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October 2, 2019

Town of Guilderland Planning Board
c/o Kenneth Kovalchik, Town Planner
Town of Guilderland, Guilderland Town Hall
Post Office Box 339, 5209 Western Avenue
Guilderland, NY 12084
kovalchikk@togny.org

RE: Draft Scope for Draft Environmental Impact Statement (DEIS) for Rapp Road Residential Development and Additional Lands; Sent via email

Dear Town of Guilderland Planning Board:

Following are additional comments we have regarding the scoping document for the Draft Environmental Impact Statement (DEIS) for Rapp Road Residential Development and Additional Lands.

We are submitting these comments now because there we have additional concerns that have developed out of knowledge we have gained since submitting our previous comments.

Thank you in advance your consideration,

Steve and Barbara Wickham
Residents of Guilderland

Comments on Draft Scope for Draft Environmental Impact Statement (DEIS) for Rapp Road Residential Development and Additional Lands

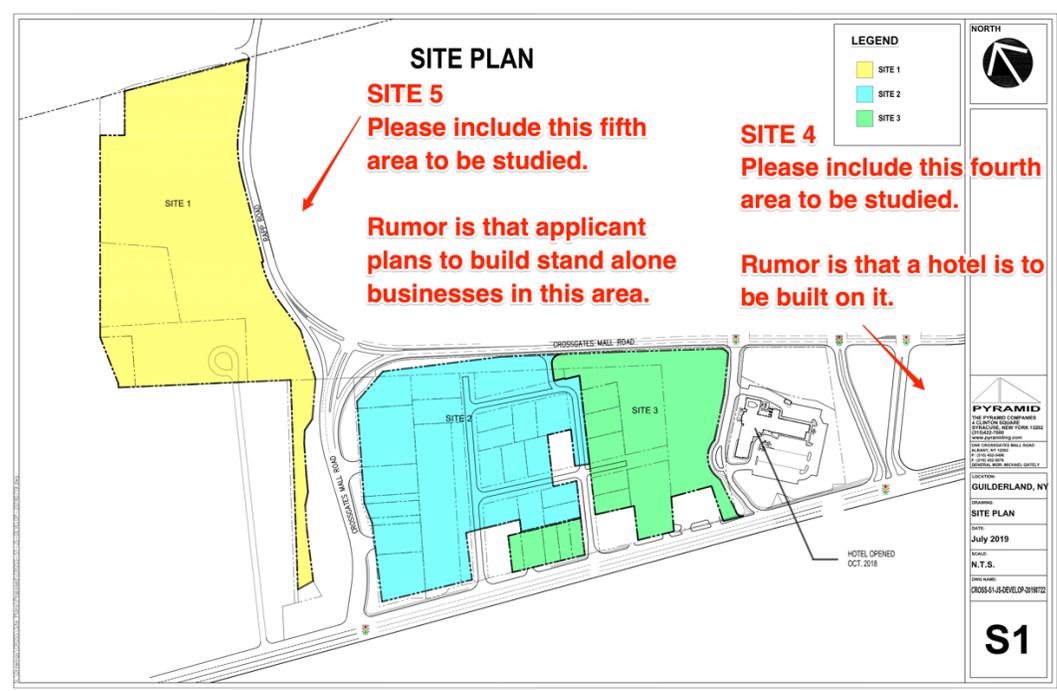
2.0 DESCRIPTION OF THE PROPOSED ACTION

In our previous comments, we asked that a fourth site be consider in the proposed action because while Steve was campaigning in the Spring of 2019 to represent District 30 of the Albany County Legislature, Steve heard rumors from residents of the district that a Costco was to be built upon SITE 2 and another hotel was to be built on upon the property we have indicated as SITE 4 on the map below, which is on the opposite side of the current main entrance to the Crossgates Mall.

We believe there is merit to ask for this because the rumor for SITE 2 seems to be more than just a rumor based on what the Applicant has submitted in the DRAFT SCOPE for purposes of the Draft Environmental Impact Statement (DEIS) as SITE 2 is to studied as “a ±160,000 square feet retail building and associated fueling facility on ± 15 acres”. This description as provided by the Applicant is consistent with the rumor of a building Costco which also typically has a fueling station associated with it.

Since submitting our previous comments, we have learned of additional rumor that Pyramid intends to build stand-alone businesses on what is known as the “Peanut Lot” on the other side of Rapp Road from the proposed SITE 1. We have designated this as SITE 5 on the map below.

In our previous comments, we suggested that SITE 5 should be considered as a reasonable alternative site for the project proposed on SITE 1 in Section 5.0 REASONABLE ALTERNATIVES ANALYSIS. We still believe that SITE 5 should be considered as a reasonable alternative site, but if the Applicant is truly considering to build other businesses on SITE 5, than that should be revealed and analyzed as part of this proposed action.



Also, this section should evaluate the true need of another fuel station on SITE 2 when there are already exists 3 other operating gas stations with 3/4 of mile to east and west and 1 abandoned gas station less than 2400 ft east of SITE 2 all along Western Avenue.

3.0 EXISTING CONDITIONS, POTENTIAL IMPACTS AND MITIGATION MEASURES

In our previous comments we requested that there be an environmental study conducted through all of the seasons when one could reasonably expect to find the endangered Karner Blue butterfly as well as the 45 other "Species of Greatest Conservation Need" including 16 birds, 14 reptiles and amphibians, and 15 insects. (Source: Internet archived page from the Albany Pine Bush Preserve Commission: <https://web.archive.org/web/20181111033124/https://www.albanypinebush.org/conservation/wildlife-management>).

We also asked that the impact on other species like turkey and deer that are known to reside on this lot and which will be displaced be studied to determine where these other species are expected to go and what their displacement impacts would be on local neighborhoods.

We now request that additional environmental study include how all of this proposed development will impact all bird populations because a research paper in Science published on Sept 19th, 2019, <https://science.sciencemag.org/content/early/2019/09/25/science.aaw1313>, showed that there has been a net loss of nearly 3 billion birds, or 29% of the population, since 1970. This depletion affects nearly all species and biomes, including familiar backyard birds, such as sparrows, finches and warblers, that live or breed throughout the United States and Canada.

The study concludes that this loss of bird population “signals an urgent need to address threats to avert future population collapse and associated loss of ecosystem integrity, function and services.”

We urge you to consider this as you evaluate the future destruction of the “undeveloped” land for the Rapp Road and Ring Road projects.

Furthermore, there is corollary impact that should be considered to destroying the “undeveloped” wooded lots on Rapp Road and Mall Ring Road. In another research paper published in Science on July 5, 2019, <https://science.sciencemag.org/content/365/6448/76>, researcher confirmed that restoration of forested land at a global scale could help capture atmospheric carbon and mitigate climate change.

The scientists say that with existing cities and farmland, there’s enough space for new trees to cover 3.5 million square miles (9 million square kilometers) world wide, roughly an area the size of the United States. The study calculated that over the decades, these new trees could suck up nearly 830 billion tons (750 billion metric tons) of heat-trapping carbon dioxide from the atmosphere. That’s about as much carbon pollution as humans have spewed into the atmosphere over the past 25 years.

But obviously this much needed reforestation means we also need to stop deforestation everywhere.

We also want to reemphasize that the Paris Agreement’s mandate is to limit global temperature increases to 1.5–2 degrees Celsius. This target translates into cutting carbon emissions in Western countries by 10 percent a year.

The net change in carbon emissions for all of this development should be calculated to determine if it will help the Town of Guilderland, the City of Albany, the County of Albany, the State of New York and the United States meet this Paris Agreement mandate. (<https://news.harvard.edu/gazette/story/2017/04/to-slow-climate-change-naomi-klein-looks-to-government-business>).