New York State Environmental Quality Review Act (SEQRA)
FINAL SCOPING DOCUMENT

FOR

CECNY Land Holdings, LLC

DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

2450 Route 9G and 76-100 Millhouse Lane
TOWNS OF Clinton and Hyde Park,
DUTCHESS COUNTY, NEW YORK

SEQRA Classification: Type I Action

SBL No. 13200-6268-03-461408 and 132400-6268-00-591367

Lead Agency and Contact Person:

Town of Clinton Planning Board
1215 Centre Road
Rhinebeck, NY 12572
Attn: Paul Thomas, Planning Board Chairman
845-266-5853

Project Sponsor (Applicant) and Property Owner:
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Scoping Document – Date of Adoption:
July XX, 2026

Contents

I. GENERAL INFORMATION

A. DEIS General Guidelines

1. The Draft Environmental Impact Statement ("DEIS") shall address all items and conform to the format outlined in this Scoping Document including the potentially significant adverse impacts of the project identified by the Town of Clinton Planning Board ("Planning Board") in the Positive Declaration, adopted on **May 28, 2026**. The DEIS may also contain studies completed by the applicant, in addition to those detailed herein. Unless otherwise directed by this Scoping Document, the specifications for environmental impact statements found in 6 NYCRR 617.9(b) apply to the content of the DEIS and are incorporated herein by reference.
2. The document should be written in the third person. The terms "we," "us," and "our" should not be used. The Applicant's conclusions and opinions should be identified as those of the "Project Sponsor," "Applicant" or "the Developer."
3. Narrative discussions should be accompanied by appropriate charts, graphs, maps and diagrams whenever possible. If a particular subject matter can most effectively be described in graphic format, the narrative discussion should merely summarize and highlight the information presented graphically.
4. The entire document should be checked carefully to ensure consistency with respect to the information presented in the various sections.
5. Environmental impacts should be described in terms that the layperson can readily understand and will be written in plain language that can be easily read and understood by the public.
6. All discussions of mitigation measures should consider at least those measures mentioned in the Scoping Document. Where reasonable and necessary, mitigation measures should be incorporated into the Proposed Action if they are not already included.
7. The DEIS may incorporate in the text or as appendices all or portions of other documents including other EISs that contain information relevant to the Project Site.
8. Highly technical material will be summarized and, if it must be included in its entirety, referenced in the DEIS and included as an Appendix.
9. The DEIS will discuss, where appropriate, all related short-term and long-term impacts, cumulative impacts and associated environmental impacts.
10. Full-scale Site Plans are to be submitted with the DEIS as a separate appendix. All plans and maps showing the Site will include adjacent homes, other neighboring uses and structures, roads, and water bodies within 100 feet of the property boundaries, a legend and north arrow.
11. The entire document will be provided in both paper and electronic (PDF only) formats. In paper form for the Planning Board's completeness review and for later public and agency

review. In electronic form for posting on the Town's website, once it has been deemed "complete" by the Planning Board.

12. Where relevant to the discussion of off-site impacts (such as traffic and community services), potential cumulative impacts with other projects proposed in the Towns of Clinton, Rhinebeck and Hyde Park will be analyzed and discussed.

The DEIS is intended to convey general and technical information regarding the potential environmental impacts of the Proposed Project to the Town of Clinton Planning Board (as Lead Agency), as well as other agencies involved in the review of the Proposed Project. The DEIS is also intended to convey the same information to the interested public. The Preparer of the DEIS is encouraged to keep this audience in mind as it prepares the document. Enough detail should be provided in each subject area to ensure that most readers of the document will understand, and be able to make decisions based upon, the information provided.

As the DEIS will become, upon acceptance by the Lead Agency, a document that may, if appropriate, support objective findings on approvals requested under the application, the Preparer is requested to avoid subjective statements regarding potential impacts. The DEIS should contain objective statements and conclusions of facts based upon technical analyses. Subjective evaluations of impacts where evidence is inconclusive or subject to opinion should be prefaced by statements indicating that "It is the Applicant's opinion that...". The Town of Clinton Planning Board reserves the right, during review of the document, to require that subjective statements be removed from the document or otherwise modified to indicate that such subjective statements are not necessarily representative of the findings of the Lead Agency.

B. Description of the Proposed Action

CECNY Land Holdings, LLC (the "Applicant") seeks Special Use Permit approval and Site Plan approval for the expansion of an existing Conference Center on property located at 2450 Route 9G and 76-100 Millhouse Lane in the Towns of Clinton and Hyde Park, Dutchess County, New York (the "Property"). The Property currently operates as a Conference Center under an existing Special Use Permit. The proposed expansion would include sixty-five (65) lodging units and daytime programming with a maximum of 240 guests on site at any given time.

The Property consists of approximately 236.64 acres, with approximately 228.4 acres located in the Town of Clinton and approximately 8.2 acres located in the Town of Hyde Park. The Town of Clinton portion of the Property is within the AR3 (Low Density Agricultural) and AR5 (Very Low Density Agricultural) zoning districts, and the Town of Hyde Park portion is within the Greenbelt (GB) zoning district. A very small portion of the Ridge Protection overlay zoning district encompasses a peak on the property which is 500 feet and higher above mean sea level (msl). Access is and will be provided from NYS Route 9G through the Town of Hyde Park parcel. An existing bridge over Crum Elbow Creek will provide permanent access, and a second bridge will provide emergency access only.

The Project proposes to continue the existing Conference Center use and expand it to provide further wellness related programming. Proposed improvements include the reuse and rehabilitation of existing buildings, construction of new structures and support facilities, internal circulation improvements, parking, water and wastewater infrastructure, stormwater management facilities, landscaping, ecological enhancement areas, and related site improvements. The Project is proposed as a single-phase development, with construction anticipated to last approximately 18 months following all required approvals and permits.

C. SEQRA Determination of Significance – Positive Declaration

On **October 3, 2023**, the Clinton Planning Board declared its intent to serve as Lead Agency in accordance 617.6 of the regulations implementing SEQRA. A Notice of Intent to Establish Lead Agency was circulated to all involved and interested agencies on **October 3, 2023**. Upon expiration of the 30-calendar day coordination time period, and having received no objections from any involved agency, the Planning Board assumed Lead Agency status for SEQRA review of the proposed action.

During the period between the Planning Board's assumption of Lead Agency status and 2026, review of the proposed action continued. The review process included periods during which no new application materials were submitted by the Applicant. These gaps in submissions were attributable, in part, to the Applicant's efforts to respond to an Article 78 proceeding. Upon receipt of additional materials, the Planning Board continued its review of the proposed action.

The Planning Board publicly reviewed the Part 2 Environmental Assessment Form, additional submissions made by the Applicant, and deliberated on the magnitude of the potential environmental impacts.

In accordance with Section 617.7 of the regulations implementing SEQRA and the criteria for determining significance, the Planning Board, acting as Lead Agency, adopted a Positive Declaration on **May 28, 2026**, finding that the Proposed Action may result in one or more significant adverse environmental impacts and therefore requiring the preparation of a Draft Environmental Impact Statement (DEIS).

Potential environmental impacts associated with the Proposed Action were identified by the Clinton Planning Board, as Lead Agency. These impacts, which may be reasonably expected to result from the Project, have been compared to the criteria for determining significance identified in 6 NYCRR § 617.7(c)(1) and in accordance with 6 NYCRR § 617.7(c)(2) and (3). The Planning Board finds that the proposed project may have significant adverse impacts on the following resources – the list below is not intended to be all inclusive:

- Ecological habitat and wetland disturbances;
- Community character;
- Consistency with the Town's comprehensive plan; and
- Wastewater generation and methods of proposed treatment.

The following involved and interested agencies have been identified:

Involved Agencies

- Town Board of the Town of Clinton
- Town of Clinton Planning Board (Lead Agency)
- Town of Clinton ZBA
- Town of Clinton Conservation Advisory Council
- Town of Hyde Park Planning Board
- Town of Hyde Park Town Board
- Town of Hyde Park ZBA
- Town of Hyde Park Floodplain Administrator
- Dutchess County Department of Health
- Dutchess County Department of Planning and Development
- NYS Department of Environmental Conservation (DEC)
- NYS Department of Transportation
- NYS Department of Health
- US Army Corps of Engineers
- New York State Office of Parks, Recreation and Historic Preservation
- West Clinton Fire District

II. SCOPING PROCESS

Pursuant to Part 617.8, the Lead Agency has conducted scoping, the primary goals of which are to focus the DEIS on potentially significant adverse impacts, and to eliminate consideration of those impacts that are not significant or irrelevant. Public comments on the draft Scoping Document were received until June 26, 2026. The Draft Scoping Document was made available on the Town website at https://portal.laserfiche.com/Portal/Browse.aspx?id=38554&repo=r-b709d026.

This Scoping Document incorporates any relevant SEQR comments raised by the public or agencies which were not addressed previously. The Planning Board adopted this Final Scoping Document on July 7, 2026.

This Scoping Document has been prepared in accordance with Part 617.8(e) and sets forth the following:

- Brief Description of the Proposed Action.
- Potentially significant adverse impacts.
- Extent and quality of information needed to adequately address potentially significant adverse impacts as well as the methodologies required for obtaining this information.
- Initial identification of mitigation measures.
- Reasonable alternatives to be considered.

- Information that should be included in an appendix rather than the body of the DEIS.
- Issues raised during scoping and determined to be neither relevant nor environmentally significant or that have been adequately addressed in a prior environmental review.

Pursuant to the requirements of SEQRA, this Scoping Document includes an initial identification of mitigation measures. As the impact analyses have not yet been performed, it is not yet possible to identify other possibly needed mitigation measures. Discussions of mitigation measures will include an explanation of how those measures would be implemented, potential environmental impacts of such implementation, the time frame associated with such implementation, and the entity that would be responsible for implementing the mitigation. The discussion will indicate proposed improvements that have been incorporated into the Proposed Action.

III. CONTENTS OF DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

A. DEIS Cover Sheet

The DEIS Cover Sheet shall include the following:

1. Identification as a Draft Environmental Impact Statement.
2. Title/Name of the Project.
3. Location (County and Town) of the Project. Section Block and Lot Number of Parcels.
4. Name and address of the Lead Agency. Name, email, and telephone number of the Lead Agency contact person.
5. Name of Property Owners by SBL.
6. Name and address of Applicant; name, address and telephone number of the contact person for the Applicant.
7. Name, address, phone number, and email address of the primary preparer(s) of the DEIS. Name, address, phone number, and email address of all consultants and other professionals who contributed to the DEIS preparation along with their project responsibilities.
8. Date of submittal of the Preliminary DEIS for the completeness review by the Planning Board and all DEIS revision dates as applicable.
9. Date of acceptance of the DEIS as complete (to be inserted at later date).
10. Date of Public Hearing and subsequent adjournments (to be inserted at later date).
11. The deadline date by which comments are due (to be inserted at later date).

B. Table of Contents

The DEIS shall include a Table of Contents with listings of major sections and subsections, tables, figures, maps, charts, appendices & any items that may be submitted under a separate cover (and identified as such).

C. Executive Summary

Chapter 1, Executive Summary, shall consist of a brief but precise summary of the DEIS that adequately and accurately summarizes the Planning Board's process of establishing the Lead Agency, a description of the Proposed Action, an identification of significant adverse impacts including unavoidable adverse impacts, the proposed mitigation measures to avoid or reduce identified impacts, and the alternatives analyzed in the DEIS. It will also include a list of all required reviews and approvals from Town, County, State and Federal agencies. The expected build year shall be included in the Executive Summary.

D. Description of the Proposed Action

Chapter 2, Project Description, will include a description of the nature of the Proposed Action. The site plan will be included as an appendix to the DEIS.

1. Project Purpose, Needs and Benefits

a. Introduction. The introduction will provide a brief description of the purpose of the DEIS and a brief statement of the steps in the SEQRA process as it relates to the project.
b. Public need for the project.
c. Objectives of the project sponsor.
d. Benefits of the project.

2. Site Location and Description

a. Define geographic boundaries and conditions of the Project Site, tax map designation and abutting roads.
b. Describe site acreage, easements affecting the Site, and existing access. Provide a description of the parcel deed and any restrictions placed on the properties in the deed. Describe historic use of properties.
c. Describe existing land uses within 1-mile of the Project Site.
d. Describe existing zoning districts and the proposed use as listed in the Town of Clinton and Town of Hyde Park zoning chapters, and any need for variances or waivers. Include a table that illustrates the project's compliance or noncompliance with the Zoning chapters. This includes a description of the small portion of the parcel within the Ridgeline Protection Area overlay zone.
e. Describe site character including a description of each building, its age and its existing use.

3. Site Design and Layout

a. Site area.

(1) Total limits and area of site disturbance. Provide or refer to map.
(2) Proposed impervious surface area (roofs, driveways, roads, etc.) including areas of "banked" parking that may be paved in the future.
(3) Describe natural areas of the Site to remain undisturbed along with proposed protection mechanisms for remaining undisturbed in the future. If the proposed site development is the maximum buildout under the Zoning Law, provide a statement to that effect.
(4) If easements or deed restrictions are proposed, describe explicitly the activities that will be allowed within those easement or deed restricted areas. This includes any easements or deed restrictions that may be placed at Brown's Pond.
(4) Describe overall site layout.

b. Buildings and structures.

(1) Description of proposed principal and accessory buildings and structures, including fences, lighting, pool or similar amenities, maintenance/storage areas and sheds, and retaining walls. Provide a figure illustrating and labeling all proposed buildings.
(2) List all buildings proposed to be demolished or altered.
(3) Building dimensions, number of stories and building height, sizes in square feet (footprint and total gross floor area), scale, and massing in relation to the zoning district requirements and surrounding land uses.
(4) Provide table of guest units, building to be located within, and the number of bedrooms/guests allowed in each guest unit.
(5) Provide proposed building elevations, floor plans showing guest units, shared spaces, and renderings.

c. Site access, vehicular and pedestrian circulation, and parking.

(1) Location and widths of roads, driveways, sidewalks, paths, and parking space number, layout and parking stall sizes.
(2) Description of access to nearby sidewalks/pedestrian paths. Describe and map any proposed hiking trails and onsite destination locations, e.g, highpoint, pond, etc.
(3) Proposed public rights of way improvements, including those made to NYS Route 9G.
(4) Snow storage areas and general maintenance of all internal roads and drives.
(5) Describe proposed bridge designs.

d. Utilities.

(1) Sewer. Describe (and show location of) wastewater treatment plant, outfall location. Provide table with calculations of anticipated wastewater demand by use/building on the site. Provide water quality standards for discharge. Provide back up measures to treat wastewater in the event of a power failure.

(2) Water. Describe (and show locations of) supply wells, treatment facility, distribution lines and back-up measures to supply water in the event of a power failure (i.e. generators, fuel tanks). Provide calculation for water demand by use.
(3) Stormwater facilities & drainage. Describe method of stormwater collection, conveyance and treatment.
(4) Waste handling and storage.
(5) Describe all other utilities, including but not limited to heating and cooling systems, and gas and electric service, as applicable.
(6) Fire protection systems for fire apparatus and need for sprinklers.

For each utility, describe proposed ownership and maintenance responsibilities.

e. Operations.
(1) Hours of operation for facilities and activities. Anticipated peak occupancy days for the facility.
(2) Staffing description. Number of employees per shift, type of employees, and maximum employment.
(3) Any onsite accommodations for staff.
(4) Parking for staff and visitors. Calculate number of parking spaces by activity. Location of parking, including for events.
(5) Total number of guests.
(6) Activities to occur at the facility. Events to occur outdoors versus indoors and frequency.
(7) Amplified events to occur outdoors.
(8) Number of events on a weekly, monthly and yearly basis.
(9) Any facilities or programs available to Town residents or the public.
(10) Describe a management plan for the facility.

f. Landscaping. Describe proposed landscaping plan, including use of native species.

g. Lighting. Describe proposed lighting plan, including use of dark sky compliant fixtures.

h. Signage. Provide a signage plan, including how various signs will be designed to present a cohesive development.

4. Construction

a. Expected year of project completion.
b. Hours for construction, including weekdays, weekends and holidays.
c. Construction periods and phasing - include a chart for the maximum anticipated duration, the start and completion of key milestone tasks such as site clearing, grading, blasting (if required), and fill placement, infrastructure, foundations, and site amenities.

d. Safety plans, if any construction activities will be on-going after any part of the project is in use.
e. Environmental protective measures such as stormwater pollution prevention plan (SWPPP), topsoil stockpiling, noise reduction, a blasting plan if needed, a description of other rock removal work, and soil erosion and sediment control measures, including limitations to soils being tracked onto Route 9G.
f. Construction access and staging, including routing of heavy machinery and trucks on Town roads. Quantify construction traffic, including truck from fill and other material export/import activities.
g. Areas for material handling and storage.
h. Describe any need for on-site rock crushing.

5. Summary and Comparison of Alternatives

Provide summary matrix of the impacts associated with each alternative compared to the proposed action. Alternatives shall include:

- No Build Alternative - the property without the action constructed.
- Alternative Wastewater Treatment Process/Design – Community Septic System, Enhanced / Advanced Treatment Units with Subsurface Disposal

6. Summary of Permits and Approvals

Agency	Approval
New York State Department of Environmental Conservation	SPDES – Stormwater
	SPDES - Wastewater
	CWA Section 401 Water Quality Certification
	NYSDEC Article 24 Permit- Freshwater Wetlands Disturbance Permit
	NYSDEC Article 17 SPDES Stormwater Permit for Erosion and Sediment Control
	NYSDEC Article 15 Permit – Protection of Waters Permit
	NYSDEC Article 15 Permit – Protection of Water Withdrawal Permit
	NYSDEC Article 11 Permit - Incidental Take Permit
New York State Department of Transportation	Highway Work Permit and Access Approvals
New York State Department of Health	Public Water Supply Approval
Dutchess County Health Department	Wastewater and Water Supply
Dutchess County Planning	GML Review
Town of Clinton Planning Board	Site Plan
	Special Use Permit
Town of Clinton Town Board	Private Commercial Road/Town Road

Agency	Approval
Town of Hyde Park Planning Board	Use and Access of Hyde Park Parcel
New York State Office of Parks, Recreation and Historic Preservation	Review via NYSDEC MOU

E. Environmental Setting, Potential Impacts and Proposed Mitigation Measures

This Section of the DEIS shall describe the existing environmental conditions on the Project Site and off-site areas where there may be adverse impacts caused by the Proposed Action. The extent of off-site areas studied for the existing conditions shall be defined for each topic. Sufficient detail will be provided so that readers are able to gain an understanding of existing conditions and the context of which potential impacts will be assessed.

For each of the following topics, existing site conditions are to be defined, proposed site conditions shall be described along with potential impacts resulting from the Proposed Action, and proposed mitigation measures designed to avoid, minimize or offset potential impacts are to be proposed. The methodology and standards used to quantify projected impacts are to be described.

All mitigation measures are proposed mitigation measures, and the need for any specific mitigation shall be assessed and determined based on an evaluation of the topics during the substantive review of the DEIS and FEIS. Further, there may be mitigations not set forth below that will be introduced as a result of the substantive analyses and review of the DEIS and FEIS.

1. Geology, Soils and Topography

Existing Conditions

a. Provide topographic mapping at 2-foot contour intervals and general description of the site topography - elevations.
b. Identify the existing bedrock and depth to same, including any exposed bedrock within the limits of disturbance.
c. Identify and list soil types on the Project Site, based on site-specific mapping with a discussion of soil characteristics and suitability for construction. Include a soils map and identify location of areas of sensitive soils (soils with shallow depth to bedrock, shallow water table, etc).
d. Identify the slopes ranges found on the Site (0-10%, 10-15%, 15-25%, 25-50%, 50%+).
e. Identify the location of the Ridge Protection Area overlay location.
f. Attach prior studies that have been conducted.

Potential Impacts

a. Quantify the total area of disturbance and provide the limits of disturbance on a map.
b. Quantify the disturbance by slope range.
c. Quantify the cut and fill on the site, and whether grading will result in net import or export of materials.
d. If fill is required, describe amount and potential sources.

e. Describe grading plan. Provide map.
f. Describe any proposed retaining walls, design and height.
g. Describe rock removal and any proposed blasting activities.
h. Identify whether soil processing or rock crushing will occur.
i. Describe construction related impacts such as fugitive dust and earth moving activities and their duration.

Proposed Mitigation Measures

a. Mitigation will be proposed for identified environmental impacts as necessary.
b. Discuss soil erosion and sediment control measures designed in accordance with the NYS Department of Environmental Conservation's "New York Standards and Specifications for Erosion and Sedimentation Control" (current version) and the Town of Clinton Enhanced General Enhanced Erosion and Sediment Control Plan for Large Projects.
c. Provide a blasting plan, if required, which will include pre- and post-blasting monitoring plan.
d. If a waiver from the NYSDEC maximum disturbance limit of 5 acres is proposed, additional mitigations will be described.
e. Describe status of any communications with applicable permitting agency.

2. Surface Water Resources

Existing Conditions

a. Locate, map, describe and quantify on-site and adjacent surface waterbodies (Crum Elbow Creek), including NYSDEC and ACOE designated wetlands and regulated areas, 100-year floodplain, based on secondary resource data and field surveys. For each wetland, provide:
    a. Wetlands type, e.g., vernal, forested, etc.
    b. Wetlands acreage.
    c. Applicable regulatory jurisdictions.
    d. Wetlands functions. Functional analysis shall be based upon one of the accepted methodologies, such as the U.S. Army Corps of Engineers HGM (hydrogeomorphic model) or EPW (Evaluation of Planned Wetlands) model.
b. Classification of waterbodies according to NYSDEC and/or ACOE.
c. Description and mapping of existing drainage areas.
d. Discuss the most current Waterbody Inventory/Priority Waterbodies List (WI/PWL) for water quality assessment information for the waters of the Lower Hudson River Basin, as posted on the State DEC website[1].
e. Quantify pre-development stormwater flow peak rates for the 1-, 10- , 100- and 500-year storm events. consistent with New York Statement Department of Conservation (NYSDEC) and Town regulations. Utilize NOAA rainfall data for 500-year storm event, should it not be available from NYSDEC.

[1] http://www.dec.ny.gov/chemical/36740.html

Potential Impacts

a. Discuss potential impacts associated with any wetland or wetland buffer disturbance. Include a discussion of impact to streams and other surface water bodies impaired by construction-related activities.
b. Discuss any encroachments into surface water resources including whether encroachments are temporary or permanent.
c. Discuss potential impacts from stormwater runoff including any modification of current drainage patterns, comparison of pre- versus post-development peak discharges, net increase in stormwater runoff rate due to increased impervious cover, potential degradation in stormwater quality.
d. Discuss potential for diminished water quality of surface waters by short- term construction activities or long-term operations, including potential for PFAS pollutants.
e. Describe use of any increased concentrations of fertilizer, pesticides, herbicides, fungicides and other chemicals proposed for use on the Project Site in the existing waterbodies, watercourses and wetlands.
f. Discuss deicing agents and locations for snow removal.
g. Quantify post-development stormwater flow peak rates for the 1-, 10- and 100- year storm events, consistent with New York Statement Department of Conservation (NYSDEC) and Town regulations.
h. The SWPPP will also demonstrate compliance with the Clinton Town Code and MS4 requirements.
i. Discuss any disturbances to the 100-year floodplain, and compliance with Clinton and Hyde Park regulations regarding flood damage prevention.
j. Discuss regulatory jurisdictions and communications with applicable regulatory agencies.

Proposed Mitigation Measures

a. Discuss potential methods for mitigation of potential adverse impacts that could result from the proposed development, including that which may be required by the NYSDEC and/or USACOE.
b. Describe proposed Stormwater Pollution Prevention Plan (SWPPP) and the Town of Clinton Enhanced General Erosion and Sediment Control Plan for Large Projects.
c. Describe long-term maintenance of stormwater facilities and any agreements that will be created to ensure maintenance.
d. Mitigation will be proposed for identified adverse environmental impacts as necessary.

3. Groundwater Resources/Water Supply

Existing Conditions

a. Provide the location and description of any existing on-site and off-site wells within 500 feet of the site.
b. If on-site wells exist, describe their construction (bedrock, gravel, depth, etc.) and current usage.
c. Identify whether the Project Site is located over any identified or designated aquifer.

Potential Impacts

a. Describe proposed well location(s).
b. Calculate the existing water usage of the uses on the site.
c. Discuss the source of contaminants (i.e. pesticides, herbicides, deicing agents, subsurface sewage disposal systems) from the site and adjacent properties and their potential impacts to the proposed well and identified resources.
d. Describe all water supply investigations that have been conducted in accordance with Appendix 5-D of the New York State Department of Health (NYSDOH), Dutchess County Department of Health (OCDOH), and the New York State Department of Environmental Conservation (NYSDEC) Regulations for community supply wells.
e. Conduct and provide results of water quality testing done in accordance with NYSDOH Regulations.
f. Describe any water wells that will be closed. Provide the methods for closure that meet NYSDOH standards.

Proposed Mitigation Measures

a. Mitigation will be proposed for identifying any adverse environmental impacts as necessary. Unavoidable adverse impacts will be identified.

4. Plants and Animals

Existing Conditions

a. Vegetative/ecological communities within the limits of the site will be identified and described as per Ecological Communities of New York State, second edition (Edinger et al. 2002). Applicant is to also refer to the Town's Natural Resource Inventory which includes habitat mapping conducted by Hudsonia. Provide habitat map of the site.
b. Summarize records made available from the New York State Natural Heritage Program, New York State Department of Environmental Conservation, and the US Fish & Wildlife Service to determine any recorded presence of threatened, endangered, or unique and rare plant and animal species on the site or within the project vicinity. Provide a table of species likely to be present on the site. Include species identified in the NRI.
c. Supplement existing data by additional on-site investigations, Investigations will be performed by a qualified biologist to identify all species encountered, including birds, mammals, reptiles and amphibians. The Applicant's ecologist will be accompanied by an ecologist retained by the Town for this purpose. Conduct a minimum of three (3) full days of field inventory by a qualified biologist to identify and document any plant and wildlife species present or potentially present within the project area. Survey locations shall be determined in consultation with the Town's ecologist and shall focus on areas most likely to experience direct or indirect impacts from the proposed action. The inventory shall include documentation of survey methods, dates, weather conditions, habitat types, species observed, and an assessment of the potential for occurrence of species not directly observed during the survey period.

d. For the Blandings turtle, the NYSDEC methodology for impact assessment shall be utilized.

Potential Impacts

a. Describe the proposed limits of site disturbance and impacts to each habitat type.
b. Describe habitat/vegetation to remain after construction and how it will be protected from disturbance.
c. Describe the potential impacts to plant and animal communities and their habitats on or in the vicinity of the Site, due to construction or operation of the Proposed Action, using the above studies of existing conditions as a baseline from which to assess impacts. This includes impacts from habitat conversion, grading, vegetative clearing, tree removal, noise, lighting, and vehicular and human encounters.
d. Describe trees to be removed, and consistency with the Town of Clinton Site Plan regulations.
e. Describe impacts of use of fertilizer, pesticides, herbicides, fungicides and other chemicals on the Project Site.

Proposed Mitigation Measures

a. Mitigation will be proposed for identified adverse environmental impacts as necessary. Mitigations shall include those that are required by the NYSDEC as part of the Incidental Take Permit.
b. Preservation of trees, to the maximum extent possible.
c. Preservation of existing conditions (e.g., forested areas, wetlands), to the maximum extent possible.
d. Utilization of existing cleared areas to maximum extent possible.
e. Establishment of clearing and grading limit lines to depict maximum limits of areas of disturbance.
f. Landscape plan for the Project Site showing proposed planting areas, as well as their design intent and function. Species of plants native to New York and common in Clinton and Hyde Park shall be used to the extent practicable for landscaping, soil stabilization, and stormwater mitigation features.
g. Protect existing mature landscape features to the maximum extent possible.
h. Buffer screening to reduce impacts on neighboring properties and area roadways.
i. Supplement with additional year-round screening as necessary.
j. Preservation of trees, to the maximum extent possible.
k. Preservation of existing conditions (e.g., forested areas, wetlands), to the maximum extent possible.
l. Pesticide Application Plans, if necessary.
m. Describe the status of the NYSDEC Incidental Take Permit process for Blanding's turtle and all associated conservation measures.

5. Traffic/Transportation

Existing Conditions

a. Provide summary of existing conditions from previously prepared Traffic Impact Study, Provide a description of size, capacity and physical condition of NYS Route 9G.
b. Provide the current vehicle levels of service for Weekday A.M., P.M. and Saturday peak hour traffic flow.
c. Provide Capacity Analysis (Level of Service) for any of the studied intersections in the Traffic Impact Study.
d. Summarize accident history over the past three (3) years of the study area roads and intersections and prepare an analysis regarding types/number/location of accidents and whether any patterns exist. A comparison against statewide average accident rates shall be made and identification of personal injury/fatal accidents.
e. Discuss availability of public transit that may serve the site.
f. Discuss existing ownership of roads and driveways within the project site.
g. Describe existing access to the site from NYS Route 9G and the existing bridge condition.

Potential Impacts

a. Describe proposed on-site traffic improvements and traffic circulation including a discussion of parking, guest parking and handicapped accessibility.
b. Project the existing traffic volumes at the identified intersections to determine the "No-Build" traffic volumes.
c. Using accepted sources, such as the Institute of Transportation Engineers' publication, *Trip Generation, latest Edition*, determine the traffic that will be generated by the proposed Project.
d. Establish trip distribution patterns for the generated trips.
e. Add the Project generated trips to the "No-Build" traffic volumes to yield the "Build" traffic volumes at the identified intersections.
f. Compare intersection levels of service for the "Build" and "No-Build" peak-hour traffic volumes to identify potential project impacts.
g. Discuss construction period traffic generation and impacts on relevant intersections and roadways.
h. Describe the proposed ownership and maintenance of the accesses and roads/driveways within the site.

Proposed Mitigation Measures

a. Mitigation will be proposed for identifying adverse environmental impacts as necessary.
b. Discuss proposed mitigations, including reconfiguration of geometry and the project site's access and NYS Route 9G.

c. Discuss safety and other needs of pedestrians and bicyclists in addressing mitigation measures to be implemented.

6. Wastewater Treatment

Existing Conditions

a. Describe existing wastewater treatment systems at the site in terms of location, size and type of facility.

b. Describe nearest municipal sewer districts to the site.

c. The DEIS shall include baseline water quality sampling of the receiving Class A stream at representative upstream and downstream locations, including during low-flow conditions where feasible. Testing shall include physical parameters, dissolved oxygen, nutrients, bacteria, BOD, suspended and dissolved solids, metals, and other contaminants of concern, and any additional parameters necessary to determine whether the proposed discharge could cause or contribute to a violation of NYS water quality standards or impair the stream's Class A best uses.

Potential Impacts

a. Describe the following potential impacts:

   i. Nitrogen loading

   ii. Phosphorus loading

   iii. Low-flow stream conditions

   iv. Dissolved oxygen impacts

   v. Thermal impacts

   vi. Cumulative watershed impacts – describe assimilative capacity analysis results

   vii. Potential future expansion of the resort

b. Describe the plant in terms of capacity, proposed treatment level and process, ownership, management and maintenance. Describe construction of transmission lines, pump stations and all facilities proposed and/or required to serve the Project. Identify whether the plant is expandable and whether the pump stations and lines are being sized to be able to handle increased capacity beyond the current project size. Address back-up systems in the event of power failure.

c. Describe contingencies should the owner fail to maintain any on-site infrastructure.

d. Address odor and noise control.

e. Address screening and buffering of the facility if visible from public vantage points.

f. Identify whether any existing septic systems will be decommissioned and any NYSDOH or other standards to be met.

Proposed Mitigation Measures
Mitigation will be proposed for identified adverse environmental impacts as necessary.

7. Land Use and Zoning/Consistency with Community Plans

Existing Conditions

a. Describe the existing and historic land uses of the site including buildings and structures.
b. Describe the adopted Town of Clinton Comprehensive Plan policies that apply to the site.
c. Discuss the Town of Clinton Natural Resource Inventory as it applies to this project. Superimpose the project site on NRI maps to document relevant features on the site.
d. Describe the Town of Hyde Park Greenbelt ("GB") Zoning regulations and all relevant land use policies and goals. Describe the Town of Clinton AR5, AR3, and RPO zoning requirements and applicability to the project site. Provide a table showing the permitted and special uses allowed within each zone. Describe the bulk regulations that apply to the site, and any special use permit standards applicable to the uses.
e. Describe Dutchess County plans applicable to the site. Plans and planning studies to be reviewed include the Dutchess County Comprehensive Plan and the Dutchess County Greenway Compact.

Potential Impacts

a. Describe the proposed land uses of the site.
b. Discuss compatibility of the Project with the above identified planning documents, zoning, site plan regulations and local laws that apply to the project site and its proposed activities.
c. Evaluate the compatibility of the project site land use with surrounding land uses.
d. Explicitly identify the need for any waivers and/or variances, and a rationale for which such waivers and variances should be approved.

Proposed Mitigation Measures
Mitigation will be proposed for identified adverse environmental impacts as necessary.

8. Community Character and Visual Resources

Existing Conditions

a. Define community character based on the Town of Clinton Comprehensive Plan, zoning regulations, agricultural protection policies, historic resource documentation, and other officially adopted planning documents.
b. Describe the existing community character of the project site and surrounding area, including its visual landscape, natural environment, agricultural and equine setting, existing Conference Center use, historic structures, open fields, forested

areas, Route 9G frontage, scenic vistas, and surrounding residential and agricultural land uses.

c. Describe existing housing types within the surrounding neighborhood, including typical lot sizes, building footprints, gross floor area, building heights, and overall development pattern to compare the proposed use against the community character of its environs.

d. Identify and describe scenic, aesthetic, cultural, and historic resources that contribute to community character, including any resources identified in local, state, or federal inventories, maps, plans, or studies.

e. Summarize the results of all cultural resource investigations conducted for the project, including Phase IA, Phase IB, and/or Phase II archaeological investigations, as applicable. Describe the age, historical significance, architectural character, and condition of on-site buildings and structures, including an evaluation of whether any resources may be eligible for listing on the National Register of Historic Places, either individually or as contributing resources within a historic district or cultural landscape.

   Summarize all correspondence, determinations, and recommendations issued by the State Historic Preservation Office (SHPO) regarding archaeological and historic resources associated with the project site.

f. Identify public roads, parks, trails, open spaces, and other publicly accessible locations from which the project site is visible.

g. Describe existing vegetation, topography, ridgelines, open fields, forest edges, and other landscape features that contribute to the visual character of the area.

h. Quantify existing ambient noise levels and identify primary noise sources during periods when the proposed use and activities would be operational.

i. Describe existing lighting conditions, including the location, height, intensity, and type of luminaires on the project site.

j. Summarize existing traffic conditions on Route 9G.

<u>Potential Impacts</u>

a. Provide a discussion of the overall site program, including all areas that may be utilized by guests, visitors, employees, and passive recreational users, including areas outside the primary limits of disturbance.

b. Describe the proposed visual character of the site and evaluate how the proposed development would affect existing community character and visual resources.

c. Discuss the proposed architectural approach, including building massing, scale, height, materials, colors, roof forms, building placement, reuse of existing structures, agrarian influences, landscaping, berming, signage, lighting, and the relationship of proposed structures to existing farmstead and landscape patterns.

d. Identify areas from which the project will be visible, including public roads, parks, trails, neighboring properties, and other sensitive viewing locations. Evaluate seasonal visibility and the effectiveness of proposed screening and landscaping.

e. Provide visual simulations, elevation drawings, cross-sections, renderings, or other graphic representations illustrating the appearance of proposed buildings, infrastructure, and site improvements from representative public viewpoints.

f. Evaluate the potential effects of the project on scenic resources, historic resources, rural character, agricultural landscapes, and other defining visual elements of the Town of Clinton.

g. Assess potential changes in noise, lighting, traffic, activity levels, and development patterns resulting from the project and discuss how such changes may affect community character. Evaluate the potential effects of the proposed action on historic, archaeological, and cultural resources, including direct impacts, indirect impacts, visual impacts, and impacts to the historic setting or context of any identified resource.

h. Evaluate potential light spillage, glare, and night-time visibility associated with the proposed lighting plan and identify measures incorporated to minimize off-site impacts.

i. Assess the project's effects on views from sensitive receptors, including surrounding residences, schools, hospitals, licensed daycare centers, group homes, nursing homes, retirement communities, public parks, and public trails.

j. Discuss whether the proposed development would diminish public enjoyment of identified scenic, historic, agricultural, or community resources.

k. Evaluate the extent to which the proposed architecture, site design, and landscape treatment are compatible with the established character, scale, and development patterns of the Town of Clinton.

<u>Proposed Mitigation Measures</u>

a. Identify measures to avoid, minimize, or mitigate adverse impacts to community character and visual resources.

b. Potential mitigation measures may include, but are not limited to:

i. Modifications to project layout and site design.

ii. Changes to building size, height, scale, massing, or architectural design. Architectural design modifications to improve compatibility with historic and agricultural character.

iii. Relocation, redesign, or removal of buildings, structures, infrastructure, or site features.

iv. Additional landscaping, buffering, berming, screening, or preservation of existing vegetation.

v. Modifications to lighting design, fixture selection, fixture height, intensity, hours of operation, or other measures to reduce light spillage and glare.

vi. Modifications to signage design, size, location, illumination, or materials.

vii. Changes to the frequency, intensity, timing, location, or number of guests, events, or activities to reduce impacts related to noise, visibility, traffic, lighting, and community character.

9. Short-Term Construction-Related Impacts

This section will summarize short-term construction-related impacts set forth in other sections of the DEIS. It will summarize:

- Phasing of construction
- Hours of construction operations
- Noise, traffic, construction traffic access to the site
- Removal of soil, rocks and trees from the site
- Identify the mitigations to be taken during construction to avoid areas to remain undisturbed.
- Identify the mitigations to be taken (timing/seasonal, inspection schedules and physical method to be used) for any and all significant habitats or listed species identified in the DEIS
- Staging areas
- SWPPP controls
- Describe any methods of recycling waste and natural materials on-site during construction

F. Alternatives

This section contains alternatives to the Project that may minimize or avoid adverse environmental impacts. Discussion of each alternative will be at a level of detail sufficient to permit a comparative assessment of benefits and environmental risks of each alternative. Sketch or concept plans of alternatives discussed will be included and a table comparing the proposed project with all alternatives in impact areas, e.g., limits and amount of disturbance, water and sewer use, square footage of buildings.

1. No Build (or No Action)

Describe the alternative where the Project Site remains in its current state.

2. Alternative Wastewater Management Approach

Comparison of the proposed wastewater treatment plant and discharge design with feasible subsurface disposal or decentralized wastewater options, including comparative disturbance, monitoring capability, permit requirements, and long-term pollutant control.

G. Adverse Environmental Impacts Which Cannot be Avoided if the Project is Implemented

The DEIS shall identify any significant adverse environmental impacts that cannot be avoided if the Proposed Action is implemented. This section shall focus on significant unavoidable impacts associated with the four scoped topics and shall distinguish between temporary construction impacts, permanent physical changes, and operational impacts.

Identify those adverse environmental effects that can be expected to occur regardless of the mitigation measures considered.

H. Irreversible and Irretrievable Resources

The DEIS shall identify irreversible and irretrievable commitments of environmental, land, ecological, infrastructure, and community resources associated with the Proposed Action, including any permanent conversion of habitat, construction of buildings and infrastructure, and long-term operational commitments. Both in the short term and the long term.

I. Growth-Inducing Aspects

The DEIS shall evaluate whether the Proposed Action would induce additional growth, future development, infrastructure expansion, or direct changes in land use patterns on or near the Property. Specifically, the DEIS shall discuss the sizing of the water supply and wastewater treatment plant and associated infrastructure (water and sewer lines) and what their capacity is to accommodate additional expansion of the conference center beyond what is proposed.

J. Effects on the Use and Conservation of Energy Resources

Summarize the use of energy resources to be used on-site and strategies to reduce energy consumption. Provide a description of the effect of the Proposed Action on the short and long-term use and conservation of energy resources; methods to reduce inefficient or unnecessary consumption of energy during construction and long-term operation; and a discussion of green building practices for the development of the site.

- Identify existing energy sources available in the vicinity of the project site. Describe the availability of gas, electric, and other fuel sources. Describe the utility service providers.
- Identify the proposed sources of energy for the uses in the project.
- Discuss both the short- and long-term energy demands of the project on energy sources.
- Discuss the use of solar facilities or other green energy measures.
- Describe energy conservation techniques and technologies incorporated into the design and operation of the buildings.

K. Summary of Mitigation Measures

The proposed action will incorporate a number of measures and project modifications to avoid, minimize, and mitigate potential adverse environmental impacts identified during the SEQR process. This section will summarize the mitigation measures discussed throughout this Draft Environmental Impact Statement. The Project incorporates or has offered the following avoidance, minimization, and mitigation measures which shall have been described in detail in the relevant sections of this DEIS:

- Water tower relocation and burying
- Removal of separate swimming pool at cottage 15
- Relocation of Cottage 15
- Addition of a Southbound left turn lane on Route 9G
- Construction of proposed second bridge for emergency access
- Architectural, landscaping, berming, and operational measures intended to maintain rural, agrarian, historic, and natural landscape character.
- Lighting design using downward-cast, fully shielded, warm-spectrum, low-level fixtures appropriate for the rural setting.
- Seasonal restrictions on tree clearing to avoid impacts to Indiana bat and Northern long-eared bat, with additional survey requirements if clearing outside approved windows is proposed.
- NYSDEC Incidental Take Permit process for Blanding's turtle, including exclusion fencing, construction monitoring, encounter protocols, conservation areas, and long-term management measures.
- Commitment to PFAS-free product sourcing to the extent practicable and guest education regarding personal product use to reduce potential pollutant loading.
- Stormwater management practices and SWPPP controls, including erosion and sediment controls, infiltration practices, green infrastructure, inspection, maintenance, and post-construction water quality treatment.

- Addition of a daylighted bioswale between the wastewater treatment plant and discharge point to provide observation, temperature moderation, infiltration, and vegetative nutrient uptake.
- Design of a wastewater treatment plant subject to NYSDEC SPDES permit limits, certified operator oversight, daily monitoring, monthly reporting, redundancy measures, and regulatory inspection.
- Design of stream crossings and bridge improvements to avoid or minimize disturbance to Crum Elbow Creek and its banks to the maximum extent practicable.
- Deed restrictions or comparable long-term protection commitments for NYSDEC regulated wetlands, wetland adjacent areas, and other conservation or mitigation lands.
- Expansion of Wetland E and creation of a 50-foot buffer with additional shallow shelf and wetland plantings to improve habitat value and potential drought refuge functions.
- Wetland restoration plantings, native planting areas, protective signage, and no-mow buffers around Wetland F and the expanded Wetland E/ornamental pond.
- Removal of the previously proposed boardwalk crossing of Wetland F, thereby eliminating direct disturbance to Wetland F and its locally regulated buffer area.

IV. APPENDICES

A. Project Application

B. SEQRA Environmental Assessment Form (EAF)

C. Positive Declaration and Lead Agency Notice

D. Adopted DEIS Scoping Outline

E. Copies of all official correspondence related to issues discussed in the DEIS. Correspondence from federal, state, regional or local agencies, members of the public, organizations or consultants contacted during the preparation of the DEIS.

F. Geotechnical Report

G. Soils Report

H. Natural Resource and Habitat Report

I. Wetland Delineation Report, NYSDEC Wetland Validation Map

J. Stormwater Pollution Prevention Plan

K. Cultural Resource Investigations

L. Traffic Impact Study

M. Water Supply Report

N. Sewer Plant Study

O. Photosimulations/Visual Impact Study

P. Other Technical Studies, as applicable

Q. Site Plan (Full scale) meeting all requirements of the Town of Clinton Site Plan review checklist.

R. Abbreviated SWPPP language, erosion and sediment control plans, effluent limit correspondence, and operations/maintenance plans.

S. Biodiversity report, NYSDEC correspondence, Draft Incidental Take Permit materials.

T. Comprehensive Plan excerpts, zoning compliance tables, special use permit materials, and land use comparison materials.

U. Community character materials, including photographs from the south looking north and from NYS 9G looking west, visual simulations, and architectural elevations.

V. Environmental impacts that were considered during review of the Part 2 Full Environmental Assessment Form (FEAF) and determined not to result in significant adverse environmental impacts and not included in the evaluations of the Draft Environmental Impact Statement.