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At the request of Save the Pine Bush, I have reviewed the August 14, 2019 Draft Scope for the proposed Rapp Road Residential Development and Additional Lands project along with all materials related to this proposal on the Town of Guilderland Website. I offer the following recommendations for topics/studies/information that I feel should be added into the Scoping Document and included in the DEIS for the project. These are organized by the chapters stated in the 8/14/19 Draft Scope.

**Section 2.3:** Provide a clear site plan map showing the parcel to be developed as well as all other parcels included in the DEIS. Include at least a ¼ mile radius line around those parcels. (The secondary land use study area would include the neighboring areas within a ¼-mile radius from the proposed site which could experience indirect impacts.) This section should provide details on each parcel to be included in the analysis, as well as within the ¼ mile radius. Describe uses (single, two-family, multi-family, commercial), zoning designation, parcel sizes, existing density of residential use, and the character of each neighborhood. Include photographs of each neighborhood.

**Section 2.3:** Identify all current easements and deed restrictions on any property subject to the DEIS. If any, identify consistency of the project with those requirements.

**Section 3.2:** Specifically evaluate the impact of development on the principal aquifer and analyze ground water connections on and off site and what impact changes in drainage/run off may have to groundwater that may impact other Pine Bush Preserve lands.

**Section 3.3:** For all biological, terrestrial and ecological resources – all habitat assessments should include field survey work and not just data/records research. The evaluation should include field reconnaissance assessment of birds, mammals, insects, snakes/amphibians, reptiles and insects found to use the site.

The field reconnaissance should include at least 2 seasonal (late spring/early summer and early fall) surveys. Surveying for at least those two seasons is critical to ensure that the study properly records all migratory wildlife that may use that habitat as an important stop in their migration both spring and fall, and during the breeding season. Some species of amphibians for example, breed early in the spring (March and April even) and are harder to find later in the year so a survey in August, for example, may miss those species. Additional seasonal surveys may be warranted as determined by the information generated from these seasonal surveys. This is the only way to fully identify the ecological role this location has in the Pine Bush and beyond. Examine the environmental systems that support the natural resources in the study area. These may include the water resource systems that transport or retain water to maintain the pine bush habitats.

Describe in appropriate detail the construction and operational activities associated with the project and analyze their interaction with the resource itself as referenced above and the environmental systems that support it.

Potential impacts on biological, terrestrial and ecology should be evaluated by looking regionally – not just loss of habitat and species on-site, but what that loss means to the larger natural community populations of plants and animals. Specifically look at habitat links between this patch of pine bush and others and identify its role in the entire system of green infrastructure hubs and links, and whether removal of this as a natural habitat will adversely impact the remainder of the pine bush.

Field surveys should use existing data and field records as well as new field observations to confirm specific locations of any listed plant or animal species that may exist or use the parcel at any time during their life cycle. All listed species as well as those identified by the New York Natural Heritage Program should be specifically studied including but not limited to the Karner Blue and the Frosted Elfin, as well as others such as the Eastern hog nosed snake and Eastern wormsnake.

**Section 3.5:** The DEIS will provide a detailed traffic analysis focusing on those peak hours and street network intersections where the highest concentrations of action-generated demand is. The Planning Board should choose the peak hours for analysis. Intersections to be included should be determined based on the threshold of 50 additional vehicle trips per hour. Include a discussion on the existing bicycle and pedestrian network in the area and if this will be impacted.

**Section 3.6.** Include a table comparing all existing zoning requirements, existing uses, and the proposed projects uses, dimensions, and other. For parcels included in the DEIS but that are not currently proposed to be developed with this Rapp Road Development Application, use a full build out (maximum density) as the future state to compare existing conditions to required and proposed conditions.

**Section 3.6:** Include a discussion of the vision, goals, and future strategies outlined in the Guilderland Comprehensive Plan (9-12-18) and how the proposed project is or is not consistent with these. Also consider other plans that may exist such as the Capital District Transportation Committee Linkage Study, and other plans that exist for Guilderland. Summarize and identify Guilderland’s role in the Mohawk Valley Heritage Corridor and how consistent the project is with that designation.

**Section 3.6:** The Planning Board should establish a year when this project and the potential adjacent parcels may have completed development and use that year to project for all analyses and to describe the full buildout conditions. Note that the environmental setting is not the current environment, but the

future environment. Therefore, the DEIS should forecast these conditions to the analysis that year for the purposes of determining potential impacts.

**Section 3.6:** The land use analysis should include the following subtasks:

- Provide a brief development history of the primary (i.e., Project Area) and secondary study areas.
- Provide a description and map of land use patterns and trends in the study areas, including recent development activity.
- Describe and map existing zoning and recent zoning actions in the study areas.
- Describe public policies that apply the study areas, including specific development projects and plans for public improvement.
- Based on field surveys and prior studies, identify, describe, and graphically portray predominant land use patterns. Describe recent land use trends in the study areas and identify major factors influencing land use trends.
- Prepare a list of future development projects in the study areas that are expected to be constructed by the chosen analysis year and that may influence future land use trends. Also, identify pending zoning actions or other public policy actions that could affect land use patterns and trends in the study areas. Based on these planned projects and initiatives, assess future land use and zoning conditions without the proposal.
- Assess the potential impacts of the proposal on land use, land use trends, zoning, and public policy.
- Describe the proposals potential effects related to issues of compatibility with surrounding land use, the consistency with zoning and other public policies, and the effect of the proposal on ongoing development trends and conditions in the study areas.

**Section 3.7.** As the Proposed Action will allow for a higher building, a preliminary assessment of urban design and visual resources needs to be provided in the DEIS. Do viewshed analysis to identify locations where it will be visible from. Use photosimulations to add to the description of community character. Photosimulations should be done to show existing visual conditions and proposed conditions from a variety of locations. Of especial importance to include in a photosimulation would be at least Gipp Road, Rapp Road/Crossgates Mall Road, Paden Circle (Backyards), Route 20, and side streets off 20 (Westmere Terrace, Brooks Road, Camp Terrace). As part of the scoping process the Planning Board should identify specific locations that should be included in a photosimulation and ask that a key map be developed to show where these locations are.

For visual resources, the view corridors within the study area from which such resources are publicly viewable will be identified. The assessment should consist of the following:

- Based on field visits, the current urban design and visual resources of the Project Area and adjacent study area will be described using text, photographs, and other graphic material, as necessary, to identify critical features, use, bulk, form, and scale.
- Potential changes that could occur in the urban design character of the study area as a result of the Proposed Actions need to be described. For the Project Area, the analysis should focus on the general massing assumed for the Proposed Project, as well as elements such as streetwall height, setback, and building envelope. Photographs and/or other graphic material should be utilized, where applicable, to assess the potential effects on urban design and visual resources, including view of/to resources of visual or historic significance and a three-dimensional representation of the future condition of the streetscape.

The DEIS should describe the Project Area and the urban design and visual resources of the surrounding area as well. The analysis would describe the potential changes that could occur to urban design and visual resources in the future with the Proposed Actions condition, in comparison to the future without the Proposed Actions condition, focusing on the changes that could negatively affect a pedestrian's or vehicles experience of the area. If necessary, mitigation measures to avoid or reduce potential significant adverse impacts need to be identified.

**Section 3.7:** Identify future needs for recreation and open space and ability of existing resources to accommodate the additional population.

**Section 3.7:** Identify the impact on affordable housing accessibility and costs that may be affected.

**Section 3.7:** The DEIS should describe the socioeconomic character of the area. This should include its population, housing, and economic activity. Assess the proposals potential effects on the socioeconomic character of the study area. Of especial importance is to address any potential impacts on affordable housing.

**Section 3.7:** Assess if there will be any significant change to the ambient noise and light levels in the residential neighborhoods surrounding the proposal. Compare this to what will result after development. Noise measurements should be made at receptor locations chosen by the Planning Board and performed at typical weekday AM, midday, and PM peak periods (coinciding with the traffic peak periods).

**Section 3.7:** Neighborhood character is established by numerous factors, including land use patterns, the scale of its development, the design of its buildings, the presence of notable landmarks, and a variety of other physical features that include traffic and pedestrian patterns, noise, etc. The DEIS should determine whether changes expected in other technical analysis areas—land use, zoning, and public policy; socioeconomic conditions; open space; historic and cultural resources; urban design and visual resources; transportation; and noise/lighting—may affect a defining feature of neighborhood character. The DEIS should:

- Identify the defining features of the existing neighborhood character.
- Summarize changes in the character of the neighborhood that can be expected in the future.
- Evaluate whether the Proposed Actions have the potential to affect these defining features, either through the potential for a significant adverse impact or a combination of moderate effects in the relevant technical areas over a cumulative nature.

**Section 3.8:** The effects of the incremental increased demand on the Town's water supply system needs to be assessed to determine if there would be impacts to water supply or pressure. The incremental water demand is the difference between the water demand in the Project Area compared to current, no-development conditions.

**Section 3.8:** Related to infrastructure, the DEIS should:

- Describe the existing stormwater drainage system and surfaces (pervious or impervious) and the amount of stormwater generated.
- Describe the existing sewer system serving the area.

- Describe future stormwater generation from the area will and determine the Proposed Actions' potential to result in impacts. Describe changes to the Project Area's surface area will be described with runoff coefficients and runoff for each surface type/area, and volume and peak discharge rates.
- Describe sanitary sewage generation for the proposal and determine the capacity of the local system and incremental demand on the system to determine if there will be any impact.

**Section 5.0:** In addition to the current alternatives included in the scope (no action, alternative site layout, alternative traffic options, and alternate site uses), include an alternate having the same uses but with smaller density/intensity and scale of development.

**Section 5.0:** For parcels not included in this phase for development, use a full build out, maximum intensity/density scenario for alternatives.

**New Section:** Add a section on cumulative impacts. This should analyze impacts of commercial and/or residential development at least on all the subject parcels.

**Description of Action:** This section should include full draft plans such as drainage plan, stormwater pollution prevention plan, lighting plan showing photometric plan, landscaping plan, pedestrian linkages, traffic flow, and a demolition and construction plan.

Sincerely,



Nan C. Stolzenburg AICP CEP

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