



September 29, 2022

Mr. Kenneth Kovalchik, (*via email only*)
Town Planner
Guilderland Town Hall
5209 Western Turnpike; PO Box 339
Guilderland, NY 12084

Re: Costco: Crossgates Mall Road

Dear Mr. Kovalchik,

Thank you for providing application information regarding the above referenced subdivision and site plan. Coordination with the Town of Guilderland and other municipalities within the 13,000-acre Albany Pine Bush Study Area is critical to the long-term conservation of the Albany Pine Bush (APB). The APB supports the best remaining worldwide example of inland pitch pine scrub-oak barrens, a large population of the endangered Karner blue butterfly and is a National Natural Landmark, a NYS Bird Conservation Area, a National Audubon Society Important Bird Area, and a Hudson River Valley National Heritage Area- Heritage Site.

The following comments and recommendations are offered in response to the plans provided.

- Protection: Consistent with our earlier March 10, 2022 (*DEIS Rapp Rd. Developments*) comments, the proposal is located within the APB Study Area, described in the 2017 Management Plan Update for the Albany Pine Bush Preserve (APBPC 2017) and in an area that is not recommended for protection as part of the Albany Pine Bush Preserve www.albanypinebush.org. Therefore the Albany Pine Bush Preserve Commission (APBPC) does not anticipate that the implementation of the proposed site plan would result in potentially significant negative impacts on our ability to create and manage a viable preserve as detailed in the 2017 Management Plan Update.
- Native landscaping: Since the project is located within the APB Study Area, any landscaping plan for this site should eliminate known non-native invasive plants and incorporate locally derived native species plantings to the greatest extent

practicable. Landscaping with native vegetation would not only benefit APB ecology but also preserve the character and “sense-of-place” distinct to the APB and this part of the town. Retaining and incorporating Pine Bush native species landscaping in carefully designed and appropriately located development can further minimize impacts to the unique and endangered APB environment.

- Outdoor lighting: The impact of outdoor lighting at the proposed site should be limited by using downward facing, enclosed high-pressure sodium vapor lights or LED fixtures rather than mercury vapor lights. Mercury vapor lights negatively affect nocturnal animals including rare amphibian and insect species in the Pine Bush. Downward facing, enclosed sodium vapor or LED lights, however, are significantly less disruptive than mercury vapor lights and have been successfully utilized elsewhere in the Albany Pine Bush Study Area.

These comments represent likely APBPC reactions to the plans submitted and are my speculation of the opinion of the APBPC. This letter is not an endorsement of the proposed plans.

Sincerely,



Neil A. Gifford
Conservation Director

cc: APBPC Technical Committee
Mr. Anthony Luisi, APBPC Chair – NYSDEC Region 4 Regional Director
Mr. Christopher A. Hawver, APBPC Executive Director
Ms. Trish Gabriel, NYSDEC Environmental Analyst – Region 4
Mr. Michael Clark, Regional Wildlife Supervisor, NYSDEC-Region 4

Citations:

APBPC. 2017. Management Plan Update for the Albany Pine Bush Preserve. Albany, NY. (www.albanypinebush.org)