

### **3.8 Traffic and Transportation**

Appendix C contains attachments with additional text, figures, tables, and/or photos related to certain traffic and transportation responses. This information includes analyses of Heiden Road access to the site.

**Comment 3.8-1. (Letter From John L. Sarna, November 22, 2011).** At your request I have reviewed for technical content the Traffic Section of the Draft Environmental Impact Statement for the proposed Raleigh and Heiden Properties development, dated October 13, 2011, prepared by Tim Miller Associates, Inc. This review follows my Review for Completeness of the original submission dated June 20, 2011, and my memos of August 16, 2011, and October 4, 2011.

*Response 3.8-1: Comment noted. Completeness submissions resulted in additional material being added to the DEIS and included some non-completeness comments included in the November 22, 2011 memo and responded herein.*

**Comment 3.8-2. (Letter From John L. Sarna, November 22, 2011).** In general I have found the technical content of the report acceptable. It meets the primary SEQR objective of disclosing all of the impacts of the proposed development, and provides an acceptable basis for the decision process.

*Response 3.8-2: Comment noted.*

**Comment 3.8-3. (Letter From John L. Sarna, November 22, 2011).** There are however, some specific areas where additional information is required, and which will have to be addressed in the Final Environmental Impact Statement. These areas are covered below in the following comments.

*Response 3.8-3: See John L. Sarna Comments 3.8- 4 to 3.8-19 and responses.*

**Comment 3.8-4. (Letter From John L. Sarna, November 22, 2011).** The traffic counts used in this study, and which are presented in 3.8-3 and 3.8-4, were made on Friday and Sunday afternoons in the Summer of 2007. In order to determine whether these counts were still applicable, the Scoping Document for the study called for new spot check counts to be made at the intersection of Heiden Road and Kiamesha Lake Road. These counts had not been made as of the June 20, 2011, submission, but were subsequently made on Friday, August 26, 2011.

*Response 3.8-4: Traffic counts used were consistent with the required scope. The 2011 traffic count is shown in Appendix C. See comment and response 3.8-13 for further detail.*

**Comment 3.8-5. (Letter From John L. Sarna, November 22, 2011).** The use of a one percent annual background traffic growth rate through 2015 plus the traffic generation from eight other residential development projects, listed on page 3.8-8, to develop the 2015 No-Build traffic volumes is acceptable.

*Response 3.8-5: Comment noted.*

**Comment 3.8-6. (Letter From John L. Sarna, November 22, 2011).** Tim Miller Associates

has revised Figure 3.8-1 to show the locations of the other developments, and this revised figure should be included in the FEIS.

**Response 3.8-6:** *Mr. Sarna was provided with a revised Figure 3.8-1 and this FEIS Figure 3.8-1 is contained in Appendix C.*

**Comment 3.8-7. (Letter From John L. Sarna, November 22, 2011).** The generated traffic volumes from these eight developments should be shown on traffic diagram figures.

**Response 3.8-7:** *Mr. Sarna was provided with the generated traffic volumes from these eight developments in tabular form. As requested these volumes are presented in FEIS Figures 3.8-7a and 3.8-7b in Appendix C.*

**Comment 3.8-8. (Letter From John L. Sarna, November 22, 2011).** The site-generated traffic volumes from the Raleigh and Heiden Properties development, which are based on ITE trip generation rates for year-around housing and on the 2007 study of recreational traffic in Fallsburg for the seasonal housing, are acceptable.

**Response 3.8-8:** *Comment noted.*

**Comment 3.8-9. (Letter From John L. Sarna, November 22, 2011).** The rationale for the directional distribution of site-generated traffic needs to be explained. The 30 percent arrival from Heiden Road to the south on Friday evening would reflect weekend commuter traffic arriving from Route 17, but would seem to be too high for departing traffic during this period. Similarly, while a 30 percent distribution of departing traffic on Sunday afternoon would seem reasonable, the same percentage applied to arriving traffic would seem to be too high. The same directional distributions need not be, and frequently are not, the same for both arriving and departing traffic. Further development of this section is called for.

**Response 3.8-9:** *DEIS pages 3.8-8 and 3.8-9 describe the distribution being based on existing traffic flows, and access positioning within the transportation network. In particular position with respect to NYS Route 17 and NYS Route 42 is critical for regional movement and access to shopping and other opportunities.*

*Except for the intersection of NYS Route 42 and Heiden Road CR 161, study intersections are not sensitive to small changes in volumes. The Kiamesha Lake Road (CR 109) intersection with Heiden Road (CR 161) being at the apex of movements illustrates this as shown in Response 3.8-11 where the northbound through volume was increased by 100 vehicles at Kiamesha Lake Road and Heiden Road with less than one second change in delay. Also Response 3.8-13 shows with volumes altered based on 2011 data again shows less than one second per vehicle change in delay.*

*On Friday although the percentages are the same, they are percentages of different volumes and hence the movement to the south of 27 vehicles is less than from the south (44 vehicles). To the south this would be 12 percent of the total trips generated and from the south 19 percent of the total trips generated. On Sunday these volumes are nearly equal.*

*Below is a general discussion using a 10 percent shift in the direction of travel based on the commented concerns.*

*For the purpose of sensitivity, a one third reduction of the projected 30 percent of exiting traffic to the south to 20 percent is considered. This ten percent shift is nine site exiting trips to other directions. Three vehicles entering the network at Park House Road would be projected north, out of the study area toward South Fallsburg shopping. The remaining six trips would be redirected mostly toward Thompson shopping using Kiamesha Lake Road and thus split between the north and south accesses. At the intersection of Heiden Road (CR 161) and Kiamesha Lake Road (CR 109), traffic from the north access reduces intersection delay as trips move from southbound through traffic to southbound right turns. This would partially offset delays caused by the three or four vehicles making left turns arriving from the southern access. Half of the traffic turning into Kiamesha Lake Road (CR 109) would be using CR 182 and not continuing to the Kiamesha Lake Road and NYS Route 42 intersection.*

*The result of above shift would be as follows. The NYS Route 42 intersections with Heiden Road and La Vista Drive would not change at all. The intersection of Heiden Road (CR 161), River Road, and Thompson Road would have less through traffic and operate at or better than previously analyzed. Based on the changes in volumes and delay from the No Build to Build Conditions, the impact of three or six vehicles at the intersections of Kiamesha Lake Road (CR 109) and NYS Route 42 and Heiden Road (CR 161) would be small. Only the southern access volumes are changing direction exiting onto Heiden Road (CR 161). This change is from left to right turns resulting in equal or reduced overall delay.*

*For Sunday the inbound traffic and outbound traffic are nearly equal at the site. The shift for the site's ten percent arriving traffic is slightly larger at 12 trips as compared to 9 trips departing the accesses on Friday. Nevertheless similar results would be expected. At the two Kiamesha Lake Road intersections the traffic on Sunday will be primarily added to easier right turn movements as opposed to Friday's left turn movements. Still only the southern access would have volume changes and the Build condition left of service A for the left turn entering traffic is unlikely to change to an unacceptable condition. For the remaining study intersections the results would be similar to Friday with little improvement or no change.*

**Comment 3.8-10. (Letter From John L. Sarna, November 22, 2011).** The development of the 2015 Build condition traffic, combining the Site-generated traffic with the 2015 No-Build traffic, is acceptable.

***Response 3.8-10: Comment noted.***

**Comment 3.8-11. (Letter From John L. Sarna, November 22, 2011).** The capacity analyses, using the methodology of the 2000 Highway Capacity Manual and the Highway Capacity Software (HCS) are acceptable. The following errors are noted.

- In the computation sheet for the intersection of Heiden Road and Kiamesha Lake Road, Existing condition, Friday peak hour (Attachment 4, page 2), the northbound traffic volume should be 376 veh/hr, not 276. This may have an effect on the analysis results
- In the computation sheet for the intersection of Route 42 and La Vista, Build condition, Friday peak hour (Attachment 4, page 25), the eastbound thru traffic volume should be

921 veh/hr, not 914. This should have no significant effect on the analysis results.

Table 3.8-6 may have to be revised accordingly.

**Response 3.8-11:** *DEIS Table 3.8-6 has been revised and is included in Appendix F. The change in delay as noted below is shown in bold and these errors do not significantly change the original results.*

*The computation sheet for the intersection of Heiden Road (CR 161) and Kiamesha Lake Road (CR 109) existing Condition Friday peak hour (DEIS Attachment 4 Page 2) has been corrected and added to Appendix C following FEIS Table 3.8-6 as Page 2. Levels of service and volume to capacity ratios have remained unchanged. The eastbound approach Kiamesha Lake Road (CR 109) delay changes to 11.5 seconds still a level of service B. Effectively the change in delay does not alter the acceptable results. This 100 vehicle increase indicates the Heiden Road intersection with Kiamesha Lake Road (CR 109) is not sensitive to such volume changes.*

*The computation sheet for the intersection of NYS Route 42 and La Vista Drive, build Condition, Friday peak hour (DEIS Attachment 4 page 25), has been corrected and added as Appendix C page 25 following immediately after the computation sheet Page 2.*

**Comment 3.8-12. (Letter From John L. Sarna, November 22, 2011).** As noted in my memo of August 16, 2011, the DEIS does not contain an analysis of the site driveway intersections with Heiden Road. These analyses were not stipulated in the Scoping Document, but it is standard practice to include them in a Traffic Impact Study. Tim Miller Associates has responded that they will include these analyses in the FEIS, which is acceptable. For the record here, these analyses need to be performed.

**Response 3.8-12:** *Traffic volumes for the site accesses were projected (DEIS Table 3.8-5) and shown in FEIS Appendix C revised Figures 3.8-11 and 3.8-12. These figures have been revised to show estimated Hotel traffic using the southern access. Hotel traffic was estimated using the Institute of Transportation Engineers' Trip Generation as indicated in Appendix C Tables 3.8-12a and 3.8-12b. Hotel distribution was based on the site distribution and balanced for the northern leg. Although comment 3.8-9 suggests a more northern distribution orientation, the DEIS distribution is a worse case for the southern site access. FEIS Appendix C level of service summary Table 3.8-12c and computation sheets are provided in Appendix C. Level of service for all access points is an acceptable level of service C or better for all driveway access points to Heiden Road (CR 161).*

**Comment 3.8-13. (Letter From John L. Sarna, November 22, 2011).** The intersection of Heiden Road and Kiamesha Lake Road should be re-analyzed using the traffic volumes from the 2011 traffic count. The higher traffic volumes on Kiamesha Lake Road could result in greater average vehicle delays, and possibly Level of Service revisions. As reported in my memo of October 4, 2011, a comparison of these counts to the traffic volumes in the DEIS shows an overall eight percent increase over the four years. Thru traffic on Heiden Road was virtually unchanged during this period, but traffic volumes on Kiamesha Lake Drive increased by about 60 percent. These spot counts are mentioned in Appendix F, Attachment 5 of the DEIS; however, the actual count volumes should be shown. This can be done in the FEIS.

**Response 3.8-13:** *The intersection of Heiden Road (CR 161) and Kiamesha Lake Road (CR 109) analysis based on August 2011 count is contained in FEIS Appendix C Table 3.8-13 and compared to the DEIS conditions. Although in general the total intersection volumes are higher working from the 2011 base counts the traffic is more evenly distributed over the hour resulting in the same levels of service and less than one second per vehicle higher. Volumes based on the 2011 count for all conditions are contained in FEIS Appendix C Table 3.8-13a. The growth for the No Build condition is slightly less as background growth is not added for the period between 2007 and 2011 and as such is already considered in the counted traffic. Level of service computation sheets follow Table 3.8-13b and are identified as Pages 1 of 3, 2 of 3, and 3 of 3.*

**Comment 3.8-14. (Letter From John L. Sarna, November 22, 2011).** At the unsignalized intersection of Heiden Road with NYS Route 42, the Heiden Road approach is calculated to be operating at Level of Service F in the Friday P.M. Existing condition, with a volume/capacity (v/c) ratio of 1.70. V/c ratios up to about 1.25 (volume exceeding theoretical capacity) can and do occur, but a greater existing v/c ratio generally indicates an actual traffic operation different from the input to the calculation. In case the following two conditions are considered to be likely

- Vehicles turning left out of Heiden Road may be turning into the striped median rather than into the southbound thru lane on Route 42. This would reduce the delay time of the left turn and thus the right turn vehicles as well.
- Vehicles turning right may be using the shoulder and the flared right turn geometry to create in effect a separate right turn lane.

Both of these possibilities are listed in the discussion on page 3.8-16 of the DEIS, although not as a reason for the high v/c ratio. While these possible operations would reduce the vehicle delays, the operation would still be Level of Service F, and the delays would, of course, increase for the 2015 No-Build and Build conditions. In their present state these would not be considered acceptable traffic operations

**Response 3.8-14:** *The New York State Department of Transportation has no comment at this time as noted in Comment 3.8-23.*

*The operation analysis is based on the summer Friday and Sunday peak hour factor of 0.83 on CR 161 indicating this condition is very short lived perhaps less than 15 minutes per day. Coupled with drivers making operational changes as using the shoulder, using the center median, and using smaller gaps this condition may be evident for only brief periods. None of these are desirable situations. In addition some traffic platoon (grouping) affects from the CR 109 and NYS Route 42 intersection signal may improve traffic operations.. Furthermore, because this situation is typically only during the summer Fridays and Sundays, it is more tolerated. As this situation shall only get worse in extending the time and/or intensity of the issues the DEIS has provided a baseline for initiating discussion on future improvements.*

**Comment 3.8-15. (Letter From John L. Sarna, November 22, 2011).** In discussing possible improvements on page 3.8-16, several mitigating measure are presented. Using the median, with proper markings and signs, to facilitate the left turn is possible, but as most drivers would not be familiar with this operation and because the left turn volume is relatively low, this improvement would have a limited benefit. Providing a separate dedicated right turn lane

probably would provide far more benefits. Signalization of the intersection probably would bring operations to acceptable levels also, but as this condition occurs for only a few hours and during only the summer months, it is questionable whether it would meet NYSDOT guidelines. It should be noted that the intersection is under the operating jurisdiction of the New York State Department of Transportation.

This intersection is impacted by virtually every proposed new development in the Town, and any solutions should be a concern for all of them.

**Response 3.8-15:** *The New York State Department of Transportation has no comment at this time as noted in Comment 3.8-23. The improvements noted in this comment are not the only improvements discussed in the DEIS. The DEIS does not rank the possible improvements or combination of improvements except to not recommend banning left turns from Heiden Road (CR 161) at NYS Route 42.*

*In support of the comment, while many drivers are not familiar with a left turn to a center receiving lane, still others would avoid such operation given the current 55 mile per hour speed limit. Furthermore, a right turn lane could also be relatively short as the number of left turning vehicles that need to be bypassed is low.*

**Comment 3.8-16. (Letter From John L. Sarna, November 22, 2011).** The DEIS shows the site-generated traffic entering from and exiting to Park House Road, but does not show the existing traffic volumes or the projected 2015 No-Build and Build traffic volumes. Presumably these would be low, and road capacity should not be a consideration here, but this is not documented in the DEIS

**Response 3.8-16:** *Comment noted. NYS Route 42 runs parallel to Park House Road. NYS Route 42 is a rural minor arterial and Park House Road is a local road. NYS Route 42 was counted and analyzed as required in the DEIS. Local knowledge of the transportation network was used by the Board to presume Park House Road has too low an existing volume and is poorly situated to be used by traffic of the majority of the site and thus capacity analysis was not required in the scoping document.*

**Comment 3.8-17. (Letter From John L. Sarna, November 22, 2011).** The poor condition of both Park House Road, Fred Road and other roads serving the “east” access drive, however, is well documented in the report on pages 3.8-1 to 3.8.6, and a number of recommendations for improvements are included. It is noted that, while Heiden Road, NYS Route 42 and other roads in the area are impacted by almost all of the proposed new developments in the Town, these “back” roads probably would be impacted only by site-generated traffic from this project.

**Response 3.8-17:** *Park House Road and Fred Road can be used as a parallel alternative to NYS Route 42. NYS Route 42 is classified as a rural minor arterial with its purpose primarily for through traffic as opposed to Fred Road and Park House Road that primarily serve as local access.*

*Poor road conditions in some cases may deter speeding and use of “back” roads for through traffic during peak travel periods. However we note that the traffic calming effect of not repaving is an observation not a Town policy recommendation.*

*Improved signing is less likely to encourage speeding than improved road surface*

*conditions. As most of the peak travel periods are during daylight, improved night visibility of signs may have the least effect on peak daytime use of back roads.*

*Generally improvements to pre-existing road conditions are not the responsibility of an applicant unless voluntarily offered. The applicant will honor any road improvement commitments made in the DEIS.*

*Section 3.8 Traffic and Transportation in the DEIS reviews local road conditions, and recommended improvements are discussed in sections 3.8.5 and 3.8.6.*

*Section 3.8.5 discusses applicant proposed mitigation measures which consist of two measures: right of way line adjustments along frontage roads to meet jurisdictional functional classifications where possible, and; adjustment of sight lines (e.g. trim back vegetation) for left turning vehicles from Heiden Road to Kiamesha Lake Road if necessary and achievable. The latter will be reviewed in the engineer's final site plan drawings.*

*Section 3.8.6 reviews overall road network issues in the vicinity of the Raleigh and Heiden properties and notes these are not the applicant's mitigation responsibility.*

**Comment 3.8-18. (Letter From John L. Sarna, November 22, 2011).** In my memo of August 16, 2011, I noted that the present location of the guardhouse might have an impact on free movement in and out of the south access road to Heiden Road. This item still needs to be addressed.

***Response 3.8-18:*** *When traffic to the Hotel is heavy, stopping vehicles at the guardhouse could be a potential issue for free movements into and out of the site. To this end, it is the responsibility of any guard not to overly delay vehicles entering the hotel causing traffic to queue into Heiden Road. See FEIS Appendix C Photo 3.8-18.*

*Traffic turning left into the Hotel would typically yield to the site's exiting traffic passing by the hotel entrance. This conventional right of way could be reversed with additional traffic control in advance of the Hotel entrance on the site's exit approach and/or with active guard intervention.*

**Comment 3.8-19. (Letter From John L. Sarna, November 22, 2011).** On page 3.8-10 of the DEIS, last paragraph, the time period should read "Friday P.M. peak hour."

***Response 3.8-19:*** *Comment is correct. Revised page added to Appendix C for context.*

**Comment 3.8-20. (Letter From Keystone Associates, December 8, 2011).** A discussion of Pedestrian/Bicycle traffic and the need for sidewalks along proposed roadways within the project site should be added as requested in the scoping document.

***Response 3.8-20:*** *Pedestrians and bicycle traffic and facilities are discussed in the DEIS in the Local Transportation Network (starting page 3.8-1) and in the Consistency with the Town Comprehensive Plan (starting page 3.8-11) subsections. Item 16 on page 3.8-14 discusses internal circulation and lack of nearby facilities or destinations for*

*pedestrians and bicyclists. Limited bicycle parking is recommended in the DEIS at accessory site facilities.*

**Comment 3.8-21. (Public Hearing Minutes, James Creighton, November 10, 2011).** The traffic study indicates that the land the unit owners would be using primarily Heiden Road but I would point out that at least 68 of the units in Pod 4 would be using Fred Road exclusively. A 68 unit development that would be a significant impact to that road in and of itself. So, I don't want to lose sight that just because the majority of the units are on Heiden Road that we're not looking at Fred Road....

***Response 3.8-21:*** *Not all the traffic from the eastern cluster with access to Park house Road would use Fred Road as indicated in site generated traffic figures (DEIS figures 3.8-7 and 3.8-8). A portion of the traffic would use Fred Road and Ranch Road and the rest would use Park House Road. These roads are discussed on DEIS page 3.8-4 and again under Network Issues starting on DEIS page 3.8-15. Conditions on these roads are shown in DEIS Appendix C Attachment 1 Photos 4 to 10. DEIS Appendix C Attachment G Table 1 provides a preliminary sign review including these roads. Road conditions are provided in DEIS Table 3.8-1.*

**Comment 3.8-22. (Public Hearing Minutes, James Creighton, November 10, 2011).** The internal road, the roads and the loops, the description here answers that the internal roads are intended to remain private, not to be deeded to the town. To the extent that the town is looking at the long-term impact of this project, I would hope that the applicant is at least required to ensure that the internal roadways, even if they are to remain private, meet full town standards so that if they are ever later dedicated to the town, for any reason, that there aren't going to be any problems or inefficiencies or difficulties with the roads. I understand the current intention to keep them private, but I would just ask that the town be sure that they remain as safe as a deeded town road and go from there.

***Response 3.8-22:*** *The proposed roads will meet Town of Fallsburg road construction standards.*

**Comment 3.8-23. (NYS Department of Transportation, Letter Dated November 17, 2011).** We have reviewed the Draft Environmental Impact Statement (DEIS) regarding the above-referenced project and have no concerns at this time. Thank you for the opportunity to review and comment on the project.

***Response 3.8-23:*** *Comment Noted.*

**Comment 3.8-24 (Letter to Planning Board, December 16, 2011, Robert Geneslaw):** Page 3.8-16, 17. (Transportation) discusses the capacity issues at the intersection of Heiden Road and Route 42, and the projected worsening of this condition with the traffic to be generated upon occupancy of the Raleigh Heiden development. The discussion includes consideration of several improvements or combination of improvement to relieve the projected conditions. It is suggested that the Planning Board request that the applicant further explore four of these potential improvements in the FEIS:

- (a) Flatten the Heiden Road – Route 42 approach grade
- (b) Improve the NYS Route 42 median to accept left turning traffic
- (c) Add a turn lane on Heiden Road



(d) Signalize the intersection

The DEIS indicates that the capacity condition exists, and the Raleigh Heiden development traffic would add a modest amount of traffic, and that since additional tax revenues will be available to the Town, that funding source should be used. The Fiscal Impact section estimates the tax receipts to be applied at full build out, projected at 2015, so the full tax receipts would not become available until at least 2016 or 2017, but the increased traffic will begin to occur several years earlier. It is suggested that an alternative to waiting for 2016 for use of tax receipts for improvement be considered in the FEIS.

**Response 3.8-24:** *The Applicant is not suggesting the improvements be funded through tax receipts from this project. The Applicant has provided data that this is an existing condition worsening over time with the addition of traffic from developments in the Town, and the intersection should be eventually improved.*

*Improving the median to accept left turning traffic might also alter the signal installation however it is rendered useless when a signal is installed. As noted by the Town's traffic consultant (Comment 3.8-15 "Using the median, with proper markings and signs, to facilitate the left turn is possible, but as most drivers would not be familiar with this operation and because the left turn volume is relatively low, this improvement would have a limited benefit." Furthermore the current speed limit would deter drivers even familiar with this operation. The median turn is not recommended especially without first reducing the speed limit and area speeds.*

*The Manual on Uniform Traffic Control Devices (United States Department of Transportation Federal Highway Administration 2009) guidance notes that "Since vehicular delay and the frequency of some types of crashes are sometimes greater under traffic signal control than under STOP sign control, consideration should be given to providing alternatives to traffic control signals even if one or more of the signal warrants has been satisfied." In this case it would make sense to change the geometry first flattening the approach grade and/or adding a turn lane, since such changes could result in having to change the any prior signal installation. Given the capacity issues is a summer peak problem, the rest of the year this signal location might function with the signal in flashing mode most of the time. Here again flattening the approach grade and to a lesser extent adding a turn lane would improve operation all year. In particular winter safety might improve if the grade were flattened. Flattening the grade would most likely be done by raising the roadbed of Heiden Road (CR 161). This could affect grades or access from properties near the intersection corners. Flattening the grade after adding the turn lane would probably require redoing the turn lane, thus it would make more sense to flatten the grade first, add the turn lane, and then add a traffic signal. Another consideration is this will be a New York State Department of Transportation signal. They will need to provide the yearly maintenance on the traffic signal. As previously described a signal may also increase overall intersection delay. Whereas, flattening the Heiden Road (CR 161) might make maintenance slightly easier and this improvement would be offsetting part of a maintenance cycle on the road. Delay to the Heiden Road (CR 161) approach should decrease slightly.*

*The long term strategy suggested is the improvements be progressed in the following order:*

*1) Flatten the grade and slightly widen the curb radius on Heiden Road (CR 161).*

- 2) Add a right turn lane on Heiden Road (CR 161)
- 3) Add a traffic signal

*Although not listed in the comment, the reduction of speed limit would improve safety and potentially improve energy conservation at the intersection and adjoining La Vista Drive and NYS Route 42 intersection at lower cost than any of the above improvements. A speed reduction would be consistent with the above three improvements.*

**Comment 3.8-25 (Letter to Planning Board, December 16, 2011, Fallsburg Fishing and Boating Club, James Creighton):** While the DEIS suggests that traffic from this project will only be problematic on Friday and Sunday evenings during the peak rush home periods, we question that conclusion. To be sure, the traffic during the Friday and Sunday evenings are of great concern, and further mitigation measures should be proposed. However, we understand that the base traffic counts were done more than four years ago in the summer of 2007; that outdated data must be updated in the FEIS in light of the increased usage and new construction in the immediate area of the proposed project.

***Response 3.8-25:*** *The DEIS included a discussion of 2007 and 2011 traffic based on a 2011 count taken at the intersection of Kiamesha Lake Road (CR 109) and Heiden Road (CR 161) in DEIS Appendix C Attachment 5 "Validation of Traffic Counts". In addition continuous count data covering July and August of 2005, 2007, and 2010 was also compared. Both indicated no adjustment was needed. In addition a separate analysis is provided in the FEIS of the intersection of Kiamesha Lake Road (CR 109) and Heiden Road (CR 161) under comment 3.8-13 indicating little change in operation. Furthermore the response to comment 3.8-11 indicates this intersection is not sensitive to large changes in Heiden Road (CR 161) traffic.*

**Comment 3.8-26 (Letter to Planning Board, December 16, 2011, Fallsburg Fishing and Boating Club, James Creighton):** In addition, we are particularly concerned with the level of traffic introduced to Park House Road (Wildwood Drive). As noted in the DEIS, 68 units will only have access via Park House Road. Accordingly, while almost all of the DEIS recommendations focus on Heiden Road (see DEIS pages 3.8-15 to 3.8-17), due care and analysis of the major impacts upon Park House Road and connecting roadways must be taken and the DEIS must be supplemented therewith.

***Response 3.8-26:*** *The focus of the DEIS was on Heiden Road (CR 161) because Heiden Road (CR 161) is a major through road. In addition Heiden Road (CR 161) will experience traffic from the hotel and three clusters of homes, not just cluster a single (Cluster 4) as is the case with the easterly side of the development. For example the Grey Road bridge that feeds Ranch Road has Sunday daily traffic of 967 vehicles total in both directions (Appendix C NYS DOT count 2008) compared to the same Sunday on Heiden Road with 4807 (Appendix C NYS DOT count 2008) vehicles.*

**Comment 3.8-27 (Letter to Planning Board, December 10, 2011, Jerry Chiochio):** According to the report, there will be 68 units will only have access via Fred Road. We are all concerned that the construction vehicles will damage this road, not to mention the constant noise pollution.

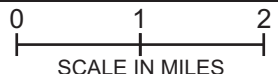
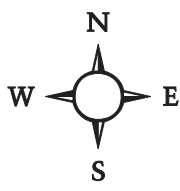
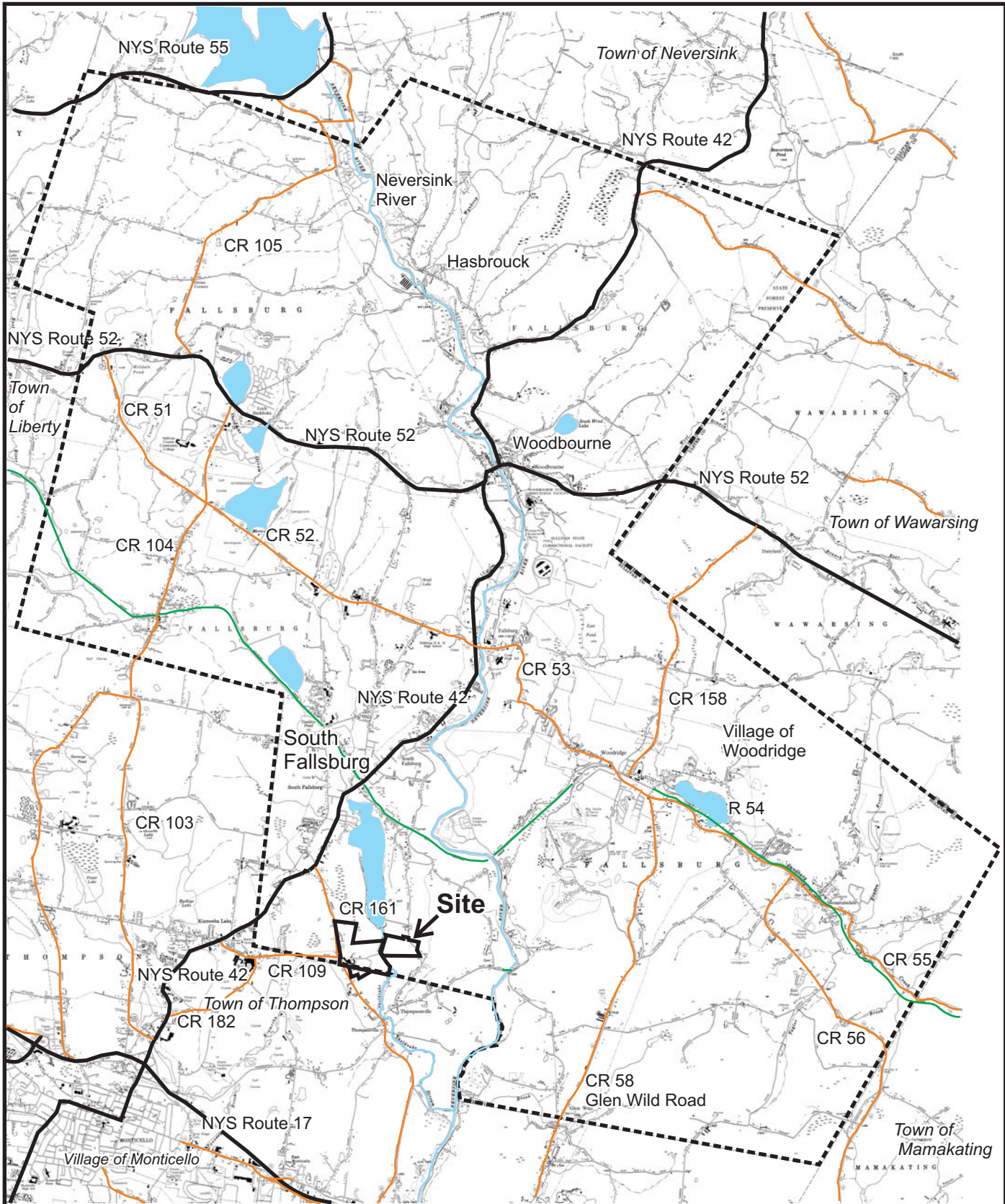
**Response 3.8-27:** *The 68 units in Cluster 4 would access Park House Road and a portion of that traffic would travel south toward Fred Road in the Town of Thompson. Fred Road is in poor condition and will need to be rehabilitated regardless of this project. The noise pollution from arriving trucks will mostly be during the week and temporary in nature. Park House Road is in better shape and therefore vehicles arriving from or departure toward that direction should result in less noise. The condition of Fred Road was identified in DEIS Table 3.8-1 and illustrated in the DEIS Appendix C Attachment 1 Photo 7.*

**Comment 3.8-28 (Letter to Planning Board, December 12, 2011, Bob Abbott):** Traffic would put a huge burden not only on Heiden Rd but very rural Fred Rd as well.

**Response 3.8-28:** *Fred Road and Heiden Road are both two lane roads with Heiden Road in better condition. As noted in Response 3.8-26 Heiden Road (CR 161) has more traffic and is in better condition than Fred Road.*

**Comment 3.8-29 (Letter to Planning Board, December 14, 2011, Larine Harr):** The sole access for approximately 70 of the units will be via Fred Road (aka Park House Road), a small, rural road that can not handle that additional traffic.

**Response 3.8-29:** *The 68 units in Cluster 4 would access Park House Road and a portion of that traffic would travel south to Fred Road in the Town of Thompson. See Responses 3.8-26 and 3.8-27.*



KEY	
Lake or Reservoir	
State Routes	
County Roads	
Old Rail or Road Grade	

**Figure 3.8-1: Regional Context**  
**Raleigh and Heiden Properties**  
 Town of Fallsburg  
 Sullivan County, New York  
 Base Map: NYS DOT Planimetric Map  
 Scale: As shown

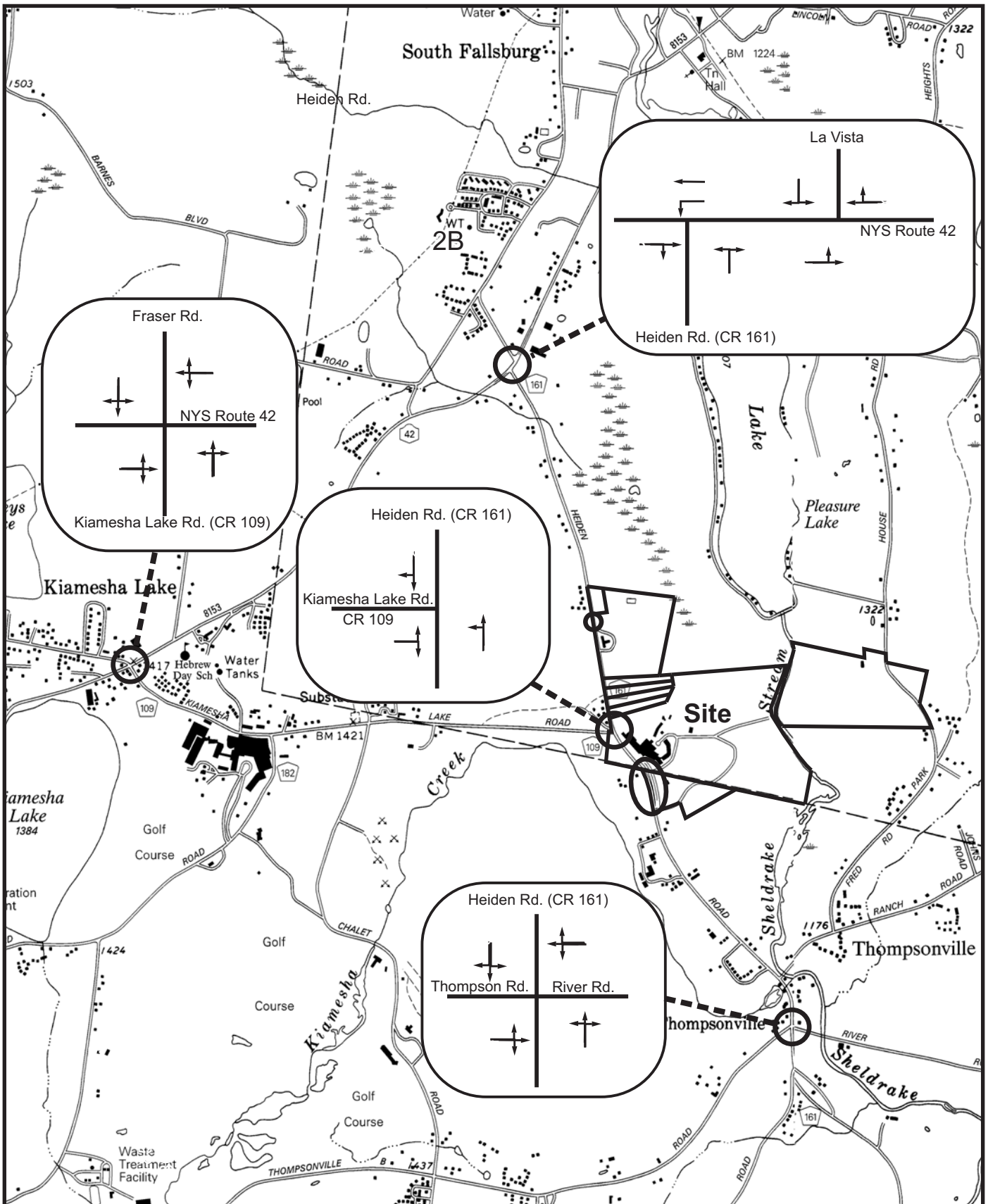


Figure: 3.8-2: Local Area  
 Raleigh and Heiden Properties  
 Town of Fallsburg, Sullivan County, New York  
 Base Map: US DOT 7.5-minute Planimetric Map, Monticello Quad  
 Scale: 1" = 2,000'