



Preservation League of NYS

September 10, 2019

Kenneth Kovalchik, Town Planner
Town of Guilderland
Guilderland Town Hall
P.O. Box 339
Guilderland, NY 12084

Re: Draft Scope: Rapp Road Development and Additional Lands

Dear Mr. Kovalchik,

I write on behalf of the Preservation League of New York State to share my comments on the draft scoping document pertaining to the Rapp Road Residential Development in advance of the preparation of a Draft Environmental Impact Statement (DEIS), as required by the SEQRA process. My comments are specifically in reference to items in the draft scope that pertain to Site 1, the potential future development area west of Crossgates Mall and southwest of the intersection of Rapp Road and Gipp Road. As you are aware, the Preservation League has been engaged in the preservation of and advocacy for the Rapp Road Community Historic District since we listed this neighborhood on our *Seven to Save* list in 2016-17. Because of the proposed development's proximity to the existing historic district, we ask that the preparation of the DEIS take special consideration of the potential impacts to this extremely significant area.

The Rapp Road Community Historic District is one of the most significant historic sites of the early 20th century for its association with the Great Migration movement – it holds significance to the City of Albany, New York State, and the nation at large. The structures that remain in the historic district are physical reminders of the story of the Great Migration, when 5 million African Americans risked their lives to leave the Jim Crow laws of the southern United States in search of a better life. Not only do the buildings remain in their original locations, but so do generations of family members related to those citizens who built the community in the early 20th century who have inhabited the neighborhood ever since. We have supported the members of the Rapp Road Historical Association in advocating for their community by helping to promote awareness about the importance of the historic resources in the district and the story of individuals who wished to live in a place where they could be fully accepted.

In today's day and age, historic communities like Rapp Road illustrate lessons from the past that are still all too pertinent in today's modern age. This historic district is a treasure to the City of Albany and neighboring areas such as the Town of Guilderland. Because of the district's precarious location next to areas of high-density development such as Crossgates Mall, local authorities must do whatever they can to protect and preserve it – even if it means carefully considering the impacts of projects occurring adjacent to but not inside the district. The draft scope for the DEIS very carefully

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outlines a proposed methodology and list of documents and studies that will be included in the document. There are several specific items in the draft scope that we would ask the Town of Guilderland Planning Board, the Lead Agency involved in the SEQRA process, to consider and offer the following comments:

- a.) **Section 2.2, Site Description:** This section outlines the proposed characterization of the planned development site as well as adjacent residential areas in the City of Albany and the Town of Guilderland. We feel it is important to include a thorough description of the Rapp Road Community Historic District in this section. The district sits directly northeast of the proposed apartment complex and commercial space and therefore should be considered a part of the site.
- b.) **Section 2.5, Construction:** This section will describe the construction of the proposed action, which includes a construction schedule/duration, staging and parking, and routing of construction traffic along local roads. Because traffic impacts are already a concern to the residents in the historic district, we would ask that a later section (ex., 3.0: Existing conditions, potential impacts and mitigation measures) specifically outline proposed mitigations to any adverse impacts caused by routing of construction traffic along local roads.
- c.) **Section 3.4, Historic, Cultural and Archeological Resources:** We are pleased to see that this section specifically notes considerations related to the Rapp Road Historic District and that comments from the SHPO Phase I Archeological survey will be included.
- d.) **Section 3.5, Traffic and Transportation:** This section will address the anticipated effects of the project on transportation-related use and infrastructure as well as traffic. We believe increased traffic to be one of the most potentially adverse impacts to the Rapp Road Historic District, especially at the intersections of Rapp Road and Gipp Road, Rapp Road and Pine Lane, Rapp Road and Springsteen Road, and Springsteen Road and South Frontage Road. We are pleased that the forthcoming traffic study will examine these areas specifically in addition to others in the area. The scope also states that possible "improvements to the roadway network" may be necessitated by the proposed action following the results of the traffic impact study. We would ask for specific clarification in the DEIS about these proposed improvements (if necessary) and how they will impact the nearby historic district. Increased access points along roadways adjacent to the proposed complex and/or a change in traffic patterns has the potential to further disrupt the historic character and quality of life for people residing in the historic section of Rapp Road.
- e.) **Section 3.7, Character of the Community/Neighborhood:** This section of the DEIS will address the affect on the character of the existing nearby community and neighborhood, which includes the Rapp Road Community Historic District. One of the foundations upon which Rapp Road was settled

in the early 20th century was its distinct similarity in landscape to Shubuta, Mississippi, the southern community that the original Rapp Road descendants left in search of a better life. The Rapp Road area of the Albany Pine Bush reminded these individuals of their native home because of a strikingly similar rural landscape. Since the later half of the 20th century, the original rural context of Rapp Road has continued to dissipate – especially with the creation of Crossgates Mall in the 1980s. By increasing large-scale urban development adjacent to this historic neighborhood, the quiet residential historic context of the area is further degraded. We encourage the preparation of a DEIS that considers this section very seriously and offers tangible mitigation measures to further protect the surrounding character of the Rapp Road area.

We appreciate the opportunity to offer comments on this proposed project and hope the Town of Guilderland takes the concerns of residents of Rapp Road very seriously. Thank you for your consideration. If you have any questions about this letter or the Preservation League's advocacy work, please do not hesitate to contact me directly.

Sincerely,

A handwritten signature in black ink that reads "Jay DiLorenzo". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Jay DiLorenzo
President

cc: Kathy Sheehan, Mayor, City of Albany
Daniel Mackay, Deputy Commissioner, New York State Office of Parks, Recreation & Historic Preservation – Division for Historic Preservation
Assemblywoman Patricia Fahy, NYS Assembly District 109
Senator Neil Breslin, NYS Senate District 44
Senator George Amedore, NYS Senate District 46