

**EAF NARRATIVE**  
**Evaluation of Potential Environmental Impacts**  
**WORLD OLIVET ASSEMBLY, INC.**

**World Olivet Assembly Center**  
**115 Dover Furnace Road**

**March 6, 2017**

**Revised November 7, 2017**

**Revised December 19, 2017**

**Revised December 11, 2018**

**Revised June 6, 2019**

**PROPOSED ACTION**

The World Olivet Assembly (“WOA”) submits this application for a special permit approval to the Town of Dover Planning Board (the “Planning Board”) to develop a religious training center and camp on Tax Parcel Nos. 7061-00-357420, 7061-00-356245, 7061-00-182280, 7061-00-062121, 7061-00-199931, 7061-00-686830, 7061-00-746846, 7061-00-726850 located at 115 Dover Furnace Road and Ore Bed Road and 30 Green Acres Road (the “WOA Center Site” or “Project Site”). Physical improvements, as described below, are proposed only for lots 7061-00-357420, 7061-00-356245 and 7061-00-182280. The balance of the lots will be the subject of an application for lot consolidation/merger. The main project site is the location of the former New York City Mission Society summer camp and conference center complex.

WOA is an association of Bible-centered churches in America which trains and educates leaders and missionaries from those churches for religious work in many countries around the world. The WOA Center will attract leaders and interns of various ministries from both domestic and international churches who will train at the center for three to six months. Some leaders and missionaries attending the WOA Center may also chose to attend the nearby Olivet University for more formal seminary training and education. As noted above, much of the WOA Center Site was used for decades by the New York City Mission Society, which operated various summer camps for New York City youth, including Camp Green Acres and Camp Sharparoon. The WOA Center will be used for religious worship, training, education, residences/lodging, fellowship, dining, communal and administrative purposes continuing this site’s long charitable history.

As shown on the enclosed Master Development Plans, the WOA Center, which will operate year round, has two main components: (1) the Chapel Green area, with lodges, residences, a small pond, and maintenance and equipment buildings along Dover Furnace Road and Ore Bed Road (which will be paved to improve access). Most of the residential units will be located in the Chapel Green area and (2) the Hayden Center, located further south along Ore Bed Road with a conference center/dining hall at Hayden Hall, offices, the Elmwood Hotel and accessory recreational uses including a tennis court, cemetary, basketball court, and a restored beach on Sharparoon Pond. Most of the offices and conference areas will be located in the Hayden Center area.

One building at the WOA Center Site, Hayden Hall, already has an existing special permit to operate a conference center and dining hall. This permit was approved by the Planning Board in 2009. This use will not change under this application. It has been included in the present special permit application for the sake of completeness and to enable assessment of any overall impacts from the WOA Center now proposed.

As the Project will also constitute a “camp, Type 1”, pursuant to Section 145-45 of the Zoning Law of the Town of Dover and contain more than five accessory facilities, a Master Development Plan has been submitted as part of the special permit and site plan application. Additionally, because WOA anticipates its annual general assembly meeting may result in a gathering of approximately 500 people, a Large Event Management Plan (the “Event Plan”) has been submitted. The Event Plan will govern the General Assembly and any other large public events held at the Project Site, although no other large public events are contemplated at this time. Note that while the Project will constitute a “camp, Type 1”, portable shelters, such as tents, trailers and recreational vehicles are not expected to be utilized at the Project Site.

There are approximately fifty existing buildings on the Project Site. WOA proposes to utilize twenty-one of these buildings, thirteen of which are located on the “Chapel Green” area of the Project Site and eight of which are located on the “Hayden Center” area of the Project Site. None of the existing buildings will be expanded or enlarged as part of their reuse.

Additionally, a new 2,500 square foot eight-unit residence will be constructed on Chapel Green. With the exception of the construction of the new residence, the footprints and floor areas of all existing structures will not be increased. WOA has no present intention to use the remaining twenty-nine buildings. Likewise, WOA has no present intention to utilize the parcels referred to as the “Cooperstown Road Site” in its March 6, 2017 submittal and is withdrawing its prior application related to that site. If WOA in the future decides to use any of the buildings or sites that are not the subject of this application, application will be made to the Planning Board for modification of the master development plan, special permit and site plan.

The Project will proceed in two phases, as reflected on the Master Development Plan. Phase I will consist of: i) minor building improvements to thirteen buildings, as summarized on the chart below, ii) the addition of directional road signs, iii) identification for each building, iv) installation of a wayfinding map, v) installation of an outdoor playground, vi) resurfacing of basketball and tennis courts, vii) installation of an ADA compliant illuminated sidewalk connecting the Chapel parking lot to buildings on Chapel Green, viii) improvements to certain existing pedestrian pathways, ix) installation of a new sign and landscaping at the WOA Center Site roadway entrance, x) upgrades as necessary to water supply and septic systems in coordination with the Dutchess County Department of Health and xi) submission of an application for lot merger/consolidation of the various lots owned by WOA.

Following acceptance of the Master Development Plan, WOA will submit a Phase I site plan to the Planning Board for its approval as part of the Special Permit.

**Phase I**

<b>Building</b>	<b>Existing Use</b>	<b>Proposed Use</b>	<b>Improvements</b>
1	Main Office/Chapel	No Change	<p>Upgrades as necessary to achieve ADA compliance.</p> <p>Upgrade water supply/septic if necessary upon confirmation of capacity and coordination with the Dutchess County Department of Health.</p>
2	Birch Lodge 18 Residential Units	<p>No change to unit count.</p> <p>An accessory daycare facility for up to 70 children is proposed.</p>	<p>Upgrades as necessary to achieve ADA compliance and any applicable standards for day care.</p> <p>Upgrade water supply/septic if necessary upon confirmation of capacity and coordination with the Dutchess County Department of Health.</p>
3	Mountain View Lodge 12 Residential Units	No Change	<p>Upgrades as necessary to achieve ADA compliance.</p> <p>Upgrade water supply/septic if necessary upon confirmation of capacity and coordination with the Dutchess County Department of Health.;</p>
4	Lake View Lodge 12 Residential Units	No Change	<p>Upgrades as necessary to achieve ADA compliance.</p> <p>Upgrade water supply/septic if necessary upon confirmation of capacity and coordination with the Dutchess County Department of Health.</p>

5	Shop	<p>No Change</p> <p>The Shop will be used for general buildings and grounds maintenance and repair.</p>	<p>Upgrade water supply/septic if necessary upon confirmation of capacity and coordination with the Dutchess County Department of Health.</p>
6	Shed	<p>No Change</p> <p>The shed will be used for storage of building and grounds maintenance equipment and materials.</p>	<p>None proposed.</p>
7	Single Family Home	<p>No Change</p> <p>Will serve as director's house</p>	<p>Upgrade water supply/septic if necessary upon confirmation of capacity and coordination with the Dutchess County Department of Health.</p>
10	Screen House	<p>No Change</p> <p>The Screen House will host outdoor dining, meetings and events.</p>	<p>Cosmetic building improvements including painting and general cleanup.</p> <p>Upgrades as necessary to achieve ADA compliance.</p>
11	Pavilion	<p>No Change</p> <p>The Pavilion will host outdoor dining, meetings and events.</p>	<p>Cosmetic building improvements including painting and general cleanup.</p> <p>Upgrades as necessary to achieve ADA compliance.</p>

14	Lodging Hall 14 Residential Units	No Change The Lodging Hall will be known as Elmwood hotel.	Upgrades as necessary to achieve ADA compliance.
16	Equipment Garage	No Change The Equipment Garage will store maintenance vehicles and equipment.	None Proposed
18	Hayden Hall Dining Hall	No Change	Upgrades as necessary to achieve ADA compliance.
24	Water Treatment Plant	No Change	None Proposed.
<u>33</u>	<u>Dining Hall</u>	<u>Dining Hall</u>	<u>Renovate existing dining hall including kitchen and bathroom upgrades, the installation of new walls, improved electrical and plumbing systems, new doors and windows and upgrades to achieve ADA compliance.</u>  <u>Upgrade water supply/septic if necessary upon confirmation of capacity and coordination with the Dutchess County Department of Health.</u>

Phase II will consist of: i) more substantial building improvements to eight buildings, ii) construction of a new eight-unit residence on Chapel Green, iii) installation of streetlights, iv)

resurfacing of gravel driveways and parking areas with asphalt and v) installation of ADA compliant parking spaces on resurfaced parking areas. Following approval of the Master Development Plan, special permit and Phase I site plan, WOA will submit a Phase II site plan to the Planning Board for approval.

**Phase II**

<b>Building</b>	<b>Existing Use</b>	<b>Proposed Use</b>	<b>Improvements</b>
8	Single Family Home	Three Unit Residence	Renovations needed to convert a single-family residence to a three-unit residential building including kitchen and bathroom upgrades, the installation of new walls, improved electrical and plumbing systems, new doors and windows and upgrades to

			<p>achieve ADA compliance.</p> <p>Upgrade water supply/septic if necessary upon confirmation of capacity and coordination with the Dutchess County Department of Health.</p>
9	Laundry	No Change	<p>Upgrades as necessary to achieve ADA compliance.</p> <p>Upgrade water supply/septic if necessary upon confirmation of capacity and coordination with the Dutchess County Department of Health.</p>
15	Office	No Change	<p>Upgrades as necessary to achieve ADA compliance.</p> <p>Requires new septic system or connection to the Hayden Hall system and coordination with the Dutchess County Department of Health.</p>
17	Cottage	Office	<p>Requires new septic system or connection to the Hayden Hall system and coordination with the Dutchess County Department of Health.</p>
19	Cottage	President's Office	<p>Requires new septic system or connection to the Hayden Hall system and coordination with the Dutchess County Department of Health.</p>
28	Cottage	Office	<p>Requires new septic system or connection to the Hayden Hall system and coordination with the Dutchess County</p>

			Department of Health.
32	Single Family Residence	No Change	<p>Renovations will include kitchen and bathroom upgrades, improved electrical and plumbing systems, new doors and windows and upgrades to achieve ADA compliance.</p> <p>Upgrade water supply/septic if necessary upon confirmation of capacity and coordination with the Dutchess County Department of Health.</p>
<del>33</del>	<del>Single Family Residence</del>	<del>Dining Hall</del>	<p><del>Renovations needed to convert a single family residence to a dining hall including kitchen and bathroom upgrades, the installation of new walls, improved electrical and plumbing systems, new doors and windows and upgrades to achieve ADA compliance.</del></p> <p><del>Upgrade water supply/septic if necessary upon confirmation of capacity and coordination with the Dutchess County Department of Health.</del></p>
New Construction	N/A	Eight Unit Residence	Requires new septic system and new well or connection to existing well and coordination with the Dutchess County Department of Health.



Portions of the WOA Center Site are served by an existing water treatment plant shown on the Hayden Center Master Development Plan. This existing plant will be renovated and updated in coordination with the Dutchess County Department of Health and all applicable permits and approvals will be obtained for the renovation. The rest of the buildings on the Project Site are served by existing individual wells, which will be evaluated in coordination with the Dutchess County Department of Health to ensure adequate service and capacity for their intended use. The individual buildings at the WOA Center Site are also served by individual septic systems which will also be evaluated in coordination with the Dutchess County Department of Health to ensure adequate service and capacity for their intended use.

On-site wetlands include the Swamp River and associated NYSDEC freshwater wetland DP-22, which covers a substantial portion of the eastern part of the WOA Center Site. However, no disturbance is proposed within this wetland or associated buffer. Sharparoon Pond is classified by NYSDEC as a class B waterbody, but is not considered a NYSDEC regulated wetland. Federal wetlands on the Project Site are more extensive, including the Swamp River, much of Wetland DP-22, as well as Sharparoon Pond and three other small freshwater ponds: one on Parcel No. 182280, another shown as a small pond on the Chapel Green Master Development Plan, and a third, shrub wetland near Ore Bed Road on the Hayden Center Master Development Plan.<sup>1</sup> No disturbance to either of the small ponds or shrub wetland is proposed. The existing beach on Sharparoon Pond is proposed for renovation, which will require placement of new sand on the existing beach area and possibly past the waterline. WOA will seek coverage, if necessary, under the appropriate U.S. Army Corps of Engineers nationwide permitting program for any disturbance to the pond and/or any protection of waters permit and water quality certification from NYSDEC. In general, other than building one new building, renovating and upgrading existing buildings and returning the Project Site to its former use as a rural gathering place for charitable use, much of the WOA Center Site will remain undisturbed.

### **SEORA CLASSIFICATION AND INVOLVED AGENCIES**

The Project falls below the thresholds in 6 NYCRR Part 617.4 for a Type I action, and thus it qualifies as an Unlisted Action under the State Environmental Quality Review Act (“SEQRA”). WOA anticipates that the Planning Board will serve as lead agency for the coordinated environmental review in accordance with the standards set forth in SEQRA 6 NYCRR Part 617. The following potential permit approvals have been identified for the Project:

- Town of Dover Planning Board (Special Permit, including site plan review under Town Code § 145-60 and sign review under Town Code § 145-39.F and possible architectural review)
- New York State Department of Environmental Conservation (General Stormwater SPDES Permit, General Wastewater SPDES Permit, protection of waters permit, water quality certification)

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<sup>1</sup> It is unclear how some of these isolated wetlands will be regulated by the federal government in light of President Trump’s recent Executive Order (dated February 28, 2017) on the Waters of the United States Rule and the existing federal circuit court stay of that rule. Nevertheless, none of these wetlands will be disturbed by the Project.

- Dutchess County Planning Department (GML § 239-m referral) for a special use permit located within 500' of a County road
- Dutchess County Health Department permits (for water supply and septic systems)
- Dutchess County Department of Public Works Highway Work Department permit (driveway upgrades on a County road and right-of-way permit for sign)
- Town of Dover Code Enforcement Officer (Fire Code operating permit for place of public assembly, Erosion and Sediment Control Permit)
- U.S. Army Corps of Engineers – Possible Nationwide Section 404 permit for discharge into waters of the United States (for beach renovation on Sharparoon Pond)

## EVALUATION OF POTENTIAL IMPACTS

In making its determination of significance as SEQRA lead agency, the Planning Board is required to consider the criteria for determining significance as enumerated in the SEQRA regulations at 6 NYCRR § 617.7(c). This section discusses each of those criteria in more detail below.

### 1. Impact on Land

The WOA Center Site contains existing buildings with associated parking areas, recreational facilities, support buildings, several ponds, an access drive and small on-premises commercial sign. The Project consists primarily of renovations of existing buildings on the WOA Center Site and new disturbance shall be limited to construction of a new residential building containing 8 units, minor construction of a new playground behind Mountain View Lodge, renovation of an existing basketball court, tennis court, and beach, and paving Ore Bed Road, two existing parking lots and an access drive. The paving of these areas will result in a ~~no net increase~~ ~~et reduction~~ in impervious surfaces following completion of Phase II because unnecessary gravel parking and road area will be removed and replaced with lawn. Other than the new eight-unit residential building, the total area of developed and open space on the WOA Center Site will remain approximately the same. Notably, much of the developed area on the WOA Center Site is set back from the nearest roads on a self-contained campus, with the vast majority of the campus shielded from the road and neighboring parcels by trees which buffer any off-site impacts.

Presently, storm water sheet flows off the existing buildings and parking areas to undeveloped areas of the Project Site with limited stormwater controls. ~~The proposed net reduction in impervious surfaces will significantly improve existing conditions and water quality by reducing sheet runoff and eliminate the need for permanent stormwater controls.~~ Stormwater on the Project Site will be managed during construction pursuant to proposed physical barriers in the form of erosion and sediment control measures, to be outlined in the Project's Stormwater Pollution Prevention Plan (the "SWPPP"). The SWPPP will address requirements for erosion and sediment control as outlined in the New York Standards and Specifications for Erosion and Sediment Control (2016). All erosion and sediment control practices will be installed prior to site disturbance activities, and all areas disturbed during construction will be stabilized by the new construction or restored as new site landscaping (predominantly lawn).

Based on the foregoing, site development paving and construction activities are not anticipated to have any significant adverse impact to land on the Project Site. ~~Indeed, the net reduction in impervious surfaces will improve site conditions.~~

### 2. Impact of Geological Features

The WOA Center Site has been developed with approximately 50 camp buildings and parking for approximately 90 years. There are no unique geological features or land forms on the Project Site and no significant clearing or grubbing is proposed. As described above, paving of Ore Bed Road, an existing access drive and existing parking areas is proposed but the overall total square footage of impervious areas will not increase. Thus, no significant impacts of geological features are anticipated.

### **3. Impact on Surface Water**

The WOA Center Site includes approximately 50 existing buildings, recreational areas, and associated parking, with existing private on-site septic disposal facilities and limited stormwater management or treatment controls. The proposed action will significantly improve existing conditions and water quality by reducing sheet runoff.

#### ***Wetlands/Streams***

There are federal and State regulated wetlands and protected streams on the WOA Center Site. Parcel No. 7061-00-357420 (115 Dover Furnace Road), shown on the Master Development Plan, contains NYSDEC-regulated freshwater wetland DP-22, located primarily to the southeast of the parcel, based on the online NYSDEC Environmental Resource Mapper. See Appendix 6. This wetland also appears in the National Wetlands Inventory (NWI) and is regulated by the U.S. Army Corps of Engineers (ACOE). See Appendix 7. The on-site pond also appears on NWI maps and is regulated by the ACOE. No construction or disturbance within these wetlands or buffers is proposed.

Parcel No. 7061-00-356245, shown on the Hayden Center Master Development Plan, contains substantial portions of NYSDEC-regulated freshwater wetland DP-22. No construction or disturbance is proposed on this parcel. Parcel No. 7061-00-182280, also shown on the Hayden Center Master Development Plan, contains two small federal wetlands and Sharparoon Pond, also a federal wetland. No impacts are proposed to either of the small federal wetlands. The disturbance to Sharparoon Pond will be limited to restoration of an existing beach area, which will require placement of new sand on the existing beach area and possibly past the waterline. WOA will seek coverage, if necessary, under an appropriate ACOE nationwide permit for this activity and/or protection of waters permit and water quality certificate from NYSDEC.

The nearest protected stream is the Swamp River, classified by NYSDEC as a “C” stream with a C(T) standard, which flows along the eastern edge of the parcel. Areas of NWI federal wetlands also surround the Swamp River. No impacts are proposed to this resource. See Appendix 7. No construction or disturbance is proposed within the boundaries of these wetlands or near the stream.

No construction or disturbance is proposed within the boundaries of the Swamp River, or State and federal wetlands and associated buffer zones, except for the Sharparoon Pond beach restoration. Stormwater controls employed during construction and the no net increase reduction in impervious surfaces following completion of Phase II will prevent any adverse impacts to this wetland.

#### ***Stormwater Management***

While some areas will be paved, there will be no increase. The proposed net reduction in impervious surface by select removal of gravel parking and driveways, approximately 5,000 SF will be accomplished by removing gravel parking areas and driveways will improve existing conditions and water quality by reducing sheet runoff and eliminate the need for permanent stormwater controls.

This improvement will ensure that the proposed use will not adversely affect any on-site or adjacent wetlands, downstream or adjacent properties.

## *Erosion and Sediment Control*

Temporary erosion control measures will prevent the adverse dispersal of sediments from runoff into sensitive areas during construction on the Project Site. Because the Project will disturb more than one acre of soil on the WOA Center Site, it will require a NYSDEC State Pollution Discharge Elimination System (SPDES) General Permit for Construction Activities (GP-0-15- 002), involving the preparation of a SWPPP in accordance with the New York Standards and Specifications for Erosion and Sediment Control (2016). The erosion and sediment control measures will be required to be implemented prior to disturbance activities.

- Stormwater management practices have been designed to the standards provided in the New York State Stormwater Design Manual.
- Designated snow storage areas and requirements for snow storage and removal which will prevent snowmelt runoff from entering the on-site wetlands or adjacent properties.
- The subsurface sanitary sewage disposal system, with a pretreatment system that is prior to the leaching fields will be reviewed and approved by the NYSDEC and the Dutchess County Department of Health to ensure compliance with NYS regulatory environmental guidelines to ensure proper treatment.

Proposed stormwater controls include:

- Areas disturbed during construction will be stabilized by the new construction or restored as new site landscaping.

Proposed erosion and sediment controls include:

- Potential impacts to soils and topography will be minimized by the implementation of the proposed Erosion and Sediment Control Plan to be included in the proposed Site Plans and SWPPP.

During construction, the erosion and sediment controls will minimize the potential for soil erosion from areas exposed during construction and prevent sediment from reaching any wetlands, downstream water bodies and watercourses through the use of silt fence barriers, sediment traps and other erosion control measures, including, but not limited to, the following:

- Topsoil protection - Complete rough grading and final grade, allowing for depth of topsoil to be added. Topsoil placed and graded on slopes steeper than five percent shall be promptly fertilized, seeded, mulched, and stabilized as needed.
- Silt Fencing - All silt fences shall be placed as close to the areas as possible, but at least ten feet from the toe of a slope to allow for maintenance and roll down. The area beyond the fence must be undisturbed or stabilized.

- Stabilized Construction Entrance – A stabilized pad of aggregate underlain with geotextile located at any point where construction traffic will be entering or leaving the Project Site onto a public road.
- Storm Drain Inlet Protection - A temporary, somewhat permeable barrier, in the form of a fence, berm or excavation will be installed around each inlet to allow settling of sediment laden water. The drainage area will be limited to one acre per inlet device.
- Mulching - Slope, grade and smooth the site to fit needs of selected mulch; mulch after soil amendments and planting is complete or simultaneously if hydroseeding is used.
- Protection of Vegetation - Existing plants, if any, to remain will be protected with construction fencing.
- Dust Control - Exposed soils will be wetted down during dry periods to reduce and control dust.
- Seeding - When construction activity temporarily ceases for more than an expected 21 days, areas to be vegetated will be stabilized with temporary seed and mulch within 14 days of the last disturbance activity.
- Inspection and Maintenance - Vegetative and structural erosion control practices will be inspected, maintained, repaired, or cleaned as per the construction inspection log in the SWPPP on a weekly basis by an approved inspector or qualified individual. Inspections by the contractor are proposed to occur daily and special attention would be given during inspections after large rain events in accordance with the New York Standards and Specifications for Erosion and Sediment Control (2016). Such practices will be inspected during the course of construction by either a New York State Licensed Professional Engineer or Certified Professional in Erosion and Sediment Control (CPESC) as required by the General SPDES Permit standards.
- Other miscellaneous erosion and sediment control measures as outlined within the SWPPP.

Based on the foregoing, the Project will not create any significant adverse environmental impacts on water resources.

#### **4. Impact on Groundwater**

##### ***Water Supply***

Some of the existing buildings on the WOA Center Site are presently served by existing water supply systems. The water supply systems were designed to provide water to the Project Site when it was being used as a conference facility and shooting club. There are three separate water

distribution systems, each consisting of its own water source. The Town of Dover currently does not have, nor is expected to develop central water or central wastewater systems to serve the project area.

The first system, known as the Minisink System, provides water to the central part of the campus, known as Hayden Center and is reported to have good quantity and quality of water. All buildings located in Hayden Center that will be reused as part of this Project are currently connected to the Minisink System. The system was previously certified to serve 100 people for seasonal use, and additional evaluation will be performed to determine its capacity to meet the projected 5,065 gallons per day water demand for the Hayden Center portion of the WOA Center.

The system's source is a groundwater well located approximately 600 feet south of Sharparoon Pond and at least 200 feet northeast of NYSDEC Wetland DP-22. A water treatment plant for the Minisink Well on Parcel No. 7061-00-182280, is shown on the Hayden Center Master Development Plan, and is expected to continue service without interruption. The distribution system consists of approximately 460 linear feet of four-inch water mains and 2,500 linear feet of six-inch water main, with five individual service connections. A control system is installed in the water treatment building. The Minisink Well is currently approved for use by Dutchess County and no additional permitting or engineering is required.

The projected water demand for the Hayden Center portion of the WOA Center is 5,065 gallons per day. A 24-hour pump test performed in September 2009 demonstrated the Minisink Well has a minimum capacity of 31 gallons per minute for a 24-hour period without causing impacts to the water source. It is anticipated that existing well can fully supply the projected demand for the Hayden Center portion of the WOA Center. WOA knows of no adverse environmental impacts reported from the existing water supply system. The Minisink System well historically provided good quality water, with only chlorination required and negative results for samples of E. coli and total coliform.

The second system, known as the Zaccara System, provides water to the Chapel Green portion of the campus. The Zaccara System consists of two wells, Well No. 1 and Well No. 4—one with UV disinfection and the other with an existing waiver for disinfection. The projected water demand for the Chapel Green portion of the WOA Center is 12,750 gallons per day. A four-hour stabilized pump test of Well No. 1, demonstrated the well has a capacity of 10 gallons per minute. Inspection of Well No. 1 determined that the 1" steel discharge pipe requires replacement. A four-hour stabilized pump test of Well No. 4 demonstrated the well has a capacity of 12 gallons per minute. Inspection of Well No. 4 determined that it will require several repairs including replacement of the pitiless adapter and check valve.

Because as-built or record drawings are not available for the Zaccara System, it is not yet possible to conclusively determine which buildings are connected to each well. As part of the public water supply permitting process with the Dutchess County Department of Health, water supply for each building in Chapel Green that is part of the Project Site will be identified, sufficiency of flow rates will be confirmed, and disinfection requirements identified

The third system, the Tapawingo System is a single well installed to serve one building, but was identified in 2009 as suitable for non-potable use only due to high iron and turbidity. An existing

water tower onsite located in Hayden Center that no longer serves the water system will be removed.

There are no known off-site residential wells or other wells nearby and thus no impacts to such wells from the projected 17,815 gallons per day withdrawal are anticipated. Moreover, only one new eight-unit structure is being proposed. WOA will submit information necessary for approvals from the Dutchess County Department of Health and/or NYSDEC in regard to this water supply.

The third system,

Water supply requirements are summarized on the following charts for Chapel Green and Hayden Center:

### Chapel Green Water Supply Requirements

Building No.	Sq.Ft.	Use	Flow Rate Per Day <sup>1</sup>	Total Anticipated Peak Usage per Day
1	8,992	Main Office/Chapel	3/seat	360
2	6,030	Daycare/18 Unit Residence	20/child 130/unit	3,740
3	3,316	12 Unit Residence	130/unit	1,560
4	3,316	12 Unit Residence	130/unit	1,560
5	2,080	Shop	15/employee	120
6	800	Shed	N/A	N/A
7	2,300	Director's House	130/bedroom	520
8	2,200	3 Unit Residence	130/unit	390
9	1,900	Laundry Building	580/machine	2,320
10	784	Screen House	N/A	N/A
11	1,872	Pavilion	N/A	N/A
32	1,700	Single Family Residence	130/bedroom	390
33	8,200	Dining Hall	10/seat	750
New Construction	2,500	8 Unit Residence	130/unit	1,040
			<b>Total Anticipated Peak Usage Per Day</b>	<b>12,750</b>

<sup>1</sup>Based on NYS Design Standards for Intermediate Sized Wastewater Treatment Systems, March 2014



### Hayden Center Water Supply Requirements

Building	Sq.Ft.	Use	Flow Rate Per Day	Total Anticipated Peak Usage per Day
14	7,336	14 Room Hotel	130/Unit	2,340
15	450	Office	15/employee	45
16	1,118	Equipment Garage	N/A	N/A
17	874	Office	15/employee	60
18	5,733	Dining Hall	10/seat	2,500
19	1,963	President's Office	15/employee	60
28	1,166	Office	15/employee	60
<b>Total Anticipated Peak Usage Per Day</b>				<b>5,065</b>

### *Septic*

The existing buildings on the WOA Center Site are presently served by private on-site septic disposal facilities. The Town of Dover currently does not have, nor is expected to develop a central wastewater system to serve the Project area. Each system serving buildings on Chapel Green will require a new permit or permit amendment from the Dutchess County Department of Health. As part of this permit process, each system will undergo a complete engineering evaluation to determine its ability to support the proposed use. Upgrades and repairs will be completed as required by the Dutchess County Department of Health. Further, a new system will be required for the proposed eight-unit residence.

Below is a summary of the Chapel Green septic systems.

### Chapel Green Septic System Summary

Building	Use	Type of System	Tank Size (in gallons)	Condition/Comments
1	Main Office/Chapel	Leach Field	1,000	Functioning
2	Daycare/18 Unit Residence	Seepage Pit	1,000	Functioning
3	12 Unit Residence	Seepage Pit	2,500	Crushed outlet pipe
4	12 Unit Residence	Seepage Pit	1,000	Functioning
5	Shop	Leach Field	1,000	TBD
6	Shed	N/A	N/A	N/A
7	Director's House	Drop Box	1,000	Functioning

8	3 Unit Residence	TBD	1,000	TBD
9	Laundry	TBD	1,000	TBD
10	Screen House	N/A	N/A	N/A
11	Pavilion	N/A	N/A	N/A
32	Single Family Residence	Seepage Pit	1,000	Functioning
33	Dining Hall	TBD	1,000	TBD

The Hayden Center septic system was evaluated in an engineering report in 2010 and showed no visible signs of failure.

In 2010, the Dutchess County Department of Health approved a new sewage disposal system as part of the Hayden Hall renovation. The system includes a 750-gallon grease trap and a 3,500-gallon septic tank. A single distribution box distributes grey water equally to 1,260 linear feet of leaching chambers. The system is designed to accommodate 3,000 gallons per day for a 150-person dining facility.

The Hayden Center sewage disposal system will require a permit amendment since the facility is expected to serve up to 250 people. The system will also be evaluated to allow connection by Buildings 15, 17, 18, 19 and 28.

Assessment of the existing Hayden Center system and connection to additional buildings will be overseen by the Dutchess County Department of Health. Upgrades will be done in accordance with the county's review and approval.

The 18 Room hotel is on a separate system that relies on a series of seepage pits. This system will have to be evaluated to confirm compliance with Dutchess County Department of Health requirements.

Projected demand for wastewater treatment capacity is limited to the religious and camp uses proposed for the WOA Center Site, estimated to be 17,815 gallons per day. No water-intensive uses are proposed. Thus, there should be no impacts to water supply systems from the use of the existing septic systems, and WOA is not aware of any adverse impacts from the existing septic system.

## **5. Impact on Flooding**

Although portions of the WOA Center Site are located within the Town's Floodplain Overlay District, the proposed action will not have any significant adverse impacts on these flood plains. No significant disturbance is proposed within this overlay district. As discussed in detail above, the total impervious area is decreasing. Eastern pPortions of the WOA Center Site are located in a FEMA Special Flood Hazard Area, however, construction not will occur with this area. See Appendix 8.

Based on the foregoing, the Project will not create any significant adverse environmental impacts to any floodplains.

## **6. Impacts on Air**

No significant stationary generators of air pollution are proposed, nor will the proposed action result in any significant alteration or impairment to air quality due to proposed construction or subsequent land use operations. The redevelopment of the buildings and access and parking areas will not significantly increase motorized vehicle traffic volumes, reduce source-receptor distances, or change existing air quality conditions to such a degree to jeopardize attainment of the National Ambient Air Quality Standards for this region. The heating sources for the buildings will remain the same without any changes in air emissions.

Based on the foregoing, the Project will not create any significant adverse air impacts.

## **7. Impact on Plants and Animals**

Given that the WOA Center Site has been developed as a summer camp with approximately 50 buildings for well over 50 years, the buildings and limited areas to be redeveloped on the Project Site do not provide suitable habitat for any protected plants or animals. On the rest of the 568- acre parcel, no significant clearing or grubbing is proposed as part of the redevelopment, and thus no additional wildlife or plant habitat will be disturbed.

The NYSDEC Environmental Mapper identified the on-site wetlands as containing significant natural communities; however, no disturbance to these wetlands is proposed. The Environmental Resource Mapper also identifies a large area in this section of the Town (including the WOA Center Site) as containing habitat suitable for Rare Plants and Rare Animals, which may include endangered or threatened species. See Appendix 6. However, as noted above, the existing buildings to be renovated and the limited areas to be redeveloped on the WOA Center Site do not contain any significant habitat. It should be noted that the US Fish and Wildlife Service ("USFWS") IPaC Resources list for the Project Site indicates that no critical habitats for endangered species are known to exist on or near the Project Site.

In response to an inquiry to the NYSDEC Natural Heritage Database, WOA has received a letter dated March 3, 3027 included in this binder as Appendix 11. The NYSDEC letter identified potential habitat for several endangered and/or threatened protected species: bog turtles (*Glyptemys muhlenbergii*), timber rattlesnakes (*Crotalus horridus*). NYSDEC also identified the Great Swamp CEA and other natural communities. In addition, although not identified in the

NYSDEC letter for the WOA Center Site, the WOA Center Site may contain habitat suitable for Indiana Bats (*myotis sodalis*). No impacts are anticipated to these species or habitats.

A Threatened and Endangered Species Habitat Suitability Assessment Report dated April 18, 2017 was prepared by Ecological Solutions, LLC (the "Habitat Report") and is included in with this revised application. The report confirmed the NYSDEC data from the National Heritage Program that timber rattlesnake habitat exists on the Project Site. The Habitat Report concluded that if practical, WOA will construct the new residential building and pave the internal roads during the acceptable work period of November 1<sup>st</sup> through March 31<sup>st</sup>. The Habitat Report also recommended a temporary construction barrier, distribution of a timber rattlesnake handout and contacting a timber rattlesnake biologist if a snake is encountered. The Habitat Report also concluded that DEC wetland DP-22 contains suitable bog turtle habitat. However, it observed that no wetland impacts are proposed. At the time the Habitat Report was issued, it was thought that the proposed new building and certain other site upgrades were located within 300 feet of the wetland boundary for DP-22, but were still well within the interior of the existing development footprint. Based upon an updated survey, we now believe that all proposed site upgrades, including the new residential buildings, are located in excess of 300 feet of the wetland boundary for DP-22.

Based on the foregoing, the Project will not create any significant adverse impacts to any plant or wildlife species.

## **8. Impact on Agricultural Resources**

The Project will not cause significant adverse impacts on agricultural resources, including consideration of prime or otherwise important farmland soils. In particular, based on a review of the Dutchess County Agricultural Districts Map, dated 2012 (included with the Application) the Project is not located within an agricultural district.

Further, the existing building and infrastructure on the developed portions of the WOA Center Site and the significant wooded areas on the rest of the WOA Center Site limit its potential for a viable farming operation. No agricultural operations are located within 500 feet of the Project boundary, but to be conservative, WOA has completed an agricultural data statement, which is included with the Special Permit Application.

Based on the foregoing, no significant adverse environmental impacts to agricultural resources are anticipated from the Project.

## **9. Impact on Aesthetic Resources**

As shown in detail on the enclosed Master Development Plan, the WOA Center Site is located in the interior portion of several large parcels totaling approximately 568 acres. Most of the existing buildings are set back from Dover Furnace Road and screened from adjacent properties, which are themselves set on large lots. The primary off-site visual impact will be the driveway entrance and sign on Dover Furnace Road (which already exists). However, this location has long been the entrance for this site, and the sign will comply with all Town requirements. If

necessary, WOA proposes landscaping at this entrance to soften any impacts and provide an attractive and pleasing entrance to the WOA Center.

Otherwise, WOA will maintain the substantial vegetative buffer surrounding the existing buildings to soften any distant views of the Project from the road. Notably, the Project is located in a RC and RU zoning district, where religious uses are permitted subject to a special permit and consistent with the character of the surrounding area. In addition, the existing buildings have been part of a summer camp development for decades, and therefore their reuse will simply renovate and revitalize a long-standing use in the community.

Any new exterior site lighting will be dark-sky-friendly (down-directed) with cutoffs to minimize both glare and spillage. Therefore, adverse impacts from site lighting of the buildings and parking areas are not expected.

The Project Site is not located in any sensitive visual corridor, scenic vista or important viewshed.

Based on the foregoing, the proposed Project will not have any significant adverse visual impacts.

#### **10. Impact on Historic and Archeological Resources**

Included in this application is a Phase IA Literature Search and Sensitivity Assessment and Phase IB Archaeological Field Reconnaissance Survey conducted by Hudson Valley Cultural Resources Consultants, Ltd. dated as of May 2017 (the “Archeology Study”). The Archeology Study noted the presence of three National Register eligible properties within one-half mile of the Project Site, and concluded that these sites would not be directly impacted by the Project.

The Archeology Study included 130 shovel tests within the Project Site in areas to be disturbed and areas considered to have the potential to yield evidence of prehistoric or historic activity on the Project Site. None of the tests yielded pre-contact or historic cultural material. The Archeology Study concluded that no further archaeological investigation of the Project Site is warranted. The remains of a 19<sup>th</sup> Century historic iron-ore blast furnace exist on the Project Site but will not be affected by the Project.

Based on the foregoing, the Project will not create any adverse impacts to cultural resources.

#### **11. Impact on Open Space and Recreation**

The Project will not significantly reduce the amount of open space on the WOA Center Site. In addition, the Project consists of renovating existing buildings on the WOA Center Site including private recreational facilities for the use of residents and attendees at the WOA Center including a new playground, renovated tennis and basketball courts, and a restored beach on Sharparoon Pond. However, most of the improvements will use existing recreational facilities from the former summer camp facility that have fallen into disuse. As a result, the proposed Project will

not cause a substantial change in the quantity or quality of open space or the use, or the intensity of use, of land either within the Town generally or in the immediate vicinity of the Project Site. The Project Site is privately owned and is not used for public recreational purposes. As discussed above, the proposed redevelopment decreases the amount of impervious surfaces.

Based on the foregoing, the Project will not have any adverse impact on open space and recreational resources.

## **12. Impact on Critical Environmental Areas**

Renovation of the existing buildings and the proposed limited disturbance on the WOA Center Site will not have any impacts on any critical environmental areas (CEAs) designated by NYSDEC. Although the “Great Swamp CEA” is located on the eastern portion of the WOA Center Site in an area roughly contiguous with the NYSDEC wetland DP-22, no construction or disturbance is proposed within this CEA. See Appendix 11.

## **13. Impact on Transportation**

The WOA Center will be utilized by about 70 staff and 120 attendees at any one time, operating from 8 a.m. to 5 p.m. Monday through Friday, with a lighter schedule on weekends. Staff will live both on-site and off-site in the surrounding communities. Most attendees will live on-site for 3 to 6 month periods or commute to the Project Site. On-site day care for 50 to 70 children of staff and attendees will be provided at the daycare center at Birch Lodge in Chapel Green. The daycare center will be accessory to the religious and camp use and utilized solely by staff and attendees. The seasonal summer day camp attendees will stay either on-site or in the community and will be shuttled over daily as a group from the MetroNorth Train Station or a central meeting place. This day camp is anticipated to operate from 8 a.m. to 7 p.m.

New York State Department of Environmental Conservation State Environmental Quality Review Act (“SEQRA”) guidance considers a project generating fewer than 100 peak hour vehicle trips per day to not be a significant increase in traffic. . The WOA Center will generate traffic significantly below that amount with maximum onsite population of about 360, including children in day care or attending summer camp, and the majority of people living on-site or arriving via carpool or shuttle from the MetroNorth Railroad Station. As such, it is not expected that the Project will have negative impact on levels of services and surrounding road network.

Annually at the end of each October, the WOA Center will host a General Assembly meeting over the course of three days, which may be attended by as many as five hundred people. WOA has submitted an Event Plan as part of its application to the Planning Board. Most of the attendees for the event will arrive by shuttle van or by the nearby train. Attendees arriving by train will be driven to the WOA Center Site in shuttle vans. Traffic impacts from the General Assembly will be minimal given the operation of WOA shuttle vans and the encouragement of carpooling for those not staying overnight at the WOA Center. The Event Plan addresses how WOA will handle the approximately 175 vehicles traveling to and from the WOA Center during such three-day period. The additional daily trips associated with this annual event are temporary

and will not serve to create significant traffic congestion, impair pedestrian safety or overload existing roads.

The Town of Dover Zoning Code provides flexibility on the number and layout of parking spaces for nonresidential uses. The Code states that parking will be

“based on the need to protect public safety and convenience while minimizing harm to the character of the community and to environmental, historic, and scenic resources. Since nonresidential uses vary widely in their need for off-street parking, parking requirements shall be based on the specific operational characteristics of the proposed uses”.

A summary of Hayden Center parking requirements and proposed parking follows:

<b>Building</b>	<b>Required</b>	<b>Provided</b>
14	36	75
15	2	20
16	2	4
17	2	4
18	42	100
19	2	5
24	0	2
28	2	2

All proposed parking for Hayden Center meets or exceeds parking standards contained in Section 145-38 of the Zoning Code. In the aggregate, eighty-eight spaces are required at Hayden Center and two hundred twelve are provided, an excess of one hundred twenty-four spaces.

A summary of Chapel Green parking requirements and proposed parking follows:

<b>Building</b>	<b>Required</b>	<b>Provided</b>
1	34	75
2	18	8
3	16	8
4	16	8
5	3	10
6	0	2
7	2	4
8	2	4
9	2	4
10	0	0
11	0	0
32	2	4
33	28	10
New Construction	8	4

Chapel Green buildings 2, 3, 4, 33 and the new residence are proposed to have less spaces than provided for in the Zoning Code. However, on an aggregate basis, 131 spaces are required for the Chapel Green Buildings that are part of the Project and 141 spaces are available on Chapel Green. Given the proposed improvements to existing pedestrian pathways, including the installation of an ADA compliant illuminated sidewalk connecting the 75 spot Chapel parking lot to buildings on Chapel Green, WOA believes the provided parking is adequate. Moreover,



adding additional parking will unnecessarily result in an increase of impervious surface at the Project Site. It also bears note that Hayden Center has an excess of 124 parking spaces beyond that which is required, which could be utilized in the unlikely event that all of the Chapel Green lots are temporarily fully occupied.

#### **14. Impact on Energy**

The Property is presently served by existing public utilities including electric, cable and telephone services via overhead transmission lines.

The Project will require the use of some additional electricity—specifically for heating, cooling, lighting and other purposes. The increase in electricity will come primarily from the conversion of the Project Site from seasonal to year-round use. Nonetheless, although the duration of service will increase, the types of service required are essentially the same as for the long-standing use of the camp. Thus, there will be no major change in either the quantity or type of energy used by the Project Site, and no additional service lines or sub-stations will be required to serve the Project Site. No significant adverse environmental impacts associated with electricity usage are anticipated.

#### **15. Impact on Noise, Odor and Light**

Noise and odor impacts during construction will be temporary and of short duration. Because the Project entails the renovation of existing camp buildings and facilities with limited paving and the construction of one small residential building, no significant noise levels during construction are expected from the Project. After construction, the WOA Center will be used for religious and camp purposes including training, education, worship and similar related uses. The absence of the former shooting range will reduce noise impacts formerly associated with gunfire from the Project Site. Thus, no significant noise impacts are expected from the Project.

New, dark-sky-friendly and energy-efficient lighting will be used adjacent to portions of Ore Bed Road, certain parking areas and pedestrian pathways and existing buildings. Exterior site lighting has been designed to be minimal while ensuring a safe and secure facility. All proposed lighting will be downward facing and will minimize light glare and spillage from the Project Site. Where appropriate, lighting fixtures will be of a full cutoff type or provided with shields to reduce glare and light pollution. The fixture locations will be sited to minimize light trespass onto adjacent properties. These measures have been incorporated to minimize otherwise potential adverse impacts from site lighting of the buildings and parking areas. Moreover, the significant vegetative buffer around the buildings will minimize, if not eliminate, any potential off-site lighting impacts from the Project.

Solid waste generated by the Project will be temporarily stored in appropriate dumpsters or compactors out of sight. On a regular basis, a private carter will collect the solid waste for removal and disposal (including recycling) at an approved facility. No adverse odor impacts will be generated by the uses on the Project Site. Based on the foregoing, the proposed Project will not cause a substantial adverse change in the existing noise levels, produce significant odor or light impacts or cause a substantial increase in solid waste production.

**16. Impact on Human Health**

No impacts to human health are anticipated by the renovations of the existing buildings because the construction and site development activities will be undertaken in accordance with and in compliance with all pertinent environmental and land development regulations and related permit and approval procedures and requirements. Due to the age of some of the buildings, asbestos and lead paint concerns may arise during renovation. However, appropriate evaluation and abatement, if necessary, will be undertaken as required by New York State Department of Labor regulations before renovation work begins.

**17. Consistency with Community Plans**

The Project is located in RC and RU zoning districts. Under the zoning code, camp, religious, charitable and educational uses are allowed in these zoning districts with a special permit already issued by the Planning Board. The Project is consistent with other similar uses nearby the Site. All buildings except for the proposed new residential building already exist in the community and their renovation and reuse in general is consistent with the surrounding community character and the criteria and performance standards set forth in Chapter 145 of the Town of Dover Town Code, as described in more detail in the Special Permit Narrative submitted along with this application. As a result, the Project will not have any adverse impacts to the Town's community's plans.

**18. Consistency with Community Character**

Other than the proposed new residential structure, no new construction beyond paving upgrades and construction or renovation of accessory recreational uses to support the main religious use are proposed to the Project Site. The vast majority of the WOA Center Site will remain undeveloped at this time, retaining substantial buffer areas from surrounding properties as is typical in the surrounding area. The redevelopment of the Project Site into a functioning religious use along with accessory residential, conference center, and non-commercial recreational uses is consistent with the long-standing character of this Project Site and the existing neighborhood character.

The Town of Dover Zoning Ordinance states:

*Wall-mounted signs. Wall-mounted signs shall not exceed 32 square feet, extend more than one foot from the surface of the wall, cover more than 10% of the front surface of a building, cover a window, obscure architectural detailing, interrupt a roofline, or be placed on the roof of a structure.*

*Individual freestanding signs for a sole business on a single lot shall not exceed 32 square feet in area nor 10 feet in height. The height of the sign shall be measured from the ground elevation to the top of the sign.*

All proposed signage associated with the Project will be in compliance with the Town's signage law.

Based on the foregoing, the Project will not have any significant adverse impacts on the community character.

## **19. Related Actions and Permissive Segmentation**

The WOA Center is one of two land use applications from WOA coming before the Planning Board this spring. The other is a site plan application related to WOA's KBERS Center located at 3483 Pleasant Ridge Road, which is contiguous to the parcels involved in the WOA Center. The KBERS Center will repurpose two existing commercial buildings for office, warehouse and craft workshop uses. Despite the common ownership and contiguity of the properties, however, the KBERS Center and WOA Center are functionally independent and unrelated projects, and therefore separate environmental review under SEQRA is appropriate. However, the Planning Board as lead agency should consider whether segmentation under SEQRA will occur because of separate review, and if so, whether such segmentation is appropriate and permissive as allowed by the SEQRA regulations.

Segmentation is defined in Part 617.2 (ag) of the SEQRA regulations as "division of the environmental review of an action such that various activities or stages are addressed under [SEQRA] as though they were independent, unrelated activities, needing individual determinations of significance." NYSDEC provides guidance in its SEQR Handbook including factors a lead agency (here, the Planning Board) should consider to determine if segmentation is occurring: purpose, time, location, impacts, ownership, common plan, independent utility, and inducement. No factor is determinative. If the Planning Board were to find segmentation is occurring, then it would need to make specific written findings that segmented SEQRA review is appropriate and permissible and that separate review will be no less protective of the environment.

The factors are discussed as follows. With respect to common location, time, ownership and a common plan, the KBERS Center is related to the WOA Center and being developed at approximately the same time on a nearby parcel. KBERS Center staff and interns may use the WOA Center residential facilities during their stay. However, the KBERS Center is geographically separate from the WOA Center, and is designed as a for-profit, commercial office and craft workshop project, while the WOA Center will include a number of religious and not-for-profit components related to religious gatherings, worship, training and administration. Therefore, the two projects have independent utility. Moreover, approval of the KBERS Center or WOA Center will not induce or commit the Town Planning Board to approve the other. Given the separate locations, different purposes, lack of inducement and independent utility of the projects, separate review may not constitute segmentation. However, because of the relationship between the WOA Center residential facilities and the KBERS Center and the common timeframe for application, segmentation may be occurring. Accordingly, WOA believes the Planning Board should assess whether segmentation is appropriate and whether separate environmental reviews are no less protective of the environment.

Segmentation is warranted here because of the functional independence of the two projects and different purposes. The KBERS Center Site is separated from the WOA Center Site and will not

generate any cumulative impacts to wetlands, traffic, or community character with the WOA Center. Instead, the impacts from the WOA Center as separate religious use can be fully assessed independently from any potential impacts from the KBERS Center distinctly commercial uses. Segmented review will be no less protective of the environment because the KBERS Center project is arguably a Type II action under SEQRA, and its facilities are not being expanded with only limited improvements to existing commercial buildings and driveways. Any impacts related to use of the WOA Center residential facilities by KBERS Center staff or interns can be fully assessed in the Planning Board SEQRA review of the WOA Center project. No impacts will be missed. Therefore, segmentation is permissible as allowed by SEQRA.