



Civil Engineering: Traffic • Municipal • Accident Investigations
Steven Schneider, P.E.
Principal

May 9, 2019

Chairman of Deerpark Planning Board
Bob Vicaretti, Sr.
Deerpark Town Hall
420 US-209
Huguenot, NY 12746

Re: **Dragon Springs**
140 Galley Hill Road
Cuddebackville, NY 12729

Dear Chairman:

Schneider Engineering, PLLC (SE) has recently reviewed additional documents that we would like to use to supplement our previous comments that were submitted to the Town of Deerpark Planning Board on February 12, 2019, regarding the Dragon Springs project.

We have received over 560 scanned files documenting the progress of the Dragon Springs project. As of the date of this report, we have reviewed approximately one-third of those documents. In this report, we have noted any traffic concerns that came up in our document review or that should be addressed.

The following are the documents we have retrieved our comments from:

1. Atlantic Traffic and Design Engineers, Inc. Supplemental Traffic Analysis dated August 10, 2011
2. Town of Deerpark Planning Board Public Hearing Record from March 13, 2013
3. Town of Deerpark Planning Board Public Hearing Record from May 8, 2013
4. Letter from Fusco Engineering & Land Surveying, PC to the Town of Deerpark Planning Board dated May 8, 2013

We offer the following comments:

- A. The Supplemental Traffic Analysis performed in 2011 by Atlantic Traffic and Design was done to supplement their original Traffic Impact Analysis performed in 2001. This analysis specifically examines the impacts to Galley Hill Road. We offer the following comments on this study, hereafter referred to as the 2011 ATDSTA:

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- a. The goal of the 2011 ATDSTA was to further determine the traffic impacts on Galley Hill Road. One of the biggest concerns with this study is that the entrance to the Site on Gurda Road, the only entrance being considered to the site, was not an intersection that was analyzed. Why not? This was an obvious omission by Atlantic Traffic and Design. Only the Galley Hill Road intersections with US RT-209 and US RT-211 were analyzed. Why were counts not taken for vehicles entering and exiting on Gurda Road to the Site? This was to be the main entrance which means it should've been the key intersection to study in this 2011 ATDSTA.
 - b. The 2011 ATDSTA claims that 85% of the project was completed at this point but does not discuss what was completed. This is significant because the Town or us could not understand what "85% complete" means when it is unclear what the entirety of the Site is supposed to consist of. Also, was the Site open and operational at this time? If it was open and operational, then Atlantic Traffic and Design should have included this in their study as useful information regarding how many people were going to the Site at this point in time.
 - c. The 2011 ATDSTA mentions a proposed Da Teng Bed and Breakfast to be located on Galley Hill Road, which is necessary to include when analyzing the "Build" condition of the Dragon Springs Project. The latest Traffic Impact Analysis performed in 2018 does not mention this project in their future traffic analysis. Was the 5-room Bed and Breakfast ever established? If not, was it altered to become something else? Still, no other proposed future developments were discussed in the 2018 study, which is questionable, and is essential to accurately predicting and analyzing future traffic conditions.
 - d. The 2011 ATDSTA analyzes the effects of a Temple in Dragon Springs and claims that there will be up to 200 people traveling to the Temple. The size of the Temple was not discussed, nor the service hours. This means that the study may not have accounted for the true peak hours. Again, this means that the numbers presented to be generated by Dragon Springs are misleading, and there is deficient and insufficient information provided in the study in order to determine and confirm accurate numbers and its impact on the Site.
 - e. The 2011 ATDSTA uses a vehicle occupancy of 3.5 persons per car traveling to the Temple. They provide no basis for this and this number seems high. A more reasonable vehicle occupancy would be less than 3.5 persons per car, which would mean more vehicles would be generated to the site given the same number of persons being generated. Normally, there are less than 2 persons per car for this type of generator. If many of the staff live close by and are going to work, they would not carpool.
 - f. It is obvious that between 2011 and 2018 there has been a tremendous increase in buildings on the property that were not originally accounted for. Knowing exactly what is going to be on the site and the hours of operation are extremely important to truthfully evaluate and analyze the traffic safety, site circulation and parking calculations on and off the Site.
- B. At the Town of Deerpark Planning Board Public Hearing on March 13, 2013, Town Attorney Glen Plotsky expressed that Galley Hill Road had been a concern at every

public hearing as of this date. Mr. Plotsky stated that concrete trucks and heavy equipment have done incredible damage to Galley Hill road. He said that widening the road, repaving the road and including new road signs would alleviate most concerns for Galley Hill Road. SE has a Galley Hill Road Improvement Plan (Plan Sheet C-1) dated March 9, 2017, showing improvements to be made on Galley Hill Road outside of the North Gate Driveway, and that is all. Since there have been many concerns expressed about the quality of Galley Hill Road, why is there only a very small portion of the road due to have improvements? Have any improvements been performed yet? Since Galley Hill Road is rural, curved, has poor sight distances in many locations, and has been expressed as a concern many times by the Planning Board, serious improvements should have been discussed in the studies performed and in the DEIS, but have not.

- C. At the Town of Deerpark Planning Board Public Hearing on March 13, 2013, Town Attorney Glen Plotsky expressed that knowing how many people will be traveling to and from the Site is important and he and the Board would like confirmation of Dragon Springs' numbers through some type of monitoring program, such as having "sign-in" sheets. This was because at this point in time, it was still unclear what Dragon Springs was utilizing their Site for. Have their numbers ever been confirmed? The most recent Traffic Impact Analysis performed in 2018 by Atlantic Traffic Design uses a prorating method to determine future generated trips, as opposed to using the industry-standard method of generating trips by land use. Did Atlantic Traffic Design not even understand the entirety of what the Site was going to be used for? Without exactly knowing what is going to be on the Site, it is impossible to have an accurate prediction of the generation of trips to the site. The lack of transparency debilitates all the traffic studies performed, and the DEIS, because truthful numbers are not presented.
- D. Very frequently, since the start of this project, the Board has expressed concerns to the applicants of Dragon Springs about not knowing what their full intention for site development was. The most recent Traffic Impact Analysis performed in 2018 by Atlantic Traffic and Design shows that the number of visitors to the Site will increase from 75 to 2,000 people. Being that the proposed 920-seat music is expected to be the highest trip generator, there must be other reasons for people visiting the Site which are still, today, unclear. The most glaring inadequacy of the studies in terms of people being attracted to the Site is the fact that Shen Yun is headquartered at Dragon Springs, and yet, these numbers were not accurately calculated by Atlantic Traffic and Design – Dragon Springs' own traffic engineering consultant firm.
- E. At the Town of Deerpark Planning Board Public Hearing on May 8, 2013, Town Engineer Al Fusco expressed concern about not knowing how many people will be traveling to the Site, and how that consequently brings up concern about emergency vehicle access to the Site. Knowing the number of people traveling to the Site is essential to determining their obligations pertaining to emergency personnel, such as Police, the Fire Department, EMS, etc. The most recent Traffic Impact Analysis performed in 2018 by Atlantic Traffic and Design does not discuss Site circulation or emergency vehicle access. Can emergency vehicles get to where they need to be in a timely manner? Do they have easy access throughout the Site? What if there is a mass gathering? These traffic safety issues must be addressed if they have not already

been. Also in this Public Hearing, it should be noted that Board Member Williard Shadt stated that the Galley Hill Road use has changed due to the intensive increase in traffic. If this is true, improvements to Galley Hill Road are essential in order to accommodate more traffic in terms of safety, since Galley Hill Road was not previously extensively used and was not originally constructed for extensive use. Road improvements should be performed by the Town and requested to be paid for by Dragon Springs. Galley Hill Road is a road never conceived for the anticipated traffic of Dragon Springs, and obviously traffic safety on any level was not considered when the Site was being developed.

- F. In the letter from Fusco Engineering & Land Surveying, PC to the Town of Deerpark Planning Board dated May 8, 2013, Mr. Fusco commented that the “parking calculations seem adequate for day to day activities.” How is this possible to conclude when it is still unknown at this point how many people will be utilizing the Site? There is no supporting data to reinforce the statement made by the Town Engineer. Why did the Town Engineer ever object to the inadequacies of the Atlantic Traffic and Design work?

Dragon springs has an obvious history of providing inadequate numbers and facts over the years to both Atlantic Traffic and Design and the Town Planning Board. The everchanging Site creates the challenge to determine legitimate traffic impacts on the surrounding roadway system, which further illuminates the doubts expressed by the Town about Dragon Springs’ intents, numbers and lack of transparency. If the applicant is proposing to use the Galley Hill entrance as the future main entrance, we have already proven that their design previously submitted doesn’t work, i.e. buses hitting walls.

In conclusion, the Dragon Springs DEIS regarding traffic and traffic safety is wholly inadequate and at worst misleading.

As soon as more documents become available to review, we would like to have the opportunity to review them. If there are any questions, don’t hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "Steve Schneider". The signature is written in a cursive, flowing style.

Steven Schneider, P.E.
Principal

File: 18-042T