



Jessica Montgomery <montgomeryj@togny.org>

**Fwd: FW: Review of Guilderland Comprehensive Plan Update**

1 message

**Lynne Buchanan** <buchananl@togny.org>  
To: Jessica Montgomery <montgomeryj@togny.org>

Wed, May 21, 2025 at 10:31 AM

Jessica,  
Please see the attached comment from Mr. McIver regarding the Comp Plan update.  
Thank you, Lynne

Forwarded message

Date: Thu, Apr 24, 2025 at 9:42 AM  
Subject: FW: Review of Guilderland Comprehensive Plan Update  
To: <townclerk@togny.org>

The attached email was not delivered to the town clerk. Please see below.

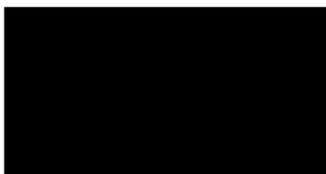
**From:** [Redacted]  
**Sent:** Thursday, April 24, 2025 9:34 AM  
**To:** 'barberp@tony.org' <barberp@tony.org>; 'napierskic@togny.org' <napierskic@togny.org>; 'crawfordj@togny.org' <crawfordj@togny.org>; 'santosg@togny.org' <santosg@togny.org>; 'beedlea@togny.org' <beedlea@togny.org>; 'buchananl@togny.org.' <buchananl@togny.org.>  
**Subject:** Review of Guilderland Comprehensive Plan Update

Town Board Members,

Good morning. The attached are comments on the final draft of the are provided for your review. I also request that you include these comments in the official record for the Draft Comprehensive Plan, and post them on the town website.

Thank you for your time.

Ken McIver





---

**Letter Final Mclver.Comp Plan cmts (003).docx**  
26K

April 24, 2025

Dear Town Board Member,

This review of the Guilderland Comprehensive Plan Update (referred to the plan) was performed on the Final Draft dated October 2024. Page and figure numbers used in the review are from that draft. The comments in this review are applicable to preserving open space, supporting agriculture, and concerns about water supplies.

When considering open space in Guilderland the following terms are important: **Rural Guilderland** (page 25), **The valley area** (page 27), **Albany County Agricultural and Farmland Protection Plan** (page 29 including figure 1), and **Albany County Office of Natural Resource Conservation** (page 33). Applicable definitions/responsibilities are given on the pages shown.

In reading the plan there are several items, which, when taken together can lead one to the conclusion that the plan is a blueprint for development in the western end of the Town. Comments on the plan follow.

**Recommendation A.2 states** “Promote and maintain the scenic resources of rural corridors and roads through the use of rural development design guidelines and conservation subdivision practices that prioritize maintenance of rural character.”

While this recommendation contains words that indicate the Town will take some actions to preserve the Helderberg Escarpment viewshed, it is not phrased in a manner that indicates development on the roads mentioned in recommendation A.2 and elsewhere in the valley will be controlled. Page 27 of the plan states, “the valley is a prime area for development”. Town must meet requirements of the Albany County Agricultural and Farmland Protection Plan and the Albany County Office of Natural Resource Conservation applicable to the roads discussed in item A.2 before development is considered. The phrases “rural development design guidelines and conservation subdivision practices” are too generic in nature to provide guidelines for the future of the viewshed or the valley and must be made more specific. As an example of development that has already destroyed part of the viewshed from Depot Road, take a car ride past Mak Farm. This should not be the future of viewsheds in rural Guilderland and the valley.

**Recommendation A.3 states** “The Town should support the Village of Altamont’s efforts to implement an interconnection between the water districts to improve the Village’s water security. It remains important to focus on water and sewer capacity improvements to support traditional population centers in Town.” This was an eleventh-hour addition to the plan, which has since had major editing. There are three disturbing issues with this recommendation. First is the fact that these changes were made without public input. The second is the impact that the interconnection will have on Guilderland’s water supply. The third is the impact that the interconnection will have on development in the western part of the Town.

The changes made in July 2023 were apparently done at Altamont's request to provide a supply of water to the village in case of an emergency that rendered the existing village water supply unusable. Unlike other parts of the plan, the citizens of Guilderland had no input. Additionally, comments provided by the Village after the July rewrite indicated that the Village wanted the process of providing an interconnection be sped up which could have impacted the Town's review of the changes to the recommendation. The following questions require answers before proceeding with action on the recommendation:

1. How many times in the past has the Village of Altamont had to resort to some sort of emergency water source? When was/were the occurrence(s)? What were the details, i.e., how long was an emergency source needed, how much water was needed?
2. In 2023, average daily use was 188,000 gallons in Altamont; 2,710,000 gallons in Guilderland. If an emergency were to occur, this is about a 7% increase in daily use for the Guilderland system. Maximum daily amounts were purposely not used. For what length of time is this sustainable without stressing the Guilderland supply, or requiring Guilderland to purchase water from another municipality?
3. The plan should define exactly what is meant by the phrase, "support the Village of Altamont's efforts to implement an interconnection between the water districts"?

The Town should not bear any cost for the engineering, equipment purchase, construction, operation, maintenance, or any other cost associated with the interconnection. And I make this statement with the knowledge that as an Altamont water customer, I may someday need this interconnection.

With respect to the impact a proposed interconnection along Route 146 will have on development in the valley section of rural Guilderland, following are noted:

1. It appears that, as changed, this section will favor the development of the area along Route 146 from Route 158 to Altamont which could eventually impact Gardner and Hawes Roads. Gardner and Hawes have previously been identified in this plan (Section A.2) as important Escarpment viewshed roadways. Additionally, an area along Gun Club Road could be developed using water from Altamont.
2. The second paragraph justifying the recommendation states in part, "This interconnection will offer an alternative drinking water for the Village. The interconnection would be sized to provide water for the entire Village in case of an emergency and is not intended to induce large scale growth and development." If the line can handle quantity of water necessary to support Altamont, it can certainly be used to support development along Route 146 and on the afore-mentioned roads. As development follows the availability of municipal water, more detail is needed in this section to prevent over development of this area of the Town.

3. The plan speaks of a “private water line as an emergency use and not intended to induce large scale growth and development”. But then the plan states, “Consider tools and land use regulations that can address potential concerns related to development along a future interconnect such as cluster and conservation subdivisions as well as the incorporation of an overlay district in this area.” This indicates that development will be taking place along the interconnection, or on roads that could be connected with municipal water from the interconnection. Again, more detail should be provided to prevent over development of this area.
4. Based on the fact that this is envisioned as a private water line, how will people who live along the interconnection be prohibited from obtaining (Guilderland) municipal water from that line if they so desire?

**Recommendation D.12 states,** “Consider using density restrictions rather than minimum lot sizes in the RA3 and RA5 District along with the provision for density bonuses that incentivize affordable housing types, open space protection, and other desired amenities.” The paragraph justifying this recommendation states in part, “Using a density measurement (i.e., dwellings per acre instead of minimum acres per dwelling), the Town has the opportunity to establish lots that fit with the landscape better while simultaneously creating opportunities for additional housing that conforms to rural design standards.” A key phrase is additional housing. This is another indication that development of rural Guilderland will continue, or even accelerate under the plan. It seems that by using a measurement of dwellings per acre, many more dwellings could be crowded into one zone, increasing the population density of areas zoned for agricultural use. This seems counterintuitive, as most people who live in RA zones are looking for more space, and therefore a less crowded (lower population density) lifestyle. As a simple example, a builder who owns 5 acres (presently an RA5) along an existing road might be able to fit as many as ten R20 (minimum 20,000 square feet) lots in the same area. If the Town is serious about maintaining the rural character of western Guilderland this item should be removed from the plan, or modified to provide the maximum number of dwellings per RA zone, for example two.

**Recommendation F.11 discussion states in part,** “District officials have also identified traffic flow inefficiencies at Guilderland High School, off of School Road in Guilderland Center, which has impacted bus scheduling and on-time attendance”. Those of us who live west of Guilderland Center are familiar with the are long delays at the intersection of route 146 and School St during High School morning arrival, afternoon dismissal, and during major school events. But this is not the only problem with traffic congestion in Guilderland Center. All of the district school buses are kept behind the high school adding to the congestion when going on or returning from their assigned runs. Tractor trailer units continuously use route 146 from route 20 and route 158 to access the industrial park in Guilderland Center. Large escorted truck shipments routinely pass

through Guilderland Center, apparently to avoid a low clearance underpass on route 20. Given the lack of space to widen route 146 in this area, consideration should be given to providing an alternate entrance to school property, perhaps through the industrial park. Additionally, development west of and in the area affected by the congestion should be limited in order to mitigate a worsening problem.

**Recommendation F.12.b states**, “Review the need to reduce street size standards in rural zoning districts of Guilderland.” As discussed in the recommendation, the result will be narrower roads and rights-of-way in rural areas. The width of a road and associated right-of-way have very little to do with maintaining rural character. It is the housing that can be built along the roads that destroys rural character. Narrower roads and rights-or-way mean that more housing can be built in a given area, increasing the population density of that area. This item is unnecessary, is a threat to our rural character, and should be removed from the plan.

**Recommendation F.12.c states**, “Update cul-de-sac rules to promote grid street patterns in rural areas.” The discussion of this recommendation states, in part, “gridded streets are more consistent with rural development patterns”. How so? Gridded streets are not consistent with rural character, they are associated with cities, not rural development patterns. This is an attempt to add more streets closer together in rural areas, much like a village, which again raises the question about increasing population density in rural areas. This item is also unnecessary, is a threat to our rural character, and should also be removed from the plan.

**Recommendation G.10 states**, “Continue enforcing existing land use regulations.” This recommendation lacks any discussion or specifics, which should be added. For example, references to the Albany County Agricultural and Farmland Protection Plan and the Albany County Office of Natural Resource Conservation should be included in this recommendation or elsewhere in this section of the plan.

**Recommendation G.1** omits a reference to recommendation A.10.

**Item A.3 in the Action Plan Table** on page 161 has not been updated to match the text of recommendation A.3.

**Item A.4 in the Action Plan Table** on page 162 has not been updated to match the text of recommendation A.4.

Please consider these comments in your review of the most recent draft of the Town's Comprehensive Plan. If you have any questions, feel free to contact me. I also request that you include these comments in the official record for the Draft Comprehensive Plan, and post them on the town website.

Thank you for your attention in this matter.

Sincerely,

Ken McIver

