



A. Arthur Comments on Draft Scope of the Proposed “Crossgates Rapp Road Residential Development”

1 message

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Tue, Sep 17, 2019 at 9:03 AM

To: kovalchikk@togny.org

September 17, 2019

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RE: Draft Scope of the Proposed “Crossgates Rapp Road Residential Development”

Sent via email and hand delivered

Dear Town of Guilderland Planning Board,

As a person who visits the Albany Pine Bush Preserve for purposes of recreation, wildlife observation and study, I have carefully reviewed your draft scoping document and have some recommendations on how to improve the document.

The Albany Pine Bush is an area of national significance that brings tourists, recreationalists, and nature enthusiasts from across the nation to visit. As the AlbanyNY.org tourism promotion site describes these lands:

“The 3,300+ - acre Albany Pine Bush Preserve located in New York’s Capital District, protects one of the best remaining inland pitch-pine scrub oak barrens in the world. This extraordinary fire-dependent ecosystem provides habitat for many plants and animals and supports 76 New York State-designated wildlife Species of Greatest Conservation Need, including the endangered Karner blue butterfly. 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. Characterized by rolling sand dunes and miles of trails, the APBP offers visitors many recreational opportunities including hiking, bird watching, cross-country skiing, horseback riding, mountain biking, hunting, fishing and canoeing.” Source: <https://www.albany.org/listing/albany-pine-bush-preserve-commission/693/>

As a person who recreates in Albany Pine Bush Preserve, and as a 15-year volunteer who works with Save the Pine Bush on many community events, preservation of this unique ecosystem is important to myself. I feel as though based on my frequent visits to Albany Pine Bush Preserve, I have an understanding of these land and a stake greater then the general public in the preservation of these lands.

The Albany Pine Bush Preserve helps drive tourism and commerce in Guilderland and surrounding towns. From mountain bike riders to nature observers to cross-country skiers to dog walkers to bow hunters to those just looking for a stroll after work, the Albany Pine Bush Preserve offers many opportunities to recreate.

General Comment:

Project Compounds Existing Environmental Impacts of Transportation Oriented Development Zoning district (TOD) – The Draft Environmental Impact Statement (DEIS) covers 45.34 acres within the 231 acre TOD. The activities that occur within the 45.34 acres of the DEIS are directly related to the impacts of the already developed sections of the TOD, and as such the DEIS should consider the compounding impacts of the additional development perimeters of the highly developed TOD already.

Comments by Section:

Section 1.0: The Executive Summary should include the total number of acres to developed, the number of acres already developed within the TOD, and the number of acres set aside for conservation and storm-water management purposes.

Section 2.0: The Site Description should include the Albany Pine Bush conservation easements and conservation lands bordering the parcel, including geographic boundaries, and characteristics of the land – including the dominant land use adjacent to the site.

Section 2.0: The Site Description should accurately depict the distance between the apartment buildings and the conservation easements and conservation lands. There should be “no reserved for future development” on parcels bordering the Albany Pine Bush Preserve and conservation easements. Indeed, it would be better for the environment if the “reserved for future development” parcel in Site 1 was dedicated to the preserve to provide enhanced buffer to the Butterfly Corridor.

Section 2.6: List whether or not a “take” permit is needed for the endangered Karner Blue Butterfly. Recognize that there are probably Karner Butterflies along the neighboring Butterfly Corridor, and that Karner Blue Butterflies do not obey no trespassing signs. If no permit is required, include an explanation of why not.

Section 3.3: This site likely contains Pitch Pine / Scrub Oak Barrens. The DEIS should include a survey of these lands, and how development will impact the community on this land and neighboring conservation parcels.

Section 3.3: The DEIS should address the impacts of developing the parcel on the ability to manage the remaining Pine Bush ecosystem.

Section 3.3: The site probably contains Karner Blue Butterfly and frosted elfin. The DEIS needs to address the impact of developing this parcel on the ability of the Albany Pine Bush Preserve Commission to manage the nearby Karner Blue Butterfly habitat and the frosted elfin habitat.

Section 3.3: The site is probably contains several NYS rare species or species listed as special concern including, but not limited to the eastern hognose snake, worm snake, eastern spadefoot, fowlers toad, eastern whip-poor-will, Cooper’s hawk, sharp-shinned hawk, inland barrens buckmoth, and mottled duskywing skipper. These species are integral to the Albany Pine Bush and those who recreate on these lands. The impact of building these project these species needs to be addressed.

Section 3.3: Impacts on the Pine Bush preserve of planting non-Pine Bush native species on the project site need to be addressed. Disturbance of this land could lead to invasive species being introduced to surrounding conservation parcels, which could impact productivity of those lands.

Section 3.4: The site is substantially contiguous to a designated National Natural Landmark. The Scope should include how the project may impact the status of the Pine Bush’s designation of a National Natural Landmark. The landmark status is integral to many people’s use and enjoyment of the land. Additionally, the designation may bring tourists and other visitors to Albany Pine Bush. The Scope should include why or why not the project fits in with the goals of the National Natural Landmark – and how it impacts the landmark status.

Section 3.5: The traffic analysis must include the impacts of the increased traffic on the endangered species, species of special concern, threatened species and all other species living in the area, including the street intersections included on page 8 of the Draft Scope document from Town of Guilderland Planning Board. Of particular concern is induced traffic along the Rapp Road Corridor which is frequently crossed by endangered species, species of special concern, threatened species, sporting species, and many other species.

Section 3.5: The traffic analysis must include the impacts of the increased traffic on the ability to fire manage surrounding parcels, which is essential for their long-term sustainability. Controlled burns are essential for the ecological integrity of these lands.

Section 3.5: The traffic study should consider the closure of Rapp Road re-route of Gipp Road roughly 300 feet to the south across 52.01-3-5.1. This would create an unbroken Butterfly Corridor (except for Pine Lane), expanding it to almost 600 feet wide with only the low-traffic Pine Street crossing it. An unbroken butterfly corridor from Blueberry Hill East through Butterfly Hill should be an eventual goal by Albany and Guilderland, although it will require re-routing of Gipp Road and Pine Street, and a full closure of Rapp Road north of Gipp. While it would require an act of state legislature, the state could change city lines to move Pine Street in the Town of Guilderland.

Section 3.5: The traffic study should consider the ecological impacts of a future Rapp Road Bypass, as has been proposed informally by the Daughters of Sarah, extending from [61 Rapp Road Road](#), following a route extending north-west to Columbia Drive. This bypass would run north of the existing Daughter of Sarah Conservation Easement but would certainly have impacts on the conservation easement, especially if it increases traffic along Rapp Road. While this bypass would be entirely within the City of Albany, the 3,900 SF commercial space and 222 unit apartment buildings will induce additional traffic onto Rapp Road and across the Butterfly Corridor, especially if the future Rapp Road Bypass is constructed.

Section 4.0: Unavoidable impacts should include a list of how many animal and plant species and the number of each species that will be impacted. How will reduced animal and plant species impact the public’s use and enjoyment of the neighboring Albany Pine Bush Preserve. Fewer wildlife could mean fewer opportunities for hunting and trapping, fewer Karner Blueberry and other species for nature observation and study.

Section 5.0: Some thoughts on alternative locations for the 222 unit apartment complex that would have a lower impact on the Albany Pine Bush.

Alternatives should include include redeveloping existing under-utilized property in the Crossgates Mall Complex – Consider moving the apartment proposal in one of the large, vacant stores in the mall or placing the apartment proposal on unused sections of the mall parking lot or other already developed site within Crossgates Malls properties. Nearly 116 acres of existing paved parking lot are within the control of the Pyramid Corporation. A 20 acre apartment complex could easily be placed on a portion of under-utilized parking area.

Alternatives should include a study of build only in Area 2 & 3 – The Rapp Road Residential Development located on Rapp Road is the most environmentally concerning part of the proposal. While some residential development may be warranted in the TOD, placing the residential development next to the existing Butterfly Corridor (National Grid – Crossgates Butterfly Hill Easement) is highly inappropriate. Butterfly Hill is a known location of endangered species. In contrast, Area 2 & 3 are already developed and are farther

away from the core Albany Pine Bush Area.

Section 7.0: With over 116 acres of asphalt parking already available within Pyramid properties, there is no need for an additional 200 parking spots within the Transit Oriented District. The footprint of any residential buildings would be much smaller if parking was omitted, and residents were to park in existing lots at the Crossgates Mall Complex. A short walk could be the apartment complex. Building the apartments units in Site 2 ([Lawton Terrace](#) and Gabriels Terrace) without parking might be the most ecologically sensitive thing to do. Forcing people to walk to their cars a short distance parked in the existing mall parking lot would reduce trips and further induce people to use public transportation.

A few additional thoughts

I support the town's proposal for building a dense, apartment building on transit lines. I believe that the transit oriented district is good step forward. Further in-fill in the developed areas in the Transit Oriented Development district is warranted, but not in areas that already wild or undeveloped. If at all possible use existing developed lands – whether it be the Lawton Terrace – Gabriel Terrace parcel, or better yet some of the 116 acres of parking that the Pyramid affiliated corporations own. Regardless of what moves forward, this project should not infringe on the Albany Pine Bush Preserve's butterfly corridor.

Recreation is important, especially when so many of our nearby areas to our cities are getting built up. Not everybody owns an automobile, and even those who do, it's often a long trip out into the country to enjoy and utilize our wildlife resources. Gasoline and motoring is only going to get more expensive in coming years. There are really very few "large" parcels of public land nearby the Albany-area that don't require a half hour drive or more. And virtually none as unique as the inland Pine Barrens that make up the Albany Pine Bush.

I am deeply concerned, especially about the Site 1 proposal and the impacts it will have on the Albany Pine Bush, an area I frequently visit and enjoy. I don't want to see any more of the Albany Pine Bush being developed, especially when there are so many existing developed lands that nearby could be re-developed for higher economic use, while preserving the last remaining open spaces that are essential for the integrity of the Albany Pine Bush Preserve.

Thank you for consideration of my comments. I hope to see my concerns address in the final scoping document, and the adequate mitigation are included in the Draft and Final Environmental Impact Statement to protect the integrity of the Albany Pine Bush Preserve which I enjoy recreating within.

Sincerely,

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