

33 Wilan Lane  
Albany, New York 12203  
September 9, 2019

Kenneth Kovalchik, Town Planner  
Town of Guilderland  
Guilderland Town Hall  
P.O. Box 339  
5209 Western Turnpike  
Guilderland, New York 12084

Re: Rapp Road Apartments application scoping document comments

Dear Mr. Kovalchik:

A closer look at the Rapp Road Project's compatibility and compliance with the goals and objectives of Guilderland's Transit Oriented Development District (TOD) should be part of the environmental review. The proposed site plan is not in compliance with Town Code Section 280-53(A) as the project adversely impacts the adjacent land uses. The purpose of the TOD as stated in Section 280-18.1(A) of the code is:

"The Transit-Oriented Development (TOD) District is designed to implement the recommendations of the Westmere Corridor Study (study) by using an overlay district to support and incentivize development that adequately protects nearby residential neighborhoods and utilizes resources within and near the TOD's boundary, including regional shopping, entertainment, and employment centers, a robust transit service with high ridership and proposed enhancements, direct vehicle access to the interstate highway system, and a nearby local business community. The TOD District encourages more compact development, traffic-calming measures, better access management, improving the environment for non-automobile-oriented modes of transportation, reducing the number of required parking spaces, supporting mixed-use buildings and pedestrian linkages, and focusing intense development away from existing residential neighborhoods."

The proposed density and scale are out of character of the surrounding residential neighborhoods, inconsistent with the character, scale and density of similar uses in the surrounding area and do not minimize impacts to adjacent properties. The recently opened five story hotel is not located near a residential neighborhood unlike this proposal; the other nearby hotel is also not near a residential neighborhood. Instead of focusing intense development away from existing residential neighborhoods, the proposed project places intense development on top of existing residential neighborhoods which conflicts with the existing nearby land uses. These concerns should be included as part of the review of the surrounding neighborhoods' characters and land uses. How does this impact the Westmere Terrace neighborhood, the Wilan Lane neighborhood, the Gipp Road area and the Rapp Road Historic District?

Traffic impacts need to be analyzed closely. Even though the current plans do not show a closure of Rapp Road, there are many issues to consider. Despite the guidance in Section 280-53(H), one proposal increased traffic on Western Avenue and would not maintain levels of service at area intersections. The proposal was to close the right hand turn from Gipp Road onto Rapp Road even though the current access to Western relieves the Rapp Road traffic. By eliminating the right turn from Gipp Road onto Rapp Road for the benefit of the project, both Rapp Road and Western Avenue will be burdened by the traffic that was formerly able to use the Ring Road contradicting the TOD goal of relieving Western Avenue pressures. The proposed TOD would ironically eliminate current direct vehicle access to the interstate for the existing neighborhoods if certain closures are pursued. Existing neighborhoods will be isolated at the expense of this proposed project. What are the impacts of funneling more traffic onto Western in general? What are the impacts of funneling more traffic through the Gipp Road neighborhood if any portions of Rapp Road are eliminated? Must anything be done to Rapp Road at all?

Pedestrian impacts should be reviewed closely as well. If this is a TOD, why is there a need for so many parking spots? Why is the residential area so far from the bus stop? How will pedestrians safely access the new CDTA stop which is being moved even further from the proposed project?

The growth inducing aspects of the current project as well as the potential additional 90 units and the other two development areas identified as Sites 2 and 3 in the Draft Scope document should be evaluated. Additionally, any proposed changes at Crossgates and Crossgates Commons should be including in the analysis.

The need for additional housing and retail spaces as proposed by this project as well as the possible projects on Sites 2 and 3 merit further review. Is the current rental market at capacity? Is there a lack of retail/commercial/office space nearby?

Given the project's Pine Bush location, the impact to the Karner Blue butterfly should be reviewed. Perhaps this a good time to review Pyramid's 1996 permit regarding the butterfly's habitat for effectiveness (NYSDEC Permit #4-0130-00007/0002). What will be the impact of the displacement of the current deer and turkey populations be?

The lighting impacts of the project should be reviewed in depth. What are the lighting standards being referenced for the project? How will light pollution be addressed? What is adequate lighting that will not spill over into Westmere Terrace and nearby residential areas? How will lighting impact drivers? What type of shielding will be provided? What is the optimum height for any necessary lighting?

Water issues need to be reviewed. Does the Town have enough capacity, both in drinking water and sewer services, to adequately handle the full build out of all three sites? Does the area have enough capacity to handle storm water runoff and changes in drainage if all three sites are fully disturbed? Will there be a repeat of the flooding issues in nearby McKownville?

The alternative of relocating the project by shifting the development closer to the mall and the current CDTA bus stop and re-routing Gipp Road at the rear of the project should be considered. A land swap would be required by abandoning a portion of the current Gipp Road alignment for a portion of the developer's parcel. A nearby example is the re-routing of Washington Avenue Extension near Fuller Road. There are two very underutilized parcels already directly on the Ring Road: the parking lot used as a charter bus stop and the lot used to stage snow removal equipment. These two lots are also adjacent to a major destination that attracts a large volume of people and are even more conveniently proximate to the already existing busy CDTA stop.

As per Section 280-18.1 G (1)(a):

"The use of access management, traffic-calming, pedestrian, bicycle and transit improvements in design and layout is encouraged. The TOD District's features are central to successful development, including underutilized land adjacent to major destinations that attract high volumes of people (such as shopping, entertainment and employment centers within close proximity to one another) which can support high ridership transit stops."

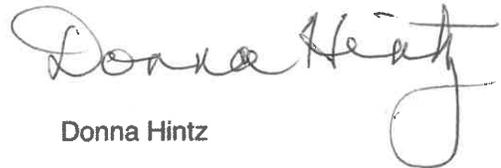
It is feasible to immediately direct traffic to the Ring Road thereby internalizing circulation and relieving traffic pressures on Western Avenue as noted in Section 280-18.1 G (1)(b). The compact development form with enhanced pedestrian, bicycle and transit presence encouraged in Section 280-18.1 G (1)(c) would be realized as the project would be closer to the mall and the existing bus stop. The parcels are underutilized and directly on the Ring Road thereby meeting the considerations in Section 280-18.1 G (1) (d) for new street connections and extensions.

Additional benefits of relocation are as follows:

- Existing neighborhoods' current access remains intact.
- A more efficient and safer connection to the mall and the transit stop would be provided for pedestrians and cyclists.
- There would be even more convenient proximity to the TOD's unique facilities as it would be closer to the mall, transit stop and the hotel.
- It would result in an even more compact development form as it would be closer to and more directly linked to the mall and the CDTA stop.
- Lighting intrusion would be less of concern as the new location would be part of the currently lit mall.
- There would be less impacts to residential neighbors from noise, glare, unsightliness and other objectionable features.
- There would be greater respect for and buffering of the existing residential neighborhoods. The existing berm on the westerly edge of the property could remain in place with the re-routed Gipp Road running nearby.
- The two proposed driveways would remain for the relocated project, but would instead intersect with the Ring Road for its primary access points which would also eliminate the need for the road between the development and the Ring Road on Rapp Road at the site of the current pedestrian access point. Making the ingress/egress points directing onto the Ring Road greatly enhances the preferred TOD internal circulation and more importantly relieves pressure on Western Avenue and Rapp Road; it would most likely increase the project traffic's use of the Ring Road.

The relocated project adequately protects nearby residential neighborhoods and focuses intense development away from existing residential neighborhoods by utilizing nearby shopping and entertainment resources as required for a TOD.

Sincerely,

A handwritten signature in cursive script that reads "Donna Hintz". The signature is written in black ink and is positioned to the right of the typed name.

Donna Hintz