residential area. Please clarify. Additional comment is provided in Chapter 4.
7	1.0 Executive Summary	Analysis		9 For Alternative 5, please describe why the Applicant believes this layout is not economically viable
8	2. Description of the Proposed Action and Project	Analysis		22 The loading area proposed at the rear of the Large Scale Commercial Building appears to require the tractor trailers to back out of the loading area, with insufficient area to turn - and then a need to exit through the parking lanes in an active surface parking lot. Please clarify.
9	2. Description of the Proposed Action and Project	Analysis		The illustrative plans do not indicate any loading areas for the Proposed Small Scale Commercial buildings (assumed to be Block B) - and similarly, no proposed circulation/access/egress route.
10	2. Description of the Proposed Action and Project	Analysis		27 Please describe how the market demand will influence project phasing. Please describe the "flexibility" the Applicant requires to respond to potential market changes
11	3.B Community Character and Visual Impacts	Analysis		56 The narrative does not provide sufficient evidence to support the statement: " Because the existing structures generally exceed proposed structures in both height and mass, it is presumable that the Project's components will be less readily seen than the existing, historic structures." Additionally, if additional support is provided and this statement is to be included, it would be more appropriately included in the Proposed Mitigation, in conjunction with proposed mitigation measures.
12	3.E. Stormwater Mgmt	Analysis		68 This office notes that CELS prepared the site plan and drainage design for the adjacent property development as the Mid Hudson Plaza. The engineer who designed the Mid Hudson Plaza still works for CELS and should be consulted to help define the changes made to the stream (that no longer crosses under the Home Depot site as shown) and to clarify the drainage to the wetland and stream along the abandoned CSX railbed to the southeast of the Hudson Heritage site.
13	3.H. Solid Waste	Analysis	p.80	Table 3.10.2 includes estimates for solid waste generation with a reference to Urban Land Institute for expected generation rates. The average per capita daily generation works out to around 3.5 pounds per day. This rate seems light in comparison to recent USEPA studies. The rate should clarify if this is a "pre" or "post" recycling rate. In regard to the commercial component there is an amount for retail employee; however there is no allocation for any commercial customers, office employees or other possible categories.

No	Chapter	Type	pDEIS Page #	Comment
14	3.1. Vegetation and Wildlife	Analysis		Considering the proposed substantial increase in development density (footprint of buildings, roadways, parking lot surfaces), the Town and applicant should make every effort to keep the new developed footprint within the existing 81 acres of previously developed/landscaped area. As now designed, the project proposes encroachment beyond the areas mapped as “Human Habitat/Landscaped Area”, including disturbance to approximately 10 acres of wooded land, 12.5 acres of meadow habitat, and additional undeveloped areas. Referring to the Site Plan, the proposed Single Family Unit development area extends into wooded and meadow habitat and the Commercial Development areas would displace undeveloped land in close proximity to the stream corridor in the southern and southwestern portions of the site. These should be avoided to protect the site’s more valuable habitats.
15	3.1. Vegetation and Wildlife	Analysis		While we agree that the project site currently offers less potential for habitat-specialist wildlife species to frequent the site due to its past history of use, the DEIS and Appendix J overuse negative terms to characterize site ecology considering the results of the ecological assessments and results of mapping review. The chapter and appendix frequently qualify the site’s ecological functions or habitats as “reduced value”, “impacted”, “highly fragmented”, or “degraded overall quality” owing to small habitat size or presence of non-native species. However, the Ecological Solutions LLC findings demonstrate an abundance of native species, the meadow habitats now transitioning to old-field represent a regionally declining habitat type with potential for use by a range of meadow-specific species, and the site is adjacent to Town-recognized and largely intact forested habitats which add ecological value to the project site, as discussed in comments below. The areas of contiguous meadow and wooded land also provide the potential for effective habitat restoration which would improve future ecological functions, especially if linked by habitat corridors to undeveloped lands to the east and north.
16	3.1. Vegetation and Wildlife	Analysis		Regarding forested habitat, the Project site is contiguous with the largely intact and roughly 250 acre forested region to the east, identified by Hudsonia, and additional forested lands immediately north. This close proximity of larger blocks of forested land adds value to the project site itself and increases its potential for use by a range of species. The DEIS describes forested patches as small, only 4.5 acres in the northwest portion of site. Although undoubtedly fragmented, the interconnected areas of wooded land in the northwest portion of the site appear to be 20 acres or more in total. Potential for area-sensitive forest breeding birds, or other forest interior species, to use the site for nesting may be low, but some forest-interior nesting species were identified onsite – including the scarlet tanager, eastern wood peewee, and wood thrush (all identified onsite by Ecological Solutions LLC). These and other species may nest onsite owing to the presence of the surrounding larger forested parcels offsite. (Rosenberg, K.V. Rohrbaugh, Jr., S.E. Barker, J.D. Lowe, R.S. Hames and A.A. Dhondt. 1999. A land managers guide to improving habitat for scarlet tanagers and other forest-interior birds. The Cornell Lab of Ornithology.) Furthermore, the undeveloped portions of the project site provide corridors for the movement of wildlife to surrounding less-developed lands. For these reasons, consideration should be given to preserving the wooded areas onsite.
17	3.1. Vegetation and Wildlife	Analysis		Regarding meadow habitat, the Project site’s undeveloped meadows (formerly maintained/mowed during the site’s use as a hospital), are mapped by Hudsonia as part of the Town’s Significant Habitats (Significant Habitats in the Town of Poughkeepsie, Hudsonia, 2008). The site itself contains one of the larger extant meadow habitats in the Town. The Hudsonia Report identifies this habitat type, once common, as now accounting for only 4% of the total land area in the Town of Poughkeepsie. The value of this onsite habitat and the potential for it being adversely affected by the proposed project have not been adequately assessed in the DEIS.

No	Chapter	Type	pDEIS Page #	Comment
18	3.1. Vegetation and Wildlife	Analysis		In its description, Hudsonia says: "Upland meadows can be used for nesting by wood turtle, spotted turtle, eastern box turtle, painted turtle and snapping turtle. Grassland-breeding birds such as northern harrier, upland sandpiper, grasshopper sparrow, vesper sparrow, savannah sparrow, eastern meadowlark, and bobolink use extensive meadow habitats for nesting and foraging. Upland meadows often have large populations of small mammals (e.g., meadow vole) and can be important hunting grounds for raptors, foxes and coyote." While all of these species and benefits may not currently be met onsite, many undoubtedly are and there is potential to offset project impacts to regional ecology if these habitats are maintained and improved onsite. The current site plan and landscaping goals do not achieve this. To avoid impacts to existing meadow habitat would require devoting these areas and managing them as habitat for grassland-dependent species rather than devoting them to mowed/landscaped areas for recreation as is proposed. The Town of Poughkeepsie Significant Habitat report (Hudsonia, 2008) includes meadow maintenance/mowing recommendations for the benefit of meadow wildlife. Considering the substantial increase in proposed development density onsite, the entirety of the historic "Great Lawn" areas should be devoted to meadow/grassland habitat restoration to offset adverse ecological impacts. This should be readily achievable with moderate reductions in the proposed site plan's footprint.
19	3.1. Vegetation and Wildlife	Analysis		The Great Lawn and North Green Buffer Report (Appendix C) contained in the DEIS is presented as a guideline for future renovation of natural habitat. However, this report is largely a discussion of the historical uses of the open meadow areas with general guidelines for their maintenance for public use by future residents. Mowing and clearing of vegetation as generally described in the report would not improve the ecological functions of these habitats, but rather would have the potential to degrade floral density/diversity and the habitat's use by meadow-dependent animals.
20	3.1. Vegetation and Wildlife	Analysis		The ecological "footprint" of residential development extends larger than the simple footprint of bldgs/yards. Pet predation and disturbance is substantial issue - in that preserving habitats on site without some measures to keep the cats out (fencing, etc.) - does not provide adequate protection. Development of the proposed project will likely induce predation to meadow wildlife from cats/dogs or other human-subsidized species (raccoons, etc.). Some methods of excluding residential pets from protected meadow/grassland restoration habitats would be necessary to avoid significant impacts to meadow habitat.
21	3.1. Vegetation and Wildlife	Analysis		The characterization of the potential for Blandings Turtle to occur onsite is reasonable – that this species is unlikely to occur. However, the project site is within the Hudsonia-mapped Blandings Turtle nesting habitat "area of concern", and contains the Hoosic soils this species prefers. Therefore, the Town may wish to obtain Hudsonia's input on potential impacts to this turtle species.
22	3.1. Vegetation and Wildlife	Analysis		The site plan shows little or no land set aside for surface treatment of stormwater runoff. Considering the substantial increase in developed area/surfaces, some surface stormwater practices would benefit water quality and minimize impacts to the onsite stream quality but may necessitate some reduction in buildable area. As opposed to sub-surface treatment, surface treatment practices (stormwater wetlands, retention/detention) may also provide wildlife benefits if designed and maintained properly.
23	3.1. Vegetation and Wildlife	Analysis		There appears to be some disparity between the Chazen findings and the Ecological Solutions findings with respect to the prevalence of native/non-native plant species (mugwort etc.) and value of the onsite habitats overall. AKRF will have more to say on this matter once the Ecological Solutions LL report and other Attachments are provided. The Town should consider retaining its own field biologist to inspect the site in the field considering the disparities. Also, the latest site investigation conducted by Chazen in 2015 consisted of just two days of field work and included a wetland delineation, which presumably occupied a good portion of that time. By comparison, the previous site inspection conducted by Ecological Solutions LLC included 12 days of field work, over several seasons. However, this field work was conducted in 2008, fully 8 years ago. Additional field time to document all habitats during several seasons (spring/summer/fall) in 2016 is advised.
24	3.1. Vegetation and Wildlife	Analysis		The chapter indicates that the New England cottontail (<i>Sylvilagus transitionalis</i>) would not occur due to lack of habitat. However, the early successional habitat preferred by this species appears to be met on portions of this site. Although the species is no longer federally listed, management of a portion of the remaining early successional habitat should be considered for the benefit of this species.

No	Chapter	Type	pDEIS Page #	Comment
25	3.I. Vegetation and Wildlife	Analysis		A wider buffer should be considered for the stream/wetlands that run along the east and south borders of the project site. A 25' buffer will not offer appreciable protection for the aquatic resources and hydrology of this stream corridor. We also note that this stream is part of a larger riparian system that is surrounded by undeveloped land offsite to the east, increasing the need for its protection. Hudsonia recommends 50m (160') stream buffers. To facilitate wider buffers and the protection of this stream and its wetlands, the proposed Site Plan should eliminate buildings and roadways at the southern end of the site to accommodate a 50m buffer.
26	3.K. Demographics	Analysis	99	Please explain difference between census terms, "family" and "household" so that the statement, "[there was growth in] non-family households" can be understood by the public.
27	3.K. Demographics	Analysis	101	Please include a description of the various open space and park resources that are listed in Table 3.13.4. The description can be brief, but should generally include size, facilities available, whether the facility is open to the public or not; approximate distance (range is acceptable) to Project Site.
28	3.K. Demographics	Analysis	108	Please present the percentage increase in the Town's population attributable to the estimated 1,872 persons estimated to reside at the Proposed Project over the Town's projected no-build population.
29	3.L. Human Health	Analysis	112	The DEIS states that the tax rate for the Fire District is set by dividing the amount needed to be raised from tax revenue by the total taxable assessed real property valuation. Please discuss the role of the state's 'Tax Cap' on this process.
30	3.L. Human Health	Analysis	118	Please provide a source for the statements, "In 2016, two new paid, professional fire fighters will be added during peak periods..." and "[those two firefighters] should accommodate current daytime call volume."
31	3.L. Human Health	Analysis	118	Please provide a source for the Police Department's estimate of increased staffing resources required to serve the Proposed Project.
32	3.L. Human Health	Analysis	119	Please explain how you estimated that the District would need 1 new full-time firefighter for each 115 additional calls?
33	3.L. Human Health	Analysis	119	Are any of the no-build projects included in the estimated 523 new calls to the fire district already accounted for in the CGR study's estimated need for 2-8 new full-time firefighters?
34	3.M. Fiscal and Economic	Analysis	127	Please explain how the population-dependent line items of the library's budget were determined. In addition, why is it not appropriate to use other budget trends for the library district to evaluate the no-build condition?
35	3.M. Fiscal and Economic	Analysis	131	Please provide a description of how your no-build (and build) methodologies for estimating impacts to the Fairview Fire District varies from that used in the CGR report.
36	3.M. Fiscal and Economic	Analysis	132	Should the proposed property tax or other revenue from the no-build projects considered in increasing expenses to the FFD also be included here?
37	3.M. Fiscal and Economic	Analysis	151	The note regarding STAR payments under Table 3.15-56 is confusing. What is the impact to the estimates provided above? Doesn't the state re-imburse the School District for reductions in taxes collected due to STAR? (And, aren't future STAR applications going to receive a tax credit from the State, rather than a rebate on their bill?)
38	3.M. Fiscal and Economic	Analysis	157	Please confirm whether the estimated cost of site improvements and vertical construction includes labor, or if they are the simply the costs of materials.
39	3.M. Fiscal and Economic	Analysis	157	Please further describe (in the text or an Appendix), how the number of operational period employees was estimated. Will any employment be generated from the residential operation? Finally, are these jobs a mix of full- and part-time, or are they FTE?
40	3.M. Fiscal and Economic	Analysis	158	Please provide in an appendix, the study of retail patterns in the Town of Poughkeepsie that was used to estimate the percentage of each household expenditure category spent in the Town of Poughkeepsie.
41	3.M. Fiscal and Economic	Analysis	159	Please describe the methodology (model) used to calculate the number of jobs and wages created during the construction and operation period, including a definition of indirect jobs. Does the earnings estimate for the jobs created take into account the various sectors in which the employment would be generated?
42	3.N. Historic and Cultural Resources	Analysis	161	The chapter states that no information regarding NYSM site 3162 is available in CRIS; some additional information can be obtained from the NYSM, which describes the site, identified by A.C. Parker, as "traces of occupation."
43	3.N. Historic and Cultural Resources	Analysis	163	If a final report was prepared for the 2004 Berger investigation and subsequently approved by OPRHP, it should be noted in the chapter (only the End of Field Letter is referenced).
44	3.N. Historic and Cultural Resources	Analysis	164	As mentioned in a previous comment, the project's potential impacts on the North Tower, which is referenced in correspondence to and from SHPO of October 22 and 23, 2015, should be disclosed.
45	3.N. Historic and Cultural Resources	Analysis	164	Under Section C. "Potential Impacts of the Proposed Project," specific text should be added under the "Archaeological Resources" header as to whether the project would have potential impacts on archaeological resources.

No	Chapter	Type	pDEIS Page #	Comment
46	3.N. Historic and Cultural Resources	Analysis	165	Please state why federal historic preservation tax credits are not being sought for the project.
47	3.O. Hazardous Materials	Analysis	167 and elsewhere	In first paragraph, the reference should be to regulatory guidelines rather than applicable standards.
48	3.O. Hazardous Materials	Analysis	167	In last paragraph, UUSCOs should not be referred to as standards. There should also be a sentence or two explaining the basis of UUSCOs and their use/relevance for comparison.
49	3.O. Hazardous Materials	Analysis	168	In first paragraph, explain briefly the NYSDEC BCP (regulatory program and steps involved) and clarify the portion/acreage of the project site to which it applies.
50	3.P. Noise	Analysis		AKRF will need to review TNM modeling used in the analysis, either in the form of TNM model files or traffic input tables, model screenshots, and noise level output tables
51	VI. Growth Inducing Aspects	Analysis	199	Please substantiate the statement: "most employees are expected to come from the local and regional workforce." Will there be hiring preferences?
52	VI. Growth Inducing Aspects	Analysis	199	Please describe what is meant by "indirect jobs" and how/why it is assumed they will be spread out over a wide geographic area.
53	VI. Growth Inducing Aspects	Analysis	199	It is not clear why the increase in assessed value would result in the increase of surrounding property values and subsequent additional development/conservation interest. With the exception of the property to the east of the site, all other land is currently developed. Please provide analysis to support this statement.
54	VII. Effects on the Use and Conservation of Energy Resources	Analysis	200	Please describe the conservation practices and LID techniques to which the Applicant will specifically commit.
55	VII. Effects on the Use and Conservation of Energy Resources	Analysis	200	Please clarify how "construction of the Project will change as it progresses..." does this refer to phasing, construction techniques and what impact does this have on energy resource utilization?

No	Chapter	Type	pDEIS Page #	Comment
1	General	General/Organizational/Typo		Table headers should be formatted so they extend over when Tables run on multiple pages.
2	General	General/Organizational/Typo		Figures - In general, the legends, insets, and figure numbers are very small and difficult to read. We suggest increasing the size of these components so they are more clearly legible.
3	General	General/Organizational/Typo		We would suggest that the document be printed on both sides (two sided). This would significantly reduce the number of volumes and use of paper.
4	1.0 Executive Summary	General/Organizational/Typo		210-30.A.i. [The HRDD zoning district purpose] is to "Promote the preservation and adaptive reuse of landmark structures in historic districts and historically significant open spaces." However, the HRDD zoning does not require that all buildings be preserved and or adaptively reused as is suggested in the text (paragraph 3). It is the current zoning district density and threshold requirements (and allowed uses) that are limiting to the Proposed development and therefore the narrative should be revised to indicate that is zoning text amendment is requested to provide relief from these requirements.
5	1.0 Executive Summary	General/Organizational/Typo	Table 1.1.2	Please refer to comments on impacts/mitigation in each chapter and revise this table accordingly.
6	1.0 Executive Summary	General/Organizational/Typo		8 Alternative 1 - Suggest revising as follows: "adaptive reuse of the central portion of the Administration Building and four other existing buildings,"
7	2. Description of the Proposed Action and Project	General/Organizational/Typo		Please provide an existing conditions map - with a legend identifying all on-site buildings (by name/number) and highlighting those buildings (or portions thereof) that are proposed for adaptive reuse. Because the text refers to existing on-site buildings proposed for adaptive reuse (i.e.. the Administration Building, the Director's residence, etc.) - a map highlighting these buildings by their current name would be very helpful to the reader to identify/locate those buildings.
8	2. Description of the Proposed Action and Project	General/Organizational/Typo		10 Introductory paragraph should either be expanded to provide a more comprehensive description of the project components or deleted.
9	2. Description of the Proposed Action and Project	General/Organizational/Typo		10 Text should be revised throughout to indicate the proposal is "adaptive reuse of the central portion of the Administration Building"
10	2. Description of the Proposed Action and Project	General/Organizational/Typo		11 Similarly, we would suggest a Local Site Context figure that matches the description in the text. Also, please clarify in this narrative (last paragraph), that the project site is located mostly in the Town of Poughkeepsie (not the City).
11	2. Description of the Proposed Action and Project	General/Organizational/Typo	Figure 2.2.3	This Figure is difficult to read. We recommend revising so it is clearly legible to the reader.
12	2. Description of the Proposed Action and Project	General/Organizational/Typo		12 Utilities - In addition to referencing the Appendices, we would suggest also directing the reader to the DEIS chapters that discuss existing and proposed utilities.
13	2. Description of the Proposed Action and Project	General/Organizational/Typo	Figure 2.3.1	Site Access is difficult to read with overlapping road names and same color/font and font size for all roads, even though they are differentiated in the text. Additionally, the narrative and the table are confusing. How/why is the abutting street different than a local access or surrounding street? We would suggest eliminating the table and clearly describing the nature of/differentiating factors for each type of road that will serve the project site -- primary access via the west, south, east, north, etc. -- in the narrative and revisions to the Figure to match the narrative.
14	2. Description of the Proposed Action and Project	General/Organizational/Typo		12 It appears from Figure 2.3.1 West Cottage Road will serve a primary Site Access Road, though this appears to be a lesser road on the Illustrative Site Plans. Please clarify.
15	2. Description of the Proposed Action and Project	General/Organizational/Typo		13 It would be helpful if the land use narrative described the land use Figure. For example, what is meant by "public service", what is the difference between "unclassified" and "other tax parcel", what is an example of a "recreation and entertainment use"?
16	2. Description of the Proposed Action and Project	General/Organizational/Typo		13 Route 9G and Violet Ave. are the same road, we suggest eliminating references to Violet Ave.
17	2. Description of the Proposed Action and Project	General/Organizational/Typo	Figure 2.4.1	It would be helpful if standard LBSC colors were used in the Figure.
18	2. Description of the Proposed Action and Project	General/Organizational/Typo	Figure 2.4.1	Please clarify that yellow designates a single-family residential use, and orange represents multi-family residential uses (including apartments and mobile home parks - suggest spelling this out)
19	2. Description of the Proposed Action and Project	General/Organizational/Typo	Figure 2.4.1	Suggest revising the Figure name to "Land Uses within 1/2 mile of the Proposed Project Site"
20	2. Description of the Proposed Action and Project	General/Organizational/Typo	Figure 2.4.1	This map misidentifies Quiet Cove Park.
21	2. Description of the Proposed Action and Project	General/Organizational/Typo	Figure 2.4.1	Marist College is identified as a "Community Service" - but should be more appropriately identified as an educational/institutional use
22	2. Description of the Proposed Action and Project	General/Organizational/Typo	Figure 2.4.1	It is difficult to differentiate the colors between "vacant", "unclassified" and "other tax parcels" and several parcels appear to not have any associated use.
23	2. Description of the Proposed Action and Project	General/Organizational/Typo		13 Zoning - Suggest revising the text to provide a description of the zoning districts and where they are relative to the project site. For example, "zoning districts to the north of the project site in the Town of Hyde Park, include _____; to the east in the Town of Poughkeepsie, include: _____", etc.
24	2. Description of the Proposed Action and Project	General/Organizational/Typo		13 Narrative (and Table 2.4.1) should be revised to be consistent with the Town Zoning Code requirements as follows: "The Table below lists permitted uses within a national landmark building and contributing area, and designated or eligible federal historic districts and those uses that are permitted in areas of the HRDD outside the national landmark building and contributing area, and designated or eligible state and/or federal historic district. All uses are subject to approval of a development master plan by the Town Board and site plan review and approval by the Planning Board."
25	2. Description of the Proposed Action and Project	General/Organizational/Typo	Figure 2.4.2	Suggest sourcing the section of the zoning code and adding a note indicating: "All uses are subject to approval of a development master plan by the Town Board and site plan review and approval by the Planning Board." to be consistent with the requirements of the Town Zoning Code
26	2. Description of the Proposed Action and Project	General/Organizational/Typo		16 Development Agreement - This section would be more appropriately included in the Zoning discussion.

No	Chapter	Type	pDEIS Page #	Comment
27	2. Description of the Proposed Action and Project	General/Organizational/Typo	16	The description of the Development Agreement should reference the agreement to evaluate connections between the commercial and residential phases to achieve an integrated plan
28	2. Description of the Proposed Action and Project	General/Organizational/Typo	16	Section 2.8, Description of the Proposed Project (which should be II.C) should be reorganized to follow the numbering and logical sequence of discussion specified in the adopted Scoping Document
29	2. Description of the Proposed Action and Project	General/Organizational/Typo	16	The first phase of the Project proposes 350,000 square feet of commercial development focused on the southern portion of the Project Site. Proposed commercial development comprises one approximately _____sf anchor retail store (A1 in Figure 2.1.2) located _____ and _____ retail stores (A2, A3, C1, D____, E____) ranging from _____sf to _____sf located in the central and southern sections and along the western border of the site south of the Great Lawn. - What about the B stores?
30	2. Description of the Proposed Action and Project	General/Organizational/Typo	17	The sentence that begins "Acting as circulation spine ..." is confusing. Suggest simplifying and also providing a site vehicular circulation Figure, which would differentiate the hierarchy of roads, one-way/two-way, primary and secondary access, etc. and then describe the map in the text.
31	2. Description of the Proposed Action and Project	General/Organizational/Typo	17	As shown in Figure 2.1.2, An _____ space parking lot (A) would be located _____ to provide sufficient parking for both the anchor and retail stores (A1, A2 and A3)
32	2. Description of the Proposed Action and Project	General/Organizational/Typo	17	"Along the southern edge of the main road" - please clarify what is meant by the main road? "would be a series of retail spaces that would abut the sidewalk" - please clarify where these are by using the lettering/numbering in Figure 2.1.2
33	2. Description of the Proposed Action and Project	General/Organizational/Typo	17	"Additionally, several approximately _____ SF mid-sized retail shops (B1/B2/B3) would be located at the south end ... "
34	2. Description of the Proposed Action and Project	General/Organizational/Typo	17	The statement "Trees and landscaping will be included through the parking lot layout" is confusing. Suggest rephrasing to something like: "landscaping medians with _____ trees"
35	2. Description of the Proposed Action and Project	General/Organizational/Typo	17	Only the central portion of the Administration Building is to be reused. It's not clear whether just the central portion is 80k s.f. or if this includes the entire extant structure. Please clarify.
36	2. Description of the Proposed Action and Project	General/Organizational/Typo	17	It would be helpful to have a table that lists the phase, the components of the phase and the expected start/completion date for each of these phases.
37	2. Description of the Proposed Action and Project	General/Organizational/Typo	18	A reference to a (newly created) map with the existing buildings proposed for adaptive reuse would be very helpful to the reader.
38	2. Description of the Proposed Action and Project	General/Organizational/Typo	Figure 2.1.4	The colors in the trail map are hard to differentiate. What do the large red circles represent? Does "pedestrian network" = Sidewalk?
39	2. Description of the Proposed Action and Project	General/Organizational/Typo	Figure 2.1.4	There appears to be a "private amenity pool" in the center of the commercial area on the western portion of the site. What is the purpose of this feature?
40	2. Description of the Proposed Action and Project	General/Organizational/Typo	Figure 2.1.4	There appears to be a very wide "pedestrian network" area surrounding the frontage of the big box commercial building, which does not connect to anything. Please clarify.
41	2. Description of the Proposed Action and Project	General/Organizational/Typo	20	The narrative states "75 of the total residences" will be for sale units, please clarify that this is 25 single family homes and 50 townhomes.
42	2. Description of the Proposed Action and Project	General/Organizational/Typo	20	The description of setbacks for the proposed townhouses/townhouse buildings is presented twice with different proposed sideyard setbacks and no proposed setbacks for the single family homes is presented. Correct bottom set of setbacks to be specific to single family homes.
43	2. Description of the Proposed Action and Project	General/Organizational/Typo	20	Please clarify this statement: " The 25 single family homes comprised of 100 four-bedroom units.."
44	2. Description of the Proposed Action and Project	General/Organizational/Typo	Figure 2.1.2	Please clarify the significance of "block boundary" and "building boundary" (which is not legible) on the Figure
45	2. Description of the Proposed Action and Project	General/Organizational/Typo	21	It would be helpful to have a table that lists the commercial components, proposed bulk and dimensional requirements, and parking ratio/number of parking spaces for each component.
46	2. Description of the Proposed Action and Project	General/Organizational/Typo	Figure 2.1.2	What is the narrow structure represented with the commercial buildings color immediately west of Building A3 on Figure 2.1.2?
47	2. Description of the Proposed Action and Project	General/Organizational/Typo	22	It is not clear to what bullet point 4 refers.
48	2. Description of the Proposed Action and Project	General/Organizational/Typo	Figure 2.8.1	This Figure is really difficult to read - as are the proposed lighting fixtures. A lighting plan that provided location/type of different types of lighting (residential/commercial/street/sidewalk/walking trail, etc.) should be provided.
49	2. Description of the Proposed Action and Project	General/Organizational/Typo	23	Correct text that the design includes a portion of trail within the County r-o-w.
50	2. Description of the Proposed Action and Project	General/Organizational/Typo	23	This is the first reference to the Main Boulevard (to be planted with a double row of deciduous trees" Please locate and label the main boulevard on the Figure.
51	2. Description of the Proposed Action and Project	General/Organizational/Typo	23	Please clarify how the "seasonal colors" of the deciduous trees will provide a colorful landscape in the winter - in leaf-off conditions.
52	2. Description of the Proposed Action and Project	General/Organizational/Typo	24	The narrative states, "Figures 2.4.1 and 2.4.2", which should be revised to refer to Figure 2.1.4, which shows proposed trails and sidewalks. Figure 2.4.2 is the zoning district map
53	2. Description of the Proposed Action and Project	General/Organizational/Typo	24	Correct text that the design includes a portion of trail within the County r-o-w.
54	2. Description of the Proposed Action and Project	General/Organizational/Typo	27	Please clarify this statement: "Following some or all of the main phase demolition, a section of the phase will then be constructed."
55	2. Description of the Proposed Action and Project	General/Organizational/Typo	Fig 2.1.1	Revise property outline to exclude County r-o-w from development areas, unless County agrees to trail proposal.
56	2. Description of the Proposed Action and Project	General/Organizational/Typo	Fig 2.1.2	Revise property outline to exclude County r-o-w from development areas, unless County agrees to trail proposal.
57	2. Description of the Proposed Action and Project	General/Organizational/Typo	Fig 2.1.4	Revise property outline to exclude County r-o-w from development areas, unless County agrees to trail proposal.

No	Chapter	Type	pDEIS Page #	Comment
58	2. Description of the Proposed Action and Project	General/Organizational/Typo	Fig 2.1.5	Do not include non-owned County r-o-w. Do not include an open space island in boulevard road and yard areas between townhouses.
59	2. Description of the Proposed Action and Project	General/Organizational/Typo	Fig 2.2.2	Shows the correct owned property, outline and the County r-o-w.
60	2. Description of the Proposed Action and Project	General/Organizational/Typo	Fig 2.2.3	Amend to show gas and telephone easement, box 4 is not an easement.
61	2. Description of the Proposed Action and Project	General/Organizational/Typo		Add a figure to show the two landfill areas and to identify the old powerhouse/smokestack location.
62	3.A.1 Land Use	General/Organizational/Typo	31	The CIA and Marist are really more "educational institution" than "community facilities"
63	3.A.1 Land Use	General/Organizational/Typo	32	While not required by the scope, additional figures such as photographs of adjacent land uses and conceptual images of the proposed project would add context and enhance the discussion of the compatibility of the proposed project with existing land uses in the study area.
64	3.A.2. Zoning	General/Organizational/Typo	Global	When referring to the requirements of the zoning code, the DEIS should include a section reference.
65	3.A.2. Zoning	General/Organizational/Typo	37	To improve readability, Section C, "Potential Impacts as a Result of the Proposed Project," should include an introduction that briefly summarizes what zoning amendments are being proposed, and the purpose and need for the zoning amendments.
66	3.A.3 Public Policy	General/Organizational/Typo	40	The history of the town master planning process, while summarized in the 2007 Town Master Plan, is not particularly relevant to this project and this discussion could be removed.
67	3.B Community Character and Visual Impacts	General/Organizational/Typo	Viewpoint Photos	Figure 3.4.1 is included in this Chapter, but there is no discussion of the content of this Figure. Rather the discussion is included in the Appendix.
68	3.B Community Character and Visual Impacts	General/Organizational/Typo		It would be helpful to have a map that illustrates the location and direction of each viewpoint, particularly given that there are several locations along Route 9.
69	3.B Community Character and Visual Impacts	General/Organizational/Typo	Viewpoint Photos	We would suggest consistency (and worst case) in color for the Proposed buildings in the visual simulations. In the Chapter, Proposed buildings are green, but in the visual Appendix (K), Proposed buildings are blue.
70	3.B Community Character and Visual Impacts	General/Organizational/Typo	53	The narrative would benefit from additional directional description, i.e. "the commercial area located to the south of the project site..."; "Additionally nearby institutions including Marist located to the southwest," etc.
71	3.B Community Character and Visual Impacts	General/Organizational/Typo	2.8.1	The narrative references Figure 2.8.1 - the conceptual lighting plan, which is difficult to read. We would suggest breaking this up in to two graphics, and providing additional images, details on the proposed lighting/location/etc.
72	3.B Community Character and Visual Impacts	General/Organizational/Typo	56	Please clarify the statement, "These residences will not generate excessive lighting demand."
73	3.B. Zoning	General/Organizational/Typo	NA	No figures are provided in this chapter. The scope requires "...mapping of zoning districts within a one-half (1/2) mile radius of the project site and permitted uses in each of the identified zoning districts." This information is provided in Figure 2.4.2 in the project description, and should be replicated here.
74	3.C. Geology, Soils, Topography and Steep Slopes	General/Organizational/Typo	62	Correct depth of on-site depression to read 25' to match other references within the DEIS
75	3.C. Geology, Soils, Topography and Steep Slopes	General/Organizational/Typo	64	Last bullet - it is not practical to ban vehicles with radio transmitters. The ban should be on the USE of the transmitters.
76	3.D. Subsurface & Surface Water Resources	General/Organizational/Typo	64	Show the 25' depression area on Fig. 3.6.1.
77	3.D. Subsurface & Surface Water Resources	General/Organizational/Typo	65	Identify the off-site wetland behind the Home Depot on Fig. 3.6.1 and on the construction drawings. Show the buffer around the wetland.
78	3.G. Wastewater	General/Organizational/Typo	App B, P 1	Figure 1, Appendix A is missing.
79	3.G. Wastewater	General/Organizational/Typo	App B, P 10	Appendix B is missing.
80	3.G. Wastewater	General/Organizational/Typo	App B, P 3	3 bedroom dwellings referenced in Section 2.0 are not shown in Table 1.
81	3.G. Wastewater	General/Organizational/Typo	App B, P 3	The Civic/Community uses should be included in the Commercial paragraph in Section 2.0.
82	3.G. Wastewater	General/Organizational/Typo	App B, P 7	Ownership of the completed improvements should be illustrated on a map. Why is New York State going to own and maintain a portion of the system?
83	3.G. Wastewater	General/Organizational/Typo	App B, P 10	The City of Poughkeepsie letter cited in Section 5.2 is missing.
84	3.I. Vegetation and Wildlife	General/Organizational/Typo		Page 2 of Appendix J indicates that the Hudson River is "900 feet east" of the project site, this should read "west".
85	3.I. Vegetation and Wildlife	General/Organizational/Typo		Page 29 of Appendix J, and elsewhere in the DEIS, reads, "There is no reason for a Blanding's turtle to continue moving westward beyond the Hudsonia-designated Conservation Zone area into... the Project Site...because core, associated and nesting habitat are all available within the Conservation Zone limits." Species movement ranges are determined by empirical studies - whether an animal has a "reason" to move within its possible range is a misplaced supposition. Recommend modifying this choice of words.
86	3.J.Traffic, Transportation, Pedestrians and Transit	General/Organizational/Typo		This chapter should be organized and numbered to match the adopted Scoping Document
87	3.J.Traffic, Transportation, Pedestrians and Transit	General/Organizational/Typo		This chapter would significantly benefit from graphics and maps illustrating the narrative. Right now, it's very difficult for the reader to understand the narrative.
88	3.J.Traffic, Transportation, Pedestrians and Transit	General/Organizational/Typo		The sentence that starts: "Route 9G is a state highway, which...., due north." Please clarify, due north of what?
89	3.J.Traffic, Transportation, Pedestrians and Transit	General/Organizational/Typo		The references to Tables and Figures in the TIS should be much more specific (i.e. include a page number). Navigating through the 1200 page document to locate the referenced materials is difficult.
90	3.J.Traffic, Transportation, Pedestrians and Transit	General/Organizational/Typo		We would suggest introductory text be provided stating "A summary table is provided at Table 1...." instead of repeating this in every paragraph
91	3.J.Traffic, Transportation, Pedestrians and Transit	General/Organizational/Typo		We would suggest moving the paragraph currently located on page 91, which describes the time/location of the manual traffic counts/ATR counts before the first time "the 2015 Existing Traffic Volumes" are referenced.

No	Chapter	Type	pDEIS Page #	Comment
92	3.J.Traffic, Transportation, Pedestrians and Transit	General/Organizational/Typo	89	For Route 9 and southern Marist Drive/Marist Drive ... the last sentence states, "Please see page 14 of the TIS Report for more details." Additional detail cannot be found on page 14, and further please clarify what additional details may be found and where.
93	3.J.Traffic, Transportation, Pedestrians and Transit	General/Organizational/Typo	91	For the sentence that begins, " In addition to the traffic volume counts..." , we would suggest that the locations described be formatted as a bulleted list or better, a table.
94	3.J.Traffic, Transportation, Pedestrians and Transit	General/Organizational/Typo	91	For the sentence that begins, "Pedestrian and bicycle movements from the east to the west side of the Marist campus..." , please clarify that this refers to the east/west crossing of Route 9.
95	3.J.Traffic, Transportation, Pedestrians and Transit	General/Organizational/Typo	91	As noted above, please move the paragraph that begins, "Manual traffic counts..." to earlier in the chapter to provide context and clarity.
96	3.J.Traffic, Transportation, Pedestrians and Transit	General/Organizational/Typo	91	For the sentence that begins, "Please see Appendix G of the TIS for the ATR counts.." please be more specific as to where this data may be located within Appendix G.
97	3.J.Traffic, Transportation, Pedestrians and Transit	General/Organizational/Typo	91	"Accident data WERE compiled..."
98	3.J.Traffic, Transportation, Pedestrians and Transit	General/Organizational/Typo	92	Mapping the MNR station and the bus stops would be very helpful to understand their relationship to the Project site.
99	3.J.Traffic, Transportation, Pedestrians and Transit	General/Organizational/Typo	93/94/95	We would suggest putting the LOS information by intersection into a table
100	3.J.Traffic, Transportation, Pedestrians and Transit	General/Organizational/Typo	95	The sentence that starts: "Driveway geometry at U.S. Route 9 .." is really confusing and would benefit from an illustration or graphic.
101	3.J.Traffic, Transportation, Pedestrians and Transit	General/Organizational/Typo	96	We would recommend a map and sections for each the road/alley/row types - clearly indicating location of on-street parking, on-street dedicated or shared bike lanes and off street trails.
102	3.K. Demographics	Gen/Typo	110	Please reference the applicable DEIS sections where the analysis substantiating the no fiscal impact claim for the School District and other community services is located.
103	3.K. Demographics	Gen/Typo	106	The Priority levels for the planned recreation department improvements is missing.
104	3.L. Human Health	Gen/Typo	119	Please include the CGR study as an appendix to the DEIS
105	3.L. Human Health	Gen/Typo	113	There is an extra 'e' in the word "Town" in the first line of the last paragraph.
106	3.L. Human Health	Gen/Typo	114	Under, 'Police', please change sentence to begin, "It is estimated that..."
107	3.L. Human Health	Gen/Typo	118	"The Police Department did not provide the basis for HOW these projections were made."
108	3.L. Human Health	Gen/Typo	119	"CGR estimated a range of 205 to 1,172 for new calls." Please clarify what 'new calls' are referenced.
109	3.L. Human Health	Gen/Typo	120	The second paragraph on the page belongs in the 'existing conditions' section of the Chapter.
110	3.M. Fiscal and Economic	Gen/Typo	140	Should the rows in Table 3.15-36 indicate the Change WITH the project or WITHOUT?
111	3.M. Fiscal and Economic	Gen/Typo	140	Please confirm that this sentence should read: "As described in the Demand Generated section, THE POUGHKEEPSIE POLICE DEPARTMENT BELIEVES THAT the Project is anticipated..."
112	3.M. Fiscal and Economic	Gen/Typo	144	Please provide a cross-reference to the section of the DEIS where the estimate of the Project's impacts on firefighter staffing is provided.
113	3.M. Fiscal and Economic	Gen/Typo	148	Second sentence in the first paragraph: "The portion of the Site in the Town OF X? is assessed..."
114	3.M. Fiscal and Economic	Gen/Typo	153	Please include subheadings where appropriate. For example, in the middle of Page 153, the analysis turns from municipal expense and revenue to retail gap analysis.
115	3.M. Fiscal and Economic	Gen/Typo	158	The first sentence of the second paragraph is missing the word, "by."
116	3.M. Fiscal and Economic	Gen/Typo	159	Please clarify the source of the \$59 million in direct construction spending used in the second paragraph on this page.
117	3.N. Historic and Cultural Resources	General/Organizational/Typo	Appendix D	Page 161 of Chapter 3.16, paragraph 2, indicates the table that appears in the PDEIS chapter (Table 3.16.1) is from a Hartgen Structures Report contained in Appendix D. But that report does not contain the table, it appears to have been omitted from the report. The entire report should be included in Appendix D.
118	3.N. Historic and Cultural Resources	General/Organizational/Typo	Appendix N - 2 through 4	The title page and pages i and ii of the archaeology report include a "draft" watermark. Is this report a draft? If so, a final report should be issued. If not, the draft watermark should be removed.
119	3.N. Historic and Cultural Resources	General/Organizational/Typo	161	Existing Conditions text should be separated under two clear headers: Historic Resources, to address historic structure issues, and Archaeological Resources, to address buried archaeological concerns
120	3.N. Historic and Cultural Resources	General/Organizational/Typo	161	In the discussion of the Hartgen Structures Survey in paragraph 2, the text should indicate that photographs of the buildings are contained in that report.
121	3.N. Historic and Cultural Resources	General/Organizational/Typo	161	Delete the paragraph pertaining to the Higgins & Quaesbarth report and only summarize information that is useful with respect to the identification and status of the historic buildings on the campus.
122	3.N. Historic and Cultural Resources	General/Organizational/Typo	161	Paragraph 5 should be moved to Section C, "Potential Impacts of the Proposed Project" and revised as discussed below.
123	3.N. Historic and Cultural Resources	General/Organizational/Typo	162	The chapter should state that all previous archaeology reports are appended to the 2016 Hartgen investigation included as Appendix N.
124	3.N. Historic and Cultural Resources	General/Organizational/Typo	163	The End of Field Letter prepared by Berger is dated December 17, 2004, not 2005 as stated in the chapter.
125	3.N. Historic and Cultural Resources	General/Organizational/Typo	164	The discussion under "C. Potential Impacts of the Proposed Project" should be separated under two headers: Historic Resources and Archaeological Resources, similar to text in the Existing Conditions discussion of the chapter.
126	3.N. Historic and Cultural Resources	General/Organizational/Typo	164	A drawing showing the footprint of the proposed project and the historic buildings to be retained should be prepared and included as a figure in the historic chapter. The historic buildings should be labeled by name and building number.

No	Chapter	Type	pDEIS Page #	Comment
127	3.N. Historic and Cultural Resources	General/Organizational/Typo	n/a	The construction chapter (3.20, page 193) includes information regarding unanticipated discoveries for archaeological resources and human remains as stipulated by OPRHP; that language should be referenced in this chapter, as well.
128	3.N. Historic and Cultural Resources	General/Organizational/Typo	all pages	SHPO should be referenced consistently throughout the chapter. As this project is not currently being reviewed under Section 106 of the NHPA, the SHPO should be referred to as the "New York State Office of Parks, Recreation and Historic Preservation."
129	3.O. Hazardous Materials	General/Organizational/Typo	NA	A figure is needed showing the BCP and VCP areas
130	3.O. Hazardous Materials	General/Organizational/Typo	166	In first paragraph, references to Appendix numbering system are incorrect
131	3.O. Hazardous Materials	General/Organizational/Typo	171	In the fifth paragraph, the sentence beginning Once should be deleted.
132	3.O. Hazardous Materials	General/Organizational/Typo	171	The last paragraph, referring specifically to pipes, should be deleted.
133	3.O. Hazardous Materials	General/Organizational/Typo	172	In first paragraph, replace "cause cancer" with "present a hazard to human health and the environment".
134	3.O. Hazardous Materials	General/Organizational/Typo	172	In third paragraph, replace "banned" with "severely restricted".
135	3.O. Hazardous Materials	General/Organizational/Typo	172	Replace "surface" with "service".
136	3.O. Hazardous Materials	General/Organizational/Typo	173	Replace "unregulated" with "universal/regulated".
137	3.Q. Air Quality	General/Organizational/Typo	187	The discussion of the air quality impacts due to construction, while meeting the requirements set forth in the scope, should be moved into the Construction Chapter and assessed under the review of that Chapter.
138	3.R. Construction	General/Organizational/Typo	P. 191	Clarify purpose of the two separate entrances (i.e. main entrance on Rte. 9 versus southerly entrance). It seems that southerly entrance is predominantly for construction traffic whereas the main entrance will be for passenger vehicles or light pick-ups.
139	IV. Alternatives	Gen/Typo	196	Please revise the narrative herein as follows: "IN THE APPLICANT'S OPINION, the Proposed Project will result in the greatest measurable benefit to the Town in multiple ways."
140	IV. Alternatives	Gen/Typo	196	Please revise the narratives herein as follows: "This scenario will offer the LARGEST number of new residential units...,with, IN THE APPLICANTS OPINION, LITTLE to no long-term environmental impacts associated."
141	IV. Alternatives	Gen/Typo	196	Please revise the narrative herein as follows: "Due to anticipated interest in the residential units and commercial space, the potential for increased tax revenues, and, IN THE OPINION OR THE APPLICANT, negligible resulting impacts, IT IS THE APPLICANT'S OPINION THAT the Proposed Project development scenario is in the best interest of the Town and the Applicant."
142	IV. Alternatives	Gen/Typo	195	The Figure #'s should be updated.
143	IV. Significant Impacts That Cannot Be Avoided	General/Organizational/Typo	198	The narrative states the impacts are reduced through engineering design and specific mitigation measures previously discussed. Please provide a table or brief narrative reiterating proposed mitigation per phase per impact category.
144	VIII. Irreversible and Irrecoverable Commitment of Resources	General/Organizational/Typo	201	Need Paragraph separator inserted between 3 and 4.

ID	No	Chapter	Comment	Applicant's 9/15 Response	Consultant Comment on 9/15 Response	OK for Completeness?
Gen-14	14	2. Project Description	It appears from Figure 2.3.1 West Cottage Road will serve a primary Site Access Road, though this appears to be a lesser road on the Illustrative Site Plans. Please clarify.	West Cottage Road will be utilized as a primary access roadway and has been added to Table 2.3.1 . Internal roads are not meant to be highlighted in the Site Plans, so as not to distract the reader from the features being illustrated in any given figure (i.e. Landscaping, Residential, etc.)	West Cottage Rd should be colored yellow in the figure and identified as such in Table 2.3.1	No
Gen-48	48	2. Project Description	This Figure is really difficult to read - as are the proposed lighting fixtures. A lighting plan that provided location/type of different types of lighting (residential/commercial/street/sidewalk/walking trail, etc.) should be provided.	The Lighting Plan has been revised and is now included in the Plan Set, plotted at a larger scale for better legibility.	Please provide an 11x17 version of this plan within the DEIS document	No
Gen-61	61	2. Project Description	Add a figure to show the two landfill areas and to identify the old powerhouse/smokestack location.	A Figure has been added, Former Landfill and Brownfield Cleanup Program Areas (3.10.1). These features are now also shown on the Cut and Fill sheet of the Plan Set.	The Former Landfill areas on Figure 3.10.1 are mislabeled. Landfill #1 is labeled as #6 and vice versa.	No
Scope-102	102	2. Project Description	The adopted Scoping Document requires graphically presenting on-site and off-site infrastructure (reference to the Engineering Plan set is not sufficient).	The Water and Wastewater chapters of the DEIS contain reference to Figures and Reports that contain on-site infrastructure graphics. However, no off-site infrastructure is proposed and is therefore not discussed.	Comment not addressed. A graphic presenting onsite infrastructure should be provided as required by the Scoping Document.	No
Scope-103	103	2. Project Description	Since there was a powerhouse, there is discussion elsewhere about tunnels to the various buildings. Discuss how to abandon the steam tunnels. Discuss changes to existing drainage system in areas of new construction.	A Steam Tunnels Figure (see List of Figures) and text explanation has been added.	A discussion of the condition and required modifications to the existing drainage system should be added to Section entitled "Underground Infrastructure"	No
Scope-106	106	2. Project Description	The adopted Scoping Document requires the stormwater management system to be shown graphically. This graphic should depict previously referenced sustainable/LID/green infrastructure practices including: rain gardens and other innovative stormwater management techniques.	The conceptual design for stormwater management is shown on the engineering Plan Set, Utility Plans (Sheets C160 - C163) and described in the SWPPP. The application of sustainable/LID/green infrastructure practices will be evaluated and designed during the site plan review stage for each phase of development. DEC regulations require implementation of these techniques.	Please provide an 11x17 version of this plan within the DEIS document	No
Scope-20	20	2. Project Description	2.1.1 The narrative explains the existing HRDD zoning regulations: "require that the Applicant for development master plan approval assess all buildings on site for potential adaptive reuse." The zoning requires consideration of adaptive reuse of the buildings, but it does not specifically require it. Given that a structural analysis for all the buildings has not been completed, we suggest that this section be revised to indicate that some of the buildings are deteriorated beyond repair (in the Applicant's opinion), while others will be demolished because their reuse would not meet the objectives of the Applicant. The true focus for the requested zoning text amendment are the current HRDD density, use and threshold requirements, which would render the Proposed Project infeasible.	The text has been revised to reflect this suggestion.	In lieu of expressing this as an opinion, we suggest that the language throughout be revised to eliminate reference to structural deficiency and replaced with a statement that indicates that reuse of the buildings does not meet the programmatic needs of the Applicant.	No
Scope-21	21	2. Project Description	2.1.3 Please describe which uses "may also require" special use permit approval from the ZBA. The MDP must include all proposed uses.	The text has been revised to indicate that these potential uses will be determined in later stages of development (site plan review). The Applicant has discussed all proposed uses, as required, but cannot know all possibilities with any certainty, so language must allow for some degree of flexibility to accommodate a fluctuating and evolving market.	These uses, at the very least, should be defined in this text.	No
Scope-23	23	2. Project Description	The statement "The Project will therefore not have an adverse stormwater impact on adjacent or downstream properties or receiving water courses" is not substantiated herein. Please provide additional narrative to support this statement.	Additional narrative and supporting calculations have been provided in the Master SWPPP to support this statement.	According to the stormwater modeling calculations provided in the SWPPP, the existing infiltration basin will be require nearly double the storage volume under post-development conditions. The DEIS should <i>briefly</i> describe how the existing basin will be able to accommodate the additional storage required.	No
Scope-36	36	2. Project Description	Existing Uses and Structures (should be Section II.B.8) - The adopted Scoping Document requires a description of all existing uses and structures on the project site, including buildings to be removed and retained and their current physical condition. Currently, this section includes a reference to the Hartgen Archeological Report and a summary of the asbestos abatement process (which is out of place here). We suggest a narrative describing all on site uses, a table and associated map, listing and numbering each existing building, its condition as verified by a qualified structural engineer, and the proposed disposition for each building.	The Applicant has provided revised Figures (Historic Structures Survey - Structures to be Retained, and Historic Structures Survey - Photo Locations Maps 1 and 2 - see Figure List) showing existing structures on site, numbered with a key and highlighting the 5 that are proposed for adaptive reuse. The Cultural Resources chapter of the text provides a summary of the Quasebarth & Higgins report and the Hartgen report, which discuss building conditions, and existing structures/uses on the site. A new Table has also been added (provided by Hartgen) that provides the name and keyed number along with a brief description of the condition of each building, titled 'Existing Conditions of HRPC Structures' - see the List of Tables. The proposed disposition for all other buildings (but for the 5 proposed for adaptive reuse) is demolition. This chapter along with the Historic and Cultural Resources and Hazardous Materials chapters review the Applicants reasoning as to why certain buildings will be demolished and others reused. As per previous discussions, the Applicant has elected not to undergo or provide a report of the structural condition of each existing building by a qualified, structural engineer.	In lieu of expressing this as an opinion, we suggest that the language throughout be revised to eliminate reference to structural deficiency and replaced with a statement that indicates that reuse of the buildings does not meet the programmatic needs of the Applicant.	No
Scope-37	37	2. Project Description	Site Remediation Plan (should be Section II.B.9) - The adopted Scoping Document requires a discussion of the site remediation plan and schedule (phases, entire site at once, etc.). The Town has already granted demolition permits for 5 on-site buildings, and we understand that remediation for several other buildings is pending. Further, we understand that some portion of the funding for these activities will be provided by the State. This section should describe the process, schedule and outside funding sources for all known site remediation activities and an anticipated schedule for future site remediation activities.	The Remedial Work Plan has not yet been completed and so cannot be provided at this stage.	Comment not addressed. Please reference documents already provided to the Town and on file as part of demolition permit.	No
Scope-54	54	2. Project Description	Please clarify the location of the Great Lawn "lookout", what will be located there, is it open to public?	These details will be further developed at a later date during the site plan review process.	Please indicate the location of the lookout on the engineering plan set and also the Figures within the DEIS. Public/private access details will be addressed during substantive review.	No
Scope-55	55	2. Project Description	The adopted Scoping Document requires "Graphics presenting streetscape design (including frontage along Route 9) and amenities.	Please refer to the provided road sections in the Engineering Plan Set (C100, C180, C181).	Please provide an 11x17 version of this plan within the DEIS document	No
Scope-56	56	2. Project Description	Please provide details on which roads are proposed for public dedication, which are proposed to be private and a section/elevation for each road type - including proposed landscaping, sidewalks, parking, bicycle paths, lighting, etc.	Please refer to the provided road sections in the Engineering Plan Set (C100, C180, C181). Public dedication is addressed on these sheets as well.	Please provide an 11x17 version of this plan within the DEIS document	No
Scope-65	65	2. Project Description	It is presumed that "street" trees would be provided within the sidewalk (public right of way). Please provide details on the width of sidewalks for both roads to be dedicated to the Town, and those that would be privately owned/maintained. Please also provide details on ownership/maintenance of sidewalks for each unit type as required by the adopted Scoping Document.	Please refer to the provided road sections in the Plan Set. This information will be further developed in site plan review. Ownership/maintenance of sidewalks would correspond with the ownership of the adjacent roadways (shown in Roadway cross-sections and profiles, C100, C180, C181).	Please provide an 11x17 version of this plan within the DEIS document	No
Scope-86	86	2. Project Description	Please define an "access collector road".	Please see the Road Sections figure in the Engineering Plan Set (C100, 180, 181).	Please provide an 11x17 version of this plan within the DEIS document	No
Scope-89	89	2. Project Description	Please provide additional detail on the roadway design (width, number of lanes, circulation, on-site parking, direction, bicycle lanes, public/private, etc.). We would suggest this is provided in a Figure.	Reference added to Sheet No. C100, Roadway Cross Sections of Site Plan.	Please provide an 11x17 version of this plan within the DEIS document	No

ID	No	Chapter	Comment	Applicant's 9/15 Response	Consultant Comment on 9/15 Response	OK for Completeness?
Scope-109	109	3.A.1 Land Use	No Figures are provided in this chapter. The scope requires a "Description and mapping of current project site land use, including the Great Lawn and Calvert Vaux landscape, National Register listed buildings, and current building condition (including description of any relevant easements or other rights of use by others)." While an existing land use map was provided in the project description chapter, it only shows off site land uses. There are no maps showing the current condition of on site land uses as required by the scope.	Textual reference to Figures presented earlier in DEIS (2.0) has been added and reference added to the Historic & Cultural Resources chapter, which provides mapping of HRPC buildings, a building conditions report by Hartgen and reference to Higgins Quasebarth study, which provides detail on buildings conditions, and the Great Lawn and National Reg. buildings. Also, Hartgen has provided a description of NRL buildings in its report (see Appendix D) and a table (HRPC Structures - Assessment of Existing Conditions) with conditions information for each structure.	This comment has not been fully addressed. While references have been added to where in the document the information may be found, the scope requires a textual description and figures within this chapter. Please provide the existing conditions map in this chapter and a brief discussion of on site buildings to satisfy the Scoping Document requirement.	No
Scope-112	112	3.A.1 Land Use	The adopted Scoping Document requires a description of easements	Easements have already been adequately addressed in chapter 2.0 (Table 2.2.1 and text - 2.2).	This comment has not been fully addressed. While references have been added to where in the document the information may be found, the scope requires a textual description and figures within this chapter.	No
Scope-113	113	3.A.1 Land Use	The scope requires "...mapping of land uses within a one-half (1/2) mile radius of the project site including public and private open space areas." Figure 2.4.1 has this information, and should be replicated in this chapter.	The Land Use figure has already been referenced in the text. Please see response to Comment #73 (and others).	This comment has not been fully addressed. While references have been added to where in the document the information may be found, the scope requires a figure within this chapter. Locating the land use map within the land use chapter would improve the readability of this document.	No
Scope-116	116	3.A.2. Zoning	The proposed mitigation section states that the "proposed Project is generally consistent with current HRDD regulations." However, no direct comparison between the existing regulations and the specifics of the proposed project has been provided. In addition, a number of zoning text amendments are proposed. As such, this statement is not supported by the information provided.	Table 3.2.2 (follows page 39 of pDEIS) provides a direct comparison between the existing regulations and the specifics of the proposed amendments for the proposed project, cites the zoning text and explains how the Project is consistent with the intent and purpose of the original HRDD regulations. Further, zoning amendments cannot be "mitigated" in the same way that other changes may be, such as Hazardous Materials for example, which entail a clear and obvious mitigation structure. Zoning changes, on the other hand, are "mitigated" by careful consideration of the proposed amendment with respect to impacts on the environment.	While a Table 3.2.2 is referenced in the text, Table 3.2.2 was not included in the current PDF submitted. Table 3.2.2 of the May 2016 version includes the proposed changes and "rationale," but does not offer a side by side comparison of existing versus proposed. Nor, does it show how the project would comply/not comply with the existing regulations. Instead, the existing regulations are simply listed in the current Section A. Furthermore, the "rationale" in Table 3.2.2 (May version) indicates why the zoning change is proposed, but makes no statements as to the Project Project's compliance or consistency.	No
Scope-118	118	3.A.2. Zoning	Table 3.2.1 should be revised to include a summary of the permitted and special permit uses in the HRDD Zoning District.	Table 3.2.1 summarizes permitted and special permit uses within 1/2 mile surrounding the project site, as Scoped in III.A.2.a.2. HRDD does not distinguish between allowed/permitted uses "as-of-right" and by "special permit" uses. As shown on Table 2.4.1, HRDD distinguishes between permitted uses either WITHIN a national landmark bldg or contributing area OR, OUTSIDE a landmark bldg or contributing area, but all uses are subject to approval of MDP, site plan review and approval. Thus, ALL uses on site are subject to a formal review and approval process.	This comment has not been addressed. The information referenced in the response should be provided in the ZONING chapter.	No
Scope-121	121	3.A.2. Zoning	No figures are provided in this chapter. The scope requires "...mapping of zoning districts within a one-half (1/2) mile radius of the project site and permitted uses in each of the identified zoning districts." This information is provided in Figure 2.4.2 in the project description, and should be replicated here.	Please see response to Comment #73.	This comment has not been fully addressed. While references have been added to where in the document the information may be found, the scope requires a figure within this chapter. Locating the zoning map within the zoning chapter would improve the readability of this document.	No
Scope-123	123	3.A.3 Public Policy	Because the Master Plan specifically refers to the residential density, the DEIS should discuss whether amendment to the Master Plan to accommodate the proposed Project would be necessary.	No, an amendment to the 2007 Town Plan is not necessary. Page 86-87 of the 2007 Town Plan states that with the allowed max of 550 units, density would be one unit/ 0.28 acres, which is higher than the 4-6 units/acre allowed in other Town Centers, but "due to the unique nature of the existing historic property, the need to accommodate ... mixed-use development, these densities are considered appropriate and are consistent with the overall intent of the new Town Plan." Considering the Plan's justification (intent and purpose) for a density of 1 unit/0.28 acres being "appropriate and consistent" with the overall intent of the Town Plan, and the proposed project's density of 1 unit/0.21 acres, such a minimal increase is still reasonably appropriate and consistent with the Plan's intent to increase density in designated areas in order to preserve open space, encourage reuse of historic properties, while also limiting residential density to sustainable levels. This minimal increase would still result in sustainable levels, yet would also enable the Applicant to achieve the residential density required to make the project economically feasible. It also fully conforms with "Key Recommendation #2" in the Town Plan, which states that "concentrating higher development densities in the Town Centers (HRDD) goes hand-in-hand with up-zoning suburban areas by encouraging re-use and re-development..." (pg 87). Therefore, the proposed project is not in conflict with the general intent and purpose of the Town Plan, rather, it embodies the goals of the Plan with slight alteration to enable feasibility.	This analysis should be added to the chapter.	No
Scope-129	129	3.A.3 Public Policy	The Master Plan includes a zoning recommendation to "Establish a base density of 300 units, and an additional incentive density of up to 150 units, for the entirety of the HRDD property." (pg 83)The compatibility of the Proposed Project with this specific density requirement should be identified and discussed. This density recommendation is further discussed on page 86. "The former State Psychiatric property located north of the proposed commercial Fairview Center will also include a mix of residential and commercial types within a center-like setting. The potential residential densities allowed within the former State Psychiatric property (referred to in the Zoning Law as the "Historic Revitalization Development District" or "HRDD") would allow development of up to 300 new units as part of a mixed use center, with the potential for an additional 150 units provided that the development plan preserves the ±18 acre "Great Lawn" west of the main historic buildings and provides for the adaptive reuse of the remaining ±269,099 square feet of the National Landmark Building. Based on the potential of 550 units within the HRDD property the effective residential density is approximately one unit for each 0.28 acres of land." (pg 86)	Text has been added to address this comment.	This comment has not been fully addressed. While a discussion of the Master Plan's density analysis is provided, it does not provide a description of whether or not the Proposed Project is consistent with that analysis.	No
Gen-71	71	3.B Community Character and Visual Impacts	The narrative references Figure 2.8.1 - the conceptual lighting plan, which is difficult to read. We would suggest breaking this up in to two graphics, and providing additional images, details on the proposed lighting/location/etc.	The Lighting Plan has been revised and is now included in the Plan Set (C171), plotted at a larger scale for better legibility.	Please provide an 11x17 version of this plan within the DEIS document	No

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Scope-136	136	3.B Community Character and Visual Impacts	Paragraph 2 - Please expand narrative to describe existing conditions/visual imagery of immediate adjacent sites, urban design character and context and description of Marist and CIA. (B.1.a)	The text has been expanded.	Consider revising to include the following sentence for improved readability of the following: "The built environment extends with several smaller plazas and nearby institutions, including Marist College to the southwest and the Culinary Institute of America to the northwest. Also present is large-scaled institutional character, marked by collegiate buildings, residential dormitories, and limited, private open space for college students."	No
Scope-137	137	3.B Community Character and Visual Impacts	Please provide existing conditions photographs of the Great Lawn/landscape elements	Please see Appendix C, Great Lawn and North Green Buffer: Guidelines and Considerations for Future Renovation, for existing conditions photographs and a keyed map. Reference has been added to the text.	Please correct reference - Appendix D (not C).	No
Scope-145	145	3.B Community Character and Visual Impacts	Please provide additional detail regarding how walking trails and paths will be lit.	Please see the Lighting Plan, C182 of the Plan Set. Further details will be developed during the site plan review process.	The reference in the DEIS text is inconsistent with this response (i.e., the DEIS says see C171). In addition, the text does not provide insight into lighting on the trails for the reader of the DEIS. Finally, we are unable to locate C-171 or C-182 in the plan set provided in May electronically.	No
Scope-151	151	3.C. Geology, Soils, Topography and Steep Slopes	Prepare a Figure or modify Figure 3.5.2 to show areas of potential rock excavation, verify that rock excavation has been included in previous project earthwork (cut/fill) quantities.	The amount of potential rock excavation is unknown pending completion of a side-wide geotechnical evaluation, which will occur during the site plan review process.	The locations of potential rock excavation should be indicated on a figure based on information provided in the Dutchess County Soil Survey.	No
Scope-169	169	3.F. Water	The Water Distribution Conceptual Layout map, as referenced in Section 7.2, was missing and will need to be included in the DEIS. This section also noted a conflict requiring the relocation of existing water main. This will need to be discussed in the DEIS, including any current or recent work performed to address this conflict.	The Water Concept layout map has been added to Appendix A of the DEIS. Paragraph C. of DEIS Section 3.F. Water has been revised to discuss the potential conflict of the development with the existing Town water main.	Please provide the map.	No
Gen-78	78	3.G. Wastewater	Figure 1, Appendix A is missing.	This Figure has been added.	Wastewater Collection System Map in Appendix B is missing.	No
Gen-82	82	3.G. Wastewater	Ownership of the completed improvements should be illustrated on a map. Why is New York State going to own and maintain a portion of the system?	The Wastewater Collection System Concept map has been revised to indicate ownership, operational and maintenance responsibilities (Town, Private, NYS) of the various sections of the system. According to the 2005 MOU, the State of New York shall be responsible for the operation and maintenance of the 18-inch sewer trunk line to the Town flow meter pit.	Wastewater Collection System Map in Appendix B is missing.	No
Gen-83	83	3.G. Wastewater	The City of Poughkeepsie letter cited in Section 5.2 is missing.	The Letter has been appended to the Report.	No appendices to the Wastewater Collection Concept Report were provided.	No
Scope-175	175	3.G. Wastewater	G.2. Provide a map showing the existing sewage system and ownership/easements, whether it is currently in use (Town or private), the size/type of pipe and its age and condition.	The size/type of pipe and age and condition of the existing on-site sewer collection system is unknown. A new sewer collection system is planned to accommodate the needs of the development. As a result, the on-site sewer collection system will be abandoned in place.	Map requested has not been provided	No
Scope-176	176	3.G. Wastewater	G.3.e Clarify on a map the ownership and maintenance responsibilities.	The Wastewater Collection System Concept map in Appendix B of the DEIS has been revised to indicate which entity (Town, Private, NYS) will own, operate and maintain the various sections of the sewer collection system.	Wastewater Collection System map in Appendix B is missing	No
Scope-180	180	3.H. Solid Waste	The discussion of private haulers use of the "Town transfer station" is incorrect and shall be revised. Similarly, the description of waste being delivered to DCRRA and then to Seneca Meadows does not seem consistent with actual current disposal practices.	The DCRRA receives many different types of waste and redistributes certain materials out to other entities for processing. The following entities will likely receive these redistributed materials: 1.) Bulk Institutional Items; commercial furniture, building materials, clothing, mattresses etc. - Institution Recycling Network, MA, 603-229-1962. 2.) Fluorescent Light Bulbs, Lead, Acid Batteries - American Lamp, Marlboro, 845-896-0058. 3.) Concrete & Other Masonry Waste - RCT, Poughkeepsie, 845 471-8700, Recycle Depot, 845-452-3939. 4.) Commercial Hazardous Waste, Care Environmental, New Jersey, 800-494-2273. 5.) Construction & Demolition Materials - Recycle Depot, 845 452-3939, Royal Carting of Dutchess County, Inc, 845 896-6000 Taylor Recycling Facility, LLC, 845-457-4021.	The information provided in the response to this comment should be added to the DEIS text.	No
Scope-181	181	3.H. Solid Waste	The discussion of potential use of the Recycle Depot as a final disposal destination for demolition related debris is incorrect as that facility has very limited capacity to process large amounts of waste at any given time.	See response # 324 above.	The information provided in the response to this comment should be added to the DEIS text.	No
NEW	NEW	3.I. Vegetation and Wildlife			Text and Table 3.11.1 indicate that the Upland Meadow Percent Coverage is 2828%. Please correct.	No
NEW	NEW	3.I. Vegetation and Wildlife			Executive Summary Table 1 is not consistent with Table 3.11.1 in the body of the document.	No
NEW	NEW	3.I. Vegetation and Wildlife			Text indicates that 9.5 acres of impervious surface would be introduced outside of Existing Human Habitat areas. Text should indicate in which habitats the impervious surfaces would be introduced and the surficial area of the impervious surface in each habitat type.	No
Scope-193	193	3.I. Vegetation and Wildlife	The eastern box turtle (Terrapene carolina carolina) is a NYS "special concern" species. The approximate location where the individual of this species was found onsite should be disclosed and provisions to provide for the species' continued use of the undeveloped areas of the site should be explored in more detail.	The text has been revised at page ix of Appendix J and Section 3.11.	Text added as noted in response. The text indicates that there is habitat to be protected. Applicant should provide a short description of the location of the habitat to be "protected" in relation to the area in which the turtle was observed? Is it adjacent to the habitat in which the turtle was observed? If not adjacent, how far distant and what lies (pre and post construction) between the two areas?	No
Scope-200	200	3.J. Traffic, Transportation Pedestrians and Transit	The location, traffic volumes and peak hours from Automatic Traffic Recorder (ATR) counts should be summarized in the TIS.	Table V-1 has been added to Appendix B of the TIS and reference to the table added to the DEIS.	April 2014 Fulton Street ATR Counts are missing from Table V-1; please include.	No
Scope-203	203	3.J. Traffic, Transportation Pedestrians and Transit	Was Journey to Work (JTW) data used to develop the residential arrival and departure patterns? If not why?	Arrival/Departure distributions are generally developed based on a review of existing traffic volumes in the area as well as a review of Journey to Work data for the Residential portion of a development.	Journey to Work Data should be provided in the Appendix	No
Scope-204	204	3.J. Traffic, Transportation Pedestrians and Transit	The TIS needs to clearly state the methodology for identifying project related traffic impacts. These locations should be highlighted in the level of service (LOS) tables. Also, all locations should be identified where the project applicant would be responsible for the mitigation measure implementation (including the cost).	Criteria for identifying project-related impacts have been added to the DEIS and TIS.	Impacted locations should be highlighted in the LOS table	No

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New		3.J.Traffic, Transportation, Pedestrians and Transit	[NEW COMMENT] The Queueing Summary Table, Table Q-1 (located in Appendix B.5) , contains the reference "See Note 3 Below" for location #5 (U.S. Route 9 & Hudson View Drive). However, Note 3 does not appear in the table. Please add Note 3 to the table. Additionally, there is only a Note 1 shown and no Note 2. If needed, please renumber the Note reference numbers so that they follow in sequence (e.g., Note 1, Note 2, etc.).		The Queueing Summary Table, Table Q-1 (located in Appendix B.5) , contains the reference "See Note 3 Below" for location #5 (U.S. Route 9 & Hudson View Drive). However, Note 3 does not appear in the table. Please add Note 3 to the table. Additionally, there is only a Note 1 shown and no Note 2. If needed, please renumber the Note reference numbers so that they follow in sequence (e.g., Note 1, Note 2, etc.).	No
Scope-213	213	3.J.Traffic, Transportation, Pedestrians and Transit	The TIS needs to include a discussion regarding parking -- number of spaces, estimated demand, shared parking, etc.	Parking is discussed in Section 2.8 of the DEIS under subsection 'Site Access, Roads, Circulation and Parking' and parking tables are now provided on the Commercial and Residential Plans (Figures 2.1.2 and 2.1.3). This TIS does not go into detail on parking.	Parking Demand and Shared Parking data and discussions need to be briefly summarized here..	No
Scope-220	220	3.J.Traffic, Transportation, Pedestrians and Transit	Please clarify how the manual/ATR counts collected in 2014, were "grown" to represent " the 2015 Existing Traffic Volumes."	2014 volumes were found to be consistent with 2015 traffic volumes therefore they were not grown. Where minor differences were found between intersections and ATR count locations, volumes were balanced utilizing highest traffic volumes. A description has been added to DEIS and TIS.	Turning Movement Count (TMC) data needs to be provided. Provide a comparison table which compares the 2014 and 2015 counts to show that the 2014 counts were consistent with the 2015 counts.	No
Scope-249	249	3.J.Traffic, Transportation, Pedestrians and Transit	Please clarify how the "site plan has also been designed to accommodate future LOOP bus stops..." where? And how?	As discussed in previous responses, the site plan has allowed for flexibility in many ways for changes in future market conditions. Potential, future LOOP bus stops would be considered during site plan review.	Please include the substance of this response in the text of the DEIS. With the inclusion, this comment can be considered addressed for completeness.	No
Gen-102	102	3.K. Demographics	Please reference the applicable DEIS sections where the analysis substantiating the no fiscal impact claim for the School District and other community services is located.		In the paragraph immediately preceding Table 3.13.17, please include this sentence, "The potential fiscal impacts to the School District from the Proposed Project are analyzed in Chapter 3.15."	No
Scope-253	253	3.K. Demographics	Please substantiate the assumption that the Project would absorb the expected 477 person increase in the Town that is projected to occur even without the Proposed Project?	The revision has been made.	The revision does not provide substantiation. Instead, please make the following changes: a) On pg. 190, delete the remainder of the text after the semi-colon in the new sentence in the middle of the paragraph. b) Delete the next two sentences. c) Add this language after the semi-colon: "an increase of approximately 1.1%. With the Project's 1,872 new residents, the Town's population would be estimated to be 45,595. This is an approximately 4.3% increase in the Town's population from the estimated population in the future without the Proposed Project." d) The final two (new) sentences of the paragraph should remain.	No
Scope-260	260	3.K. Demographics	Please calculate the projected number of school-age and public-school age children using the methodology outlined in the scope.	The School District was not able to provide data for calculating the number of school-age children to be generated by the Project. Rutgers residential multipliers were used in lieu of data from the School District. The number of projected school-age children was shared with the superintendent.	Please include copies of the correspondence in which the information was requested from the School District, and any response, in an appendix to the DEIS.	No
Scope-263	263	3.K. Demographics	The scope requires a discussion of potential impacts to community facilities and services based on information provided by each service provider. That information is not presented in this Chapter.	The revision has been made.	Project impacts to the Libraries are not addressed. While a proportional increase in the user base is described, the impacts of that increase are not discussed. Perhaps a sentence stating that an X% increase in users of the library system is not anticipated to have a significant adverse impact on the library system, especially in the context of increased revenue for the library district.	No
Scope-264	264	3.L. Human Health	Please provide a source for the factual statements regarding the Police and Fire Department's existing conditions, including staffing levels, response times, and equipment.	The revision has been made.	Please include the correspondence in which the information was provided in an Appendix to the DEIS.	No
Scope-269	269	3.L. Human Health	Please provide a direct comparison of the increase in police calls attributable to the no-build projects and the Proposed Project.	This is shown in Tables 3.14.13 and 3.14.14. Pending and Proposed Projects: 230. Hudson Heritage: 293.	Please add the following sentences to the paragraph at the bottom of page 200, "As described above, without the Proposed Project, call volumes for the police department are expected to increase by 3.4%. The 3.2% increase by the Proposed Project is in addition to the 3.4% generated by other 'no-build' projects."	No
New		3.M. Fiscal and Economic	[NEW COMMENT] On page 172, text says the total amount of property tax levied on the Site by the Town Was \$148,485.14 but the Table 3.15.2 which appears to correspond to that amount shows a total tax levy of \$117,160.51. Please correct or explain the discrepancy.		[NEW COMMENT] On page 172, text says the total amount of property tax levied on the Site by the Town Was \$148,485.14 but the Table 3.15.2 which appears to correspond to that amount shows a total tax levy of \$117,160.51. Please correct or explain the discrepancy.	No
Scope-277	277	3.M. Fiscal and Economic	Why are the various funds within the Town's budgets presented separately? For informational purposes? Also, please state why the Town-wide water district and fourth ward sewer improvement area were removed from the Town's budget and discussed separately.	The funds are presented separately for informational purposes. The Water and Sewer Budgets are presented separately because they are funded through special assessments and rents/charges and not through the Town's general property tax.	Please include the response text in the DEIS.	No
Scope-284	284	3.M. Fiscal and Economic	Why is it assumed that the firefighters and building expansion would not be needed until the Build Out of Phase 2 of the Project.	Phase 1 results in 35 new fire calls, not enough to justify another firefighter on its own, given the ratio of 1 full-time firefighter per 115 calls. Building expansion will be needed at the point when new firefighters are added.	Please include the response text in the DEIS.	No
Scope-313	313	3.M. Fiscal and Economic	The potential impacts of potential tax abatements or historic tax credits are not discussed in this Chapter.	The Applicant is not seeking real property tax exemptions or abatements at this time.	Per the adopted scope, this should be noted in the DEIS.	No
Gen-117	117	3.N. Historic and Cultural Resources	Page 161 of Chapter 3.16, paragraph 2, indicates the table that appears in the PDEIS chapter (Table 3.16.1) is from a Hartgen Structures Report contained in Appendix D. But that report does not contain the table, it appears to have been omitted from the report. The entire report should be included in Appendix D.	The Table is a separate document from the Structures Survey report and was not intentionally omitted from the report. It was provided as an 11x17 insert following the Chapter to improve legibility of a large Table. An 8x11 version in the Appendix would have been illegible. The text has been revised to clarify this for the reader.	The table needs to be provided for review.	No

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Gen-126	126	3.N. Historic and Cultural Resources	A drawing showing the footprint of the proposed project and the historic buildings to be retained should be prepared and included as a figure in the historic chapter. The historic buildings should be labeled by name and building number.	Please see Figure 3.16.1, Historic Buildings and Districts. Also, the Illustrative Site Plan (Proposed Project), Figure 2.1.1 shows the proposed project footprint and highlights the historic buildings to be retained in grey. The Historic Structures Survey - Structures to be Retained, 2.8.1, shows structures to be retained with the existing conditions building footprint (HRPC buildings). References have been added to the text.	Please change reference in the first paragraph under "Historic Resources" to reference Figure 2.8.1, not 2.8.2.	No
Scope-317	317	3.N. Historic and Cultural Resources	Regarding the October 23, 2015 SHPO letter (paragraph 5), 5 buildings are referenced as being retained with their retention approved by SHPO. Missing in this discussion is the Freestanding North Tower north of North Wing of Administration Building, referenced as building #2 in a letter sent from EFG/DRA Heritage, LLC to SHPO on October 22, 2015, where this building is included as a structure to be renovated and incorporated into the master plan of development. SHPO's October 23, 2015 response letter indicates that they are "encouraged to see that your team has committed to the retention and possible restoration of the Olmsted Great Lawn and the North Tower." Therefore, please provide a discussion of whether the North Tower is being retained as part of the project. If not, please describe why not - and clarify whether additional consultation with SHPO regarding this building has occurred.	The Applicant agreed to explore the retention and re-use of the North Tower as part of the project, but the Tower hasn't yet been evaluated as part of a community amenity. The Applicant is considering reuse pending a structural evaluation and analysis.	On page 216, first paragraph under "Historic Resources" the paragraph ends with a sentence saying that a sixth structure, the former Director's Residence (Building 59) may be considered for adaptive reuse pending further structural analysis. Isn't this the North Tower? Building 59 (Director's Residence/Superintendent's Residence) is one of the five buildings where it has been already decided/confirmed that it will be retained and adaptively reused. Please correct.	No
Scope-319	319	3.N. Historic and Cultural Resources	This chapter should start with an introduction that provides the regulatory context of the SHPO's review. A July 16, 2015 SHPO letter indicates their review is pursuant to SEQRA. An April 14, 2016 review indicates the review is pursuant to Section 14.09, as a result of the DEC permit. Please clarify under what statute the SHPO has reviewed the project.	Review falls under Section 14.09.	Please state that the SHPO has reviewed the project pursuant to SEQRA and Section 14.09 in the chapter.	No
Scope-322	322	3.N. Historic and Cultural Resources	Pursuant to the adopted Scoping Document, Section N.1 (d), summaries should be provided of the Higgins and Quaesbarth and Larson Fisher Associates reports. Relevant information in the reports regarding the identification and S/NR status of historic resources should be discussed. The chapter should reference that the 2005 Higgins & Quaesbarth reports is contained in Appendix N. The Larson Fisher Associates report should be provided as part of the PDEIS review and as it is referenced in the PDEIS, it should be included in an appendix to the PDEIS.	The text has been revised to include these summaries and the Larson Fisher report is included in the Appendix.	Please indicate in the text pertaining to the Larson Fisher report that this report is included as Appendix F. Also, please fix typo "emendations" to "recommendations" when discussing the Higgins & Quaesbarth report (last sentence of paragraph 4 under "Historic Resources" on page 216).	No
Scope-323	323	3.N. Historic and Cultural Resources	The text should clarify the status of the buildings on the project site. Pursuant to the Final Scoping Document, Section N.1. (e), consultation with SHPO should be undertaken to confirm the National Register eligibility of the buildings and structures on the project site. Table 3.16.1 provides columns with different headers for S/NR status, which are keyed to different years determinations were made, yet it isn't clear if the 2015 NYSOPRHP eligibility Assessment column contains the final determination of S/NR status of the buildings. Also it should be specified if the "State Register Boundary" column refers to a S/NR listed or S/NR eligible historic district. SHPO's CRIS database identifies certain other buildings (beyond the Administration Building, the NHL) on the hospital campus as S/NR eligible.	Reference in the text and the Table have been revised.	The revised table needs to be provided for review. In addition, the text and Figure 3.16.1 should agree as to whether the State Register boundary is a "State Register" or "State Register-eligible" historic district.	No
Scope-330	330	3.N. Historic and Cultural Resources	In the last paragraph on page 165, the Section 14.09 consultation process should also be described, as the DEC SWPPP permitting falls within the 14.09 purview, and the process by which consultation will occur for the DEC action pursuant to 14.09 should also be described. This last paragraph should also be moved to the "introduction" section of the chapter, as suggested in a previous comment.	The 04/2016 letter (see Appendix O) constitutes this review.	Please describe the Section 14.09 process in the text of the DEIS.	No
Scope-331	331	3.N. Historic and Cultural Resources	Under Section D. "Mitigation," include the timing for reclaiming the time capsules located in the cornerstones of on-site buildings pursuant to Section N.4(b) of the adopted Scoping Document.	This will be determined during site plan review.	Please add this language (from the spreadsheet) to the chapter.	No
Scope-332	332	3.N. Historic and Cultural Resources	Under Section D. "Proposed Mitigation," the process by which continued consultation with SHPO will occur, as requested in their letter of October 23, 2015, should be described.	No further review by SHPO is required.	This is not completely accurate. There will be continued consultation with SHPO regarding the identification of resources with respect to the Great Lawn (10/22/2015 letter from EFT/DRA Heirage, LLC to SHPO and SHPO's 10/23/15 response letter). Please indicate in the chapter that there will be continued consultation with SHPO regarding the Great Lawn.	No
Scope-334	334	3.O. Hazardous Materials	In second paragraph, explain to the reader the scope of a Phase I ESA, i.e., a paper study to determine known or potential environmental conditions and the meaning of a REC	The revision has been made to the text.	The revision does not seem to be in the text.	No
Scope-335	335	3.O. Hazardous Materials	In second paragraph, explain whether the Phase I ESA addressed the entire project site or a different area	The revision has been made to the text.	The revision does not seem to be in the text.	No
Scope-337	337	3.O. Hazardous Materials	Clarify whether the discussion and testing relates to LBP (0.5% or more) or LCP (any amount).	The 2014 ACM by QuES&T tested and found both LBP and LCP. Please see Appendix B of the Report for the complete analytical data (a spreadsheet), which shows positive results for both LBP and LCP.	This should be clarified on p. 288 in the text - currently just says "lead in paint."	No
Scope-339	339	3.O. Hazardous Materials	In third paragraph, there needs to be a more detailed discussion of the activities which would have to be conducted including those related to the VCP, BCP (if any), tanks, sewage leaks, ACM maintenance, etc.	The revision has been made to the text.	This discussion is scattered throughout chapter. Please include brief summary of all these points in Mitigation section. Please include a discussion of measures to be taken should tanks or additional sewage leaks be found, or how PCBs and lead-based paint should be addressed. Please note whether VCP area is expected to be disturbed (if so, clarify that Site Management Plan would be followed). Also, please include a discussion of maintenance of ACM that are not being disturbed. Also p. 287 says that structurally sound buildings would be abated for ACM prior to demo, but p. 293 says that demo will take place before abatement - please clarify?	No
Scope-340	340	3.O. Hazardous Materials	In Sections A, B and D, the portions of the site not subject to the BCP or other regulatory programs should be addressed. State whether the Phase I findings need for Phase II testing (and if so when this would be done and under what program) or explain if existing BCP data is sufficient to characterize the remainder of the site. In Section D, is it the intention that all or certain BCP requirements would be followed, e.g., with respect to air monitoring and capping? what would be the mechanism for ensuring the work in this area is performed assuming it is not subject to a regulatory program?	A partial response/revision has been made relating to the remediation plans which have not been completed.	This response is OK for the BCP site, but it's unclear whether these plans will apply for the rest of the site, or what measures would be taken there. As previously noted, would be very helpful to note in the summary for each report, whether that report applies to the entire site or only a portion.	No
Scope-341	341	3.O. Hazardous Materials	In Section C, there needs to be a discussion of required activities that would be associated with the proposed project, e.g., demolition, excavation/soil disturbance for new construction, and rehab of existing buildings, and how each of these can present hazards unless the proposed project includes a range of measures before, during and after construction. These measures should then be set out (probably in bullet form) in Section D with reference to regulatory requirements, as appropriate. It should be made clear which measures are site-wide and which apply only to limited areas. The existing organization of Sections c and D is confusing - D should include both already required work and work associated with the proposed project. It is suggested that it be organized into pre-demolition, demolition, construction-phase and post-construction phases.	A partial response/revision has been made. This pertains to the remedial work plan which has not been completed.	See other comments on this section; also, Section C now discusses demo and soil disturbance, but not rehab of existing buildings. It's also not clear which requirements and measures apply site-wide vs just to portions of the site. What measures will be taken for soil disturbance in areas which are not in the BCP or VCP?	No
Scope-342	342	3.O. Hazardous Materials	In Section D clarify the capping requirements, for the BCP area and elsewhere. Which SCOs will be used? Will areas not needing disturbance for the proposed project also be tested? And capped if they exceed SCOs?	A partial response/revision has been made. This pertains to the remedial work plan which has not been completed.	This is OK for the BCP area. What will be done elsewhere?	No
Scope-343	343	3.O. Hazardous Materials	Address the need for (or provision of) vapor controls in new construction and remaining buildings.	A partial response/revision has been made. This pertains to the remedial work plan which has not been completed.	This is OK for the BCP area. What will be done elsewhere?	No
Scope-361	361	3.R. Construction	Clarify demolition information distinguish or label Building or Pavement to remain.	Please see # 158.	The revised site plan must be submitted for review.	No

ID	No	Chapter	Comment	Applicant's 9/15 Response	Consultant Comment on 9/15 Response	OK for Completeness?
Scope-366	366	IV. Alternatives	Why is there a reduction in commercial square footage associated with Alternative 4? Is it not possible to reconfigure the commercial area and/or site to accommodate the full build of the program?	In order to allow for 100,000 SF more of commercial, the Site could not support the associated parking demand without building parking garages, which is not economically feasible.	This explanation should be included in the DEIS text.	No
Scope-368	368	IV. Alternatives	The last paragraph may need to be edited. Impacts to those environmental categories can and should be evaluated. For AQ and noise, they may be similar to the Proposed Project owing to their relationship to traffic, building program, and building footprint. Impacts to visual and community character may be similar to the Proposed Project owing to a likely similar overall concept site plan. And impacts to vegetation and wildlife, excepting TES, are generally also a function of overall disturbance.	A paragraph has been added discussing existing conditions relative to habitats and qualitatively discussed the difference in impacts to habitats from the four alternatives layouts and the proposed project.	New text was not found in the Chapter.	No
Scope-369	369	IV. Alternatives	How were the number of public school age children for the various alternatives estimated? Were they estimated using the methodology outlined in the scope?	The number of school age children was estimated using the Rutgers residential demographic multipliers. The School District was not able to provide data for calculating the number of school-age children	Please include this footnote (source of PSAC estimates) in Table 4.1.1. In addition, Table 4.1.1 seems to have been inadvertently deleted from the revised text.	No
Scope-373	373	IV. Significant Impacts That Cannot Be Avoided	This section should list and describe demolition/short term impacts/ long term/permanent impacts in separate sections.	A new table (Significant Impacts Summary) has been added to summarize this information.	In table, under 'Construction,' there is a description for Short-Term impacts from construction activity but the next column to the right states there are no short-term impacts. The latter should be amended to reflect the other column.	No
Scope-389	389	VIII. Irreversible and Irretrievable Commitment of Resources	Please quantify the water and energy resources proposed to be expended and describe conservation measures to be incorporated into the project to mitigate impacts. al context?	Please see the Water chapter for water resources proposed to be expended and proposed conservation measures therein (i.e. fixtures). The proposed commercial and residential structures will be designed to meet NYS building code energy requirements and will utilize conservation techniques and measures to the extent practicable as determined by the Applicant.	Please provide this reference in Chapter VIII	No

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Gen-14	14	2. Project Description	West Cottage Rd should be colored yellow in the figure and identified as such in Table 2.3.1	No	This revision has been made to the Figure and Table.	This comment will be offered during substantive review - For consistency, West Cottage Road should be updated in the surrounding and Regional roads in Table 2.3.0	Yes, But.
Scope-106	106	2. Project Description	Please provide an 11x17 version of this plan within the DEIS document	No	Please provide an 11x17 version of this plan within the DEIS document	The plan has been provided - however, this comment will be offered during substantive review. This applies to all the plans - there is one black and white legend provided - though the figures are in color. Either a legend should be provided on each plan or a colored legend should be provided as sheet 1 of the site plan package.	Yes, But.
Scope-21	21	2. Project Description	These uses, at the very least, should be defined in this text.	No	The following text has been added to the pDEIS at sub-section 2.1, in the discussion of Site Plan, Subdivision, and Special Use Permits (pg 34-35): "The Project is not anticipated to be fully built-out until 2025, or later, depending on economic conditions not within the Applicant's control. Over this time, regional and local marketplace conditions are likely to change due, in part, to the development of the Project, and the growth it induces. Given the long completion horizon, and the likelihood of economic and marketplace changes over time, the Applicant cannot know today whether, for example, future demand will be for rental or for-sale housing, or what specific types of commercial uses will be in demand in the future. To give the Project the best opportunity to succeed, the Applicant needs the flexibility to accommodate changing conditions. The Applicant will also not be in position to enter into binding leases or other occupancy agreements with commercial uses unless and until the Project is approved. Given these factors, the Applicant cannot be expected to be able to identify specific potential uses at this point in the review process. As discussed in subsection 1, above, the Applicant has proposed amendments to the HRDD regulations to broaden the uses permitted in the HRDD, some of which - such as indoor and outdoor recreation facilities, and hotels - would be subject to the supplementary regulations in Article VIII of the Zoning Ordinance. The uses currently permitted in the HRDD, and uses to be permitted, are in Table 3.2.2 of this DEIS."	This comment will be offered during substantive review. A range of potential uses should be identified.	Yes, But.
Scope-23	23	2. Project Description	According to the stormwater modeling calculations provided in the SWPPP, the existing infiltration basin will be require nearly double the storage volume under post-development conditions. The DEIS should <i>briefly</i> describe how the existing basin will be able to accomodate the additional storage required.	No	"The existing infiltration basin has been witnessed to have no standing water after high intensity storm events. Based on the USGS Soils data, the infiltration rate of Type HsB soils, located in this portion of the site, is typically a rate of 1.98 to 19.98 in/hr. The Hydrologic model prepared for the stormwater runoff infiltration, assumes a very conservative exfiltration rate of 0.5 in/hr. During the site plan review and detailed design, detailed testing, including falling head permeability testing will be performed."	Satisfactory for completeness, but will be offered during technical review.	Yes, But.
Scope-112	112	3.A.1 Land Use	This comment has not been fully addressed. While references have been added to where in the document the information may be found, the scope requires a textual description and figures within this chapter.	No	S - add Easements figure following chapter The following text (and the table) has been added to the chapter: "There are seven (7) easements of record affecting the Site as shown on Figure 2.2.4 and listed on Table 2.2.1 below (previously provided in Chapter 2.0, Project Description). Five of the seven easements are Town easements providing access for water lines, sanitary sewer lines, and utilities. Two private companies also hold easements on the site. Verizon has an easement for telephone utilities access and Central Hudson Gas and Electric has an easement for gas lines. The locations of each of these easements are provided textually in the table below and illustrated in Figure 2.2.4."	Consider renumbering the figures to match the chapter within which they appear	Yes, But.
Scope-113	113	3.A.1 Land Use	This comment has not been fully addressed. While references have been added to where in the document the information may be found, the scope requires a figure within this chapter. Locating the land use map within the land use chapter would improve the readability of this document.	No	S - add land use map	Consider renumbering the figures to match the chapter within which they appear	Yes, But.

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Scope-151	151	3.C. Geology, Soils, Topography and Steep Slopes	The locations of potential rock excavation should be indicated on a figure based on information provided in the Dutchess County Soil Survey.	No	A new figure and the following text have been added to the chapter: "Chazen performed an analysis to identify areas where bedrock may be encountered during excavation, illustrated on Figure 3.5.3, Areas of Potential Rock Excavation. The analysis overlaid in depth to bedrock by soil type from the 2001 Dutchess County Soil Survey with the proposed grading plan for the Site. It is noted that the soil survey is general in nature and that a more detailed analysis incorporating geotechnical investigation and evaluation will be conducted later in the process."	Consider providing this figure on a soils map instead of a site plan?	Yes, But.
Scope-260	260	3.K. Demographics	Please include copies of the correspondence in which the information was requested from the School District, and any response, in an appendix to the DEIS.	No	This data was requested in a phone interview between Camoin Associates and Superintendent Rychcik on November 19, 2015. Dr. Rychcik stated that the School District did not have a methodology for estimating new school-age children that would result from the Project. For sensitivity, this detail has not been added to the text directly.	This comment has not been resolved and will be reiterated during substantive review. Please provide some supporting documentation that the school district was contacted. This can be in the form of a memo documenting relevant portions of the discussion with the Superintendent - or even a footnote indicating time, date, participants in the phone interview.	Yes, But.