



CLINTON COUNTY PLANNING DEPARTMENT

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City of Plattsburgh Common Council
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To the Honorable Members of the Plattsburgh City Common Council:

The Clinton County Planning Board met December 4th, 2019, and decided by a vote of 7-0 with one abstention to send the following comments to the Council regarding the Draft Environmental Impact Statement for the Downtown Area Improvement Projects / Revitalization Initiative.

The Clinton County Planning Board has several concerns with regard to the proposed Downtown Improvement Project, and the Draft Environmental Impact Statement. In particular, the area impacted by the Durkee Lot Mixed-Use Development (DLMUD) is of most concern, and the amount of information currently provided regarding this proposed project to the board / public. The answers to these concerns may be addressed in some instances in the documentation, but because of the size of the document and the time available to review, there was no time to verify this.

Parking Deficiencies:

Durkee Lot Mixed Use Development Lot: According to the DEIS, the current zoning would require 317 new off street parking spaces for the proposed DLMUD. The City makes a case for less than this number, and states that 286 spaces will be available off street for this project and be adequate for the project. However, 50 of these spaces are also claimed to be a part of the public parking not related to this project, and are being double counted. The document also states that 165 spaces are available in underground parking, but does not provide a blueprint / site plan that shows this parking on paper, fitting under the building. It appears that there are 236 parking spaces dedicated for only the DLMUD project, and that the 50 extra spaces realistically would be used by the DLMUD project to total 286, which may be adequate to serve the project, but does not meet the City code. The Board believes this project should meet the City zoning requirements for parking, or better justify how less parking is to be adequate.

Parking Expansions to replace the Durkee Street Lot: The project will be eliminating 289 spaces in the current Durkee Street Parking Lot, potentially making 50 available to the general public after redesign as shared parking. However, as stated above in discussion of the DLMUD

project, these spaces are likely needed to meet the daily requirements of the DLMUD project, and should not be double counted. The parking spaces that will be created in either new lots, lot reconfigurations, lot expansions, or other shared agreements with other agencies / governments ideally would equal the number of spaces lost from the Durkee Street Lot.

The DEIS states that parking lots should generally have less than 85% of the spaces filled, and the Durkee lot often exceeds this number at 87% during peak hours daily. Though spaces may be available elsewhere in other lots, and there may be "just enough" parking, this greatly reduces the ability for the downtown business area to grow from the current condition, which is a goal of the project. If the parking is adequate now, but this project is removing a great deal of the available spaces, the ability for businesses to expand or fill vacancies in the downtown area is reduced and impacted negatively by the lack of available parking.

Downtown Parking Overall: The DEIS proposes that 400 spaces will be available after the project for general public parking in the downtown study area, while 394 are currently available. However, the spaces included double counts the 50 spaces within the newly proposed parking within the DLMUD. If these spaces are counted only once, there is quickly a reduction of 50 parking spaces. Additionally, the 66 shared spaces at the County Government Center realistically are not completely available as replacement parking – though they do greatly improve parking availability in the area around the Government Center. The lot reconfigurations by the County added a total of 53 new spaces – however 9 spaces were moved off from Court Street into the parking lots, for a real total of 44 more spaces in the vicinity. There is an argument that can be made that there are now 44 more parking spaces around the Clinton County Government Center, primarily available to the public. As a result of the expansion project, there are now adequate spaces on the Government Center Complex for employees, when previously there was a shortage of as many as two dozen. Many of these employees were parking in city public parking spaces. This board believes that the number gained would be more conservatively 44 rather than 66, which reduces the 400 claimed spaces.

The final determination is difficult because of the lack of blueprints for the underground parking and site plans for the above ground parking, but it appears that in total there will be a reduction of public parking within the downtown area of approximately 70-100 spaces. The board believes this would have a significant negative impact on the downtown area, especially the ability for the downtown business district to grow and revitalize.

The location of parking to multiple lots instead of one massive lot can have a positive impact by providing parking closer to many of the uses within the downtown area.

The City is encouraged to review the scope of the project, to see if downscaling is an option / alternative.

Another alternative that does not appear in the DEIS is to provide closer vehicular and pedestrian access to the harborside parking area. Currently there is a circuitous route to reach this parking area, and no viable pedestrian access directly to Bridge Street. There also does not appear to be a sidewalk to reach the Riverwalk path from the harborside parking area; pedestrians would need to cross a lawn area to reach this path. The City may want to determine whether a foot crossing of the railroad tracks near the west end of the harborside lot, or a sidewalk to the far east that does not cross the tracks. This may allow better access to the lot for businesses and residences in the Bridge Street area and beyond, which could reduce

the on street parking pressure from the nearby businesses and residences. This could have a similar effect as the County Government Center parking expansion, allowing parking to “shift” to less used areas, and allowing for more on street parking nearer to the downtown.

Overall Map / Detailed Site Plan: The County Planning Board suggests that the City include one detailed map that shows all of the proposed parking modifications within the study area, with the dimensions of all lots shown including the width of typical parking spaces and lanes, and a numeric count total on each lot. Additionally, the DLMUD structure should include blueprints that indicate how the underground parking is accessed, how these spaces fit under the structure, and the impacts on surface level changes that will likely need to occur by the construction of this building. The conceptual plan that is included appears dated, and does not match with other sections and descriptions in the DEIS.

Clinton County Department of Social Services Facilities at 13 Durkee Street: The Board is concerned that there will be inadequate parking for the employees and customers of these facilities. Approximately 180 employees work in this facility, and currently park in many cases in the Durkee Street and Broad Street Lots. These employees will need off street parking, and based on the figures provided, will nearly fill the Arnie Pavone lot and Broad Street lots during business hours. The spaces are also needed by local residents and business owners because of the removal of the Durkee Street Lot.

Farmers Market impacts: The Board believes the proposed move of the Farmers market to the area closer to the sewage treatment plant will have a negative impact on the Farmers Market. This site is much less visible, and further removed from the downtown area.

Durkee Street Redesign: The Board believes that the proposed modifications are more dangerous to all modes of transportation, as it involves backing out into the roadway. Pedestrian and bicycle traffic is most at risk. The Durkee Street Redesign does not appear to have a separate conceptual site plan provided within the DEIS.

Deliveries / Truck Traffic Access: The Durkee Street redesign and the Durkee Lot Mixed Use Development do not appear to have adequate means to provide truck deliveries to the businesses along Durkee, which is often the rear of businesses on Margaret Street. No designated pull offs, or examples of how truck traffic would flow through and within the project were noted in the DEIS.

Downtown Growth Limitations: The Board believes that the net loss of parking in the downtown area will have a negative impact on the existing businesses and structures in the downtown business district. Though the addition of parking closer to certain facilities will improve those locations, the overall net loss will impact the availability of parking. This in turn impacts the viability of the downtown area to grow and expand both businesses and residential apartment spaces above the existing downtown business district.

Deviation from the original DRI plan: The Board believes that this project deviates from the original plan, reducing the community benefits / public access portion.

Riverwalk Access and Riverwalk Plan: The proposal does not appear to enhance the Riverwalk in accordance with the Saranac River Trail plan. Connectivity is not well demonstrated. A visual impact analysis of the project from the Riverwalk should be provided

as to demonstrate the visual impacts of this project on the trail, to include conceptual drawings similar to those provided from the front side of the DLMUD project, and indicate the height differences, if any from the Riverwalk and the rear of the DLMUD project, and how the entrance to the underground parking will work. The board is also concerned about safety along this section of the Riverwalk if there becomes a "boxed in section" as a result of this project.

Tax implications: The Board is concerned about the impacts on County, Local and School taxes that this project may create – does this project pay an appropriate PILOT for the impacts on County, Local and school budgets as a result of the project.

DRI Strategic Investment Plan and Original Application: These documents should be included in the appendix, and appear to be omitted.

Alternative actions: The City may want to add additional alternative actions and explore those actions, which include but are not limited to: Reduction in the commercial square footage within the project (especially the restaurant use which requires the highest parking per square foot, and the commercial reuse of the farmer's market structure); Reduction in the total number of apartments; construction of a public parking garage on the DLMUD site; construction of a public parking garage on the Arnie Pavone parking lot site.

Positive Declaration: There are likely other concerns that the Board would have with regards to this project, however these issues were the primary impacts discussed and commented upon. The board believes that this project requires a positive declaration of environmental impact as submitted. The board suggests that a revised / supplemental DEIS be submitted that addresses these many concerns adequately.



Sheridan Garner, Chairperson

cc: County Planning Department Files