

3.8 COMMUNITY RESOURCES COMMENTS AND RESPONSES

Comment 3.8-1 (Letter #1: Clifford H. Schwartz, December 10, 2008 and at the Public Hearing, December 10, 2008): I am concerned about the enormous impact this large development will have on our community services, including schools, fire, ambulance, police, and postal services. I find it incomprehensible that the DEIS was declared complete and ready for public comment when item 8 on page 1-12 of the September 10 Response to Comments states that the "Police, Fire, EMS and Schools sections will be revised as suggested." It does not seem possible that an educated decision about this project can be made without a clearer understanding of its impact on such fundamental and vital services. It is the obligation of the applicant to provide us with a clearer picture of those impacts. At this stage in the approval process, we should be able to comment on a comprehensive analysis of service impacts. I also wish to note that some of the calculations in the information presented are questionable.

Response 3.8-1: *In response to the Town Planner's completeness review comments documented in a letter to the Thompson Planning Board dated June 5, 2008, the Applicant's team generated the "Response to Comments" document dated September 10, 2008 noted by the commentor. This document identified the actions required to address the Town Consultant's comments and the party responsible for that action. The quoted text in the comment is taken directly from that document.*

The Community Services section of the DEIS, which includes Police, Fire, EMS and Schools sections, was revised subsequent to the September 10, 2008. The Lead Agency's review and acceptance of that DEIS/DGEIS as complete indicates that the original comment from the Town Consultant was adequately addressed in the body of the DEIS/DGEIS, that the DEIS/DGEIS complies with the adopted scope and that the revisions provided the Town with a clear understanding of the potential impacts to these vital services thus allowing the Planning Board the ability to take a hard look at these impacts and the project as a whole.

The comprehensive analysis of potential adverse impacts on community services included in the DEIS, based upon the adopted Scope for the DEIS, disclosed that no significant impacts on police protection are anticipated from the proposed project and that tax revenues generated by the proposed project would mitigate the increased demand on fire protection, emergency medical services, and schools.

In response to comments received on the DEIS plan, the Applicant is seeking approval of the as-of-right Residential Alternative presented in the DEIS. In this alternative, the commercial component of the project has been reduced from 480,000 square feet to 60,000 square feet, while the number of residential units has been increased from 1,340 to 1,613 households. The increase in households with the As of Right Plan would generate a population increase of 3,825 rather than the 3,260 increase anticipated from the previously proposed plan. However, as indicated in the DEIS, the anticipated impacts on community services associated with the As-of-Right Plan would be similar to those disclosed in the DEIS for the previously proposed action.

The Applicant notes that the calculations of necessary fire and emergency personnel included in the DEIS were based upon multipliers from the Urban Land Institute (ULI). The current national average is 1.59 fire personnel per 1000 population (International City/County Management Association). Benchmark data from the Southeast Michigan Council of Governments (SEMCOG) recommends 1.95 full time employees for fire and

EMS per 1000 population. The ULI multiplier is between these two criteria thus is considered to present representative multipliers indicative of current conditions. The calculations of projected school age children were based upon multipliers from the most recently published work of noted demographic researchers, Burchelle and Listokin, in the June 2006, Rutgers University Center for Urban Policy. These calculations are repeated below for the As of Right plan.

Based on planning standards contained in the ULI's 1994 Development Impact Handbook (Development Handbook), it is estimated that 1.65 fire personnel per 1,000 population would be required to serve a new population. The anticipated increase in population of 3,825 persons resulting from development of the As of Right Plan would generate a demand for 6.3 additional fire personnel over a twenty year development period. The increase in the Town's existing population from Phase 1 of the project (1,149) would create a demand for 1.9 additional fire personnel over a four to five year period.

The standard for emergency medical services, according to the Development Handbook, is 4.1 full-time personnel and 1 vehicle per population of 30,000. The introduction of 3,825 permanent persons to the Town of Thompson would result in the potential added demand for 0.52 EMS full-time personnel and 0.13 vehicles in a twenty year period. The increase in the Town's population from Phase 1 of the project (1,149) would create a demand for 0.16 additional full-time personnel and 0.04 vehicles over a four to five year period.

The standards for evaluating EMS personnel levels are based on ratios established for departments with paid employees, however this is the most accurate means identified to make projection. While this method may result in some inaccuracy when used for volunteer departments, the difference would not be significant.

The planning standards ratio for police personnel provided by the ULI in their 1994 Development Impact Assessment Handbook, is two police per population of 1,000. Currently, the Sheriff's office employs 43 sworn members of the Patrol Division and the New York State Police are also present in the County. However, the number of patrolmen assigned from the New York State Police is considered sensitive information but as stated in a letter from the state Police on March 2, 2008 "the New York State Police anticipates adapting and adjusting to any increase in calls for service or response times [that] this project, or any other project, may create." The letter received from Eric J. Chatboty, Undersheriff for the Office of the Sullivan County Sheriff, dated June 26, 2009 and attached in Appendix D of this document states that "This project alone would not require expansion of the current equipment or staffing levels of the Sheriff's Office." According to the ULI standards mentioned above the project would result in the need for an additional 2.3 police personnel for the population increase associated with Phase 1 and 7.7 at full build out.

The letter received from the Office of the Sullivan County Sheriff on June 26, 2009 states "[o]ur typical average response time to the geographic center of your proposed project would be 5 minutes."

The total number of school-age children to be generated by the project was calculated based on student multiplier data available from Rutgers University, Center for Urban Policy Research, Residential Demographic Multipliers, June 2006. As noted in the

minutes of the meeting held between RH Land and Monticello School District Superintendent, Dr. Patrick Michel, on February 27, 2008¹, these multipliers were reviewed by the Monticello School District and found to be acceptable. At this same meeting Dr. Michel also agreed that a projected cost of approximately \$10,000 per student would be a reasonable basis for the analysis. The actual projected cost used in the fiscal analysis was slightly higher at \$10,466 per student. The population of school age children projected for the Proposed Action would be approximately 432 children over the twenty year build out period similar to the 435 children under the plan presented in the DEIS/DGEIS. However, if the project's population would mirror the Town's population, i.e., 30 percent of all housing units are seasonal, then the school age children population would be reduced to 302 students over a twenty year build out period.

As noted, the proposed action would be constructed in phases. The first phase is planned to be completed by 2014. The population of school age children projected for Phase 1 would be 139. These children are likely to arrive in the Monticello School District over a four to five year period, resulting in an annual school age population increase of approximately 30 new children or three children per grade on average. This analysis has been conducted based upon 100 percent year round occupancy. However, for comparison purposes only; If the project's population would mirror the Town's population, i.e., 30 percent of all housing units are seasonal, then the school age children population would be reduced to 97 students over a four to five year build out period.

The Applicant also notes that the proposed project would be constructed in phases over a twenty year period allowing existing services in the community to gradually adjust to the elements of the project. The potential increases in demand for community services would thus be introduced gradually over time. Similarly, tax revenues generated would also increase as the project is developed. It should be noted that the School District recently passed the School Budget for the 2009-2010 school year by an overwhelming majority and the performance of the school district has been on the rise in recent years. The influx of school children and tax revenue from the proposed project will help to support these positive trends.

The fiscal analyses presented in Chapter 1.0 herein indicate that, to the extent that the proposed project results in impacts to community services, tax revenues generated by the built project can be expected to offset a portion if not all the public costs for those services. The subsequent phase(s) of the project may need to address any additional demand that is attributable to future development of the project.

Data is presented herein to assess the potential impacts of the full build out and conditions projected after the completion of Phase 1, analysis of interim build out conditions of the project were not called for in the project scope, nor is an analysis of the project under construction considered relevant.

Comment 3.8-2 (Letter #1: Clifford H. Schwartz, December 10, 2008): The school analysis also should address capacity issues in the existing school buildings.

¹ Minutes of the RH Land Meeting with Monticello School District Superintendent February 27, 2008 are included in DEIS Appendix B.

Response 3.8-2: Refer to Response 3.8-1. The DEIS specifically noted that in February, 2008, the project team met with the Monticello Central School District's Superintendent, Dr. Patrick Michel, to discuss the potential impacts on the Monticello Central School District from the proposed development. See DEIS Appendix B, Correspondence, for the minutes of that meeting. With specific respect to the capacity of the school system, Dr. Michel also noted that consideration should be taken into building an elementary school in the area by the project's completion, although Dr. Michel indicated that the elementary school is currently not at capacity. The As-of-Right Plan now proposed would be constructed over a twenty year period and would generate a similar number of school aged children to the previously proposed alternative.

The projected student population of 432 children will be introduced into the school district over a twenty year period. In addition, the students introduced into the school district would be enrolled in various grade levels. The introduction of these students into various grade levels over a multi-year period would further ameliorate the effect of the increase in school district enrollment resulting from the project. On average less than two children per grade will arrive annually. The extended approval and construction period for the Rock Hill project provides time to allow the district to implement measures to accommodate the introduction of new students from this and other projects in the area.

Based upon the currently proposed As-of-Right project, with the fee simple Townhouse units included, the projected tax revenue to the school district is estimated at \$4,151,486. The projected cost to the school district is estimated to be \$4,521,312 if all of the units were year round units. This would result in a deficit of \$369,826. For comparison purposes, under the existing demographic scenario where 70 percent of the units are expected be used year round, the projected cost to the school district would be \$3,160,732, a difference of \$990,754.

According to the Tax receiver of the Monticello School District, the total assessed value of property in the Monticello School District is \$1,751,356,423. The potential deficit of \$369,826 would result in an increase to the tax rate of less than \$0.25 per \$1,000 of assessed valuation. For a home valued at \$200,000 in the Monticello School District, this increase would equate to a worse case tax increase of approximately \$36.00 per household per year. This projection does not take into account any increase in commercial development in Rock Hill to support the needs of the new residents, nor does it take into account any seasonal or senior residents who would have no need for school district services. In light of these additional factors, it is not expected that the worse case scenario will ever be realized.

A decision as to the use of these funds would be made by the School Board. If there were no need for additional funds by the school district, an increase in revenue could serve to reduce the tax rate throughout the school district. Alternatively, a more likely scenario is that the funds would be used to augment future school budgets to provide services for an expanding population, or a capital improvement bond could be proposed to fund future capital expansion as required.

Comment 3.8-3 (Letter #1: Clifford H. Schwartz, December 10, 2008): Section 3.8.4 discusses the impact on emergency medical services. An annual cost of \$62,400 is calculated at the top of page 3.8-10, but no conclusions are reached about whether that amount is to be borne by the Rock Hill Volunteer Ambulance Corps, by Mobilemedic EMS, or by individual

service recipients. In addition, there is no explanation of why the calculation is based on a 40-hour week when emergency medical services are needed by the community during every one of the 168 hours in a week. The analysis needs to be expanded to specifically address the costs to be incurred by the Rock Hill Volunteer Ambulance Corps as a result of this project. We also need a more detailed explanation of how the costs of paid EMS professionals will be charged to the community - whether through taxes or charges per service call.

Response 3.8-3: Section 3.4-8 of the DEIS indicated that an annual cost of \$62,400 would be incurred for a two person, twelve hour shift of paid EMTs that might be necessary to supplement Rock Hill Volunteer Ambulance Corps volunteers as a result of the proposed project. The DEIS also indicated that the Rock Hill Volunteer Ambulance Corps would receive \$54,074 annually in tax revenues generated by the proposed Rock Hill Town Center development. Under the currently proposed As of Right Plan, the projected tax revenues are projected to be \$53,663. These funds could be used to offset the impacts on emergency services were it determined to be necessary to hire the paid EMTs. A mechanism would be developed to distribute any increased emergency medical costs among the community should they arise. Additionally, Mobile Medic, a fee for service ambulance provider, is available to augment necessary ambulance service requests for the residents Rock Hill.

Comment 3.8-4 (Letter #2: Steve Gottlieb, Rock Hill Fire District, December 10, 2008): As of this time, we do not feel that the DEIS in its current form adequately addresses the concerns of the Rock Hill Fire District.

Response 3.8-4: As discussed in the DEIS, the project site is located in the Rock Hill Fire District served by the Rock Hill Volunteer Fire Department (RHVFD) which is an all-volunteer company. At the time the DEIS was prepared, the District had a staff of 67 volunteers that protects a population of approximately 1,600 residents and businesses in an area of about 16 square miles.

As further discussed, the District's service ratio is nearly 42 fire personnel per 1,000 population. The response time to the project site is expected to be approximately three to six minutes. The fire house for the Rock Hill District is located at 61 Glen Wild Road adjacent to the project site and houses various apparatus to respond to emergencies.

In keeping with Rock Hill Fire Department Chief Sean Rieber's November 18, 2006 request (included in DEIS Appendix B), fire hydrants would be installed by the Applicant along proposed private roads to provide water for fire fighting. These hydrants will be privately owned and maintained.

Based on planning standards contained in the Urban Land Institute's (ULI) 1994 Development Impact Handbook, it is estimated that 1.65 fire personnel per 1,000 population would be required to serve a new population. With the now proposed As of Right Plan, the anticipated increase in population of 3,825 persons would generate a demand for 6.3 additional fire personnel over the twenty year development period. The increase in the Town's existing population from the first phase of the project (1,149 persons) would create a demand for 1.9 additional fire personnel over a four to five year period. The national average is 1.59 fire personnel per 1,000 population (International City/County Management Association). Benchmark data from the Southeast Michigan Council of Governments (SEMCOG) recommends 1.95 employees for Fire and EMS per 1,000 population. The ULI multiplier is between these two criteria.

As noted above, in their letter dated November 18, 2006 the Rock Hill Fire District indicates that a volunteer staff of 67 fire fighters serves a population of 1,600 persons. At this rate the ratio of fire personnel to residents is four per 100. The anticipated population increase at full buildout is projected to be 3,825 persons. At the existing ratio, this may indicate the need for a significant number of additional fire fighters. However the multifamily condominium units are anticipated to include sprinkler systems which would reduce this need. The anticipated growth in population should provide a new resource for volunteer fire fighters to come forward, particularly since the Applicant has agreed to pursue affordable housing to help meet the needs of local volunteers, service personnel, and recent high school and college graduates. The Applicant will include marketing efforts in their home-buyer prospectus material to encourage community service volunteers. The New York State Division of Fire Safety conducts fire training for all levels of fire fighters. This fire training is available in Sullivan County and is available with out charge to either the fire personnel or the Fire Company. In addition to the anticipated increase in available tax revenue, the Applicant will continue to actively support the fund raising activities of the Rock Hill Fire District to meet their future needs.

According to Fire Chief Sean Rieber (November 18, 2006 correspondence) if mutual aid is needed, the Fire District would be assisted by fire fighters from adjoining districts. Chief Rieber also indicated that the fire district has outgrown its facilities and has begun planning for future expansion. According to Chief Rieber, the District would require additional equipment, including aerial apparatus, up to two command vehicles, and a first response vehicle for EMS responses, in order to provide adequate fire protection services for the proposed project. Chief Rieber further noted that the new equipment would be funded with the additional tax revenue received from the proposed development, and that these funds would become an annual budgetary item. The projected revenue to the Rock Hill Fire District upon completion of Phase 1 is estimated to be approximately \$89,529 annually. Upon completion of the project these revenues are estimated to be \$297,384. The need for any increase in fire protection could be funded with these tax revenues.

Comment 3.8-5 (Letter #2: Steve Gottlieb, Rock Hill Fire District, December 10, 2008): The DEIS has based the potential impacts on the Rock Hill Fire District on the Urban Land Institute's 1994 Development Impact Handbook. Based on this handbook, the statement was made in the DEIS that the District's current personnel level exceeds the standard for the entire Town of Thompson even after the projected population increase from the Rock Hill development. Essentially, the statement is being made that the Rock Hill Fire Department and District would be able to handle all emergencies in the entire Town of Thompson with its current staffing levels, including the Monticello Fire District. This statement simply isn't true. Each and every fire district is distinct and separate and has its own necessary levels of protection that are necessary. Basing a rural fire departments needs on a report from the Urban Land Institute is not reliable.

Response 3.8-5: Refer to Response 3.8-4. The analysis of potential adverse impacts on fire protection services in the DEIS was based not only upon the well recognized planning standards in the ULI's 1994 Development Impact Handbook but also upon the noted discussions with Fire Chief Sean Rieber which disclosed specific information about the Rock Hill Fire Department. That analysis indicated that the District's current personnel level exceeds the ULI standard before the project population increase. Fire Chief Sean Rieber indicated that additional fire fighting equipment may be necessary in

order to provide fire protection services to the Rock Hill community, the projected tax revenue anticipated to go to the Rock Hill Fire District can be used to cover the expense of additional fire equipment as necessary.

Comment 3.8-6 (Letter #2: Steve Gottlieb, Rock Hill Fire District, December 10, 2008):

Most importantly on that list of equipment is the need for a ladder truck and a facility in which to store it.

Response 3.8-6: Refer to Responses 3.8-4 and 3.8-5. As discussed above, the projected tax revenue to the Rock Hill Fire District upon completion of Phase 1 is estimated to be approximately \$89,529 annually and \$297,384 annually upon completion of the project. During discussions with Chief Rieber, he noted that new equipment would be funded with the additional tax revenues received from the proposed development, and that these funds would become an annual budgetary item. The tax revenues to the District could also be used to fund the purchase or construction of a facility to store any new equipment such as the ladder truck noted in the comment.

Comment 3.8-7 (Letter #2: Steve Gottlieb, Rock Hill Fire District, December 10, 2008):

Other concerns of the Rock Hill Fire District that were not properly addressed are as follows:

1. Who will be responsible for making sure hydrants are tested, flowing, clear of snow in winter, etc?
2. Will the developer provide adequate training for current members and neighboring mutual aid departments for the varying types of construction?
3. Will the developer provide funding to the Rock Hill Fire District to subsidize any upfront costs for additional equipment and apparatus as well as for recruitment and retention? Since November 2006 the active roles have dropped from 67 to 55, however, the number of very active firefighters who perform the majority of the duties is significantly lower than that figure. As it stands now, we are in need of new volunteers. Additional population would further enhance that need.

Response 3.8-7: 1) In keeping with Rock Hill Fire Department Chief Sean Rieber's November 18, 2006 request (included in DEIS Appendix B), fire hydrants would be installed by the Applicant along proposed private roads to provide water for fire fighting. The Homeowner's Association would engage duly qualified professionals to conduct the necessary hydrant testing and all required maintenance. A steel elevated water storage tank will be constructed in Phase 1 adjacent to the Commons Area. Preliminary sizing of the tank is 1,000,000 gallons which will provide storage capacity equal to the average daily consumption plus fire flow storage requirements.

2) Funds generated from property taxes provided to the District could be used for training current members and neighboring mutual aid departments for the varying types of construction as deemed appropriate by the District.

3) As noted above, tax revenues to the District are expected to be approximately \$89,529 after completion of Phase 1. These funds, and subsequent revenues, could be used to subsidize any upfront costs for additional equipment and apparatus and for recruitment and retention of volunteers as deemed appropriate by the District.

Comment 3.8-8 (Letter #2: Steve Gottlieb, Rock Hill Fire District, December 10, 2008): The November 2006 letter requested numerous pieces of information from the developer for a more informed answer and was written more as a brief overview of the capabilities of the Rock Hill Fire District. However, many questions remain unanswered or incompletely answered.

Therefore, it is the opinion of the Rock Hill Fire District that our concerns were not adequately answered in the DEIS. However, representatives from the District wish to meet with the developer to open up a dialogue in which more information can be obtained about the proposed project and to discuss its impacts on the Rock Hill Fire District.

Therefore, we respectfully request that the Planning Board keep this public hearing open in order to facilitate such a meeting and that all comments made as a result of that meeting be incorporated into the FEIS.

***Response 3.8-8:** The Applicant has had unofficial meetings and discussions with members of the Rock Hill Fire District. The applicant will schedule continued meeting(s) with representatives of the Fire District to provide additional information about the proposed project, to discuss impacts it may have on the District and to identify specific measures to mitigate any impacts. The increased population anticipated to live in the proposed Rock Hill project will provide the opportunity for the Fire District to recruit new volunteers. The anticipated tax revenue will provide the ability for the Fire District to fund additional equipment as necessary. As a condition of site plan approval, the applicant will work with the Fire District to insure appropriate fire flows and adequate fire hydrant locations.*

Comment 3.8-9 (Letter #10: Susan Roth, AICP, Hudson Valley Planning and Preservation, December 9, 2008): The Association is concerned that the DEIS does not provide an adequate analysis of the proposed impacts on the Rock Hill Fire Department. The Association requests that all comments provided by the Rock Hill Fire Department be addressed in the FEIS and that a more detailed impact analysis based on local data be incorporated into the Findings Statement.

***Response 3.8-9:** Refer to Responses 3.8-4, 3.8-5, 3.8-6, 3.8-7, and 3.8-8.*

Comment 3.8-10 (Letter #10: Susan Roth, AICP, Hudson Valley Planning and Preservation, December 9, 2008): As a way to further minimize impacts on community services and traffic, the developer could create an active over 55 adult community as part of the unit mix. The impacts of such a development on volunteer ambulance corps services should be addressed.

***Response 3.8-10:** Refer to FEIS Section 3.5 (Transportation) concerning impacts on traffic. Approximately ten percent or 168 of the total dwelling units proposed in the As-of-Right Plan would be occupied by residents 55 years of age and older. The Applicant has yet to decide the distribution of the housing units for these residents, but envisions further discussions and deliberation with respect to the siting of these units as the site development approval process advances. A final decision in this matter will be based upon a number of considerations, including reducing any potential adverse impacts and the housing market.*

Further, the Applicant notes that the DEIS included an analysis of potential adverse impacts on ambulance services and concluded, based upon the standard for Emergency

Medical Services in the Urban Land Institute's 1994 Development Impact Handbook, that the introduction of 3,260 permanent persons to the Town of Thompson would result in the potential added demand for 0.45 EMS full-time personnel and 0.11 vehicles in a twenty year period. Similarly, the additional population of 3,825 persons resulting from the now proposed As of Right Plan would result in the potential added demand for 0.52 EMS full-time personnel and 0.13 vehicles in a twenty year period. Based on the ULI multipliers, the proposed project would not have a measurable impact on emergency services.

Comment 3.8-11 (Letter #10: Susan Roth, AICP, Hudson Valley Planning and Preservation, December 9, 2008): The DEIS indicates that 49 active adult units would be provided. However, more should be provided as a way of minimizing impacts to local schools. More units clustered in an area on the site would provide the critical mass needed to help make it an identifiable community that better addresses the needs of individuals over the age of 55.

Response 3.8-11: Refer to Response 3.8-10.

Comment 3.8-12 (Letter #10: Susan Roth, AICP, Hudson Valley Planning and Preservation, December 9, 2008): Section 3.8.4 of the DEIS indicates that this area is currently served by the Rock Hill Volunteer Ambulance Corp, and provides a discussion of the impacts, based on a conversation with Mr. Tom Bogursky, who indicated that in times of shortage, residents can rely on paid ambulance services provided by Mobilemedic EMS. In the current configuration with the total proposed units, it is clear that more residents in Rock Hill would have to rely on Mobilemedic EMS services. The ambulance service will not be able to discriminate against new residents and compel them to be serviced by Mobilmedic EMS, as suggested on page 3.8-10.

Response 3.8-12: Refer to Responses 3.8-3 and 3.8-10.

Comment 3.8-13 (Letter #10: Susan Roth, AICP, Hudson Valley Planning and Preservation, December 9, 2008): On November 26, 2006, the Superintendent of the Monticello School District, Dr. Patrick Michel, issued a letter (located in Appendix B) stating that this project would have a significant impact on the district's resources. According to the superintendent, multipliers used by the school district are based on a ratio of 1.6 new students per household, which would imply a total of 2144 students to be generated by the proposed project (1340 units x 1.6) over the 15 year period. However, on page 3.8-3, the DEIS estimates the number of new students to be approximately 435 over the 15 year period, less than half the number predicted by the School district's multiplier. Even with allowances for the proposed senior restricted units and smaller apartments as provided in the current proposal, it does not seem possible to support the developer's lower estimate. The combination of a reduced density and the inclusion of an active adult community will result in less impact to our schools.

Response 3.8-13: Refer to Response 3.8-2 concerning Superintendent of Schools, Dr. Michel's, concurrence with the projections of new students included in the DEIS and Response 3.8-10 concerning inclusion of an adult community in the project to further mitigate adverse impacts on the school system. The Applicant notes that the number of students anticipated from the now proposed As of Right Plan would change from approximately 435 to 432 over the twenty year buildout. However, based upon the seasonal use of the residences, the number of students may be reduced to 302 or lower. In addition, according to correspondence from Dr. Michels included in the DEIS (Appendix B), nearly nine percent of the school age children in the school district

currently attend private or home schools. Based upon this percentage, the projected increase in school enrollment would further decrease.

As discussed in the DEIS, the proposed project includes residential and commercial components. The fiscal analysis included in Section 3.10 indicated that there will be an annual net benefit from the proposed action. As noted in Section 3.10, of this FEIS, the now proposed As-of-Right project, including its fee simple Townhouse units, would generate tax revenues \$4,151,486 for the school district, while the projected cost to the school district is \$4,521,312 if all of the units are year round units, resulting in a deficit of \$369,826. However, under the existing demographic scenario where 70 percent of the units are permanent year round use, the projected cost to the school district would be reduced to \$3,160,732, resulting in a difference of \$990,754. These funds could be used to offset the effects of any increase in student enrollment resulting from the proposed project.

Finally, as indicated in the DEIS, the Applicant remains committed to working with the school district to further examine its operation and refine the fiscal analysis to minimize potential impacts on the district.

Comment 3.8-14 (Letter #18: William J. Pammer, Jr., PhD, Sullivan County Division of Planning and Environmental Management, December 19, 2008):

DPEM feels there will be an impact on the school system not reflected in the DEIS. The second homeowners in the County and in Thompson constitute a significant portion of the population. However, there are characteristics that attract second homeowners that are not present in this proposed development, which more closely resembles a suburban style subdivision. Therefore, it is incorrect to assume that such a high percentage of homeowners will not have children in the school system. DPEM believes that the schools will be financially burdened beyond any additional tax revenue received if this project is developed as planned, and mitigation should be proposed.

Response 3.8-14: Refer to Responses 3.8-2 and 3.8-13.

Comment 3.8-15 (Letter #19: Steve Gottlieb, Rock Hill Fire District, January 19, 2009):

The Rock Hill Fire District has an additional critical concern regarding the DEIS as submitted by the developer for the above- referenced project. If Glen Wild Road is widened into four lanes, as anticipated by the developer, the Rock Hill Fire District, as well as citizens of the Town of Thompson, will be gravely impacted.

The District uses the property in front of the existing building to clean and pack its trucks and more importantly, this area in front of the current building serves as a buffer when our trucks pull out into traffic and return, thus being able to back safely onto the pad. If Glen Wild Road is widened, the District will completely lose this buffer and the safety of the members of the Fire Department may be compromised.

Response 3.8-15: The widening of Glen Wild Road specified in Appendix E (Traffic Impact Analysis) was proposed to be constructed entirely within the existing available rights-of-way. The widening is proposed to avoid significant impacts on traffic operating conditions in the study area and to provide adequate capacity to accommodate project and non-project traffic. The widening, and all proposed traffic related improvements, will be designed and constructed in accordance with acceptable standards.

A revised Traffic Impact Analysis, dated February 27, 2009, is included with this FEIS as Appendix E. The analysis demonstrates a significant reduction in project-generated peak-hour traffic volumes of up to 60 percent resulting from the As-of-Right Plan. As a result of the reduced traffic volumes, the mitigation measures previously proposed have been reduced and are no longer expected to require the acquisition of the private property noted in the comment.

Comment 3.8-16 (Letter #20: Robert Geneslaw, Robert Geneslaw Co, December 31, 2008):

It is understood from the DEIS/DGEIS that the project sponsor has sent a copy of the document to the Monticello Central School District for a review of enrollment and fiscal impacts but has not yet received a response. The FEIS/FGEIS should include this information. At this time of uncertainty with respect to state funding for the schools and the economy in general, projections are difficult to make, but an effort should be made none the less. To the extent possible, this analysis should include the current plans for the Concord Project, at least within the time frame of Phases 1 and 1A.

Response 3.8-16: Refer to Response 3.8-2 and 3.8-13. Analyses of anticipated fiscal impacts that may result from the proposed project are included in Section 3.10 of the DEIS and Section 3.10 of this FEIS. The Applicant notes that no comments on the DEIS were received from the school district. Since redevelopment of the Concord site is currently under review and its final form and outcome are uncertain, the fiscal impacts of that proposed project were not considered in the analysis of impacts anticipated the Rock Hill Town Center Development.

Comment 3.8-17 (Letter #20: Robert Geneslaw, Robert Geneslaw Co, December 31, 2008):

The Rock Hill Fire District has requested an opportunity to meet with the project sponsors to review their concerns. The FEIS/FGEIS should incorporate steps necessary to mitigate project impacts. We also note that the Concord DGEIS also included an examination of Fire District needs that were generally similar with respect to projected equipment needs. There should be some coordination with respect to equipment and building(s) and training needs, location and cost distribution.

Response 3.8-17: Refer to Responses 3.8-4, 3.8-5, 3.8-6, 3.8-7, and 3.8-8.

Comment 3.8-18 (Steve Gottlieb, Public Hearing, December 10, 2008): I've submitted a letter to the Town. The Fire District's concerns are basically some wrong information that were in the original report that we wish to correct.

The other concerns are that we keep the meeting open so we can talk to the developers in the future about some of our concerns, and that we keep our options open to possibly form a special taxing district for the new development just in case there is an impact on the Rock Hill Fire District where we do have to buy additional equipment or an addition. That way there, the brunt of the tax base of the Rock Hill Fire District doesn't have to, you know, pay for what they're going to, you know, cause the development, well, the Rock Hill Fire District to absorb. So that way they're, you know, just they are paying for it. And that's our main concerns.

Response 3.8-18: Refer to Responses 3.8-4, 3.8-5, 3.8-6, 3.8-7, and 3.8-8.

Comment 3.8-19 (Steve Gottlieb, Public Hearing, December 10, 2008): And, you know, the height of the building we haven't really seen. And the water supplies, hydrants, who's going to maintain them? Because we already have a problem in Emerald Green where we have

things that look like fire hydrants that aren't. Like we had a fire the other day. Luckily, they have a lake, and here there is no lake. So that's one of our big concerns. And basically that's about it. Just so we can keep an open, you know, dialogue with the Planning Board.

Response 3.8-19: *Refer to Responses 3.8-4, 3.8-5, 3.8-6, 3.8-7, and 3.8-8.*

Comment 3.8-20 (Susan Roth, Public Hearing, December 10, 2008): They're also concerned about the impacts on the services that are provided in their area, namely the Rock Hill Fire Department and ambulance corps and some of the other service providers, including the schools.

Response 3.8-20: *Refer to Responses 3.8-4, 3.8-5, 3.8-6, 3.8-7, and 3.8-8 concerning potential impacts on the Rock Hill Fire Department. Refer to Responses 3.8-3 and 3.8-10 concerning impacts on the Rock Hill Volunteer Ambulance Corps and Responses 3.8-2 and 3.8-11 concerning impacts on the school system.*