

Daniel T. Whitehead, Environmental Analyst

New York State Department of Environmental Conservation
625 Broadway
Albany, New York 12233-0001

0. Dear Mr. Whitehead,
0. As part of the scoping session for public comment on the Wildacres, Highmount and DEC projects, I submit the following issues of concern.
0. Ulster County Rd. 49A, located in the small town of Hardenburgh, NY, does not currently possess the ability to handle increases in traffic and usage projected during development and year round operations. Currently Ulster County is in contract with the Town of Hardenburgh for maintenance of this road. How will usage of this road affect Ulster County and the Town of Hardenburgh? Costs associated with road maintenance and improvements should not be borne by either the town or county.
0. The Towns of Woodstock, NY and Olive, NY have expressed great concern about projections for increased traffic along State Rt. 28. I agree that this issue has not been given due consideration. I suggest that a strong analytical survey and review of possible traffic patterns, including seasonal and developmental stages, be included as part of the DEIS.
0. Strong feelings exist in local communities that issues relating to “Community Character” have not been properly evaluated or given due consideration as a result of being unduly dismissed during adjudication hearings. In my discussions with involved parties, the “Community Character” issue has been mischaracterized as the sentiment of those who reject all changes in our community. I request a realistic review of projected financial impacts upon our school, fire, police and other districts that will result from realistic projected increases in needs of services. I do not find that prior models have accurately evaluated this important question.
0. Similarly, I suggest a comparative review of like sized resorts with equivalent community demographics, and the resulting changes that have occurred in regional real estate sales and associated impacts upon economies in these comparable communities.
0. I recommend a realistic comparative analysis of available housing in the area and work force requirements for staffing all levels of operations at the proposed project. Does the geographic region of inclusion accurately reflect the real time and mileage workers will travel for employment opportunities, or will usage of the current model result in a shortage of housing and or a legally employable workforce?
0. I recommend legally binding assurances that the proposed project will not allow for casino and/or gambling operations on site and that all proposed environmental benefit initiatives run in perpetuity without the use of sunset provisions.
0. Clearly, there have been substantial investments of monies and resources in the proposed project by the developer. In order to ensure due diligence by the DEC on behalf of local, regional and state taxpayers, I strongly suggest that any eventual changes in

ownership or completion of sale to other entities contain requirements for close adherence to provisions contained in original agreements. All efforts should be made to avoid the proposed project from comparatively becoming a large scale “turn-key” operation. This would not be beneficial to the community. I believe it is of great importance to have a thorough exploration of the standing prospectus to investors and all inclusive promises, should there be an unforeseen need to recover losses. Is the funding sound? Using the model of Stranded Costs that relate to utilities, there should be no public bail out should investment projections fall short and requirements for site remediation occur. Due to the fact that the lead agency has appropriately avoided any segmentation of these related projects, and that the lead agency (DEC) is an actual beneficiary of the project’s construction; I recommend and advise full research of, and transparency of all existing assurances and arrangements with the project’s prospectors. In what manner will the DEC approach associated legalities relating to the pending partnership with Crossroads Ventures? I urge that all business arrangements be made open, transparent and truly benefit the people of the State of New York.

- 0. Thank you kindly for your service and for the opportunity to share these concerns.
- 0. Respectfully submitted,
- 0. Brian Shapiro
- 0. Ulster County Legislator, District 2
- 0. Chair, Ulster County Environmental Committee

Chair, Ulster County Board of Ethics