



## Parks, Recreation and Historic Preservation

**ANDREW M. CUOMO**  
Governor

**ERIK KULLESEID**  
Acting Commissioner

April 3, 2019

Dominic Rigosu, A.I.A.  
Chair, Albany County Planning Board  
Albany County Department of Public Works  
449 New Salem Road  
Voorheesville 12186  
(via email)

Re: SEQRA/DEC  
Rapp Road Development, LLC/New Apartment Complex/Townhomes  
Rapp Road, Guilderland, Albany County  
19PR01578/APB Case #10-190203221

Dear Mr. Rigosu:

Thank you for requesting the comments of the Office of Parks, Recreation and Historic Preservation (OPRHP). As you know, our office provided the attached letter to the Town of Guilderland Planning Office on March 11 as part of their SEQR review.

Since that time, I have spoken with members of the Rapp Road community regarding concerns relating to existing and future traffic congestion in the National Register listed historic district.

The district was designated to the Nation's list of properties worthy of preservation in 2002. This distinction was based on the unique history associated with this important neighborhood, which evolved out of the Great Migration of the early 20<sup>th</sup> century. The neighborhood was the product of sharecroppers from Shubuta, Mississippi who were relocated to New York by Rev. Louis W. Parson. Originally settled in the city of Albany near Rev. Parson's church, the community found urban life difficult and unfamiliar to their predominantly rural agrarian experience in the South. Thus, the community relocated to what at the time was an isolated rural pine barren west of the city. What they established there replicated more closely the rural lifeways that these first settlers were accustomed to. The homes and community buildings they erected, the seemingly random layout of the land and lots along the narrow and then rural Rapp Road remains evident today in the historic district. This unchanged setting within the district remains a highly significant part of the historic integrity of this listed district.

At the time of the designation this setting had been somewhat compromised by the construction of Crossgates Shopping Mall in the 1980s and to a lesser extent the Daughters of Sarah Nursing Home complex. The addition of the Atria and the expansions at Crossgates Commons have also impacted the physical setting of the district. Today mature vegetation and open space setbacks still largely buffer the core of the Historic District from these modern visual intrusions. However, the traffic associated with these developments continues to increase and to directly affect the historic district.

Per the regulations that guide the New York State Historic Preservation Law (NYPRHPL §14.09), an adverse impact on a listed historic property is found when a project is likely to cause the "*introduction of visual, audible or atmospheric elements which are out of character with the property or alter its setting.*" (9 NYCRR Part 428.7(a)(3)) Such impacts can also be cumulative

in nature, growing and evolving over time until they reach a point where they jeopardize the historic character of a place.

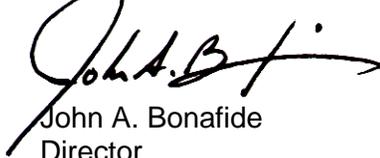
In speaking with community members, it has become clear that the relentless traffic associated with the steady commercial growth now surrounding the Rapp Road Historic District has reached a level of adverse impact. The use of this intact and evocative section of Rapp Road by commuters and shoppers as a short-cut is now having a profound, direct and negative impact on the serene rural qualities that the first settlers sought as their refuge from the city of Albany.

In reevaluating our comments to the Guilderland Planning Board, we now recommend that the potential cumulative traffic impacts from this newly proposed development be fully assessed. This evaluation should look at the expanded traffic counts anticipated with the proposed high-density housing project. We also strongly recommend that the existing high volume of non-local residential traffic that floods this unique and historic neighborhood be addressed and dramatically reduced through all methods available.

By way of this letter, we are alerting the New York State Department of Environmental Conservation that any Section 14.09 review conducted for this undertaking will require a significantly more rigorous assessment of traffic impacts to the Rapp Road District. This letter is also being submitted to the Town of Guilderland as an update to our previous SEQR comments.

If I can be of any further assistance, I can be reached at [john.bonafide@parks.ny.gov](mailto:john.bonafide@parks.ny.gov) or (518) 268-2166.

Sincerely,



John A. Bonafide  
Director,  
Technical Preservation Services Bureau  
Agency Historic Preservation Officer

cc: Kenneth Kovalchik, Guilderland Town Planner *(via email)*  
Ms. Beverly Basquez *(via email)*  
Charles E. Vandrei, NYSDEC *(via email)*

att: March 11, 2019 letter-NYSHPO to Town of Guilderland



**Parks, Recreation  
and Historic Preservation**

**ANDREW M. CUOMO**  
Governor

**ERIK KULLESEID**  
Acting Commissioner

March 11, 2019

Kenneth Kovalchik  
Town Planner  
Town of Guilderland  
PO Box 339  
Guilderland, NY 12084-0339  
*(via email)*

Re: SEQRA/DEC  
Proposed Rapp Road Apartments/Townhomes/New Construction  
Gipp and Rapp Roads, Guilderland, Albany County  
19PR01578

Dear Mr. Kovalchik:

Thank you for requesting the comments of the Office of Parks, Recreation and Historic Preservation (OPRHP) as part of your SEQRA process. These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8) and its implementing regulations (6 NYCRR Part 617).

Our office has assessed both the archaeological and historical impacts that might be associated with this action. Based upon this review, it is the OPRHP's opinion that the project, as submitted, will not impact cultural resources in or eligible for inclusion in the State and National Register of Historic Places.

If I can be of any further assistance, I can be reached at [john.bonafide@parks.ny.gov](mailto:john.bonafide@parks.ny.gov) or (518) 268-2166.

Sincerely,

John A. Bonafide  
Director,  
Technical Preservation Services Bureau  
Agency Historic Preservation Officer