

Grace Nichols  
38 Parkwood St. #2  
Albany, NY 12208

September 15, 2019

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

Dear Mr. Kovalchik,

I'm concerned about the impact of the proposed 222-Unit Residential Project with 400 attached parking spaces slated for over 20 acres of Albany Pine Bush land for its impacts on quality of life for the community, on the historical and cultural resources, and on traffic, but I am focusing my comments on the wellbeing of the surrounding residents who cannot speak for themselves -- the communities of non-human species for whom any undeveloped land in the pine bush is a part of their home.

The site is adjacent to the Crossgates KBB Preserve Area, one designed to mitigate the devastating impact of the mall itself on the Karner Blue Butterfly population suggesting the presence of rare pine bush species in that vicinity.

The Scoping document for the project says it expects the DEIS to assess the project's impact on endangered, threatened and/or special concern species and impacts to significant habitat areas

Please include in the Environmental Impact Statement:

- The effect of the 5 story buildings on the birds of the Pine Bush area. The Audubon Society lists the Albany Pine Bush as an important bird area. It hosts The Common Nighthawk, listed by the NYSDEC as a species of special concern. On August 28, 2019, the Albany Pine Bush Commission held a Common Nighthawk observation night. We are so lucky that they are beginning to thrive in the pine bush. In the Pine Bush, "Red-shouldered hawk (NYS Special Concern) is a confirmed breeder. ...Other Species of special concern that have been observed include American bittern, sharp-shinned hawk, Cooper's hawk, northern goshawk, golden-winged warbler, yellow-breasted chat, and vesper sparrow." (Source: NYSDEC site on the

Albany Pine Bush Bird Conservation Area

--<https://www.dec.ny.gov/animals/48628.html>

How might 5 story buildings impede or endanger these species?

- Patricia Gabriel, an Environmental Analyst with the NYSDEC submitted a request that there be a study done to assess the presence of Eastern hognose snakes and which points out that Eastern Worm snakes have been found in the area. A qualified herpetologist needs to be brought onsite to survey the site to find the incidence of reptiles and amphibians and evidence of their homes there.
- The effect of the noise of increased traffic on the wildlife in the area. Wildlife density decreases near a boundary with noise and traffic. How does this land function as a buffer, and what will be the effect of removing that function?
- The effect of the light pollution associated with the project on wildlife, particularly insects and bats whose populations are negatively impacted by light pollution. In order to do this, we need a survey of moths in that area by putting up temporary lights and identifying the species we find attracted to them.
- The effect of this proposed land use on the night-time movements of mammals such as coyote and fisher on that land. A motion sensitive camera should be brought onsite to assess the wildlife that moves through.
- We know there will be chronic stormwater pollution associated with the parking lot and any salt use by the apartments. That toxicity needs to not only be held to standards that are safe for the human community, but also standards that are safe for the wildlife in the area.
- There needs to be an assessment of the ecosystem services provided by the site to the species in there area.

This site is part of the land that hosts, buffers and protects rare Albany Pine Bush species. Encroachment on their land has myriad effects on them. Karner Blue Butterflies nearly lost their struggle to exist here when we underestimated the negative impacts of development. This project which proposes above and below ground parking, 5 story tall buildings, commercial and residential spaces, associated traffic, and a chronic

encroachment on the surrounding area, needs careful consideration of all its impacts on this biologically rich area.

We are also at a moment in time which is unprecedented in Natural History due to the speed of the temperature changes all over the globe and the speed of the disappearance of species all over the globe. Extinction of species have defined causes: Habitat destruction, invasive species incursion on native habitat, the introduction of pollution into the environment, the exploitation of species and climate change itself.

The United Nations' Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), published findings in April-May 2019. Drawing on over 15,000 scientific and government sources, its 145 authors from 50 countries published startling findings with implications for all land-use discussions. They announced that the average abundance of native species in most land based habitats have fallen 20 percent since 1900. Over 1 million species currently are on the brink of extinction. More than 40 percent of amphibians are threatened. 680 vertebrate species have been driven to extinction since 1600. Urban areas have more than doubled since 1992. Three-quarters of the land-based environment have been significantly altered by human actions.

These findings are the backdrop against which our deliberations regarding increased development of already vulnerable ecosystems takes place. The science suggests that the carrying capacity of the collective environment is exceeded. Our discussions must shift to how to concentrate development on less of the already developed pieces and leave the undeveloped land as wild as possible. Collective survival depends on giving extant species what they need to continue, and what they need more than anything, is habitat in which to live.

Thank you for your attention to these issues,

Grace Nichols