

RECEIVED DEC 23 2019
Mayor's office @ 11:51 am

I am submitting the following as my response to the DGEIS (Draft Generic Environmental Impact Statement):

Suggestion:

In future statements please provide a glossary of the acronyms that appear throughout. It will help maintain coherence and comprehension. For example, Downtown Revitalization Initiative is initially referred to as such, but is identified throughout the report from then on as DRI. Likewise Durkee Lot Mixed Use Development is known as DLMUD. All other named entities become scattered throughout the text as EIS, LPC, NAPGBP, APMPP, PFCM, FRB, PUD, SIP, etc. and it is difficult if not impossible to recall what they mean and how they apply to the discussion at hand. A glossary listing the acronyms and their meanings would be most helpful.

Overall Response to the DGEIS

My overall response to this report is that much of what is being proposed is based on speculation, with little concrete data specific to the City of Plattsburgh to back it up (the classic "Build it and they will come" approach.) Responding to all the details of the DGEIS is beyond my ability, so I will discuss a few areas that stood out to me as I read through the DGEIS.

The Proposal

- 170 companies were contacted to build some form of housing in downtown Plattsburgh.
- Only one company, Prime LLC, responded.
- Why was this?

My speculations:

1. Companies may have felt three weeks was too short a time to consider a measured response.
2. The project was too big to take on.
3. The project was too small to take on.
4. The companies decided they could not or did not wish to adhere to whatever criteria was set out in the proposal.
5. Companies may have decided the project was too risky from a perspective of possible return on investment.

Speculation

1. Did Prime LLC have a heads up on this proposal before the three week window opened?
2. Were the specifications for this proposal written so that only a company like Prime LLC could meet the requirements to qualify?
3. Was there any contact with Prime LLC before the proposal was written?

I would think it might have given the City pause to enter into a contract for a proposal that had generated so little response and feedback from potential partners. Was this considered at all?

On page 2 of the DGEIS it is stated that “Prime was selected as the *preferred* (my italics) developer of the DLMUD.” Out of a field of one, hardly a selection.

DLMUD

1. 115 unit, five story apartment, with possible retail, restaurant, office space on ground floor. Alternative plans described, but this is the plan favored by Prime LLC and the Lead Agency (LA).
2. One, two and three bedroom apartments (see Table 43, page 172 of DGEIS for breakdown.)
3. Square footage of each type of apartment? I could not find any data in the DGEIS.
4. Rental cost to tenants? Described as “market price” in the DGEIS, but no examples given.

5. Target tenants:

-“Based on the unique nature of the proposed project, it was *assumed* (my italics) that all 115 apartment units will be occupied by net new households to the City. New residents would make purchases in the City...” (page 175)

-drawn by expansion of business and industry in the region, but not specifically in the City.

-younger people, younger families with higher incomes due to new jobs in businesses and industries that may or may not come to this region.

Considerations:

-a large proportion of younger, college educated potential tenants can be expected to be carrying large college debts that may require decades to discharge. Depending on the monthly rent set by Prime, they may or may not have the real income necessary to allow them to occupy the Prime building.

-Prime’s policy on pets? A no pet, or restrictive pet policy could be a deal breaker for some potential tenants. An open policy brings other problems.

-is it more economical for them to rent versus buying a starter home? Is it more livable?

i) home ownership builds equity and credit.

ii) interest rates on mortgages are tax deductible.

iii) if/as a family expands, living space is affected in one and two bedroom apartments. Could lead to frequent/increased turnover. Possibility of low, unstable tenancy rates if tenants cannot be replaced as quickly as they leave.

If You Build It, They Will Come, And Spend Money, But Where?

1. DGEIS report estimates these new residents will spend 40% of their Annual Per Unit Spending (APUS) in the City. Where will they spend it? (page 176, Table 52)
2. Did the company preparing the DGEIS actually tour the City, and specifically the downtown area to see what is available to people living there now?
3. The majority of current City residents use the supermarkets and stores in the malls outside the City in the Town of Plattsburgh to meet their shopping needs because we have few to no comparable businesses within the City limits. Why should we expect new residents to be any different?
4. Brick and mortar retail is being challenged by Internet sales. We can expect these new residents to be computer savvy.
5. Many empty store fronts currently exist on Margaret and Clinton Streets. What plans are being made to encourage new, unique businesses to locate in those areas? What plans are being made to make this part of Plattsburgh so attractive and welcoming that residents and visitors and tourists would prefer to visit and shop downtown Plattsburgh rather than online or up at the malls? If you build it they may come, but if they want to spend money, I think much of that 40 % of APUS is going to head out of the City and into the Town. Or Burlington. Or Lake Placid. (This is not a criticism of the DGEIS, or the City of Plattsburgh. There may be other plans for downtown revitalization of which I am not aware, and this issue was not addressed in the DGEIS).

The Farmers Market

1. Current plan is to relocate PFCM from DSL to Green Street near the Sewage Treatment Plant.
2. An earlier plan was to erect a new building at Harborside. Objections:
 - i) too far from downtown.
 - ii) safety concern – single roadway in/out could be blocked by stopped train where road crosses the tracks.
3. Green Street location. Objections:
 - i) proximity to the Sewage Treatment Plant; bad optics, even with improvements.
 - ii) closer than Harborside, but still remote.

iii) safety concerns: same as 2.ii above. How will that be addressed?

Last of All, Parking

1. The question is, what does downtown Plattsburgh have to offer that would make people want to drive down there AND pay for the privilege?
2. How much will it cost to buy, install, and maintain the parking kiosk/meters? How long will it take to recoup the initial outlay? Will we pay for a meter monitor?
3. Unless the City can offer people things and experiences they want and cannot get elsewhere, they will go elsewhere, especially if they have cars. They have other options. Paid parking can be a decision making factor. Has the City considered the effect paid parking will have on businesses in the City?
4. Paid parking, in the end, may be more costly than profitable for all concerned.

5. Emergency Snow Parking:

-DSL offers one large, centralized place where residents without off street parking know they can park when the snow plows have to come out.

-with the loss of the DSL new parking spots are promised at various other locations throughout the City. This could lead to drivers scrambling from lot to lot in search of a spot. Not efficient, possibly even dangerous.

-not addressed in the DGEIS, or any place that I am aware of.

Summary

In closing, I would like to state again that some of my comments do not have the data to back them up, because no appropriate data was included in the DGEIS. There is some speculation on my part. But there seems to be a great deal of speculation in the DGEIS on how the Prime plan will benefit the City. I think this plan puts the cart before the horse. Create an attractive and alluring downtown and people will want to visit, shop, and perhaps even live there. An attractive and alluring downtown benefits everybody, old residents and new. As for a five story apartment building:

Build it and they will come?

Maybe.

Maybe not.

How much of the City's future are you willing to bet on this speculation?
To my way of thinking this proposal is NAPGBP.

GLOSSARY

NAPGBP: Not A Particularly Good Business Plan

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Hand delivered at 11:50am

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