

### **3.4.8 Traffic and Transportation Comments and Responses**

#### **Introduction**

Since the publishing of the DGEIS, Orange County has been progressing the Larkin Drive West project and issued an Environmental Assessment Form as part of the initial process in declaring itself Lead Agency for the project. The notice of intent to be Lead Agency on the Larkin Drive West project is included in FGEIS Appendix C. Larkin Drive West would connect CR 105 to Forest Avenue and NYS Route 208. In particular this would shift traffic from Bakertown Road to Forest Avenue as a means to access CR 105.

#### **Comment 3.4-1A (Letter 2, Steven Neuhaus, Orange County Executive, June 10, 2015):**

The traffic impact study is inherently flawed given that reduction in vehicle trips are estimated from the American Community Survey and by utilizing traffic counts rather than conducting a comprehensive origin and destination survey to calculate vehicular trips by dwelling unit type in Kiryas Joel.

**Response 3.4-1A:** *There is no need for a new origin and destination study to secure a generic understanding of the trip generating characteristics of Village residents. Traffic counts are the most direct way of examining existing traffic characteristics and were used in the DGEIS to characterize local conditions along with the American Community Survey. The American Community Survey provided information on trip characteristics including modal split conditions. Increased sidewalks, bus, taxi, and cars service activities anticipated for the 507-acre annexation area are expected to reduce vehicular trips as compared to the no annexation condition. See also response 3.4-3.*

#### **Comment 3.4-1B (Letter 2, Steven Neuhaus, Orange County Executive, June 10, 2015):**

There is also no sound statistical or mathematical rationale in the DGEIS for reductions in vehicular trips and traffic impact between the no-build, 507 and 165 acre annexation alternatives.

**Response 3.4-1B:** *DGEIS Appendix F Table F3-9 shows the total trips generated under each of four scenarios, considering trips generated from different distributions of development over 1,207 acres (the existing Village and the 507-acre annexation territory) and the alternative scenarios of development over 864 acres (the existing Village and the 164-acre annexation territory). The DGEIS evaluation of the 507-acre territory shows that lower density development (no annexation) results in more vehicle trips generated overall than the higher density scenario (with annexation).*

*In the alternatives analysis of the 164-acre annexation territory, the with annexation and no annexation overall trip generation results are similar, within three percent of each other. These alternatives and the 507-acre with annexation scenario all benefit, with regard to trip generation, from higher density. The 507-acre no annexation trip generation is higher because the lower density development projected over a wider area does not benefit from trip reducing factors such as transit connections.*

*The benefits of high density development with concomitant reduced vehicle trips is specifically recognized by both the Southeastern Orange County Traffic and Land Use Study, and the Orange County Smart Growth document.*

*The statistical and mathematical rationale presented in the DGEIS for reductions in vehicular trips is based on the Village's historical reliance on and benefits of sidewalks, public transit, etc., enumerated in the modal split, and reasonable expectation of continued benefits. The geographical location of the development in relation to its position within the transportation network is the rational basis for the difference.*

**Comment 3.4-1C (Letter 2, Steven Neuhaus, Orange County Executive, June 10, 2015):**

Furthermore, several major components that characterize a comprehensive traffic impact study such as a safety/accident analysis, an intersection level of service (LOS) evaluation, as well as a narrative of the anticipated traffic impacts and any changes in LOS that will occur on existing roadways both within and surrounding the Village are missing from the traffic impact analysis.

**Response 3.4-1C:** *Material on accident analysis/safety and level of service within the Village of Kiryas Joel can be found in the New York State Department of Transportation Final Design Report PIN 8759.65 and 8780.20 Kiryas Joel Roadway and Pedestrian Improvements (July 2013). Such information applicable to areas outside the Village can be found in the Southeast Orange County Traffic and Land Use Plan.*

*Project specific traffic impact studies as required by the New York State Department of Transportation along State routes are not required here as annexation is not the source of growth and traffic is not an impact of annexation. Site specific traffic impact studies may be required for major developments as part of the SEQRA review of future individual projects or as part of the State Highway Permit process.*

*When individual projects come before the municipalities they may require a Traffic Impact Study as part of a subsequent SEQRA analysis.*

*The NYS DEC SEQR workbook threshold for a traffic capacity study is noted on DGEIS page 3.4-28. High Accident Locations (HALS) are computed for the State system however there are no State highways in the Village of Kiryas Joel or the annexation lands.*

**Comment 3.4-1D (Letter 2, Steven Neuhaus, Orange County Executive, June 10, 2015):**

Changes in the distribution of traffic on area roads due to annexation has also not been analyzed to any extent in the DGEIS.

**Response 3.4-1D:** *Population growth and related development will generally add traffic to the network over time. The annexation action, however is not the cause of any traffic increase.*

*Population growth is not projected to cause a "change in distribution" of traffic. Traffic will increase and its source and distribution will be, for the most part, based on the location of new residential development. See Response 3.4-1B.*

*Changes in the distribution on area roads is a result of the location of development in relationship to the transportation network and is reflected in the differences in traffic volumes on different routes, as demonstrated in DGEIS Appendix F Table F3-9.*

**Comment 3.4-2 (Letter 2, Steven Neuhaus, Orange County Executive, June 10, 2015):** The community relies on mass transit to address transportation needs and this is one of the primary

underlying assumptions for reducing vehicle trips in traffic impact analysis. However, there is no discussion on how mass transit services will be provided to the annexed property area.

**Response 3.4-2:** *The community relies on mass transit as one means to reduce traffic. The Village of Kiryas Joel also relies on sidewalks, including plowing them in the winter, to encourage people to walk. Sidewalks will be extended to cover new annexed area and will either be installed along with future development projects by project developers or as a Village of Kiryas Joel local project in conjunction with the State, as in the recent sidewalk improvements.*

*The use of rail for transit between the no-build and build condition is expected to remain similar. The use of carpools, taxis, car services, buses, and automobile to travel to the railroad station may change.*

*As the area development continues, fixed route bus services will be rerouted with new schedules. Siting of bus stops and other bus infrastructure will be required as future development applications are processed. Carpools, taxis, and car services are more flexible and will respond as dwellings are occupied and demand services.*

**Comment 3.4-3 (Letter 2, Steven Neuhaus, Orange County Executive, June 10, 2015):**

**Demographic Data Sources:** The DEIS document must utilize a consistent data source to provide the socio-economic characteristics and demographic attributes which are ultimately relied upon to form conclusions throughout the DEIS. The DEIS currently draws upon several different versions of the ACS 5-year estimates to characterize modal split, vehicle ownership, journey-to-work- data, and many other socio-economic variables for the resident population of Kiryas Joel and the annexation areas. For example, Table 3.4-11 relies upon the 2006-2010 ACS Estimates to state that 24% of when the most recent 2009-2013 5-year Estimates are the most recent data made available by the Census Bureau.

**Response 3.4-3:** *The U.S. Census Bureau is constantly conducting new surveys and releasing data from surveys. Different surveys gather different information and survey elements are sometimes altered as surveys are updated. Since no one survey has all the data useful to a DGEIS study, more than one survey is commonly used. Below are some data used from the 2006-2010 ACS and updated data from 2009-2013.*

*The combined percentage of people driving alone or carpooling remained relatively constant in the Village of Kiryas Joel from the 2006-2012 to 2009-2013. Both these percentages increased in the Village of Harriman indicating the estimates for trips in the 507 acre annexation area under no annexation may have been low. Overall the data in FGEIS Table 3.4-1 below suggests the 507 Build (annexation) condition is better than indicated in comparison to the 507 acre No Build (no annexation) Condition as presented in the DGEIS.*

<b>FGEIS Table 3.4-1 Mode of Transportation To Work</b>				
<b>Mode of Travel</b>	<b>Village of Kiryas Joel</b>		<b>Village of Harriman</b>	
	ACS <sup>1</sup> (2006-2012)	ACS <sup>2</sup> (2009-2013)	ACS <sup>1</sup> (2006-2012)	ACS <sup>2</sup> (2009-2013)
Drive Alone	29%	27.6%	63%	67.1%
Carpool	15%	17.2%	5%	17.4%
Public Transit	24%	17.8%*	19%	10.2%*
Walk	26%	34.1%	5%	0.3%
Bicycle	0%	**	1%	**
Other (Taxi, Motorcycle)	0%	1.6%	2%	0.9%
Work At Home	6%	4.5%	4%	4.1%
<sup>1</sup> Source: As shown in DGEIS Table 3.4-11 rounded to nearest percent from US Census American Community Survey 2006-2012.				
<sup>2</sup> Source: US Census American Community Survey 2009-2013. See FGEIS Appendix H1.				
* Includes Taxis in Public Transportation instead of other				
** Not shown separately.				

**Comment 3.4-4 (Letter 3, James C Purcell, Village of Monroe Mayor, June 10, 2015):** The transportation impacts (including related traffic counts, noise impacts, and air quality impacts) are not fully or properly studied because it is assumed that all Village residents presently, and all future residents of the proposed annexed parcels will, adhere to Hasidic religious restrictions on their behavior, such as no driving on the Sabbath and certain religious holidays, and no woman drivers. Obviously, and especially as to the proposed 507- acre annexation (and/or its alternative), this religious restriction on behavior cannot be legally enforced. Thus, there must be additional studies in a SGEIS or in the FGEIS to properly identify the transportation needs and habits of non-Hasidic religious behavior, study their impact and offer meaningful mitigation measures.

**Response 3.4-4:** *Since the growth projections for the Village population and the entire concept behind the annexation petition are associated with persons that observe particular cultural practices and have for decades, it is reasonable to assume that this will not substantially change in the foreseeable period of time.*

*The DGEIS study does not state that all current or future Village residents will adhere to the restrictions -- rather it acknowledges the characteristics of the local population and the likelihood those characteristics will be applicable to the future population. Studying an alternative population and its characteristics would not be reasonable under the anticipated circumstances. Moreover it is reiterated, growth will occur with or without annexation. There will be no noise or air impacts associated with annexation per se.*

**Comment 3.4-5 (Letter 12, Jim Freiband, Town of Woodbury, June 10, 2015):** Further the roadway access needs to become a forefront issue as congestion for a city of 40K..., even if largely on bus transit cannot be squeezed through a suburban road network. Access is needed for direct connections to I86 near the overpass to relieve pressure at Rte 32.

**Response 3.4-5:** *It is anticipated that the Village will monitor traffic conditions as growth takes place over time. Travel studies will be undertaken as necessary, along with major*

*development applications to assure safe access to the regional network and a well functioning transit system.*

*There is anticipated to be increased pressure from regional growth on NYS Route 32 as previously projected in the Executive Summary Southeast Orange County Traffic and Land Use Study. The study identified the interchange as a mid-level feasibility project (page S-16).*

*One of the major differences between the No Build Conditions and the 164 Acre Build Condition to the proposed 507 Acre Build Condition is that development under the latter condition will shift traffic toward the NYS Route 208 interchange and away from Route 32 and its interchange with the Quickway (NYS Route 17 / future I-86). Improvements planned for I-86 are not intended to preclude access options to the Quickway as discussed under the third item on DGEIS page 3.4-28 (see also Orange County Transportation Council Long Range Transportation Plan, December 2011). Improvement of this interchange is not anticipated within the 2025 time frame of the DGEIS.*

**Comment 3.4-6 (Letter 18, Stephen Welle, Mayor, Village of Harriman, June 10, 2015):** The DGEIS claims that because the Hasidic women do not drive, the traffic impacts will be minimal. If the population increases at just the conservative rate indicated in the DGEIS, there will be a dramatic increase in traffic due to the increased services required to serve the additional population. There is more to traffic than just personal vehicles!

***Response 3.4-6:*** *The DGEIS does not claim that because Hasidic women do not drive that the impacts will be minimal. Rather because in the Kiryas Joel community women don't drive, automobile ownership per household is comparatively low, and alternative means of travel are heavily used, the peak hour traffic is lower than typical.*

*The DGEIS indicates that for the peak hours of travel a projected 68 to 69 percent increase in traffic for the annexation Condition and 83 to 92 percent increase in the No annexation condition. Volumes are shown in DGEIS Appendix F Table F3-9.*

*Peak traffic usually occurs at peak commuting times. Personal vehicles are not the only vehicles in the existing traffic stream and this is expected to continue. Taxis, car service vehicles, trucks, and buses are all part of the traffic stream. Bus transportation is discussed on page 3.4-9 of the DGEIS. Modal split is discussed on page 3.4-8 of the DGEIS and refers to Appendix F3, Table F3-1 illustrating this. See also FGEIS Table 3.4-1 (at Response 3.4-3). Pedestrian traffic is also important as discussed within the modal split discussion and immediately following it starting on page 3.4-8. Future modal split is projected on page 3.4-19.*

*Carpooling, buses, walking, taxis, and personal car service will all increase and the higher density in the annexation lands is anticipated to be an important factor in reducing overall traffic for the Build (annexation) Condition.*

**Comment 3.4-7 (Letter 18, Stephen Welle, Mayor, Village of Harriman, June 10, 2015):** A recent study done for the South East Orange County Traffic Task Force warned of the potential of violations of the Federal Clean Air Standards with a modest to significant increase in traffic in the affected area.

**Response 3.4-7:** *There is no reference provided for the study for the Task Force, so it cannot be verified in context.*

*The DGEIS notes that future development of the annexation territory is anticipated to reduce and spread out traffic demand during peak hours compared to the No Annexation (No Build) Condition. From a traffic, noise, and air quality perspective, this is a desirable condition.*

*Many of the projects contained in the Southeast Orange County Traffic and Land Use Study have or will become part of the New York State Department of Transportation's Transportation Improvement Program (TIP). Federal Law requires Conformity to the Clean Air Act Amendments of 1990. The Orange County Transportation Council adopts the "Transportation/ Air Quality Conformity Determination for the Orange County Portion of the NY-NJ-CT PM2.5 Non-Attainment Area". The TIP includes the Larkin West Drive project as well as other area projects. Therefore plans such as the Southeast Orange County Traffic and Land Use Study have looked at future traffic and the individual improvement projects to address anticipated future transportation needs and lessen any impacts on air quality.*

**Comment 3.4-8 (Letter 29, Mary Bingham, Monroe, June 21, 2015):** The traffic section was lacking information on the following 3 intersections:

- a. Route 208 and Mountain Road
- b. Bakertown Road and County 105
- c. Schunnemunk Rd and Route 208

These intersections are important as the proposed annexed parcel may cause changes to the existing traffic patterns that could negatively affect these intersections.

**Response 3.4-8:** *Growth will occur on the annexation territory with or without annexation. Again, as stated in the DGEIS, traffic studies will take place as needed as growth takes place so that applicable improvements may be implemented along with site specific development proposals.*

*Route 208 and Mountain Road (CR 44) intersection and the intersection of Schunnemuck Road and NYS Route 208 are discussed on page 3.4-4 of the DGEIS.*

*The realignment of CR 105 at Bakertown Road is identified in Table 3.4-7 of the DGEIS. Starting on Page 3.4-3 of the DGEIS is a discussion of CR 44, Bakertown Road, and Forest Road. These are the roads feeding the subject intersections.*

*The DGEIS projects not only the total traffic leaving the Village of Kiryas Joel by major routes, but it details the traffic changes to the major routes leaving the Village that would potentially alter volumes at these three intersections. A completed Larkin Drive West extension would potentially shift traffic, primarily away from Bakertown Road.*

*DGEIS Figures 3.4-3 through 3.4-6 show existing volumes. Figures 3.4-9 through 3.4-12 and Figures 6-2 through 6-5 show projected trip generation for the 507-acre and 164-acre annexation scenarios, respectively. Appendix F Table F3-9 shows the projections of changes in future traffic under each of the future four conditions for the key roads leading to these three intersections. These cover both the a.m. and p.m. peak hours.*

**Comment 3.4-9 (Letter 38, Michael Kroposki, June 20, 2015):** One example of the unaddressed economic issues is the need for adequate access roads. It appears that the annexation area will lead to expanded use of access on Forest Avenue, a Monroe Village street which was not designed for use as a major access way. Who will pay for upgrading expanded access for the high density development in the annexation area? (If it is even feasible). Certainly not the Village of Monroe! This is a real impact which is not addressed in the draft DGEIS. This should have been at least mentioned in the Cumulative Impacts section but it is not.

**Response 3.4-9:** *From DGEIS Appendix F Table F3-9 the volumes on Forest Road will be less under the Build Condition 507 annexation (861 vehicles in the a.m. and p.m. peak periods) than the No Build 507 acre annexation (873 in the a.m. peak hour and 924 in the p.m. peak hour).*

*In general the State maintains the state highway network and localities maintain the local network. In the case of Forest Avenue, a more detailed study of a connection to CR 105 and NYS Route 208 is proposed as Larkin Drive West following up on work in the Southeast Orange County Traffic and Land Use Study. This connection would reroute some traffic in the Town of Monroe away from the Village of Monroe.*

**Comment 3.4-10 (Letter 40, Russ Kasso, Monroe, June 22, 2015):** Emergency evacuation plans and traffic - There are only two roads in and out of KJ. Both of them merge into the only major arteries that would be used to escape from the area. With additional population - in the event of a natural emergency or otherwise (earthquake, nuclear accident), the exit of KJ currently would completely block the entire rest of the town. Only 13 miles away Indian Point could have such an event at any time. We've had two serious events causing shutdown of the nuclear reactors in the past two months. Even now the density of KJ would delay any evacuations. This does not appear to be addressed in the DGEIS.

**Response 3.4-10:** *Orange County maintains an emergency management plan as shown on <http://www.orangecountygov.com/content/1162/975/2095/2091/5401/default.aspx>. It notes with regard to Indian Point that: "Indian Point Energy Center in Buchanan, New York is comprised of two nuclear power plants. Although Indian Point is located in Westchester County, a small portion of Orange County is contained in a 10-mile radius of the facility. This area is called the Emergency Planning Zone." Thus Kiryas Joel is outside the Emergency Planning Zone.*

*The DGEIS examines four key roads out of the Village of Kiryas Joel. There are routes out of the Village of Kiryas Joel that lead away from Monroe through Woodbury. See comment and response 3.4-14A discussing additional accesses.*

*Depending on the specifics of an emergency, some or all routes would be used. In that the writer is from the Town of Monroe much of the Town would approach the Route 208 interchange with the Quickway from the south while Kiryas Joel residents would approach from the north and south.*

*With higher densities in the 507 acres primarily to the west of the existing Village of Kiryas Joel traffic would tend to shift to CR 44 and the NYS Route 208 approach from the north. The density in the western part of the annexation lands is anticipated to be higher under annexation and thus vehicle ownership is anticipated to be less. Thus with fewer vehicles leaving Kiryas Joel and more headed to CR 44 to the north, the*

*annexation is anticipated to make evacuation easier for Monroe residents in the non-annexation area than if the annexation is not approved.*

**Comment 3.4-11 (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015):** The traffic section does not evaluate the true impact of full build out of the parcels to be annexed into the VKJ.

***Response 3.4-11:*** *The traffic section evaluates both the No Build and Build conditions using the same methodology. The true impact is the difference between annexation (Build Condition) and no annexation (No Build Condition) hence the reason for using the same methodology.*

*The DGEIS is a generic evaluation and does not evaluate the impact of each individual parcel as the land has not been zoned and no site specific applications have been advanced. Impacts related to individual parcels must be done as part of the environmental process as individual parcels are planned and brought before the appropriate municipality for approval.*

**Comment 3.4-12 (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015):** No analysis is given for adequate consideration to noise exposures and sources of noise as an integral part of the DGEIS. Will unacceptable noise zones above 65 db and above result from the annexation and development of the annexed land?

***Response 3.4-12:*** *The annexation in and of itself does not change noise levels rather there are differences in noise levels that will result from development that would occur after annexation or no annexation through the 2025 horizon year. DGEIS indicates in section 3.4.6.1 that even if the traffic increased all at once, the change in noise would be barely perceptible. Since the noise increases over a ten year period, ambient traffic noise increases should not be perceptible regardless of the development following the annexation decision.*

*The DGEIS does not address construction noise as such will occur regardless of the annexation decision and will be controlled as per the municipalities noise ordinances including the days of the week and hours of the day. Construction noise is a temporary noise. Under annexation the construction of sewer and water lines should replace individual well and septic construction. Under annexation more sidewalks would be constructed.*

**Comment 3.4-13 (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015):** The maps/figures provided often fail to include the annexation territory as a reference. Figures 3.4-7 (Area Sidewalks) and 3.4-8 (Bus Routes) as examples do not include the proposed annexation territory, making it difficult to relate the text to the proposal. This should be corrected.

***Response 3.4-13:*** *DGEIS Figure 3.4-2 of the local transportation network and the cited traffic figures have been revised to show the annexation area. DGEIS Figure 3.4-8 is a schematic representation of the Village of Kiryas Joel so the annexation area is also schematically shown and may include non-annexation areas. Readers can refer to DGEIS Figure 2-3 showing the 507 acre annexation area and DGEIS Figure 6-1 for the 164 acre annexation area. Revised FGEIS figures 3.4-2, 3.4-7, and 3.4-8 are included at the end of the section.*



**Comment 3.4-14A (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015):** Traffic Study Methodology: The traffic study in the DGEIS is deficient and inherently flawed given that reductions in vehicle trips are estimated from the American Community Survey and by utilizing traffic counts. The appropriate calculation would be fashioned by conducting a comprehensive origin and destination survey to calculate vehicular trips by dwelling unit type in Kiryas Joel. Traffic counts into and out of Kiryas Joel were compiled for OC Road 44, Forest Rd., Bakertown Rd. and Acres Rd. and used to reduce all vehicle trips generated by the 4100+ households in Kiryas Joel (referred to as mode split in the DGEIS) by 18% and 25% for the AM and PM peak hours, respectively. However, traffic from significant thoroughfares at the cordon line into and out of Kiryas Joel (Seven Springs Rd, CR 44 (North), Bakertown Rd. (North)) were not counted or included in the total trips made by Kiryas Joel inhabitants. The use of Saturday traffic conditions in Kiryas Joel (DGEIS page 3.4-7) to estimate through traffic does not meet the Institute of Traffic Engineers standards and is unacceptable. As a result of these numerous flaws in the traffic analysis, trip reduction (mode split) is overestimated in the DGEIS.

**Response 3.4-14A:** *Using vehicle counts to establish trip rates is the standard methodology as can be seen in the wide acceptance of the Institute of Transportation Engineers' Trip Generation Manual, 9<sup>th</sup> edition, Washington DC, 2012, Vehicle counts also provide direct data on route choice. The US Census data including the American Community Survey provides a wide variety of data including some origin destination data and modal split. See also response 3.4-1A.*

*There is a very strong correlation between density and modal choice. Higher densities are needed to support transit services. Sidewalks also tend to be found in higher density locations where residents and services are situated in close proximity.*

*The No Build condition of the 507-acre annexation proposal places a larger portion of the population in a lower density area unsupported by sidewalks and transit services. Lacking these services in the western portion of the study area, there will be more people driving in the No Build condition.*

*Seven Springs Road, CR 44 (North) and Bakertown Road all reflect traffic to and from the north away from the primary commuting route of the study area. These roads are more subject to Woodbury (Village and Town) traffic. The CR 44 North and Bakertown Road North traffic can be seen in the New York State Department of Transportation Final Design Report PIN 8759.65 and 8780.20 Kiryas Joel Roadway and Pedestrian Improvements (July 2013).*

*The Institute of Traffic Engineers became the Institute of Transportation Engineers in 1975 (see <http://library.ite.org/pub/245906fa-979c-9dbf-13f1-e117ef58d0f1>). It is well established that traffic counts are an extensively used methodology for determining trip generation and that approach is recommended by the Institute of Transportation Engineers with specific methodology suggested in its Trip Generation manual.*

*The County recognizes the trip characteristics of Kiryas Joel as unique (Comment 3.4-15). The use of Saturday traffic conditions in Kiryas Joel, when indeed the majority of the local population does not drive, is clearly a practical method to estimate through traffic. DGEIS Table 3.4-6 is used to validate the methodology. The method is also safe and non-disruptive to the travelling public.*

**Comment 3.4-14B (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015):** Traffic impact is not calculated quantitatively at all.

*Response 3.4-14B: The annexation action will not cause an increase in traffic but there will be a potential change in its distribution which the DGEIS examined quantitatively. See DGEIS Appendix F Table F3-9.*

**Comment 3.4-15 (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015):** Origin & Destination Survey: There is no question that vehicle trip characteristics made by Kiryas Joel families are unique. Women do not drive for religious and cultural reasons. Household vehicle ownership is low. A large number of people rely on mass transit services to commute to work. The numbers of taxi and car service trips are also much greater than other communities. These travel characteristics are so unique that a comprehensive origin and destination study is needed to obtain statistically significant trip generation rates and to accurately estimate through and pass-by traffic, as well as estimate overall traffic and air quality impacts of the proposed DGEIS alternatives.

*Response 3.4-15: Origin and destination surveys are generally not used for determining trip generation rates. The Institute of Transportation Engineers' Trip Generation Manual has, for decades, been recognized as the primary source to estimate traffic from all manner of land uses. It relies almost entirely on traffic counts. See Response 3.4-13.*

*The travel characteristics of vehicular ownership, modal split, commuting times among others are well documented in the US Census American Community Surveys. DGEIS Table 3.4-6 verified the methodology used.*

**Comment 3.4-16 (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015):** Traffic Study Components: Several key components that characterize a comprehensive traffic impact study, including a safety/accident analysis, an intersection level of service (LOS) evaluation, and a narrative of the anticipated traffic impacts and any changes in LOS for existing roadways within and surrounding the Village, are missing from the traffic analysis. Changes in the distribution of traffic on area roads due to annexation have also not been analyzed to any extent in the DGEIS. The DGEIS only examines the number of trips generated and does not address the impacts of those trips to specific intersections and roadways. There is no review of safety and or accidents in Section 3.4. An operational analysis is the traditional standard when evaluating potential traffic impacts of an action.

*Response 3.4-16: As noted in response 3.4-1D, the annexation action is likely to bring about a redistribution of traffic compared to no annexation as opposed to more traffic. That potential redistribution has been discussed in the DGEIS. See DGEIS Appendix F Table F3-9. See response 3.4-1C regarding level of service and safety evaluation.*

**Comment 3.4-17 (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015):** Truck Traffic: Page 3.4-23 of the DGEIS indicates that "...commercial development is anticipated to grow in step with the growing residential needs, generally comprised of the existing balance of truck and vehicle traffic along with a similar proportion of internal trips with commercial destinations." The growth and impact of commercial truck traffic due to annexation will affect roads within and surrounding Kiryas Joel. The impact of increased truck traffic to area roads and air quality has not been analyzed to any extent in the DGEIS.

**Response 3.4-17:** *The annexation itself will not increase or decrease truck traffic. Under the annexation alternative, there may be more truck traffic servicing the annexation area than under the no annexation alternative. Effectively, development in the annexation scenario disperses the truck traffic to a larger area thereby reducing the potential of impacts of truck traffic on area roads and potential effects on air quality. As noted in response 3.4-1C, any future development including new commercial development will be subject to review under SEQRA and other applicable federal, State, and local laws at the time such specific projects are proposed.*

**Comment 3.4-18 (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015):** Annexation Alternatives Traffic Impact: The DGEIS asserts that annexation produces fewer new trips than growth without annexation produces, and therefore the annexation action is not responsible for any mitigation since the mitigation would have been required anyway. One of the basic premises of the traffic discussion is that less trips are generated under the annexation action than under no annexation is not substantiated. There is also no sound statistical or mathematical rationale in the DGEIS for reductions in vehicular trips and assumed traffic impact between the no-build, 507 and 165 acre annexation alternatives. The use of travel and trip-making characteristics from the Village of Harriman ACS and applying them to the 507+/- and 165+/- acre annexation alternative areas (Page 3.4-19) is unjustifiable given that the 507 and 165 acre alternative areas do not share any common characteristics to any degree with the Village of Harriman.

**Response 3.4-18:** *The Village of Harriman is used only for the analysis on the 507 acre No Build Condition. There are several characteristics that are similar -- particularly proximity to Park-N-Ride lots with bus service, the railroad, the Quickway, and the Thruway. Density and limited sidewalk availability are other similarities. See also response 3.4-1B.*

**Comment 3.4-19 (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015):** Mass Transit Utilization: The community relies on mass transit to address transportation needs and this is one of the primary underlying assumptions for reducing vehicle trips in the traffic analysis. However, there is no discussion on how mass transit services will be provided to the annexed property area and how mass transit will reduce trips and assumed traffic impact quantitatively. A near doubling of the population will place significant demands on the transit system. Transit routes will vary depending on the annexation alternative selected, along with local street geometry, thereby affecting roadway capacity and levels-of-service.

**Response 3.4-19:** *See Response 3.4-2. The Monroe Bus Company and the Village of Kiryas Joel provide the majority of mass transit services in and around the Village. There are four local routes within the Village and two with destinations in Monroe and Woodbury. These buses operate six days per week. See FGEIS Appendix F6.*

*The expansion of transit services will occur as development occurs which is typical. The Village fully expects to provide appropriate and convenient transit services to its citizenry and is continually monitoring the efficacy of its transit system. Bus routes will be expanded as needed and bus stops will be added as growth occurs and private development applications are processed. It is expected the Monroe Bus Company will look for opportunities to expand its services to the community.*

*Bus traffic has not played a significant role in local traffic or congestion and in fact, has served to keep substantial vehicular traffic off local roads. There is no reason to believe that the expansion of the transit system will cause adverse impacts. Moreover, annexation will not increase demand on transit. That is a function of population growth.*

*The annexation rather would expand the area of service. In some cases existing bus routes already traverse annexation areas. Transit routes will not depend on the annexation alternative selected rather the development that follows. The addition of any new local streets would need to consider if bus routing will take place there. Since the development will not occur all at the same time other services as taxis, car services, etc. may fill in until an adequate density is constructed to support bus transit.*

*The quantitative analysis of vehicular trip reduction is based on all forms of alternative travel and does not single out bus transit.*

**Comment 3.4-20 (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015):** The traffic analysis relies, in part, on the construction of transportation improvements conceptualized in the Southeast Orange County Traffic and Land Use Study to address any impacts of increased traffic. There is no discussion on how the annexation/no annexation alternatives may impact the demand and/or timing of a planned improvement. There is no discussion about the timing of the growth, the distribution of this traffic based on the timing, or what impact this will have on the system if particular improvements are not in place.

***Response 3.4-20:*** *The DGEIS shows estimates of annual changes in population growth in Table 3.2-1. Also, the County has done its own projections of population growth and is well aware of the likely timing.*

*The distribution of traffic is not impacted by the timing of the population growth. The distribution is impacted by development location resulting from the annexation and those future volumes were projected with and without implementation of annexation.*

*The Southeast Orange County Traffic and Land Use Study discusses transportation project feasibility, land use alternatives, and impacts of no improvements being built within the horizon time frame (a No Build Condition analysis). Similar to the DGEIS the study also does not look at individual transportation improvements or development projects so much as land use and improvement scenarios.*

*The DGEIS provides updated information on projects completed and currently being progressed in Tables 3.4-7 and 3.4-8. Orange County has initiated the SEQR review of the Larkin Drive West project – see FGEIS Appendix C.*

**Comment 3.4-21 (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015):** There is no discussion of how construction related traffic will impact the highway network. As a result of the planned action (and the alternative), a greater volume of construction activity will occur in the annexation territory. The distribution of this traffic will vary and should be explored and discussion should occur about traffic impacts during mass gatherings as well.

***Response 3.4-21:*** *Construction traffic will occur with or without annexation, however the commenter is likely correct that under the annexation alternative, there will be more very*

*local construction traffic in the annexation area than under the no annexation alternative. Traffic counts include existing construction activity. Construction traffic is included in overall future traffic volumes.*

*Nonetheless, construction traffic would be highly localized, be distributed over a long time horizon, and assuming a similar number of households will be constructed under either option, it is not viewed as representing a significant impact of annexation. It is a short term activity.*

*Mass gatherings will occur with or without the annexations. The Village manages traffic entering and exiting the Village during such events with its traffic control officers and equipment as needed.*

**Comment 3.4-22 (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015):** Section 3.4 is an analysis of trips, not how these trips impact the roadway network. Section 3.4 bases all conclusions/recommendations on the number of trips without providing an operational analysis. Several critical intersections should be selected and level of service compared for existing, no-build, and build conditions.

***Response 3.4-22:*** *Again, traffic growth is associated with the natural population growth taking place in the community. Annexation will not cause traffic, but rather a likely redistribution of traffic. A review of DGEIS Figures 3.4-9 through 3.4-12 reveals the differences in the key roads connecting the Village to the regional network, between the annexation and no annexation alternative.*

*The Village will monitor traffic levels at key locations as its population grows and may require traffic studies with applicable level of service evaluations to be done at the time of site specific development applications. See also response 3.4-1C.*

**Comment 3.4-23 (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015):** Section 3.4.7 Mitigation Measures states that “As the traffic impacts are not expected as a direct result of annexation action, mitigation measures are not required for the annexation action.” In addition the DGEIS Executive Summary notes that “Traffic impacts are not expected as a direct result of the annexation action but rather will evolve over time as growth takes place.” This assertion amounts to segmenting the action from a readily foreseeable impact.

***Response 3.4-23:*** *The statements cited are factual and simply recognize that traffic growth is going to occur with or without the annexation. The "action" as defined by SEQRA is annexation, not the inevitable population growth that will occur in the community and its environs. The proper methodology therefore is a conceptualized general assessment of the effect of annexation.*

*In the case of this action, the DGEIS is disclosing an anticipated difference in distribution of future traffic and higher traffic growth from the population increase under the 507 acre no annexation alternative. There is no segmentation, as defined by SEQRA. This does not preclude the Village from requiring a subsequent SEQRA review as individual development actions are brought before the Village that may directly impact traffic.*

**Comment 3.4-24 (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015):** Section 3.4 contends that no mitigation is required

as a direct result of the annexation based on the fact that annexation will produce fewer trips than would normal development. If traffic generation is a result of annexation and introduces new trips to the study area, then mitigation from the impact of these trips must be considered based on the results of a quantitative analyses of the impact of the trips generated by annexation. The annexation action is a specific project and as such should be considered as generating new traffic and being responsible for associate mitigation.

**Response 3.4-24:** *See response 23. Annexation without a development project is not a trip generating event. Providing mitigation for unidentified development projects that might occur at an unspecified time is not practical for an action such as consideration of an annexation petition that has no development project associated with it. As noted elsewhere and in the DGEIS, this SEQRA review will not eliminate the need to consider potential impacts from specific development projects pursuant to SEQRA as such projects materialize.*

**Comment 3.4-25 (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015):** What is the last sentence on page 3.4-7 based on? This sentence states “The counts for Table 3.4-2 indicate the traffic levels for the a.m. and p.m. mid-weekday periods are of the same magnitude typical for commutation areas.” Where are the traffic levels for typical commutation areas presented?

**Response 3.4-25:** *See Figures 3.4-3 to 3.4-7 for midweek traffic. These morning and evening typical commuter peaks can be seen in Box and Oppenlander, 1976, p 190.*

**Comment 3.4-26 (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015):** Table 3.4-3 compares 2014 counts conducted in the Village of Kiryas Joel to “Kiryas Joel External” trips based on an “External Percentage”. It is noted that this “External percentage” is “computed based on Saturday traffic being pass through traffic as a percentage of Sunday traffic for the day ending 5 p.m.” The rationale behind this method should be explained in more detail, and quantitative details should be provided showing how the external percentages were arrived at.

**Response 3.4-26:** *The rationale is that nearly all of the existing Village residents do not use vehicular travel and businesses are closed from sundown Friday to sundown Saturday (the Sabbath). Thus trips on Sabbath are basically external to external or pass through trips. None of the counts capture internal trips.*

**Comment 3.4-27 (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015):** Section 3.4 and Appendix F present several tables showing trip rates for two land uses – 220 Apartments and 330 Condos. These rates are different for the same land uses in the various tables. The rational for these discrepancies should be explained or the errors corrected.

**Response 3.4-27:** *Where sufficient data is available and rates are within the range of actual surveys, non-linear equations rates are typically used instead of linear averages. Effectively the non-linear rates are different depending on the variable size (number of dwelling units). Hence, the rates for a specific land use may differ in the tables because the numbers of units the rates are based on are different.*

**Comment 3.4-28 (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015):** Modal splits are discussed on page 3.4-8 and then

appear as factors (percentages) in Table 3.4-5., where they are applied to trip generations to arrive at adjusted (lower) trips. Where did these percentages come from? The quantitative method of arriving at the percentages should be provided.

**Response 3.4-28:** *Modal split is discussed on DGEIS page 3.4-8 and see Appendix page F-1 Table F3-1 data from the US Census. The US Census actual numbers of users are used by the US Census Bureau to generate the percentages. These percentages have been rounded to the nearest whole number. See DGEIS Tables 3.4-12 and 3.4-13 in conjunction with DGEIS Appendix F Tables F3-5 to F3-8.*

**Comment 3.4-29 (Letter 55, Sheila Conroy, June 22, 2015):** There are references to CR 64 (Dunderberg Road) as being the most direct route to the Quickway, Thruway and Woodbury Common. For clarification, I believe you mean Ninninger Road. Dunderberg Road turns off CR 64 and runs past the Monroe-Woodbury Middle School and the High School.

**Response 3.4-29:** *The most direct route is CR 105 to CR 64, then continuing on to NYS Route 32 from which Woodbury Commons, The Quickway, and the Thruway can be accessed.*

**Comment 3.4-30 (Letter 55, Sheila Conroy, June 22, 2015):** For clarification, were the dates chosen for the traffic study (late January and early February 2015) affected in any way by weather conditions? Specifically, was there stormy weather that affected school openings or that could have affected traffic counts?

**Response 3.4-30:** *Counts were taken during non snow days because snow plowing damages the counting tubes.*

**Comment 3.4-31 (Letter 55, Sheila Conroy, June 22, 2015):** The following statement appears to be a bit misleading: "Overall, the proposed annexation compared to no annexation is anticipated to result in a reduction of 18 to 25 percent in the growth peak hour trips into and out of Kiryas Joel as shown in Table 3.4-14. Within the context of these volumes, then the number of trips generated is effectively reduced by developing within the annexation territory." If am understanding this correctly, trip generation does increase within the annexation area by the fact that it will be developed in the high density lifestyle of the existing Village. However, because with annexation, it would become part of the Village, these trips do not count as travel into and out of Kiryas Joel.

**Response 3.4-31:** *The assumption in the comment that the traffic is reduced because some annexation traffic becomes internal traffic is not correct. The reduction is based on comparing trips leaving the combined area of the Village of Kiryas Joel and the proposed annexation area under both the annexation and no annexation conditions. Both alternatives increase by the same number of households. The difference is the increased reliance on the automobile in the 507-acre no annexation area generates more vehicle trips per household. See response 3.4-1B.*

**Comment 3.4-32 (Letter 55, Sheila Conroy, June 22, 2015):** The document does not address 2 facts. Annexation of 507 acres will likely extend bus lines. While public transportation does take cars off the roads, buses, unless they adopt cleaner exhaust systems, can be quite polluting as seen and smelled from the black smoke exiting the tail pipe. If the "inevitable" growth occurs within the existing Village and is not distributed out into the annexed areas, while

there will be more buses with increased population, the distribution would be more contained by use of existing bus routes and bus stops and thus less polluting.

**Response 3.4-32:** *Comment noted. On DGEIS page 3.4-29 the extension of bus lines is noted as being highly feasible in reducing traffic. The minor amount of bus traffic under either annexation scenario, is not expected to result in adverse air quality environmental impacts. The inevitable growth of the Village population cannot be legally forced to remain in the Village. The fact that so many people have requested annexation is a sign that the population has and will continue to locate to the 507 acres proposed for annexation regardless of whether it is annexed or not.*

*Both the 164 acre scenarios and the 507 annexation scenario showed lower total traffic volume increases leaving the area than the 507 acre no annexation scenario because of densities supporting alternative means of travel. The 507 acre annexation also spreads the smaller traffic out thereby reducing pollution increases in any one area.*

*There are two general types of buses, the short haul routes used for local travel using smaller buses and the commuter coach buses for longer distances, typically to New York City. The longer haul buses are generally privately operated and therefore need high occupancy to run. The short haul buses are publically operated and often subsidized due to lower ridership. "The Village of Kiryas Joel provides this service using seven buses and is the busiest local fixed route operator in the County."<sup>1</sup> A bus pollutes more than a car using similar fuel, however when examined based on passenger miles, buses that are heavily utilized are less polluting. This is even true ignoring the improved efficiency for vehicles on the road due to the removal of all the extra automobiles. See also M.J. Bradley & Associates, "Comparison of Energy Use & CO2 Emissions from Different Transportation Modes," Manchester NH, May 2007.*

**Comment 3.4-33 (Letter 57, Michael Donnelly, June 22, 2015):** It may be recommended that current ratio of registered vehicles to dwelling units in Kiryas Joel be extrapolated to 2025 and beyond. Also the increase in taxis and public transportation vehicles should be factored in when considering the build out and the impact on the four intersections and the triangular intersections of 17M and 208.

**Response 3.4-33:** *The number of registered vehicles per household would be expected to be higher under the 507 acre No annexation scenario. Vehicle ownership is not directly used in the distribution as it is compensated for in factors of actual use as modal split and trip rates. Under the annexation scenarios, vehicle ownership per household should remain similar to existing vehicle ownership rates.*

*The traffic increases in the DGEIS considered all forms of vehicular transportation - not just cars. See response 3.4-1C.*

**Comment 3.4-34A (Letter 61, Dennis E. A. Lynch, Feerick, Lynch, MacCarthy, PLLC, June 22, 2015):** We believe that capacity analyses of all affected roadways and intersections should be evaluated to determine the potential impacts. The Transportation Section of the report does project trip generation based on the two (2) scenarios, with and without annexation, as provided in tables found in Appendix F. Trip generation rates for the same classification vary

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<sup>1</sup> <http://www.transitorange.info/bus-services/local.html>, Accessed August 4, 2015.



between the zoning designations. For example, the trip generation rate for ITE Class 230 (Condo) in Table F3-5 varies between 0.351 and 0.507 depending on the location of the unit. Table F3-7 designates a rate for the same classification of 0.417 and 0.339. Additional discussion and documentation must be provided for the varying use of trip generation rates.

**Response 3.4-34A:** See response 3.4-27 on trip rate differences. See also responses 3.4-1C and 3.4-22.

**Comment 3.4-34B (Letter 61, Dennis E. A. Lynch, Feerick, Lynch, MacCarthy, PLLC, June 22, 2015):** Page 1-12, 13, regarding traffic indicates that with annexation, reduced traffic growth outside the Village is anticipated as Village transportation services such as sidewalks are extended into the annexation area, as compared to without annexation.

**Response 3.4-34B:** Comment noted.

**Comment 3.4-34C (Letter 61, Dennis E. A. Lynch, Feerick, Lynch, MacCarthy, PLLC, June 22, 2015):** The DGEIS text does not properly identify or analyze affected intersections beyond the Kiryas Joel boundary.

**Response 3.4-34C:** See responses 3.4-1C and 3.4-22.

**Comment 3.4-35 (Letter 61, Dennis E. A. Lynch, Feerick, Lynch, MacCarthy, PLLC, June 22, 2015):** The Traffic section, p. 3.4-21 refers (footnote 11) to a traffic study referenced as prepared by Saccardi & Schiff. This study is not recent and was prepared for a project that was not approved. A more relevant study would be the traffic study prepared by AKRF for the selected casino in Sullivan County. This section should be revised to reflect the current study and the implications on traffic thereof.

**Response 3.4-35:** Comment noted. It is further noted that the Town of Woodbury,<sup>2</sup> Village of South Blooming Grove,<sup>3</sup> and Village of Tuxedo<sup>4</sup> have fully supported casino projects as part of the licensing application process. The New York Gaming Facility Board did not select their applications to be considered for gaming facility licensure (December 17, 2014). The DGEIS did not consider traffic related to unselected sites for Casino development. Casino development in the selected areas is not relevant to the growth of Kiryas Joel in any meaningful way regardless of the annexation scenario.

The potential casino traffic would be expected to alter traffic on the Quickway passing by the Village of Kiryas Joel and was considered as part of Final Route 17 Transportation Corridor Study, Sullivan County and Orange County, May 2013, DGEIS Appendix 4.3.

The traffic data reviewed by the Gaming Commission can be found on <http://gaming.ny.gov/gaming/montreign.php#407> with the traffic study at [http://gaming.ny.gov/pdf/Redacted RFA Applications/Montreign/Redacted RFA Application/Exhibit VIII.C.1.f/2013 - FEIS/A](http://gaming.ny.gov/pdf/Redacted%20RFA%20Applications/Montreign/Redacted%20RFA%20Application/Exhibit%20VIII.C.1.f/2013%20-%20FEIS/A). The casino traffic study examines late Friday and Sunday times as peak travel times. These are also not peak travel times on Village of Kiryas Joel access roads.

<sup>2</sup> <http://gaming.ny.gov/pdf/Region1TownofWoodbury.pdf>

<sup>3</sup> <http://gaming.ny.gov/pdf/Region%201%20Village%20of%20South%20Blooming%20Grove.pdf>

<sup>4</sup> <http://gaming.ny.gov/pdf/Town%20of%20Tuxedo%20Extract%20-%20CORRECTED%20Resolution%20of%20Support%20-%20Pages%201%20-%2005.pdf>

**Comment 3.4-36 (Letter 67, Richard J. Pearson, PE, & Robert B. Peake, AICP, June 18, 2015):** The entire Traffic and Transportation section needs to be revised to reflect conditions associated with the buildout of the annexed territories beyond year 2025 as well as continued development within Kiryas Joel as previously described in this memorandum.

*Response 3.4-36: A ten year planning horizon is common for generic conceptualized studies of this nature. Moreover, the annexation, which is the action subject to SEQRA, is not a traffic generating event.*

*The 2025 horizon places projected DGEIS growth in line with the projected growth to the horizon year of 2020 as detailed in the Southeastern Orange County Traffic and Land Use Study; see DGEIS Table 3.4-10.*

**Comment 3.4-37A (Letter 67, Richard J. Pearson, PE, & Robert B. Peake, AICP, June 18, 2015):** Key intersections are described on page 3.4-4 (CR 64 was inadvertently labeled as CR 44 in the DGEIS).

*Response 3.4-37A: Both CR 44 and CR 64 are discussed on page 3.4-4. On Page 3.4-3 and 3.4-4, CR 64 is described as Dunderberg Road connecting from NYS Route 32 to CR 105. The entire length of CR 64 is now named Nininger Road, the western part being formerly Dunderberg Road. There is no inaccuracy in the labelling of CR 44.*

**Comment 3.4-37B (Letter 67, Richard J. Pearson, PE, & Robert B. Peake, AICP, June 18, 2015):** Quantitative intersection capacity analyses should be computed for the four intersections described in the DGEIS, as well as for the triangular intersections of Route 208 and Route 17M. The analyses should be provided for peak weekday AM and PM hours based on existing traffic volumes as well as future volumes without and with the annexation and buildout of the annexed territories.

*Response 3.4-37B: See responses 3.4-1C and 3.4-22.*

**Comment 3.4-37C (Letter 67, Richard J. Pearson, PE, & Robert B. Peake, AICP, June 18, 2015):** A Saturday peak hour analysis is not required since Kiryas Joel related Saturday traffic volumes are significantly lower than on other days. We concur that trip generation rates per unit for Kiryas Joel is lower than rates in other municipalities since many people walk rather than drive, the women do not drive and many people use public transportation, carpool and limit certain trips to internal trips within Kiryas Joel.

*Response 3.4-37C: Comment noted.*

**Comment 3.4-37D (Letter 67, Richard J. Pearson, PE, & Robert B. Peake, AICP, June 18, 2015):** However, the potential buildout including the annexed area and continued growth within the existing 700 acre Kiryas Joel should be compared to the less intensive potential buildout of the Town lands without the annexation. Recommended improvements to the analyzed intersections should be described and analyzed.

*Response 3.4-37D: Comment noted. See responses 3.4-1C and 3.4-22.*

**Comment 3.4-37E (Letter 67, Richard J. Pearson, PE, & Robert B. Peake, AICP, June 18, 2015):** The DGEIS discusses the obligation for future consideration of SEQRA on particular

projects that may be proposed. Have traffic studies been performed for Planning Board review of developments recently constructed within Kiryas Joel?

**Response 3.4-37E:** *No recent traffic studies have been done in association with the relatively small projects that have occurred in the past few years. A large area design traffic impact study was recently completed (New York State Department of Transportation "P.I.N. 8759.65 and 8780.20 Kiryas Joel Roadway and Pedestrian Improvements" Project Report, July 2013).*

*The Larkin Drive West project is in the Town of Monroe just on the other side of NYS Route 17 from the Village of Kiryas Joel. Orange County has initiated the SEQR review of the project; see FGEIS Appendix C.*

**Comment 3.4-38 (Letter 70, Elizabeth Ridgeway, June 22, 2015):** Six major state roads (or road segments) listed in The DGEIS are located outside the boundaries of KJ and none of them has direct access into KJ although the Quickway follows the village's southern boundary. There is also no entrance or exit into or out of KJ off of the Quickway. Why? Where's the recommendation for this, annexation or not.

**Response 3.4-38:** *The Village is not in charge of connections to a State or Federal highway.*

*The "Southeastern Orange County Traffic and Land Use Study" identified a Quickway interchange at CR 105 as Mid-Level Feasibility (noted in DGEIS page 3.4-28). The Orange County Transportation Council "Long Range Transportation Plans (2011-2040)" call for leaving options open regarding future improvements (DGEIS page 3.4-28). Such connections are not identified as a priority by those studies and therefore remain unplanned and unfunded.*

*The Larkin Drive West project has some funding and is being investigated as a potential connection from CR 208 to CR 105. This would provide access from NYS Route 208 to CR 105 near where an interchange might someday be constructed. Larkin Drive West would intersect with Forest Avenue providing a connection to southern part of Village of Kiryas Joel.*

**Comment 3.4-39 (Letter 70, Elizabeth Ridgeway, June 22, 2015):** There are 3 key county roads that pass through or run along the village of KJ and are all two lane roads. County Route 64 is one such road and it carries a large population of Monroe-Woodbury school children to and from the four schools located off it. I have been witness to many close calls on that road. People travel this road at a high rate of speed as the road is mostly straight. It has many blind spots due to the limited site distance from the hills. There are many inexperienced drivers on that stretch as the High School is one turn off this road. Added vehicles will only increase the odds of accidents.

**Response 3.4-39:** *Comment noted. CR 64 does not run through the Village of Kiryas Joel although it runs along a small portion in the southeast corner. See Response 3.4-29 regarding reason Village of Kiryas Joel traffic uses CR 64. The State Police barracks is located on the western end of CR 64 near the Village of Kiryas Joel and hence there is a police visibility to reduce speeding.*

**Comment 3.4-40 (Letter 70, Elizabeth Ridgeway, June 22, 2015):** As I look at Figure 3.4-2: Local Transportation Network, this is a map highlighted in orange and blue. The “key” roads are in orange. Is this map from 1991? This visual doesn't show the extent of roads that are traveled by the Village of KJ residents (and the delivery trucks, construction vehicles, emergency vehicles, school buses...) going into and out of the village daily. Large areas have been omitted. I highlighted the following roads in both orange and green in the attachment to this e-mail. They are - Route 208 and North Main starting at the intersection by Schunnemunk St. continuing past Franklin. North Main turns into Spring Street running past Smith's Clove Park and out to Freeland/County Route 105.. Carpenter Place, Mill Pond Parkway, Maple and Mapes are major entry/egress “key” roads for the residents and other traffic of the village. Another area is Seven Springs Rd. between Forest Rd. and Mountain Rd. The entire stretch of Forest Rd. and Forest St. from the bridge to N. Main Street.

*Response 3.4-40: The base map is from 1991 and does include roads mentioned. The map is not intended to show every road as a key road. Mill Pond Road is important to the Village of Monroe but not a key road in context to NYS Route 17M that parallels it. Seven Springs Road between Forest Road and Mountain Road will become more important under the annexation alternative, however it offers a route around - not through - the existing Village of Kiryas Joel. Many of the roads identified are more key roads to the Village and Town of Monroe than the Village of Kiryas Joel and are impacted more by their own traffic.*

**Comment 3.4-41A (Letter 70, Elizabeth Ridgeway, June 22, 2015):** Section 3.4.states “Existing traffic patterns in Kiryas Joel reflect the culture of the residents of this community. Most Kiryas Joel residents do not drive from sundown Friday to sundown Saturday. Saturday traffic is lighter than most other communities where retail activity on Saturdays generate considerable amounts of traffic.”

Residents from outside of KJ are very impacted by the traffic that the village of KJ creates outside of its borders (the highlighted map proves it). Saturday is a day that the community outside of KJ does shopping, kids sports, errands, as these working residents hold weekday jobs. Saturdays on our area roads are quite enjoyable. Saturdays are very reminiscent to what every day used to be like when I moved here 23 years ago, even with the build-up of stores and other residences because it has been organic growth. The traffic that has come as a result of unplanned explosive uncontrolled growth the other 6 days of the week is crushing to our community. The road conditions suffer from the constant traffic, the noise and the pollution is overwhelming.

*Response 3.4-41A: Comment noted. The reduced traffic from sundown Friday to sundown Saturday is shown in Figures 3.4-3 through 3.4-6. Most municipalities have traffic from adjacent municipalities as these figures illustrate for the period of reduced traffic in the Village of Kiryas Joel. Annexation will not cause additional traffic in the local network. The Annexation is projected to reduce traffic outside the study area compared to no annexation. This document is one of many planning documents that have occurred over the years, the Southeast Orange County Traffic and Land Use Study is another. See FGEIS Appendix A, References for a list of studies.*

**Comment 3.4-41B (Letter 70, Elizabeth Ridgeway, June 22, 2015):** Litter is a huge factor. The Town of Monroe has had to pay upwards of \$5k, and \$7k on two separate occasions within the last year to Marangi Carting to clean up the roads going into this village from the town.

**Response 3.4-41B:** *Comment noted. Annexation will not cause additional littering. Unless specifically covered in a new maintenance agreement with the Town of Monroe, the Village of Kiryas Joel DPW would be responsible for litter pickup along roads within any annexed lands.*

**Comment 3.4-41C (Letter 70, Elizabeth Ridgeway, June 22, 2015):** Concrete trucks, construction vehicles, delivery trucks, emergency vehicles, taxis, cars, box trucks, tractor trailers all on narrow 25 mile an hour residential streets. Night and day, 6 days a week, non-stop.

**Response 3.4-41C:** *With any population growth, there is concomitant development and temporal construction traffic. Annexation will not cause construction traffic, however, there may be more construction activity in the annexation area if the annexation petition is approved, than under the no action scenario. Both municipalities put restrictions on construction noise. See also Response 3.4-4E.*

*As part of a local project, the Village of Kiryas Joel planned and has been improving parts of Mountain Road, Acres Road, Forest Road, and Bakertown Road (New York State Department of Transportation "P.I.N. 8759.65 and 8780.20 Kiryas Joel Roadway and Pedestrian Improvements" Project Report, July 2013).*

**Comment 3.4-41D (Letter 70, Elizabeth Ridgeway, June 22, 2015):** Add to this the frequent holidays that the village of KJ celebrates. Some of these celebrations, none of which are discussed in this DGEIS regarding traffic, are so large that tens of thousands rush in within a one or two day period to partake in the festivities.

**Response 3.4-41D:** *These activities are not affected by the annexation decision. Under the Annexation, the Village of Kiryas Joel public safety and ambulance services would expand more than without annexation thereby having more personnel available if needed.*

**Comment 3.4-41E (Letter 70, Elizabeth Ridgeway, June 22, 2015):** Trucks with loud speakers strapped to them are driven around the village of KJ and out along the neighboring streets with music blaring until 2am.

**Response 3.4-41E:** *These activities are not affected by the annexation decision. These activities are likely not permitted in either municipality although the Village of Kiryas Joel noise code may more directly prohibit it under section 92-4 F(4).*

**Comment 3.4-42A (Letter 70, Elizabeth Ridgeway, June 22, 2015):** 3.4.6.1 - Noise – Existing noise is typical in the study area. A constant barrage of construction vehicles is very noisy. The act of construction itself is noisy, banging, nailing, tailgates of dump trucks banging against themselves when they dump their load, cement trucks. The large celebrations, many celebrations – vehicle traffic, horns blowing, loud music from the village that can be heard miles and miles outside of the village of KJ. Residents outside of KJ have had to complain as late as 1am and 2am to their local police stations that the noise from the village is still going on.

**Response 3.4-42A:** *See Response 41. Any annexed area would fall under Village of Kiryas Joel noise code whose regulations are stricter in some cases, for example ending construction noise at 8 p.m. (Kiryas Joel Code section 92-2 F) instead of 9 p.m. (Town of Monroe Code section 33A-3B (6)).*

*Under annexation public safety and ambulance services would be expanded more than without annexation. The activities and size of the celebrations would not be affected by annexation.*

**Comment 3.4-42B (Letter 70, Elizabeth Ridgeway, June 22, 2015):** The village of KJ has never spoken with the surrounding communities about these events or their police departments beforehand.

***Response 3.4-42B:*** *The annexation will not have an effect on events in the Village that attract numbers of people. The Village manages traffic entering and exiting the Village during such events with its traffic control officers and equipment as needed. Public safety and ambulance service expansion is discussed in DGEIS section 3.3.4.*

**Comment 3.4-43A (Letter 69, Daniel Richmond, Zarin & Steinmetz, June 22, 2015):** The DGEIS makes many assumptions about projected traffic patterns based on religious and cultural norms in the Kiryas Joel community, namely, that most residents do not drive from sundown Friday to sundown Saturday (DGEIS at 3.4-5, 3.4-7) or during religious holidays (DGEIS at 3.4-7), and that women residents do not drive (DGEIS at 3.4-8.) These assumptions lead the DGEIS to falsely conclude that traffic impacts will be "very low." (DGEIS at 3.4-7.) Although the male residents may not drive on the Sabbath or other religious holidays, and although the female residents may never drive, the DGEIS recognizes that taxi and car services and public buses are common transportation substitutes. (DGEIS at 3.4-8 to 3.4-9.) Thus, the traffic analysis must address increases in cars and buses on the roads at all peak and off-peak hours, including use of cars and buses operated by non-Hasidic drivers during the Sabbath and religious holidays.

The SGEIS must realistically incorporate the use of these shared modes of transportation into its trip analyses and must specifically recognize and address the heightened use of taxis particularly by all women in the community. The SGEIS also must address noise and air quality impacts from the increase in vehicles on the road, including proposing mitigation measures for noise and air quality.

***Response 3.4-43A:*** *The DGEIS on page 3.4-7 in the section on "Existing Conditions" does not conclude that traffic impacts will be "very low" rather it states: "The entrances to the Village have very low Saturday traffic compared to either Sunday or normal mid-week commuter traffic."*

*The above refers to the existing conditions shown in DGEIS Figures 3.4-3 to 3.4-6.*

*The peak hours are used to establish future volumes as these volumes are worse case volumes. DGEIS figures 3.4-3 to 3.4-6 show the use of off-peak and Sabbath volumes under existing conditions. Sabbath traffic is the lowest during the week and similar results would be expected for religious holidays. While non-Hasidic drivers operate cars and buses on the Sabbath and religious holidays, the population growth being nearly all Hasidic will neither drive nor ride on the Sabbath for non-emergency purposes.*

*The traffic volume increases include all types of vehicles and were considered with respect to noise and air quality in the DGEIS. See response 3.4-28.*

**Comment 3.4-43B (Letter 69, Daniel Richmond, Zarin & Steinmetz, June 22, 2015):** An influx of up to 60,000 people in the territories at issue – a number that will surely grow once the

SGEIS accounts for the likely possibility of in-migration from the other Hasidic communities – would greatly increase the number of taxis, buses, and other shared modes of transportation on the roads, even during the Sabbath and/or religious holidays.

**Response 3.4-43B:** *Migration in and out of the community is primarily males that move to where their spouse's family resides. This is considered in the population growth; see DGEIS section 3.2-3. The DGEIS accounts for increases in taxis, buses, and other modes of transportation.*

*In the 507 acre No Annexation Condition, the growth in other modes is anticipated to be less thereby increasing automobile use.*

*The total population projection for 2025 is 42,297 with a growth of 19,663 (DGEIS Table 3.2-3) not 60,000. By comparison, relying on housing permits, the County projected in 2006 that 2020 Village of Kiryas Joel population would be 32,758 which is about where the DGEIS puts the 2021 population (32,945) and supports the rationality of the DGEIS projections.*

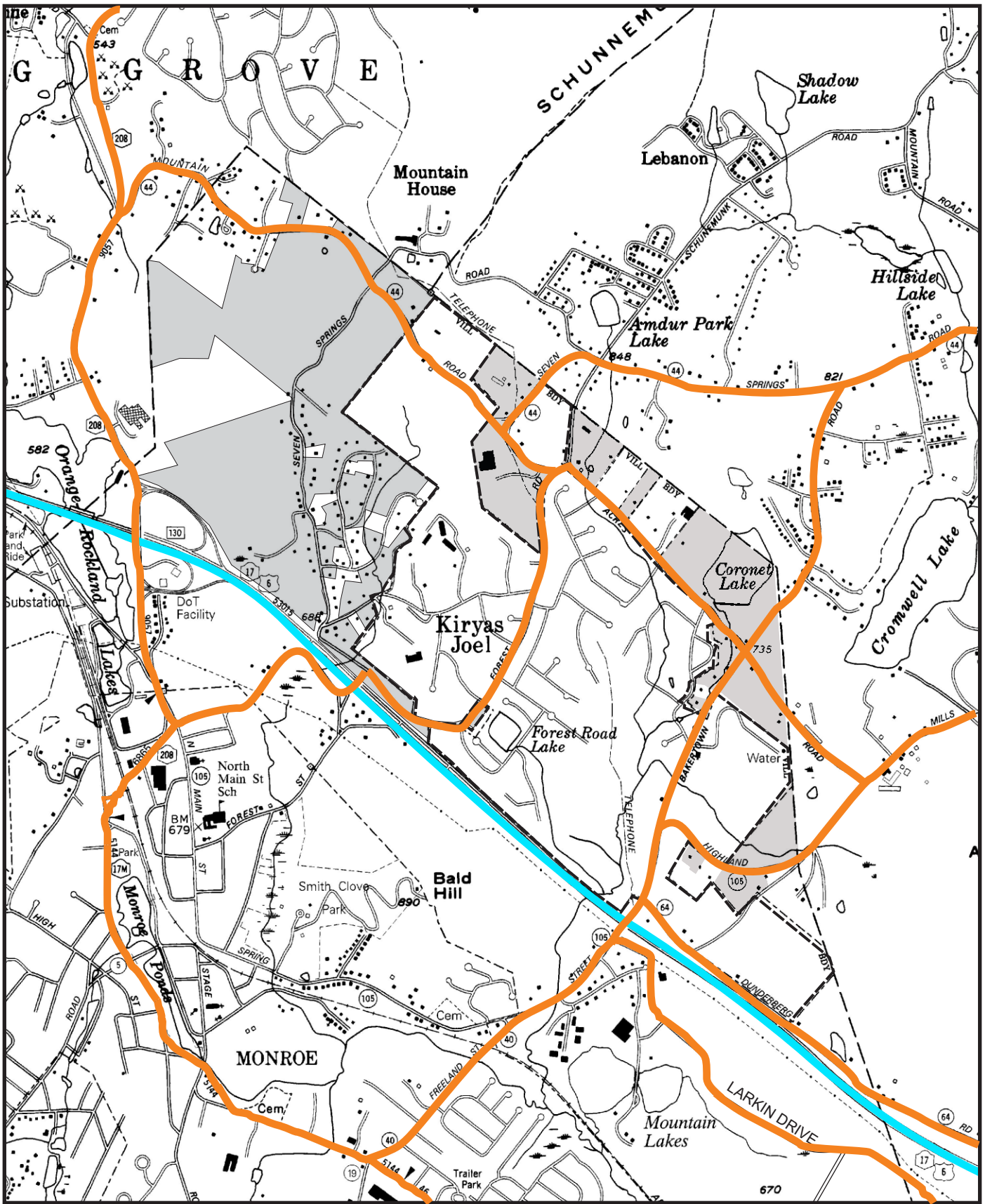
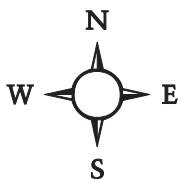





Figure 3.4-2: Local Transportation Network

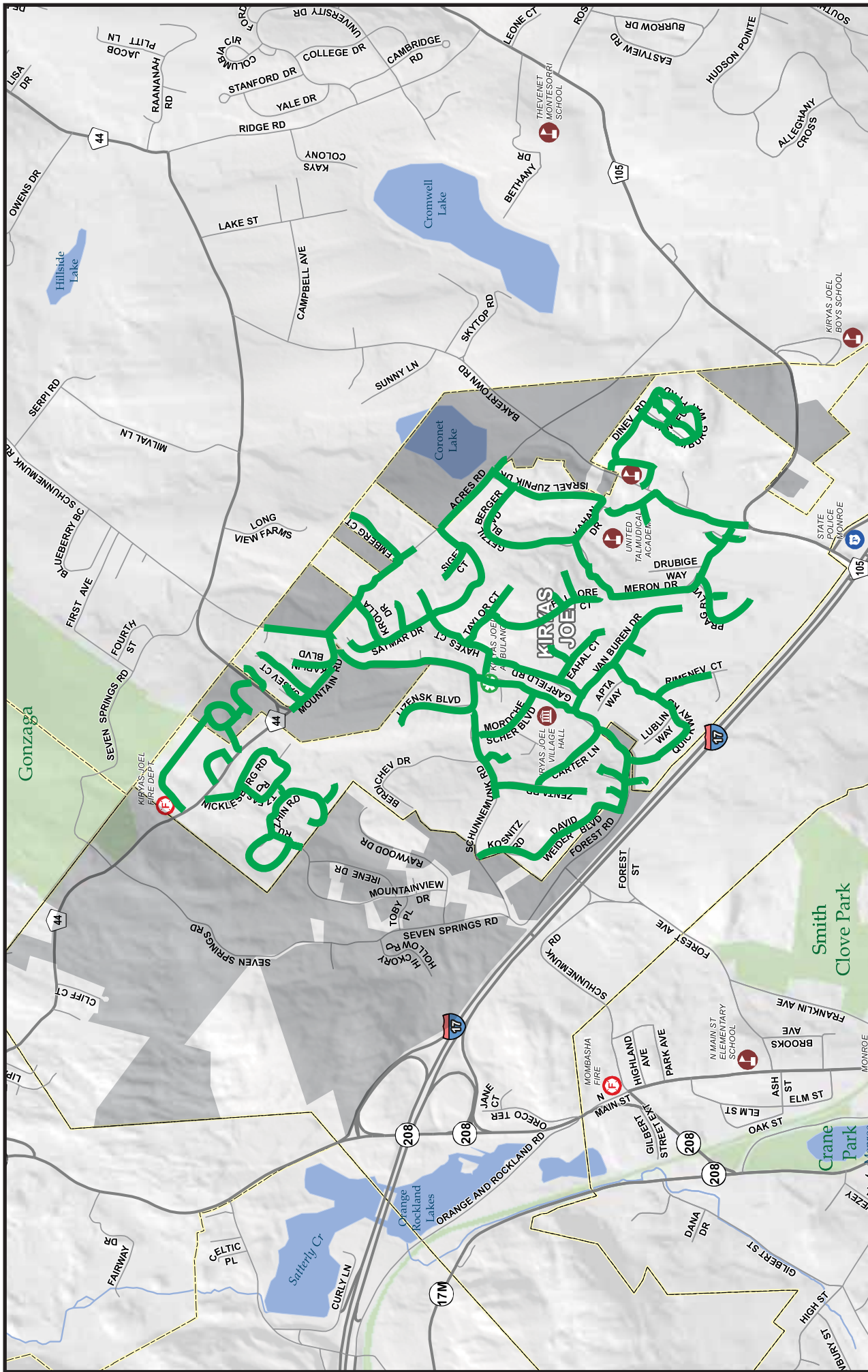
Kiryas Joel Annexation  
 Town of Monroe and Village of Kiryas Joel  
 Orange County, NY

Source: NYS DOT Planimetric Quad, 1991  
 Scale: 1" = 2,000'



Legend	
	Key Roads
	The Quickway
	Annexation Territory

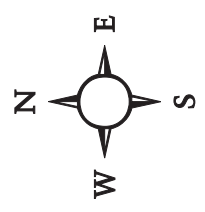


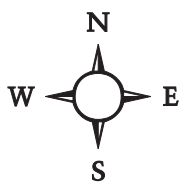


**Figure 3.4-7: Area Sidewalks**  
 Kiryas Joel Annexation  
 Town of Monroe and Village of Kiryas Joel  
 Orange County, NY  
 Base Map: Google Maps  
 Scale: NTS

**Legend**

- Sidewalks
- Annexation Territory





**Figure 3.4-8: Bus Routes**  
 Kiryas Joel Annexation  
 Town of Monroe and Village of Kiryas Joel  
 Orange County, NY  
 Source: Orange County Transit, <http://www.transitorange.info/routes/monroe.html>, 2014  
 Scale: NTS