HUDSON HERITAGE PARK

Town of Poughkeepsie, New York
Draft Environmental Impact Statement (DEIS)

Revised Draft Scoping Document
2nd Edition

For Discussion by the Poughkeepsie Town Board on December 3, 2008

IMPORTANT NOTES:

- Please begin review of this draft on page 4.
- Text that has been changed since the November 14th Draft (1st Edition) is indicated by underlining (for additions) and strikethrough (for deletions).
- Town review team comments are included in the right-hand margin – these indicate subjects that are still being refined.
- Written comments about this Draft Scoping Document should be submitted to the Poughkeepsie Town Board:
  C/o the Town of Poughkeepsie Planning Department
  1 Overocker Road
  Poughkeepsie, NY 12603
- Written comments from Involved/Interested Agencies and the Public should be received by December 8, 2008.
This document identifies the issues to be addressed in the Draft Environmental Impact Statement (DEIS) for the proposed Hudson Heritage Park mixed-use development project in the Town of Poughkeepsie, New York. This Scoping Document contains the items described in 6 NYCRR Part 617.8 (f) (1) through (6).

Classification of Action: Type 1 [617.4(b)(6)(i) a project or action that involves the physical alteration of 10 acres].

Lead Agency: Town Board
Town of Poughkeepsie
1 Overocker Road
Poughkeepsie, NY 12603

Scoping Meeting:

Introduction/DEIS Guidelines: The DEIS shall cover all items in this Final Scope of issues and will conform to the format outlined in this document. The DEIS shall be submitted in hard copy and .pdf format. Each impact issue (e.g., traffic, natural resources, etc.) shall be presented in a separate subsection which includes a discussion of existing conditions, impacts associated with the proposed action and any mitigation measures designed to minimize identified issues. If appropriate, impact issues listed separately in this document may be combined in the DEIS, as long as all issues described in this Final Scope are addressed.

Narrative discussions shall be accompanied by appropriate tables, charts, graphs and figures whenever possible. If a particular subject can be most effectively described in graphic format, the narrative discussion shall summarize and highlight information presented graphically.

Information shall be presented in a manner that can be readily understood by the public.

All assumptions shall be clearly stated. Any "worst case" scenario analysis for impact discussions should also be identified and discussed. Information, assumptions, calculations and references in the DEIS need to be verifiable and provided as part of the DEIS.

All discussions of mitigation measures shall consider at least those mitigation measures mentioned in the Final Scope. Where reasonable and necessary, such mitigation measures
shall be incorporated into the proposed action if they are not already so included. For any mitigation measure listed in the Final Scope that is not incorporated into the proposed action, the specific reason why the Applicant considers it unnecessary shall be discussed in the DEIS. The Applicant may suggest additional mitigation measures where appropriate. When no mitigation is provided, the DEIS should explain the basis therefore.

The document shall be written in the third person (i.e., the terms "we" and "our" shall not be used). The Applicant's conclusions and opinions, if given, shall be identified as those of the "Applicant". When describing the project and its potential impacts the DEIS should use the word "would" rather than "will".

The entire document shall be checked carefully to ensure consistency with respect to the information presented in the various sections.

The DEIS shall be preceded by a cover sheet(s) that identifies that the document is a DEIS, the name of the proposed action, the location of the proposed action by address and tax map parcel numbers, the name and address of the Lead Agency and Project Sponsor along with the name and phone number of the contact for each, the name, address and phone number of the primary preparer(s) of the DEIS, the date of acceptance of the DEIS, the deadline by which comments are due on the DEIS, a list of consultants involved with the proposed action as required by SEQR and a Table of Contents which shall include a list of figures, tables, appendix items and additional DEIS volumes, if any.

**Description of Proposed Action:**

The Applicant, Hudson Heritage Development, LLC, proposes to develop a mixed use pedestrian-oriented residential and commercial development on an approximately 156 acre site substantially located in the Town of Poughkeepsie, New York. Though a 0.04 acre sliver at the northern edge of project site is located in the Town of Hyde Park, no development is contemplated on this portion of the Project site. The property is identified as tax parcel 6163-03-011149 on the Town of Poughkeepsie Tax Map. The project site is located within the Historic Revitalization Development District (HRDD).

The project site is bordered on the north by commercial and residential development and the Town of Hyde Park Town line, on the south by the Mid-Hudson Plaza, on the east by New York State owned property and on the west by Route 9. The site is located directly across from Dutchess County’s Quiet Cove Park and the Marist College campus.

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1 The majority of the proposed Project site is located in the Town of Poughkeepsie. 156.19 acres of the Project site are located in the Town of Poughkeepsie (Parcel Grid identification #: 134689-6163-03-011149-0000) and 0.04 acres of the Project site are located in the Town of Hyde Park (Parcel Grid identification #133200-6163-03-025314-0000). No development is proposed on the portion of the project site located in the Town of Hyde Park.
The proposed development plan would include 750 single-family, townhouse, and multifamily residential units. In addition, the project proposes approximately 100,000 square feet of office space; and 250,000 square feet of retail space, including two larger scale retail stores located at the southern end of the project site, just north of Mid-Hudson Plaza. The proposed project includes a pedestrian oriented Main Street, with retail shops, restaurants, and other commercial uses located off Route 9 in the southern portion of the site. Residential development extends from the Main Street area to the north where a combination of buildings are designed as traditional neighborhoods, with sidewalks, small parks, amenities, small scale retail and professional office uses combined in several interconnected neighborhoods.

The project proposes to preserve the approximately 18 acre “Great Lawn” as a centerpiece for the overall development.

The proposed project would be built in four phases. The first phase, which would be expected to commence mid-2010, would include the proposed commercial/retail uses at the southern end of the Project site. The second phase would consist of the townhouses just north of the commercial uses. The third phase would include the renovation of on-site historic buildings and the residential development on the northeastern portion of the site, and the fourth phase would include the single-family homes and townhomes at the northwestern portion of the project site. It is expected that project construction would last approximately eight years, concluding in 2018.

The DEIS will contain the following information and address the following issues as they relate to the proposed action:

**COVER SHEET** identifying:

1. The Proposed Action and its location;
2. The name, address and telephone number of the Lead Agency and contact person;
3. The name, address and telephone number of the preparer and other organizations that contributed to the DEIS; the date of DEIS submission and acceptance; and
4. The name, address and telephone number of the Applicant;
5. Public hearing date and DEIS comment period;
6. Website where DGEIS and FGEIS will be posted, as required under state law.

Following the cover sheet, a list (name, address and telephone numbers) of all subconsultants involved in the project and a list of all interested and involved parties would be provided.

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2 Commencement date of 2010 is contingent on the Applicant obtaining all approvals.
3 Estimated date for project completion, of 2018, is subject to changing market conditions.

Behan Planning Associates, LLC
TABLE OF CONTENTS, indicating the chapters of the DEIS and page numbers as well as lists of exhibits, tables and appendices.

The text of the DEIS would include the following:

I. EXECUTIVE SUMMARY – The summary would describe the Proposed Action, its anticipated significant impacts and potential mitigation measures for each impact area, and the alternatives analyzed in the body of the document. It will describe the project’s purpose and need from the Applicant’s and Town’s perspective. It would also include a list of all required reviews and approvals from Town, County and State agencies, and a list of the interested and involved agencies. A description of the actions required for project approval would also be included in the Executive Summary.

II. PROJECT DESCRIPTION
   A. Site
      1. Identification of regional and area location
      2. Tax map designation, and total parcel area
      3. Abutting streets, site access and surrounding road network
      4. Utilities
      5. Land uses and existing zoning
      6. State Historic District and Federal Historic District status
      7. Description of all uses currently on the project site and the disposition and timing of on-site uses
      8. Discussion of project background and site history

   B. Proposed Conceptual Development Plan
      1. General layout and design concept – minimum plan scale shall be 1”=100’
         for master plan documents with plan enlargements as required to illustrate more specific development solutions for a typical segment of distinct neighborhood or housing models, other areas as necessary to represent “typical” plan layout or site character conditions such as the hierarchy of streets, pedestrian oriented retail areas, etc.; and an area inclusive of the renovated historic structures to remain (and related new building construction and site work).

Comment [MW1]: We are working to narrow this down as appropriate.
2. Description of components of the proposed development
   a. Discussion of the calculation of site density
   b. Rehabilitation and reuse of on-site buildings - including clear delineation of buildings that will remain and those that will be removed, and a description of interim measures to protect and stabilize historic structures.
   c. Residential
      (1) Single-family homes
      (2) Townhomes
      (3) Multi-family units
      (4) Carriage Homes
      (5) Proposed floor layouts and cross sections of proposed structures
   d. Commercial/Retail Component
   e. Office Component
   f. Parking, including loading areas
   g. Public Amenities
   h. Roads - including cross sections of proposed roads showing the hierarchy of varying road sizes and related facilities such as parking, pedestrian facilities and walkability, bicycle lanes and storage racks, as well as landscaping. Plans should note location, general extent and slope of maximum road gradients.

3. Description of Site Management entities (i.e. – Master Association, Homeowners Association, etc.)

4. Active and Passive Recreation Space

5. Site Access

6. Site Circulation (pedestrians and vehicles)

7. Utilities, including on-site and off-site infrastructure improvements, addressing:
   a. Clear definition of proposed water lines, locations of any booster stations, pressure reducing stations, etc.
   b. Details regarding connection points and means of connection to existing water and sewer utilities, etc.
   c. Clear definition of proposed gravity sewer mains and/or sanitary force main to include locations of any wastewater pump stations, etc.
   d. Preliminary road profiles to assess feasibility of utility locations.
   e. Detailed description of necessary infrastructure upgrades for either water or sewer either on site or off site.
   f. Description of ownership and maintenance of utilities on privately owned lands.

Comment [MW2]: We may refine this list – looking for an appropriate level of detail at this stage.
8. Conceptual landscaping plan, including treatment of site perimeter
9. Construction duration and Project phasing
   a. Discussion of the relationship of phasing the residential development, the adaptive reuse of existing buildings on site and new commercial/retail development
   b. Discussion of phasing of infrastructure improvements.
10. Site disturbance: amount of land to be cleared; impervious surface created
    Incentives – Discussion of the incentives allowed in the Historic Revitalization Development District and how they are being employed by the project applicant in their Master Development Plan.
11. Demolition – description of how this will be accomplished

C. Project Purpose, Need and Benefits
   1. The purpose and public need and benefit to the Town of Poughkeepsie
      a. Including discussion of incentives allowed in the HRDD
   2. The objectives of the project sponsor

D. List of Required Review, Permits and Approvals – Involved and Interested Agencies (see end of Scoping Document)
III. **EXISTING CONDITIONS, IMPACTS, MITIGATION** –

The analyses of the project would be performed for the expected year of completion of the project (2018) and would include, where applicable, the cumulative effects of other proposed projects within a one-half mile of the boundaries of the site.

Required elements for each chapter of Section III of the DEIS follow:

A. **Land Use and Zoning**

1. Existing Conditions –

   a. Discussion of current site land use (including any relevant easements), maps and narrative describing land uses, development patterns, zoning districts, and requirements within a ½ mile radius of the site; and conformance to Town and County Planning documents including:

      (1) Town of Poughkeepsie Zoning Law
      (2) Town of Poughkeepsie Land Subdivision Regulations
      (3) Town of Poughkeepsie Town Plan
      (4) Town of Poughkeepsie Local Waterfront Revitalization Guidelines
      (5) the Route 9 Land Use and Transportation Study
      (6) Greenway Connections.

   b. Discussion of applicable provisions of the Zoning Ordinance of the Town of Poughkeepsie including site plan review and subdivision regulations as they may suggest “typical” design standards for single family development components of the project. Discussion will include description of how the proposal conforms to the “New Urban” design philosophy which is discussed in the Town Plan and the Zoning Ordinance and which is defined in the Charter of the New Urbanism.

   c. Discussion of incentives pursuant to the Town of Poughkeepsie Development master plan requirements for the Historic Revitalization Development District (HRDD).

   d. Discussion of applicable goals as defined in the Town of Poughkeepsie Town Plan, Town of Poughkeepsie Local Waterfront Revitalization Guidelines, Route 9 Land Use and Transportation Study and Greenway Connections such as the recommended connection of Route 9-9G, suggested improvement of pedestrian connections and consideration of alternatives to the automobile.

   e. List of pending or proposed projects in the Town of Poughkeepsie (and Town of Hyde Park) within 1 mile of the proposed project site property boundary and including St. Andrew’s Village mixed use development in Hyde Park.

   f. Discussion of 18-acre Great Lawn and other potential areas of Open Space Preservation.

Comment [MW3]: This will be replaced with a map and/or a list of specific projects.
2. Anticipated Impacts
   a. Identify the relationship (including road patterns and access) of the proposed development to overall land use patterns within the study area, and to immediately adjacent properties.
   b. Proposed Action’s conformance with Town of Poughkeepsie Town Plan, and relevant portions of various local and county planning studies including but not limited to those identified in A1 above.
   c. Discuss the supportive rationale for compliance of the proposed action development density with the incentive requirements pursuant to the Town of Poughkeepsie Development master plan requirements for the HRDD. The project applicant will provide a specific supportive rationale for granting the additional density beyond 550 units based on project benefits to the Town such as fiscal impacts, affordability, and “greenness” and adherence to “New Urban Design”.

3. Proposed Mitigation
   a. Appropriate mitigation measures to reduce identified impacts associated with the proposed project will be discussed.
   b. Description of means to conserve areas of open space in perpetuity by way of an acceptable mechanism (i.e. restrictive covenant, deed restriction, conservation easement, etc).

B. Community Character/Visual Impacts
1. Existing Conditions - Documentation with photographs and narrative, of the visual character of the site and the immediately surrounding area.
   a. Identify “zones” of distinct character on the site such as the historic campus center, the great lawn, park like street frontage, and its prominent gateway location on Route 9 when entering the Town of Poughkeepsie.
   b. Description of the surrounding community character including the Route 9 corridor, Quiet Cove Park, Marist College, surrounding residential and commercial areas and their current connectivity with the site including an analysis of potential connection opportunities (as recommended in local and county plans, regulations, guidelines and other documents) such as the CSX West Branch development as a multi-use trail.
   c. Discussion of the development history (or sequence) of the site including components of the current site that were part of the original Olmsted/Vaux site and landscape plans including a description of former building uses. Within the areas of the site designated as the “State Historic District”, the “Federal Historic District” and for an area 200' in depth from the eastern R.O.W. line of Route 9 for a distance of 2/3 of the frontage from the southernmost corner of the property, depict on plan existing trees greater than 18 inches in caliper. Note that within the
historic districts, this request does not suggest that trees of lesser caliper are without historical value or significance or constraint. For the entire site, depict on plan the perimeter of significant massings of trees with particular consideration of those that are within the view corridors as noted below. Depict on plan existing specimen trees (greater than \( X \) inches in caliper) on site and/or perimeter of significant massings of trees, that are within the view corridors as noted below. Discussion of the development history (or sequence) of the site including components of the current site that were part of the original Olmstead/Vaux site and landscape plans.

d. Description of the architectural style and visual character of both the historic buildings on the site and well as the landscape design of the site.

e. Discussion of existing site features such as fencing, rails, garden structures, etc. as they may influence the design of proposed amenities.

f. Identify zones or points of the site that have a particular identity similar to the way the Great Lawn is identified – for example, the golf course, pavilion in the woods, the rail spurs and the service side of the site, etc.

g. Identification of specific important on-site and off-site viewpoints by the Town Board or its professional consultants including but not limited to views of the proposed development from Route 9 such as the long views from Southbound Route 9 north of the site, northbound Route 9 south of the site, and from locations within Quiet Cove Riverfront Park, not just at the entrance from Route 9. Further, panoramic photo views taken from these viewpoints with an associated photo view map indicating viewpoint locations and view angles. Narrative to include information regarding applied photo lens.

2. Anticipated Impacts

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Comment [MW4]: Can we be more specific about the viewpoints?
Perhaps replace with a map and language such as: “See attached map (Exhibit XX) identifying view points of concern to the Town at this time.”
a. Preparation of a viewshed analyses with a before and after panoramic photo view comparison using the previously identified viewpoints. Prepare viewshed analyses from specific locations identified by the Town Board. These would include views of the proposed development from Route 9, such as the long views from Southbound Route 9 north of the site, northbound Route 9 south of the site, and from locations within Quiet Cove Riverfront Park, not just at the entrance from Route 9.

b. Preparation of illustrated sketches showing commercial, residential and open space components of the project. Sketch methods should include sections which would indicate the general parameters of a typical street types (keyed to plan) such as road widths, distance building to building, front yard depths, building heights, etc.

c. Discussion of the proposed lighting program including typical light fixtures, maximum foot candles, and how this complies with the Town lighting standards and with dark sky performance objectives.

d. Discussion of compliance with Community Character goals per local and county plans, regulations, guidelines and other documents (as indicated in Land Use and Zoning Section) including, but not limited to, the following:

(1) Preservation of National Landmark Building and contributing area in historic district and Great Lawn by clustering mixed-use development within “New Urban” design plan. Discuss how the conceptual architectural style of the proposed buildings relates to the architectural character of the site’s historic structures.

ey. Discussion consistency of the proposed landscape and master plan development design with the historic/original Olmstead/Vaux site and landscape plans and values.

f. Discuss whether or how off-site uses could be connected to and through the project site with emphasis on connectivity of off-site neighborhoods to be connected through the project site to provide students and the general public with the opportunity to walk or jog through the project site (i.e. to Quiet Cove Park or a possible future multi-use trail along the CSX West Branch).

g. Describe all walkable community attributes including but not limited to walkable sidewalk and trail network, connection to intermodal transit options, road crossings, safety measures and separation from motor vehicles and bicycles, surface design and landscaping including sidewalk furniture and other accessories such as trash receptacles.

h. Discuss and illustrate using appropriate visualization techniques how the southern end commercial structures integrate visually with the background of historic structures north and east of this portion of the site.

i. Discuss the relationship of the project to adjoining institutional uses that are adjacent to the project site.
3. Proposed Mitigation
   a. Appropriate mitigation measures to reduce identified impacts associated with the proposed project will be discussed, including including buffer areas, existing tree protection, landscape preservation zones, landscaping plan.
   b. Consider Architectural and Urban Design Pattern Book for the project.

C. Geology – Soils, Topography and Steep Slopes
   1. Existing Conditions
      a. Identification of existing on-site soils using Dutchess County Soil Survey data
      b. Description of subsurface conditions including soil stratigraphy and locations of rock outcroppings (if any)
      c. Description of surface conditions including delineation or identifications of outcroppings, significant depressions, ridges or other landforms, etc.
      d. Description of topography and steep slopes using available mapping with graphic overlay, and shown with the existing buildings and road network as a frame of reference.

   2. Anticipated Impacts
      a. Development of a preliminary grading plan and Description of potential impacts of site grading with respect to soil erosion slope stabilization, and rock removal, and preservation of existing trees and tree masses (effects on water patterns in addition to the impacts of cuts and fills).
      b. An estimate of cut and fill and description of impacts if cuts and fills are not balanced and discussion of restrictions and permits per Town code requirements.
      c. Discussion of rock removal and blasting, if any
      d. Description of increase in impervious surfaces
      e. Description of construction phasing

3. Proposed Mitigation
a. Appropriate mitigation measures to reduce identified impacts associated with the proposed project will be discussed.

b. Erosion and sediment control plan and preliminary Stormwater Management Plan (A complete stormwater pollution prevention plan will be developed in accordance with NYSDEC regulations prior to construction)

c. Discussion of any requirements or procedures related to blasting, if necessary

d. Discussion of ownership and maintenance of stormwater management facilities including related post-construction maintenance agreements with the Town.

e. Discussion of grading and retention strategies to minimize impact on trees to remain.
D. **Subsurface and Surface Water Resources**

1. **Existing Conditions**
   
a. **Description of subsurface conditions including hydrogeologic zone boundaries and special groundwater protection areas (if any).**

b. Delineation and mapping of existing ACOE wetlands and streams

c. Discussion of existing drainage (including regional watershed and on-site drainage) patterns and their relationship to the project site (Stormwater volumes and peaks would be provided for the 1, 10, 25, and 100 year storms)

d. Discussion of floodplains and floodways

e. Discussion of compliance with relevant Town of Poughkeepsie aquatic resource regulations (Town Code Chap 116).

f. Discussion of compliance with relevant Town of Poughkeepsie Stormwater Ordinance (Town Code Chap 173)

g. Discussion of on-site aquatic resources and their relationship to the Hudson River and Hudson River Critical Environmental Area (CEA)

2. **Anticipated Impacts**

a. Potential impacts to ACOE and Town of Poughkeepsie wetlands and wetland buffers (functional analysis)

b. Potential impacts to State of NY drainage system in Route 9 and downstream discharge points.

c. Description of pre and post development rates for the 1, 10, 25, and 100 year storms.

d. Description of proposed stormwater management system including proposed drainage facilities and detention areas. Discussion of low-impact development and curb vs curbless stormwater systems and their incorporation into the proposed strategy.

e. Description or assessment of impacts on water resources available to significant areas of existing landscape to be preserved such as the Great Lawn or other wooded areas on the perimeter of the site.

f. Discussion of ownership and maintenance of stormwater management facilities including related post-construction maintenance agreements with the Town.

g. Discussion of compliance with Town of Poughkeepsie aquatic resource regulations (Town Code Chap 116).

h. Discussion of compliance with Town of Poughkeepsie Stormwater Ordinance (Town Code Chap 173)

d. **Proposed Mitigation**

a. Appropriate mitigation measures to reduce identified impacts associated with the proposed project will be discussed.

b. Preparation of a preliminary SWPPP to include rough sizing of ponds or other practices as necessary to address all relevant State and Town design criteria including a discussion of sustainable stormwater
measures. The SWPPP shall also include all applicable items as noted within GP-0-08-001, Part III Sections A and B.

E. Water

1. Existing Conditions
   a. Discussion of existing municipal water supply and capacity
   b. Discussion and mapping of existing and proposed on-site infrastructure
   d. Discussion of previously formed water district
   e. Discussion of existing site infrastructure (ie. water, stream chiller lines, etc.) including a description of the investigation methods.

2. Anticipated Impacts
   a. Description of proposed project-generated demand for potable water, by project component
   b. Description of ownership and maintenance of on-site project water supply conveyance system
   c. Description, location and mapping of proposed connections to municipal water supply and including locations of significant infrastructure items (i.e. booster stations, pressure reducing stations, etc).
   d. Description of ability of municipal water supply to accommodate project-generated demand.
   e. Description of investigation of existing utility infrastructure and proper abandonment during construction.
   f. Description of removal or abandonment methods of existing water and stream chiller lines utility infrastructure during construction.

3. Proposed Mitigation
   a. Appropriate mitigation measures to reduce identified impacts associated with the proposed project will be discussed.
   b. Provide a plan for implementation of the recommended mitigation measures. The plan should include, but not be limited to, construction phasing and timing and a monitoring plan to ensure the appropriateness of each recommended improvement at the time of construction.
   c. Discussion of sustainable measures to reduce water consumption

F. Sanitary Sewage

1. Existing Conditions
a. Description of current municipal wastewater treatment facility, location and capacity
b. Discussion of Memorandum of Understanding and 1980 agreement
c. Discussion of existing site infrastructure related to sanitary sewer including a description of the investigation methods.

2. Anticipated Impacts
a. Discussion of estimated project generated demand by component at full buildout
b. Description of ownership and maintenance of on-site project wastewater conveyance system and including locations of significant infrastructure items (i.e. Sewer pump stations).
c. Discussion of the capacity of the existing wastewater treatment facilities and downstream collection system to accommodate project-generated demand
d. Discussion of formation of a sewer district
e. Discussion of removal or abandonment methods of existing sewer utility infrastructure and proper abandonment during construction.

3. Proposed Mitigation
a. Appropriate mitigation measures to reduce identified impacts associated with the proposed project will be discussed.
b. Provide a plan for implementation of the recommended mitigation measures. The plan should include, but not be limited to, construction phasing and timing and a monitoring plan to ensure the appropriateness of each recommended improvement at the time of construction.
c. Discussion of sustainable measures to reduce wastewater generation and to improve wastewater quality

G. Solid Waste
1. Existing Conditions
a. Discussion of existing solid waste generation from the project site
b. Discussion of current collection and disposal for the project site

2. Anticipated Impacts
a. Discussion of anticipated project generated solid waste, by component (land use type)
b. Discussion of on-site storage, removal, etc (including discussion of recycling)

c. Discussion of disposal location and ability of this off-site location to accommodate project generated solid waste and related construction and demolition debris.

d. Discussion of any on site crushing or processing of building materials including brick, concrete, asphalt, etc.

3. Proposed Mitigation

a. Appropriate mitigation measures to reduce identified impacts associated with the proposed project will be discussed.

b. Discuss construction and demolition debris management plan including staging, storage areas, crushing methods or other processing means. Define measures to mitigate nuisance concerns (noise, dust, etc.)

c. Discussion of sustainable measures to reduce solid waste during project construction and once construction is completed.

H. Flora and Fauna

1. Existing Conditions

a. Discussion of preservation of the Great Lawn

b. Discussion and mapping of ecological communities, cover types and habitats, and existing biodiversity

c. Discussion of rare, threatened or endangered species found on the project site.

b. Inventory, delineation and evaluation of existing specimen (X inches in caliper size) trees (18 inches in caliper size) of unique or exceptional horticultural, ecological or habitat value.

c. Description of Hudson River Critical Environmental Area (CEA).

2. Anticipated Impacts

a. Quantification of all ecological communities to be impacted by proposed action including loss of wooded areas and habitat fragmentation effects; and impacts on resident plant and animal populations.

b. Loss or changes to habitat of threatened or endangered species and, where applicable, potential impact due to increase of nuisance species.

c. Description of impacts, if any, to Hudson River Critical Environmental Area (CEA).

3. Proposed Mitigation

a. Appropriate mitigation measures to reduce identified impacts associated with the proposed project will be discussed.

b. A conceptual landscape mitigation plan showing proposed landscaping as mitigation to removal of existing vegetation from the perspective of...
replacing visual buffers or plant masses that are valuable for visual and aesthetic reasons; and from the perspective of mitigation for the loss of cover and habitat. The Plan should also include information on habitat protection and emphasize the utilization of native plant species (including those species which may be important to/wildlife).

c. Plan to include the conceptual location, number and type of landscaping proposed and a list of typical/representative plants. Specific species and sizes of trees to be identified on the site plans when submitted for Site Plan Review.

I. Traffic

1. Existing Conditions

a. Inventory of existing road conditions in the site vicinity, including lane widths, lane markings, parking conditions and regulations, speed limits, shoulder/sidewalk widths, general alignments and grades, and sight lines. The inventory should include Route 9, Route 9G, West Dorsey Lane, West Cottage Road, Fulton Street, and Cedar Street.

b. Determination of existing traffic volumes, including pedestrians and bicyclists, in the weekday AM and PM peak hours and Saturday peak hour documented by manual traffic classification counts and existing levels-of-service for each of the following intersections:

(1) Route 9 and new access to CIA/St. Andrews project
(2) Route 9 and West Dorsey Lane/CIA Drive
(3) Route 9 and River Point Road in the Town of Hyde Park
(4) Route 9 and Big Meadow Lane in the Town of Hyde Park
(5) Route 9 and existing northerly Site Driveway-aligned with County Park Entrance
(6) Route 9 and new southerly Site Driveway
(7) Route 9 and Home Depot/northern Marist College Drive
(8) Route 9 and central Marist College Drive/Fulton Avenue
(9) Route 9 and southern Marist Drive/Marist Drive Extension
(10) Route 9G and Paint Shop Road/Cottage Road
(11) Route 9G and Fulton Avenue
(12) Route 9G and Cedar Street
(13) Route 9G and Pendell Road

Data from other available studies will be utilized and integrated as appropriate.

b. Analysis of available traffic accident reports for the past three (latest available) years for the above noted roadway network.

c. Description of available transit services for residents of the Fairview area including Dutchess Community College, St. Francis Hospital, and
Marist College, for future residents and patrons of the proposed project including distances to transit stops and accommodations to access transit.

e. Description of goals per Town of Poughkeepsie Town Plan and Route 9 Land Use and Transportation Study including the Route 9-9G connection.

1. Anticipated Impacts
a. Develop anticipated trip generation for the site development for the AM, PM, and Saturday peak hours and develop the distribution for entering and exiting traffic during those peak hours from and to the road network
b. Future Without the Project – Identify the “No Build” conditions which include the existing traffic volumes projected with a growth rate and appropriate project specific surcharges to the Build year(s) to determine the No-Build levels-of-service for each of the above-noted intersections
c. Future With the Project – Determine Build Levels-of-services with site generated traffic added to the No-Build traffic volumes for each of the project phases. Included will be an analysis of driveway geometry and sight lines
d. Detailed description and discussion of parking strategies and design parameters including, for example, dedicated parking areas, shared parking among different uses to prevent over-parking, “land banking” of certain areas for potential future parking development, if needed, as well as on- and off-street parking allowances with control measures such as parking meters, time limits, etc. Discussion of parking strategies and design parameters including dedicated parking areas, shared parking among different uses and on-street parking allowances.

e. Discussion of pedestrian circulation on-site and its relationship to community goals and area trails including access to on-site and off-site active and passive recreation facilities.
f. Discussion of proposed ownership/maintenance of site roadways
g. Discussion of impacts from construction activities
h. Discussion of various types of roadways for different functions including alternate “non-standard” pavement and right-of-way widths.
i. Discussion of provisions for emergency access on dead end cul-de-sac or narrower road sections with tighter turn radii.
j. Description of available multi-modal travel options for future residents and patrons of the proposed project including distances to transit stops and accommodations to access transit. The discussion should include on-site and off-site intermodal transit options including but not limited to school and regular loop busses, railway, courtesy vehicles, bicycles, etc.
k. Describe the multi-modal connection options between residences, commercial sites, educational facilities such as schools and universities, recreational facilities, Town, County and other governmental offices and...
facilities and other community services such as libraries, day care or medical centers etc.

l. Description of how the proposed action addresses the Town of Poughkeepsie Town Plan and Route 9 Land Use and Transportation Study goals including the Route 9-9G connection.

m. A qualitative discussion of the proposed project’s impact on the Town’s transportation network consistent with Town and County planning studies.

3. Proposed Mitigation: Identify necessary mitigation measures to address safety, capacity, level of service and delay degradations associated with the site development. Actions may include but are not limited to:
   a. Traffic control implementation including signing, markings, signalization, etc.
   b. Roadway or intersection modifications including new roadways, intersection relocations, easements, right-of-way donations, linkages to adjacent parcels, multi-modal improvements such as pedestrian, bicycle, and transit accommodations
   c. Discussion of proposed mitigation as they relate to the recommendations in the Route 9 Land Use and Transportation Study.
   d. Provide concept plans for all mitigation at a minimum scale of 1:100 (larger scale if necessary)
   e. Provide a plan for implementation of the recommended mitigation measures. The plan should include, but not be limited to, construction phasing and timing and a monitoring plan to ensure the appropriateness of each recommended improvement at the time of construction.

J. Demographics and Community Facilities

1. Existing Conditions
   a. Description of current population of the Town of Poughkeepsie from census and population change from 1990 to present
   b. Persons per dwelling unit from census, from 1990 to present
   c. Description of other demographic issues such as income, employment, age, etc.
   d. Description of Town facilities and other relevant service providers including:
(1) On-site and off-site recreational resources (active, passive and availability for public) such as open space, trails or commercial recreational venues and their current connectivity
(2) Police
(3) Fairview Fire District and emergency services, including budget, capacity, and description of the taxing structure
(4) Town of Hyde Park School District, including budget, enrollment trends, physical capacity, and other issues
(5) Building Inspector
(6) Highway Department
(7) Other community services (such as libraries, day care centers, medical or intermodal transit facilities)
   e. Open space plan including demonstration of current active and/or passive recreational uses

2. Anticipated Impacts
   a. Number of persons expected to occupy units
   b. Increase in Town population as a result of the project
   c. Potential impacts to community facilities and services from the proposed development based upon information provided by each service provider, and discussion of which service system components (i.e. firehouse, library, intermodal transit facilities, public recreation facilities), if any, can be provided on the Hudson Heritage Park site.
   d. Discussion of the ability of existing emergency services personnel, equipment and facilities to accommodate the proposed development
   e. Discussion of anticipated project-generated school age children, and the potential impact to the Town of Hyde Park School District
   f. Discussion of on-site community services
   g. Discuss the availability of indoor and outdoor recreation facilities for on-site residents and the general public for youth, family and senior citizen age groups.
   h. Discuss the viability of commercial recreation facilities as on-site uses.
   i. Discuss a site-wide open space use plan including passive and active uses, detailing of pocket parks, trails, etc. that also addresses the restoration and future use of the Great Lawn.

2. Proposed Mitigation
   a. Appropriate mitigation measures to reduce identified impacts associated with the proposed project will be discussed

K. Fiscal and Economic
   1. Existing Conditions
      a. Identify current taxes provided to each taxing jurisdiction (e.g., Town, County, School District, Fairview Fire District, etc.).
b. Provide market analysis regarding the demand for proposed residential and non-residential uses in the market area.

c. Assess the current operating budgets and particular operating conditions for the Hyde Parks Schools, the Fire District, Town Police, highway department and other service providers pertinent to assessing project impacts and mitigation measures.

2. Anticipated Impacts –

a. Identify projected taxes to each taxing jurisdiction (Town, County, School District, Fire District, Police Department) and compare to the cost of providing services to the completed project

b. Analysis of per pupil costs to the school district to educate additional project-generated school age children, considering marginal cost thresholds and impacts on the School Aid formulae including school budgets, enrollment trends, physical capacity issues or other details.

c. Analysis of whether tax revenue generated by the project will impact (positively or negatively) fire district taxes paid by existing residents and business owners in the Fairview Fire District.

d. Assess major capital costs, if any, for other Town services (Fire, Police, recreation, etc.)

e. Analysis of the potential impacts of the proposed office and retail development on existing office and retail uses in the market area.

f. Analysis of community service providers including schools, fire, emergency services, library, etc. discussing whether the location of an on site service facility or sub-station might improve the overall functioning of any particular service delivery system.

g. Description of employment generation resulting from construction, project site operations including office and store employees and property management functions

h. Description of fiscal impacts resulting from resident expenditures.

3. Proposed Mitigation

a. Appropriate mitigation measures to reduce identified impacts associated with the proposed project will be discussed

L. Cultural Resources (historical and archeological)
1. Existing Conditions
   a. Provide detailed building surveys/reports on current structural integrity and hazardous conditions for structures as specified by SHPO; environmental assessments (including asbestos and lead content) of buildings as specific by SHPO.
   b. Provide detailed studies in accordance with the New York State Standards for Cultural Resources Investigation including a Phase 1A Literature Search and Sensitivity Study.
   c. Assess the site’s potential archeological sensitivity and Phase 1B field testing, as necessary.
   d. Record copies of correspondence to date with recommendations or directives from the National Register and National Historic Landmarks.
   e. Provide an aerial photograph of all historic buildings keyed to the existing conditions survey/report.
   f. Provide a detailed description of all historic building façades including the portion of the southern wing building that was damaged by fire.
   g. Describe requirements pursuant to §210-30, Historic Revitalization Development District (HRDD), D.1.b.ii.
   h. Describe architectural and landscape design requirements pursuant to §210-30, Historic Revitalization Development District (HRDD).

2. Anticipated Impacts
   a. Identify potential impacts to archeological and historic resources.
   b. Identify which structures will be preserved and which will be removed and explain why.
   c. Provide an aerial photograph of all historic buildings indicating buildings to remain, to be stabilized, or to be demolished and indicate their adaptive re-use.
   d. With the involvement of an architectural historian discuss the feasibility of preserving the existing building façades, and specifically the façade of the southern wing of the building damaged by fire, as an aspect of its adaptive reuse.
   e. Discuss how the proposed amount of building restoration complies with the requirements pursuant §210-30, Historic Revitalization Development District (HRDD), D.1.b.ii.
   f. Discuss how the proposed development architectural and landscape design and styles comply with the requirements pursuant to §210-30, Historic Revitalization Development District (HRDD).

3. Proposed Mitigation
a. Appropriate mitigation measures to reduce identified impacts associated with the proposed project will be discussed.

b. Provide specific timeline for measures (roof repair, smoke alarms, motion-detection security lighting, etc.) to protect and stabilize structures to remain.

c. On-going coordination with SHPO on National Register and National Historic Landmark properties.

d. Identify additional studies including, if necessary, photo documentation of structures prior to demolition, a Phase II or III archaeological assessment and if recommended through the consultation process, the appropriate treatment of significant resources.

e. Discuss measures for the preservation of existing building façades and specifically the façade of the southern wing of the building damaged by fire (if appropriate).

f. Discussion of the potential to salvage or relocate smaller site structures and reuse on site.

M. Phase I Environmental Site Assessment

1. Existing Conditions

a. Summary of Phase 1 ESA Report, including a full discussion of contaminant related issues including status, subsurface conditions summary, status of completed investigations and remedial activities regarding effects on local soils, surface water and groundwater regimes. The discussion should also include a description of any underground or above ground petroleum storage tanks along with any related studies or remedial measures. Further, potential impacts of the off-site New York State owned lands to the east of the project which are contaminated and which have undergone some remediation should also be addressed.

Discussion should include:

i. Former Landfill Areas

ii. Asbestos Sampling and Abatement

iii. Lead Paint Survey and Abatement

iv. Registration and Closure of any underground or above ground petroleum storage tanks

v. Potential Volatile Organic Compound (VOC) Contamination

vi. Sub-slab vapor intrusion

2. Anticipated Impacts
a. Proper management and Disposition of Site Construction, Demolition Debris (i.e. building contents) should be described to include removal methods, transportation impacts, etc.

b. Summary of any environmental items identified in Phase I or Phase II studies

3. Proposed Mitigation
   a. Appropriate mitigation measures to reduce identified impacts associated with the proposed project will be discussed
N. Housing

1. Existing Conditions
   a. The DEIS will describe the present housing inventory in the Town of Poughkeepsie and Dutchess County and the market for a range of housing types including live-work housing, second floor / above store housing, street level and student housing.
   b. Discussion of the region’s housing affordability gap which is currently being studied by Dutchess, Ulster, and Orange County in the Tri-County Housing Needs Assessment (if available - anticipated January 2009 completion date).

2. Anticipated Impacts
   a. Analysis comparing the market for new housing types with the proposed housing types and relationship to the region’s housing affordability gap as described above.

3. Proposed Mitigation
   b. Appropriate mitigation measures to reduce identified impacts associated with the proposed project will be discussed.

O. Noise and Air

1. Existing Conditions
   a. Provide a list of sensitive noise receptors which currently exist in close proximity to the boundaries of the project site.
   b. Perform a noise screening assessment to provide an indication of existing noise levels at locations along the boundaries of the site. The assessment will be performed during morning and afternoon hours. The noise locations to be monitored shall be submitted to the Town for approval. Noise levels recorded at these locations (Level Equivalents – Leq) will be compared to Town of Poughkeepsie noise ordinance thresholds or other applicable State standards.

2. Anticipated Impacts
a. Evaluation of potential noise impacts resulting from construction activities. Expected noise levels produced by typical construction equipment will be reviewed against existing noise levels, as well as applicable Town/State thresholds. The NYSDEC program policy document entitled “Assessing and Mitigating Noise Impacts” will be used to report on expected noise levels. Distance, topography, vegetation, noise source duration and weather conditions will be evaluated for expected noise impacts associated with construction activities and construction traffic.

b. If blasting is proposed, the potential impacts of noise from blasting will be evaluated and discussed.

c. Impacts from noise resulting from increased traffic generation on area roads will be evaluated and discussed.

d. An evaluation of the impacts associated with the removal of buildings that currently may act as noise barriers for the existing residential neighborhoods adjacent to the site will be included in the noise study.

3. Proposed Mitigation

   a. Appropriate mitigation measures to reduce identified noise impacts associated with the proposed project will be discussed. The proposed mitigation measures shall comply with applicable Town/State Codes.

   b. Description of appropriate mitigation measures to reduce potential noise impacts associated with construction and blasting, if applicable.

P. Air

1. Existing Conditions

   a. Ambient air quality conditions in the study area will be summarized based on NYSDEC monitoring data for the most recent five year period. Their compliance will be compared with the National Ambient Air Quality Standards (NAAQS).

   b. All study area intersections contained in Section I.1.b. will be screened for carbon monoxide (CO) utilizing traffic data in accord with NYSDOT screening procedures outlined in NYSDOT’s Environmental Procedures Manual (EPM).

2. Anticipated Impacts

   a. Based on the procedures outlined in the EPM, the intersections that do not screen out from requiring a detailed air quality analysis should be ranked and prioritized and the three worst case intersections should be modeled. Analysis of the potential CO air quality impacts for the full build out year of the project for the “No-Build” and “Build” conditions for the three peak periods studied in the traffic analysis will be completed. The Consultant shall define the worst case meteorological conditions in the project area using the information contained in the EPM as a guide. If the three modeled
intersections comply with the ambient air quality standards, it can be assumed that any other intersections would also comply with the standards.

b. **Analysis of the potential Particulate Matter (PM$_{10}$ and PM$_{2.5}$) air quality impacts for the full build out year of the project for the “No-Build” and “Build” conditions for the three peak periods studied in the traffic analysis.** The Consultant shall define the worst case meteorological conditions in the project area using the information contained in the NYSDOT Project Level Particulate Matter Analysis Final Policy dated September 2004 or the latest New York State methodology manual as a guide. The three worst case intersections should be included in the PM analysis. If the three intersections comply with the ambient air quality standards, it can be assumed that any other intersections would also comply with the standards.

c. **Based on the size of the proposed development the criteria for projects requiring a mesoscale air quality analysis should be reviewed.** If applicable, a mesoscale analysis should be conducted. If not required, the report should include a statement summarizing the review of the mesoscale analysis criteria.

d. **The Consultant shall summarize the results of the air quality analysis in a report which includes a comparison to State and Federal Air Quality Standards.**

e. **Evaluation of potential air impacts resulting from construction activities, site preparation, and construction traffic and comparison to established air quality parameters.**

f. If blasting is proposed, the potential impacts on air quality from blasting will be analyzed and discussed.

3. **Proposed Mitigation**

   a. If required, means to alleviate air quality impacts associated with the proposed project will be proposed including measures to improve traffic flow and intersection level of service.

   b. **Description of appropriate mitigation measures to reduce potential air quality impacts associated with construction and blasting, if applicable.**

**Q. Project Phasing Plan**

This section of the DEIS will provide a detailed description of the overall phasing of the proposed project. This discussion will provide possible alternatives to the present phasing plan especially in how the restoration of the historic buildings can proceed during the initial project phase and how housing components could be incorporated during initial development phases.

**Q. Incentives**

Behan Planning Associates, LLC
This section of the DEIS will discuss in detail the incentives allowed in the Historic Revitalization Development District and how they are being employed by the project applicant in their Master Development Plan.

Given that substantial incentives are at the discretion of the Town Board, the project applicant will provide a supportive rationale for granting the additional density based on project benefits such as fiscal impacts, affordability, and “greenness” and adherence to “New Urban Design”.

IV. ALTERNATIVES - The analysis of reasonable alternatives to the Proposed Action would be based on schematic site plans, with impacts quantified in terms of areas of disturbance, traffic generation, water and sewer utilization, population, school age children and tax generation. Alternatives would be compared to one another and to the Proposed Action (in a summary table). This would include the following alternatives:

A. No Build
B. Previously Approved Site Plan
C. Alternative Without Discretionary 200 Dwelling Unit Density Bonus
D. Alternative that provides for the restoration and adaptive reuse of historic buildings as part of the first phase of development.
E. Discussion of alternative mixes of uses that could result from possible changes in market conditions (over the many years that project development would occur) and how that might be relevant to incentives or other impact issues.
F. Alternative that assumes a different housing mix of live-work housing, second floor / above store housing, street level and student housing not currently part of the proposed action.
G. Alternative that includes an additional 100,000sf of commercial space above what is included in the proposed action.
H. Mitigation alternative(s) considering a Route 9-9G connector road for the proposed action and land use alternatives above. Two connector road alternatives should be considered: one connector road alternative beginning at the site’s main entrance off of Route 9 across Quiet Cove Park and the other connector road alternative beginning at Winslow Gate Road in the southern portion of the site.

V. SIGNIFICANT IMPACTS THAT CANNOT BE AVOIDED - Identification of significant long term and short-term construction impacts (including construction impacts: traffic, air quality, noise, etc.) that cannot be avoided. For construction impacts, the discussion would include project sequencing and construction impacts on surrounding roads and neighborhood properties.

VI. GROWTH INDUCING ASPECTS
A description and analysis of potential growth-inducing aspects, including short and long term, and primary, secondary and indirect impacts, will be provided and mitigation measures discussed if necessary. This section would provide a qualitative discussion of the potential impact of proposed action on local business, population characteristics, community character, and community services.

VII. EFFECTS ON THE USE AND CONSERVATION OF ENERGY RESOURCES

A description of the effect of the proposed action on the short and long term use and conservation of energy resources will be provided including ways to reduce inefficient or unnecessary consumption during construction and long term operation. A discussion of the following typical energy conservation measures will be provided:

- Design methods to reduce fuel costs for heating or cooling such as district heating;
- Supplemental use of other energy sources not requiring fossil fuels such as solar energy, geothermal, etc.;
- Recycling and use of recycled materials; and
- Indirect energy benefits, such as locating and designing a proposed action to accommodate public transit, or using shuttle buses to serve a facility, or locating of a facility to minimize commuting or shopping travel distances.
- Consideration of sustainable operation and maintenance practices.

This discussion will include specific recommendations that will be implemented. To the greatest extent possible, they will be organized and graded according to the relevant certifications defined by the US Green Building Council’s LEED programs. The analysis of the LEED program will specifically focus on exploring green operations of future buildings.

There will be a discussion how relevant programs, such as those offered by NYSERDA, are being used to offset the capital costs of reducing energy consumption.

VIII. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Identification of those natural and man-made resources consumed, converted or otherwise made unavailable for future use as a consequence of the proposed action.

IX. APPENDICES

A. SEQRA Materials
B. Correspondence Related to the Project
C. Technical Studies
   1. Traffic Impact Analysis
   2. Stormwater Management Report
   3. Cultural Resources Report
   4. Phase I - Environmental Site Assessment
   5. Habitat Assessment
   6. Water and Sewer Reports
LEAD AGENCY
Town Board of the Town of Poughkeepsie
Supervisor Patricia Myers
1 Overocker Road
Poughkeepsie, NY 12603
845-485-3600

INVOLVED AGENCIES

Town of Poughkeepsie Planning Board
Chairman John T. Weisman
1 Overocker Road
Poughkeepsie, New York 12603
(845) 485-3657

Town of Poughkeepsie Highway Department
Mr. Marc Pfeifer - Superintendent of Highways
1 Overocker Road
Poughkeepsie, New York 12603
(845) 485-1750

Dutchess County Department of Health
Dr. Michael Caldwell, Director
Dutchess County Health Department
387 Main Street
Poughkeepsie, New York 12601
(845) 486-3400

New York State Department of Transportation
SEQRA Unit
Traffic Engineering & Safety Division
Region 8 NYS Department of Transportation
4 Burnett Boulevard
Poughkeepsie, New York 12603
(845) 431-5750

New York State Department of Environmental Conservation - Region 3
William C. Janeway, Regional Director
Region 3
21 South Putt Corners Road
New Paltz, New York 12561
(845) 256-3000

Behan Planning Associates, LLC
New York State Office of Parks, Recreation and Historic Preservation  
William Krattinger  
Field Services Bureau  
P.O. Box 189, Peebles Island  
Waterford, New York 12188-0189  
(518) 237-3265

INTERESTED AGENCIES

Town of Poughkeepsie Zoning Board of Appeals  
James C. Santoro, Chairman  
1 Overocker Road  
Poughkeepsie, New York 12603  
(845) 485-3650

Town of Hyde Park Town Board  
Supervisor Lawrence Delafield  
Town Hall  
4383 Albany Post Road  
Hyde Park, New York 12538

Town of Poughkeepsie Conservation Advisory Commission  
1 Overocker Road  
Poughkeepsie, New York 12603

Town of Poughkeepsie Historic Preservation Commission  
1 Overocker Road  
Poughkeepsie, New York 12603

Fairview Fire District  
Chief Tory Gallante  
258 Violet Avenue  
Poughkeepsie, New York 12601  
(845) 452-7453

Town of Poughkeepsie Police Department  
Thomas Mauro  
Acting Chief of Police  
19 Tucker Drive  
Poughkeepsie, New York 12603  
(845) 485-3666
Hyde Park Central School District  
Carole A. Pickering, Superintendent of Schools  
11 Boice Road  
P.O. Box 2033  
Hyde Park, New York 12538  
(845) 229-4000

Dutchess County Department of Planning & Development  
Roger Akeley, Commissioner  
27 High Street  
Poughkeepsie, New York 12601  
(845) 486-3600

United States Army Corps of Engineers  
Civil Works Office  
U.S. Army Engineer District, New York  
26 Federal Plaza  
New York, New York 10278-0090  
Contact: Mary Ann Miller  
General Number: (917) 790-8414

United States Department of the Interior  
US Fish and Wildlife Services  
David Stillwell  
Field Supervisor  
3817 Luker Road  
Cortland, New York 13045  
(607) 753-9334

Scenic Hudson  
Ned Sullivan, President  
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