



May 13, 2020

Stephen J. Feeney, Chairman – Town of Guilderland Planning Board
Town Hall | Route 20
PO Box 339
Guilderland, New York 12803

RE: Rapp Road Residential / Western Avenue Mixed Use Redevelopment Projects Draft Environmental Impact Statement

Dear Chairman Feeney:

Please accept this letter outlining the City of Albany's preliminary comments related to the above referenced projects and the associated Draft Environmental Impact Statement (DEIS). The City takes no position on the overall continued development on the Pyramid Corporation and Crossgate Mall parcels, provided that the negative impacts to nearby Albany residents and neighborhoods are fully mitigated. The primary impact from the Crossgates Mall Development and future expansion is related to roadway capacity of Rapp Road between Gipp and Washington Avenue Extension—primarily within the Rapp Road Community Historic District.

The Rapp Road Community Historic District is one of the most culturally significant historic districts in the City of Albany and was listed on the National Register of Historic Places in 2002. The Rapp Road Community is significant as a rare example of a rural African American chain-migration community that is still intact and flourishing. Residents were able to replicate much of their life in rural Mississippi and pass their values and culture on to future generations. The Rapp Road Community was established by and home of Louis W. Parson, pastor of Albany's First Church of God and Christ. He was responsible for recruiting the majority of Rapp Road's families from the South. At the time of designation, seventeen of the original families, including three first-generation residents, still lived on Rapp Road. The City of Albany remains committed to protecting this community, its cultural importance, and its historic significance.

The City of Albany met with the Town of Guilderland and Pyramid in March of 2019 to discuss the impacts on the proposed 222 unit apartment complex. At the time, the City noted that it was likely, given the available land owned by Pyramid, that there would be additional growth within that area. The City recommended an approach that allowed for future growth, while solving the issues related to Rapp Road where it passes through the The Rapp Road Community Historic District. This section of Rapp Road is a narrow roadway that is owned, in many areas, up to the center line by the residents on either side. This means that reconstruction of this roadway, to meet the existing traffic and future demand is not feasible.

The City proposed a bypass (Alternative 1) which we felt solved the issues related to the Rapp Road and its inability within the Historic District to accommodate increases in traffic. This alternative was intended to allow for future growth. By August 2019, the SEQRA process was restarted to incorporate COSTO and associated gas stations. It is likely, this is not the end of the expansions within the Crossgates / Pyramid parcels.

ALTERNATIVE 1 | EASTERN BYPASS

This is the City of Albany's preferred alternative and the only which eliminates through traffic in the already constrained area of Rapp Road, minimizes any increase in emergency response time, and does not impact the quality of life or convenience of the Albany residents in the Rapp Road Community Historic District, Pine Lane, or Willan Lane. This alternative accomplishes the following:

- Protects the Rapp Road Historic District from through traffic, preserving both the cultural and historic significance of this area;
- Provides for a road that could be constructed to required standards and handle future expansion and development on the Pyramid lands;
- Allows convenient access to Washington Avenue Extension and Western Avenue for the residents of the Rapp Road Historic District, Pine Lane, and Wilan Lane;
- Does not negatively impact emergency or other essential services to the City's residents in this area;
- Provides for a connection between Washington Avenue Extension and Western Avenue;
- Brings traffic out at a controlled signal at Washington Avenue Extension, rather than the frontage road; and
- Can be constructed entirely on lands owned by the Pyramid Corporation;

The City understand that this alternative would impact an area noted in the Pine Bush 2017 Management Plan Update as recommended for full protection. However, in balance with the need to protect a significant cultural and historic area, provide for continued economic development of the area, protect the quality of life of the residents in the area, and continue to protect the the Pine Bush area, we feel this Alternative is clearly the best one and the only one which accomplishes all of those objectives. The area required for this alternative represents a small fraction of the total land area recommended for full protection.

This alternative would require a cul-de-sac or turnaround for the fire departments largest apparatus where Rapp Road terminates to the south. Based on the area available, this appears to be feasible.

ALTERNATIVE 2 | WESTERN BYPASS 1

While this alternative does eliminate through traffic in the already constrained area of Rapp Road, it is not recommended as the City's preferred alternative for the following reasons:

- It would have a negative impact on the quality of life of residents of the Daughters of Sarah;
- The land is not owned by either the City of Albany or Pyramid Corporation;
- It does not bring traffic out to a signal on Washington Avenue Extension, but instead puts traffic on a frontage road, west of the traffic signal;
- Would impact emergency response time to residents of Pine Lane and Wilan Lane;
- Provides a direct connection to Crossgates Mall, greatly increasing the traffic near the Daughter's of Sarah and on the frontage road;
- Requires more road construction than Alternate 1; and
- Bisects a larger area Recommended for Full Protection in the 2017 Management Plan Update.

ALTERNATIVE 3 | WESTERN BYPASS 2

While this alternative does eliminate through traffic in the already constrained area of Rapp Road, it is not recommended as the City's preferred alternative for the following reasons:

- Greater negative impact to the Daughters of Sarah;
- Requires more road construction than Alternative 1;
- Would greatly increase emergency response time to residents of Pine Lane and Wilan Lane;
- Provides a direct connection to Crossgate Mall, greatly increasing the traffic through this area;
- Would cause traffic cut-through from Columbia Circle office developments;
- Adds traffic at Gipp Road and Pine Lane; and
- Bisects a larger area Recommended for Full Protection in the 2017 Management Plan Update.

ALTERNATIVE 4 | SOUTHBOUND ONLY - MIDDLE OF RAPP ROAD

While this alternative does eliminate legal through northbound traffic in the already constrained area of Rapp Road, it is not recommended as the City's preferred alternative for the following reasons:

- Impacts the residents of Rapp Road Historic District, Pine Lane and Willan Lane. No connection from Western Avenue;
- Difficult enforcement of the one-way, unnatural mid-road change;
- Decreases traffic in one direction, but highly likely that some motorist will ignore. During major congestion, motorist will seek the path of least resistance;
- Increase traffic in the southbound direction while doing nothing to improve Rapp Road through the historic district; and
- Provides direct connection to Crossgates Mall, greatly increasing traffic potential.

ALTERNATIVE 5 | EMERGENCY ACCESS ONLY - MIDDLE OF RAPP ROAD

While this alternative does eliminate legal through north and south bound traffic in the already constrained area of Rapp Road, it is not recommended as the City's preferred alternative for the following reasons:

- Impacts the residents of Rapp Road Historic District, Pine Lane and Willan Lane. No connection to or from Western Avenue;
- Difficult enforcement without physical barrier;
- During major congestion, motorist will seek the path of least resistance;
- Potential traffic increases with no improvements to Rapp Road through the historic district; and
- Provides direct connection to Crossgates Mall— difficult to monitor / enforce; and
- May decrease traffic, but at a convenience cost to Albany residents in the area.

ALTERNATIVE 5A | NO THROUGH ACCESS - CLOSURE OF RAPP AT PINE LANE AND GIPP

While this alternative does eliminate traffic in the already constrained area of Rapp Road, it is not recommended as the City's preferred alternative for the following reasons:

- Completely severs any connection through the City of Albany from Wilan Lane from Washington Avenue Extensions;
- Greatly increases response times for emergency services for Wilan Lane residents; and
- Requires access for all services to Wilan Lane to enter from the Town of Guilderland.

ALTERNATIVE 5C | NO ACCESS - CLOSURE OF RAPP AT PINE LANE AND GIPP

Although this alternative has not been presented, it would be a modification of Alternative 5. The major difference would be that the emergency access portion (shown in yellow on the plan) would be eliminated as would that section of the road. Although this alternative would impact travel times for Albany residents in the area, the City would consider this as a possibility, with further study based on the following:

- Removes connections to Rapp Road from Crossgates, the proposed Costco, and the proposed housing development—therefor ensuring there is no increase in traffic through the Historic District from these development; and
- Would not affect emergency response times for Wilan Lane, Pine Lane, or the Rapp Road Community Historic District.

ALTERNATIVE 6 | GIPP ROAD REALIGNMENT

This option would be strongly opposed by the City of Albany for the following reasons:

- Greatly increases traffic through the Rapp Road Community Historic District from Costco, the proposed housing development, and Crossgates Mall with no improvements to a section of roadway that cannot accommodate any increase;
- Greatly increases response times for emergency services for Wilan Lane residents; and
- Requires access for all services to Wilan Lane to enter from the Town of Guilderland.

ALTERNATIVE 9 | RAPP ROAD REALIGNMENT

This option would be strongly opposed by the City of Albany for the following reasons:

- Greatly increases traffic through the Rapp Road Community Historic District from Costco and Crossgates Mall , and potentially the proposed housing development, with no improvements to a section of roadway that cannot accommodate any increase.

TRAFFIC IMPACTS

Based on a review of the trip generation estimate and methodologies, our traffic consultants believe that the trip generation has been over estimated during the AM peak hour and under estimated during the PM and Saturday peak hours. Their trip generation estimates is as follows:

- 150 fewer trips during the AM peak hour
- 90 more trips during the PM peak hour
- 220 more trips during the Saturday peak hour
- The distribution of traffic traveling through the City of Albany is expected to be higher than presented in the traffic study. Specifically, the TIS estimates that 20% of the Rapp Road residential project will go through the City but only 10% of the traffic from Costco and the mixed-use project. It's likely that the Costco and mixed-use traffic will be closer to 20% like the Rapp Road residential project.
- Based on the trip generation and trip distribution changes, the increase in traffic through the City of Albany will likely be higher than presented in the traffic study.
- An estimate of the number of site-related trips that will travel through the City of Albany will be provided for each of the roadway alternatives as part of the detailed review.

The City of Albany will continue to review the various alternatives and the Draft Environmental Impact Statement for these projects. We will be submitting additional comments prior to the deadline.

Sincerely,



Christopher P. Spencer

Commissioner of Planning and Development | City of Albany