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Comments on the DEIS for Rapp Road Residential/Western Avenue Mixed Use Redevelopment Projects by Russell Ziemba

1 message

Russell Ziemba <rz1813@gmail.com>

Tue, May 26, 2020 at 6:43 AM

To: Kenneth Kovalchik <kovalchikk@togny.org>

Cc: Russell Ziemba <rz1813@gmail.com>, Russell Ziemba <russellziemba2004@yahoo.com>

Please acknowledge the receipt of this email by return email to:

rz1813@gmail.com and russellziemba2004@yahoo.com

so that I know you received it.

Comments on the:

Draft Environmental Impact Statement, for the proposed:
Rapp Road Residential/ Western Avenue Mixed Use Redevelopment
Town of Guilderland, Albany County, New York

Prepared by Russell Ziemba for the Lead Agency:

Town of Guilderland Planning Board
Guilderland Town Hall
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Contact: Kenneth Kovalchik
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May 25, 2020

Sent via email and hand delivered to the Guilderland Police Department
at Guilderland Town Hall (because of COVID-19 Pandemic)

Dear Kenneth Kovalchik and Town of Guilderland Planning Board,

My biography:

I have a long history of involvement with the Pine Bush and efforts to preserve it for future generations. I have been a student of and advocate for environmental sustainability for the last five decades. I am a graduate of the Environmental Studies program of the University at Albany. I am a Board member of Save the Pine Bush, and a long-time supporter of the Pine Bush ecosystem and the Albany Pine Bush Preserve. I first became aware of the Pine Bush on my initial day in Albany and Guilderland in August of 1971, and began studying it my first semester at the University Albany that fall.

As a member and Board member of Save the Pine Bush I've read, studied and commented on more than a dozen different proposals that have produced Environmental Impact Statements, and the Guilderland Comprehensive Plan, and the Management Plans produced by the Albany Pine Bush Preserve Commission.

I've lived in the Capital District for forty-nine years. For the last three years I've been a member of the Board of Directors of the Honest

Weight Food Co-op, a locally originated, owned, and operated business with a yearly budget of twenty-nine million dollars. As a Board member I've worked on issues of local sustainability for our area, and environmentally responsible business practices for the Co-op.

Lead Agency:

I believe that the large scope of this project, and clear-cutting of Site 2, and other federal and state violations trigger a reestablishment of lead agency, allowing another involved agency to adhere to SEQRA's procedures and act as "stewards of the... land, and living resources" with "an obligation to protect the environment for the use and enjoyment of this and all future generations" as required by NYS Environmental Conservation Law. ECL 8-§0103(8)."

Title of this DEIS:

How people judge an idea can be greatly influenced by how it is presented. I think the name of the proposed project: Rapp Road Residential/ Western Avenue Mixed Use Redevelopment Projects, should not include the word "Redevelopment" since almost all of the 46 acres proposed to be developed are currently undeveloped and could easily be managed so that the land could revert to Pine Bush: upland pine barrens ecology. Framing the proposals as redevelopment incorrectly and unfairly presents these poor ideas as a community benefit.

They would be an overall detriment to the region and would significantly erode the quality of life of Guilderland residents. The proposed projects would squander Guilderland's most unique, distinctive and valuable feature: the Pine Bush. Valuable resources and energy would be misspent on poorly located projects that should be focused on rebuilding our city cores where a complex and integrated infrastructure already exists. This project would perpetuate the destructive practice of suburban sprawl at a time when we should know better.

All of what is being proposed would be better located somewhere else, like in a city, or nowhere else because it is not needed. The housing should go where there is already a complex infrastructure and dense development and where redevelopment is needed like the inner cities or Albany, Schenectady, or Troy. It should go where people can walk to what they need rather than having to drive everywhere. This proposed housing, retail commercial, and office space should be infill in an urban area and not built on green space, especially such a valuable and rare ecosystem like the Pine Bush.

Crossgates/Pyramid wants to develop this land with these proposals not because they are needed, not because these locations are the best locations for the community, but only because they own the land, it is in close proximity to their current mall, and they want to make money for themselves.

Transit-Oriented Development District:

All of what is being proposed is in the newly created Transit-Oriented Development District or TOD. The purpose of a TOD is creating vibrant, livable communities, which are compact and walkable, pedestrian oriented, mixed-use communities centered around high quality public transportation systems. This makes it possible to live a lower-stress life without dependence on a car for mobility or survival. In our current era of climate change and global warming this would allow us to reduce our carbon footprint and other negative impacts on the

environment, while revitalizing urban areas.

Growing Guilderland with the associated lowering of the quality of life for residents of the Town is not smart for the Town or for the Capital District region. Transit-Oriented Development Districts place walkable design with pedestrians as the highest priority. In this plan pedestrians are an after thought. Their safety will be more at risk from vehicles and their health more impacted from the air and noise pollution the vehicles create.

This proposal wants to add more than 1700 additional parking spots, in an existing sea of asphalt where usually only thirty or forty percent of the spots are filled. This percentage can be seen by examining the aerial photos used in the DEIS. This is a clear indicator that what is being proposed is out of compliance with the intent of a TOD. It is a dangerous perpetuation of what is causing many of our societal, environmental, financial, and psychological problems.

The most striking aspect of this proposal by Crossgates is the perpetuation of environmentally toxic, unsustainable growth in the midst of the climate crisis/ catastrophe that we are now in. This proposal would be an extension of car culture at a time when we now realize this road is leading us over a precipice to disaster. Forty or fifty years ago this type of proposal would have been considered foolish by urban planners and environmentalists, but now after what we have witnessed over the intervening decades it is considered extreme folly.

In cities it is more difficult to find parking spots and because of the proximity of numerous transit options residents often choose not to own a car or to use one only on rare occasions. The DEIS did not consider where these units could be located so that no parking spots are needed or perhaps only a minimal number, which would be comparable to urban levels.

Costco is not a local business, so most of the money that would be spent there would be leaving the community rather than circulating and recirculating in our area. And building a new gas station is perpetuating the old and outmoded practice of individual car driving. This is particularly appalling since this is in a TOD. If we are going to build something it should embody what we want, not what we need to change.

This proposal would be a perpetuation of car culture at the expense of mass transit, walking and bikes. It is expensive to build, maintain, and operate individual cars for everyone, not just from a financial standpoint but also in terms of resource consumption and pollution. Even recycling used cars is costly financially and environmentally. Why are we constructing our society in ways that are dysfunctional and destructive to nature and the human psyche? Why are we building a world in which you have to own and operate your own car in order to be a functioning member of society?

In downtowns people often walk, bike, or take buses because there are a multitude of venues that are easily available using these forms of transportation. The DEIS did not adequately examine where 270 units could be better located so that non-car methods of transportation would be viable, and if this site is chosen, how these non-car methods could be made viable.

There are health costs of living where driving is the most likely option for transportation. The reliance on the automobile has contributed to numerous health crises: obesity, heart disease and cancer are the most obvious, but stress from driving is a factor in these and other common diseases. The DEIS did not adequately examine

what the likely morbidity and mortality rates from these diseases would be for residents who adopt a car dependent lifestyle compared to those who travel by more healthy methods.

Although density and even high-rise buildings make sense and are appropriate in an urban setting, five story buildings are out of place in the Pine Bush. They will be a visual intrusion to the Preserve and for miles around. Expend the money and resources where they can do some good, like Downtown Albany, not in a fragile ecosystem where five story buildings are an eyesore rather than an attribute.

Psychological problems can be induced by environmental conditions. Separation from others with everyone in their own car is a cause of isolation and depression. Rational and empathetic people often change when they get behind the wheel of a car. The experience of driving pits drivers against each other. It becomes easy to dehumanize other drivers. Road rage is only the most obvious pathology associated with driving. The DEIS did not adequately examine what the hidden costs of thousands of additional car trips per day will be. How many more people will be injured or killed? How many more accidents will occur? What will be the added costs to the average driver?

Hard, dense surfaces and more parking lots and paved areas create temperature extremes more readily than vegetation and soil. There is more heating (and cooling). Runoff is contributing factor to soil and water pollution and to flooding. The DEIS did not adequately examine how heating, water and soil pollution, and runoff can be avoided during construction and throughout the lifespan of this proposed development, or avoided by not building any of this.

The sixth great mass extinction for the Earth:

Crossgates/Pyramid wants to develop this land with these proposals not because they are needed, not because these locations are the best locations for the community, but only because they own the land, it is in close proximity to their current mall, and they want to make money for themselves.

We are currently living in and causing the sixth great mass extinction for the Earth, and the climate crisis that we are now witnessing is being perpetuated by projects like this. The most devastating global problems have local components and connections. We are causing these problems here and promoting them worldwide by our actions and decisions.

Global annual mean CO2 concentration has increased by more than 45% since the start of the Industrial Revolution from 280 ppm during the 10,000 years up to the mid-18th century to 415 ppm as of May 2019. The present concentration is the highest for 14 million years. These high levels of greenhouse gases in the atmosphere are creating environmental havoc. The whole carbon footprint of the project during construction and especially when completed and occupied was not comprehensively calculated or estimated. How this proposed project could be made carbon neutral during the construction phase and when (if) it is fully occupied was not adequately considered.

Last July was the hottest month ever recorded to have occurred on this planet. According to reports, the years 2014 to 2018—are the warmest years ever recorded in the 139 years that the National Oceanic and Atmospheric Administration (NOAA) has tracked global heat. How this proposed development could be heated and cooled and supplied with electricity without having to use fossil fuels or nuclear energy was not given appropriate consideration by the DEIS.

The some of the highest winds and most violent hurricanes have occurred in the last three years: Dorian, Michael, Maria, and Irma. One hundred year floods are happening every ten years.

NASA has estimated that the polar ice caps are melting 9% every ten years, which is an extremely alarming rate. If the temperature on earth continues to rise at its current rate the Arctic will have no ice by 2040. The Arctic ice cap has decreased since the 1960s by as much as 40%.

2017 was an intense, and in many cases record-breaking, wildfire season – especially on the west coast of North America. Despite predictions that that season would be relatively mild due to ample rain and snow from the previous winter, excessive heat combined with dry vegetation and strong winds created conditions for fires to start and spread more easily. British Columbia lost over 2.86 million (yes million!) acres to deforestation from wildfires that year, while totals are at over 1 million acres for California in the U.S., with another 1-2 million combined in Oregon, Washington, Montana, and surrounding states. This type of disaster has not occurred in New York State in over 100 years, but it is becoming more likely as temperatures and wind speeds rise. Where 270 housing units could be located not in or near a fire adapted ecosystem was not adequately considered.

What we have learned from decades of building in inappropriate locations is that this type of development can seem safe in the short term but runs high risks of catastrophe in the long term. We know that we should no longer continue building on barrier islands, extreme slopes, flood plains, and fire adapted ecosystems. Eventually the sword of Damocles, which is hanging over our heads, will fall. We are going to see more extreme weather: cold, hot, wet, and dry. One year we will have a cool and wet summer season, the next could be hot and dry with a sustained drought. If this is followed by high winds, and a careless spark, or a lightning strike, wildfires in the Pine Bush could result as we commonly now see in the West. Besides identifying locations for this project that are not in a fire adapted ecosystem, the DEIS should have identified how residents would be evacuated and where they would stay if wildfires threaten this area.

Environmentally exacerbated diseases and plagues are occurring. Because of quick travel to almost any part of the world, we can easily be exposed to diseases that we would not normally encounter locally. It is myopic to think that we can separate ourselves from these problems. Diseases that we thought we eliminated or haven't seen in over a century are making comebacks. Diseases that were once rare or not found locally have become common: lyme disease, anaplasmosis, and other tick borne diseases.

We are also at risk from new diseases like COVID-19 than can quickly spread to pandemic proportions. Locally based economies are safer from pandemics. Businesses that get most of their products from China, or thousands of miles away, are riskier than those that are locally sourced.

Disease, worry, and anxiety that we never had to consider are now part of our every day lives. They diminish the quality of lives and our ability to enjoy the outdoors or the company of others, because of the real fear of these now common diseases. They cause a separation from nature, and each other, which is growing all the time and becoming worse with each generation. There is a loss of connectedness with nature and empathy for other beings and the life sustaining environments of the Earth.

COVID-19 has exposed the fragility of many of our current structures

that are the basic yet faulty assumptions of how and where we get food and other commercial products. A distribution network which spans the world and where most of the goods to be sold at Costco come from thousands of miles away assumes a world where oil is cheap, people are expendable, and it acceptable to use the air we breath and the water we drink as dumps. We can monitor local suppliers, not those whose locations are distant or unknown.

A more locally and regionally based system is more resilient, because it doesn't rely on long and easier to broken supply lines. It is more sustainable since it consumes less energy and produces less pollution. It is more financially beneficial since the money circulates longer in our region. It is more accountable since we can more easily scrutinize the whole process.

We continue consuming resources and creating garbage as if there were no consequences to our actions, as the Rapp Road landfill, already the highest point in the City of Albany becomes larger each day with no waste solutions in sight. The landfill, which is highly visible admission of our failures as a consumer culture continues to grow and foul the Pine Bush Aquifer below it and foul the air above it, as it vents methane and other noxious fumes.

For most items, recycling is not a viable option since China stopped importing our recyclables. This area does not have a sustainable plan to deal with garbage, recycling, or composting. What the likely garbage footprint of this proposal would be, and ways to minimize it, is not adequately considered in the DEIS.

Expanding Crossgates and expanding the Dump:

It is not a coincidence that for decades Save the Pine Bush and many others have been fighting the cancer-like expansions of Crossgates Maul and the City of Albany Waste Management Facility (also known as the City of Albany Rapp Road Waste Management Facility, the ANSWERS Landfill (lack of answers), Mount Trashmore, or mostly commonly- the Dump. They are both inappropriate, manmade invasive species don't belong in the Pine Bush. They are located only a mile apart. To simplify the process, some have suggested eliminating the consumers and just running a pipeline directly from the Maul to the Dump.

We live in a throw away culture. In a few years what you buy at the mall ends up in the garage, then in a garage sale, and everything that doesn't sell goes to the dump. This is not accidental. Manufacturers make products that can't be repaired or upgraded so they have to be discarded and new ones purchased. Although perhaps healthy for sales it is bad for the consumer and the Earth (oh ya, the Earth). Viewed from a psychological perspective, many people buy things they don't really need because they are unhappy or bored. More than ever people are disconnected from real experiences, other people, nature, and the Earth itself. They have an emptiness they don't understand and try to fill it with new toys, which become old really fast.

Where is the Pine Bush?:

The Pine Bush once covered over 58,000 contiguous acres according to a study done by Save the Pine Bush members John Wolcott and Jerry Mueller in the 1990's. They did an extensive survey of lands adjoining the current Pine Bush, taking soil tests to determine the proper sandy substrate, and vegetation analysis to include areas where classic Pine Bush species still occurred.

The current extent of the Pine Bush ecosystem is about ten percent of

that or roughly 5,800 acres. A majority of that exists in the Albany Pine Bush Preserve, but a good portion exists on privately owned adjoining lands. Much of the ten percent that is left is highly fragmented by roads, railroads, and various types of developments with parking lots and paved surfaces.

Crossgates should partner with the Commission and local municipalities to buy and manage connecting pieces, rather than proposing greater fragmentation. Dangling the 8.4 acre parcel as a bargaining chip and possibly withholding it is sadistic. Crossgates should donate it to the Commission for the Preserve immediately since that is the only honorable thing to do.

Our Pine Bush is a globally rare feature and arguably the most distinctive and valuable natural resource of our region. To wantonly destroy it is inexcusable. Its value is underestimated by the Town of Guilderland and not really utilized to the benefit of residents or visitors. The Town and adjoining municipalities should commit to preserving all of the current and former Pine Bush that remains within their boundaries and within the study area of the Albany Pine Bush Preserve Commission. Additionally there are still some areas of Pine Bush that are outside of the study area that are being preserved or need preservation, such as the Woodlawn Preserve in Schenectady County.

The base map for the Site Location Map and some of the other maps used in the DEIS is the U. S. Geological Survey, 7.5 minute, Albany, N.Y. quadrangle which was published in 1953 and photo revised in 1980. For up-to-date information it is not the best base map to use since so much in this area has been altered since 1953 and even 1980. Crossgates Mall does not even appear on the later photo revision.

In other ways this base map is very instructive since it roughly shows the extent of the Pine Bush in recent history and during many of our lifetimes. "Pine Bush" is labeled on this topographic map and clearly visible on the Site Location Map in the DEIS. It is also labeled on the Voorheesville quadrangle map, which is the adjoining quad to the west. On the Albany quadrangle map you can see the label "Pine Bush" extending eastward beyond the Northway (I 87) and Exit 24 of the NYS Thruway.

The Pine Bush ecosystem once covered the campus of the University at Albany and the Harriman Office Campus, and likely extended all the way to or beyond the Pine Hills neighborhood in Albany. Although we can lament the destruction that took place decades or centuries ago there is not much we can do about that now, other than preserving pockets of ecosystem where they still survive and planting native Pine Bush species in these areas of former Pine Bush.

Sites 1, 2, and 3 are a totally different situation. They already contribute to the Pine Bush ecosystem even though they have had some disturbance and have not been burned or managed. Without being part of the Preserve or any ecological management they still provide important buffers and habitat, and with appropriate management their value to the ecosystem would greatly increase.

The Pine Bush is not just the Albany Pine Bush Preserve, although that is the heart of it. The neighboring undeveloped parcels of land that are privately owned continue to contribute to the Pine Bush ecosystem as habitat, buffers, and valuable microclimates and refuges for plants and animals. Although they are not officially part of the Preserve, their value should not be discounted and every effort should be made to add them to the Preserve. With ever increasing, disruptive climate change, the spread of plant and animal diseases, and even positive factors like prescribed burns by the Commission, these areas can act

as havens and refuges while other areas are devastated.

The proposed 8.4 acres addition to the Preserve by Crossgates:

It is erroneous to count the 8.4 acres that Crossgates proposes to give to the Commission for the Preserve as an addition, since it already functions as part of the ecosystem. It would be evil to not add it to the Preserve regardless of the outcome of these proposed developments. It is also unjustified to count the 8.4 acres as a fair mitigation for the loss of nearly 20 acres in site 1 and the 26 acres of Sites 2 and 3. The 90% of the Pine Bush ecosystem that is developed or lost by fragmentation, was not lost all at once but by a constant erosion by development proposals like these. A line in the sand has been drawn and these proposals have crossed it.

What should happen to Sites 1, 2, and 3?:

What should happen to these three parcels of land? Green space, especially Pine Bush should not be built on. They should be environmentally managed so that they can revert back to Pine Bush. Nothing that is being proposed uses or enhances what is unique or special about Guilderland. Nothing proposed supports the local character of the town. It is all cookie cutter sprawl that is consuming and debasing our country. The Pine Bush is a globally rare feature and of immense value, not only locally, but to our region, our country, and the world. It is not only a value to us aesthetically, biologically, and ecologically, it has huge potential economically.

Ecosystems are more sustainable when they are contiguous, and extensive, with fewer edges and intrusions. They are easier to manage and perpetuate with less active management. The Pine Bush Preserve is still very fragmented. The inclusion of these 19.68 acres, and the 15 acres from Site 2, and the 11.34 acres from Site 3 would all help to fill out the Preserve and make it more sustainable. Demands of money and staffing become less when preserves are properly configured. All of these parcels should be added to the preserve to make it more viable. The DEIS does not adequately examine how the desired acreage for the Preserve can be achieved, and rare, threatened and endangered species helped if these parcels are not included.

The long term sustainability of the Crossgates Butterfly Hill and the migration of Karner blue butterflies will become more tenuous if the habitat on this 20 acre parcel is destroyed, and thousands of daily car trips are added to Rapp Road and the Crossgates Mall Road. Karner blue butterflies are low and slow fliers and it is likely that their migrations will be impeded or stopped by the increase in fatalities from car traffic. The DEIS does not adequately examine the likely extent of Karner blue butterfly fatalities from this, any how they can be avoided.

Although the Karner blue butterfly is the star of the Pine Bush, there are other butterflies and moths that need protection. This is also true of the worm snake and the eastern hog-nosed snake and many other species. A healthy ecosystem will foster the survival of all pine barrens species especially the ones that are most at risk: the rare, threatened and endangered species. The DEIS did not include an adequate inventory of plants, animals, fungi, and other life forms on these sites, both residents and migrants, and how those that have a protected status can be protected rather than obliterated.

Because of the barriers that added traffic on widened or new roads will cause, which will exacerbate the already fragmented condition that exists, other methods of facilitating wildlife dispersal should

be seriously considered. Overpasses and underpasses that are vegetated with native Pine Bush species, that are locally sourced, would be a partial solution. Proposed locations and dimensions for overpasses and underpasses should be included in the DEIS along with lists of appropriate species that would be planted on them.

Growth:

We are already experiencing a breakdown in systems as we exceed the carrying capacity of the environment and existing built infrastructure. To continue to try to expand our population, our consumption of goods and services, and the resultant destruction of our sustaining environment is foolish. Growth is not smart, sustainability is.

How many lanes do you want to add to the road network to try to accommodate the overload? The wider and more heavily trafficked the roads get, the more dangerous and obnoxious they become. As a result fewer people walk or ride bicycles. The pedestrian and cyclist experience transforms from being an inconvenience to a hazard.

If these 270 units are constructed they will compete with housing units that already exist in appropriate development areas like downtown Albany. The DEIS did not adequately determine the extent of this competition. Is there a need for 270 more housing units on Rapp Road and Western Avenue? The DEIS did not adequately examine this question. The population of the Capital District has been fairly stable. There have been shifts in population to the inner ring suburbs and outer ring suburbs and now back to the cities. If completed will this development hurt efforts to repopulate our cities? The DEIS did not adequately look at this.

People move out of the city to escape traffic, noise, light pollution, air pollution and other negative environmental qualities, but often they find that these problems follow them to their suburban locations. Some believe the answer is to move further out, which compounds the problems rather than solving them. The DEIS did not adequately examine how these negative environmental qualities can be lessened rather than increased, so that current residents will not be tempted to move further out and consume more green fields that we need to keep green.

Building on natural areas even if they are not valuable and rare ecosystems like the Pine Bush is a wasteful and destructive practice and should be stopped. Nature will survive without us, but we need nature to survive. Developed areas, vacant malls, brownfields, and parking lots are more suitable locations for proposals like this. The DEIS did not adequately identify where alternative areas like those mentioned above exist nearby where these units could be constructed.

If the applicant is dead set on building housing, why not do a project everyone can support? Why not rehab 270 units in areas that need rehab, like Clinton Avenue in Arbor Hill or the South End of Albany and/or build compatible mixed use infill on vacant lots in these areas? These areas are in the food desert and people who live there also lack other basic commodities. People could easily walk, bike, bus, or carpool to retail in their neighborhoods. The need is there. The market is there. Retail needs to move back to urban areas and it could be done in a socially and environmentally responsible way. The DEIS did not adequately examine other, more appropriate sites in urban areas like those mentioned above, that are more distant from Crossgates as locations for residential units and mixed use.

Rapp Road Historic District impacts:

The Rapp Road Historic District would be dramatically affected by increased traffic with the accompanying air, noise and light pollution from vehicles. These forms of pollution would affect the historic integrity and aesthetics of the Historic District and diminish the quality of life for the residents. The large increase in traffic would be a major safety hazard for drivers and pedestrians. Residents now have trouble pulling out of and into their driveways. Since there are no sidewalks, pedestrians usually walk in the street. This would increase their risk of injury and death. There isn't enough room to expand the roadway or to add sidewalks to this narrow road and doing so would detract from the historic qualities of the district. The DEIS did not adequately examine how any additional traffic above current levels can be avoided, and how the quality of life of those who live here and their safety can be enhanced rather than diminished.

A new type of mall, ideas for Crossgates to consider:

Pyramid/ Crossgates started out as retail and has been diversifying into entertainment and housing as their retail component has diminished. I propose that they pursue a new and growing industry: ecotourism. It is a natural fit and they can use it to rebrand themselves as a responsible neighbor and citizen of the world rather than the irresponsible villain image they now project. It would draw people to their retail by providing experiences no other malls offer, except maybe one other, called Forum Groningen.

Forum Groningen is a multifunctional building and is a model for the new shopping experience. It is a newly built cultural center in the city of Groningen in the northern part of Netherlands. It houses a library, cinema, and parts of the Groninger Museum, exhibitions, galleries food and drinks, a tourist shop and events. The Forum is the place to be in Groningen. It is trying to show that retail centers don't need to sell to survive. It is a cultural department store filled with books and images, and a multipurpose conference center. The newly opened Forum Groningen is a place that makes you want to stay. Students know how difficult it can be to find a study spot sometimes. Luckily, the designers of the Forum also kept that in mind. 1.3 million visitors per year are expected to visit this new attraction.

Crossgates could have more because of its strategic location. Yet it currently either tries to ignore its location in the Pine Bush or views as an impediment to its goal to continue its cancer-like growth. Crossgates should capitalize on the Pine Bush and use its power to enhance it, not obliterate it, or transform it into the boring and unsustainable crap that we see everywhere.

What is Crossgates most valuable asset? I think it is the Pine Bush! It is in close proximity to a world-class environmental treasure. The Albany Pine Bush Preserve supports 76 New York State-designated wildlife Species of Greatest Conservation Need, including. The APBP is a National Natural Landmark, Hudson River Valley National Heritage Area Site, a New York State Unique Area, Bird Conservation Area and a National Audubon Society Important Bird Area. Crossgates Mall is next to valuable, prime habitat: the Butterfly Hill. It could be connected to a growing network of trails into the Pine Bush, and the Discovery Center. Why not focus and expand on this to draw people in and make money?

Crossgates is located at the entrance to the Preserve and could be nearly surrounded by it if these three parcels were added to the Preserve. Being located at the beginning or end of a trail and an

important starting or stopping point, it could provide valuable additions to enjoying and exploring the Pine Bush. It would be a great location for bike rental and repair and sales, lockers, showers and changing facilities, and all of the other support services for outdoor recreation.

Alan Fiero at Farnsworth Middle School reconfigured an existing space to create a modest yet impressive butterfly garden. This facility is great for the students at the school but is not generally accessible to the public. Crossgates could create the largest butterfly garden and conservatory in the world! It could focus on local species especially those that are rare, threatened, and endangered. There are a couple of other butterfly gardens and conservatories in the Northeast, but none are nearby and nothing exists of this scope or magnitude.

The DEIS did not adequately consider using the Pine Bush in a constructive and supportive way rather than consuming and destroying it. The DEIS did not consider embracing the bounty of the Pine Bush and expanding and enriching it, while enriching the lives of the thousands of visitors who would flock to such a unique attraction, and most importantly enrich Crossgates and the investors, for being savvy business minds out ahead of the trends.

When you have a unique treasure next door, you don't obliterate it, you cultivate it, and cash in on it. Unique natural beauty, especially in the form of butterflies, is universally desirable. A world class butterfly conservatory and everything that would be associated with it would make Crossgates a destination unlike any other and would be a magnet for attracting shoppers to reverse their slumping retail businesses.

To expand the desirability and viability of this project and the Pine Bush ecosystem as a whole, they could donate the various undeveloped properties that they own within and near the Pine Bush study area to the Preserve. Additionally they could help to purchase the remaining full and partial protection areas to complete the Albany Pine Bush Preserve outlined in the Albany Pine Bush Preserve Commission's plan.

The future of retail, entertainment and restaurants at Crossgates:

The COVID-19 Pandemic is very likely to change the nature of retail, entertainment, and dining in the near future and for years to come. Many businesses will not reopen and others will close because of the decreased sales during the pandemic. Many people are likely to change their buying, viewing and dining practices because of these last few months. I would expect Crossgates to lose a sizeable portion of the businesses that now rent space at the mall. I would expect a fair amount of vacant space within the mall to occur. Although this may be a difficult transition, I think it would be timely and a wise business strategy for Crossgates to adopt the new types of activities I've described in the paragraphs above.

Potential Pine Bush trail and walking and bicycling opportunities:

Sites 3, 2, and 1 could function as the southeastern gateway to the Preserve. They would be the only section of the Preserve east of Route 155 to front on Western Avenue. High quality Pine Bush on these parcels would act as an introduction and invitation to people heading west.

Although the Preserve fronts on various internal roads in the Pine Bush, the two major local transportation and business corridors, Route

5 and Route 20 give people on a slight hint of the amazing ecosystem that exists between them. From these roads, that are the passages west across the country from Albany, nothing relates to the Pine Bush. There are no support services or access points. The Preserve does not front or connect to Route 5 at all, and there are only a few small frontages and potential connections that exist on Route 20, and they are all west of Route 155.

As the Pine Bush becomes more well known it will attract more people for recreational uses. There needs to be more of it so that it can perform as a good habitat for native species while allowing people to get out in nature. Peripheral and non-intrusive trails could allow people to experience the solitude, wonder and stillness of a dewy morning sheltered between the dunes; or viewing the moon, planets, and stars away from the ever increasing light pollution obscuring our night sky.

People are much more likely to use recreational opportunities if they are easy and close for them to access. Places that can be reached by foot, bike or bus rather than a long drive create the opportunities for a more serene and enjoyable experience. It is better to walk around your community than to drive to the gym, but only if your community is walkable, safe, and not a traffic congested, stinky, noisy nightmare.

Walking down Western Avenue in the eastern portion of the Town of Guilderland is much more difficult and unappealing than it is walking down Western Avenue a few miles east in the City of Albany. In the urban area there are good sidewalk networks, more services, attractions, and amenities along the walk. There are public restrooms and overhanging trees, parks and recreational opportunities and the traffic is much slower. It is safer, more convenient and better connected. There is greater density and things are closer in proximity, so many more people walk, bike or bus. And Albany is a city so it can support greater density.

Throughout history there have been many suggested routes for trails in and around Albany. Some suggest a green necklace around the city, others connect Albany with nearby localities. I would like to see a system of trails that runs between Albany and Schenectady that would connect to the bikeway and other trails, including those in the Preserve.

For thousands of years a footpath which became a trail and then a carriage road and eventually the Thruway, connected Albany and Schenectady. It was the shortcut that skirted the Cohoes Falls, and connected the Hudson and Mohawk Rivers. That trail approximately paralleled Route 5. It was called the Maquas Padt (Mohawk Path) and later became the Kings Highway. It was the original direct footpath between the two cities. Although small portions of this prehistoric path still exist in the Pine Bush, it no longer functions as a footpath since much of it has been obliterated by the Thruway and other roads.

We lost our trail that connected the two cities and the two rivers in a direct, safe and interesting way. Herman Melville traveled the route and wrote about it and the Pine Bush beautifully in Moby Dick. This important and unique feature that added to the quality of life of pedestrians, cyclists, and nature lovers was lost but could be approximately recreated. Sites 1, 2, and 3 could play an important role.

The addition of these three parcels to the Preserve, with their strategic location at the southeastern edge of the Preserve, connecting to Western Avenue, CDTA, and population centers, would

enhance visibility, awareness, and accessibility of the Pine Bush ecosystem. They could provide links and entry into the Preserve. Crossgates is located at the edge of the Preserve and nearly surrounded by it. Positioning itself at the beginning/end of the trail and at an important stopping/starting point, would enhance the quality of Crossgates as a destination.

The intent of the Rapp Road/ Western Avenue proposals is to make money for its investors, with little redeeming social or environmental value. I believe that we could have both. Why not make money while doing something helpful for the community and the planet? We could have a win/win situation if we created the right plan. I've proposed some alternative development proposals for Crossgates in the Pine Bush and within neighborhoods in the urban core of Albany. The DEIS did not adequately consider these types of alternatives to what is now being proposed by the applicant.

Crossgates could become a good and helpful neighbor rather than a villainous enemy. The most valuable publicity is word of mouth from people you trust and respect. These types of responsible and locally and globally beneficial actions are better than any publicity money could buy.

Thank you for considering the many environmental impacts and alternatives I've outlined. I hope the applicant will amend the DEIS to include them. I also hope that the applicant can make a profit while making the Rapp Road/ Western Avenue neighborhood, the Pine Bush, our region, and the world a better place.

If these three sites were managed as to allow the return of the Pine Bush ecology, they would not cost the town much in services, but would improve the quality of life for town residents and add to the economy by stimulating visitors to this unique area. Crossgate/Pyramid should utilize this gold mine in it's back yard and not destroy it with proposals that would be much better located where they are needed and more appropriate.

I am very much opposed to what is being proposed for all three sites. I ask the Town of Guilderland Planning Board to not approve any of the proposals for these three sites as they now are being proposed. I ask the Town also to facilitate a change in lead agency for the evaluation and determination of the three proposed projects.

Thank you for your time and consideration.

Sincerely,

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