

DGEIS Statement is a thorough and exhaustive report of the proposed projects in downtown Plattsburgh. Site maps are keyed to site photographs. Tables and graphs support and make specific the material in the text. Moreover a table on the timetable of demolition and construction is listed in a detailed graph. The documentation within the DGEIS shows that proposed DLMUD will have a potentially devastating impact on the economic and social life of the City of Plattsburgh.

The Prime LLC Building

A key area for further scrutiny is the residential units proposed for the DSL. Page 24 quotes from the May 25, 2017 NYS Plattsburgh awards booklet that the award states "...*may* include approximately 45 residential units..." (emphasis, mine). I take the statement to mean that an apartment building is **not** required at all to fulfill the requirements of the grant. Yet page 18 describes the Prime LLC proposed 115 apartment unit building shown on the site map, page 20 to take up more than half of the DSL.

Section 2.2.3, DMLUD, page 18, states that **all** of the DSL will be owned by the Prime LLC. Of the 86 space surface parking remaining on the south end of the lot only 50 spaces will be available for public parking. The Prime LLC will purchase all of the DSL for one dollar turning the now public space into exclusively private space. I assume the 36 sequestered spaces in the surface parking are for the use of guests of the apartment dwellers.

The original 45 apartment figure is not mentioned again until the end of the report. The narrative on page 198 under heading "4.3 Alternative C: Reduced Residential Count.." mentions again the smaller 45 unit residential unit structure. Yet no reason is given for the decision approving the adopted larger apartment structure.

The large Prime LLC building is the core issue damning the proposed projects. A smaller apartment building of 45 units or less would not irreparably damage the DSL's other functions and would not create as significant a parking problem in the city. The PFCM could remain on the site and still allow for enlarged garden islands within the DSL.

The Prime LLC building is not in accord with the grant application for enhancing the DSMUD. Because of the large building, the parkland, part of the DSMUD, is limited to only four trees. More than half of the lot will be taken as a private structure and the rest of the lot, the 86 space surface parking lot is privately owned with limited public access. The parkland element essentially vanished. How can this proposed restructuring of the DSL meet the standard of beautification and community access to the site?

Community access to the DSL

PFCMB and the DSL together with Trinity Park are sites of outdoor community activity. The restructuring of the DSL as shown on page 20 shows over half of the space committed to a private use apartment building. Vehicle access will be further restricted by one way street traffic. The current proposal will limit public gatherings. I have witnessed and participated in countless activities in DSL over the years. Summer farmer's markets, winter and summer yard sales, Halloween parades, BOP activities, drama productions and a women's march are among them. Even Mayor Read has chosen to make a community presentation on the restructuring of the center City in the PFCM pavilion.

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Tim Palkovic dropped off at City Clerk's office

The PFCM Relocation

The Land use map on page 47 titled “Land Use” graphically shows the remote location of the proposed PFCM. This alone shows the undesirable proposed location of the PFCM. No mention is made of the PFCM just 1 city lot from the sewage treatment pools. Nor is any mention made of the need for odor abatement.

Page 39 also mentions that the ground water is contaminated at the Green street site, and that the building needs asbestos abatement. These last two issues are not significant but they, along with the war bunker appearance of the building contribute to make the site unappealing. The odor and the relative remote location, however remain significant issues.

One Way Durkee Street

The large apartment building already will limit activity in the DSL by blocking vehicles and pedestrians from the north. Furthermore the one way traffic on Durkee Street will limit vehicular traffic entrance only to the south end of the proposed privately owned DSL lot.

Safety of angled parking on the proposed one way traffic reconfiguration of Durkee Street is a safety hazard. It limits traffic on the street and service trucks will block traffic when unloading. Angled parking on a narrow one way street creates the hazard of reversing cars backing into oncoming traffic.

Demographics of Prime LLC tenants

The DGEIS does not directly address demographics of potential tenants. This omission is the source of much speculation. In one example, my Ward 4 counselor, Peter Ensel, has stated in a conversation with me that tenants of the new building may come from Burlington – workers who find housing on the other side of the lake too expensive. It would be reasonable to expect that people who work in Burlington, where a wide variety of stores are available, and the state sales tax is lower (non-existent for clothing) would do their shopping there, before returning to Plattsburgh to sleep. Others have other ideas of the income level of likely tenants for the Prime building. There is not any reliable data. I have heard from personal sources that an annual salary of \$70,000 is suggested to afford a \$1000 a month one bedroom apartment. The speculation is that the Prime LLC units will bring new wealth to the city based on these these tenant projections. This is speculation.

Page 175 states that median household income in the city is just over \$43,000. The household income in larger Clinton County is reported as \$59,000. These figures are used to estimate household spending in table 52, page 176. But no reference is made to the income level necessary to rent the units in the Prime building. New household spending, Table 52, Page 176, is estimated as 1 1/3 million dollars per year in the City of Plattsburgh but the graph fails to mention that most goods and services are not located in the City but in the Town of Plattsburgh. For example the city does not have a department store, clothing store or a movie theater. Furthermore, none of the services except for the NCFCo-Op, listed in the graph exist in city core.

“Strong Towns” Recommendations

No reference is made to current thinking in *Strong Towns, A Bottom up Revolution to Rebuild American Prosperity* by Charles L. Marohn, Jr.. *Strong Towns* proposes, as a guiding principle, that small projects are better than large ones because the risk of failure in a smaller project is not potentially

devastating. On the other hand a successful outcome of a small project will indicate the direction of other future projects. Large projects create large risks. If a large building fails to attract tenants that can afford the rental fees the city will suffer the consequences.

The assumption of the DGEIS report is that the Prime LLC building will create wealth by the tenant spending and management of the new building, which it may, if it attracts tenants as anticipated. But even so the spending will take place in the town of Plattsburgh, not the City. Furthermore, the building itself, as *Strong Towns* emphasizes, is a *liability* not an asset:

1) The DGEIS PILOT program excuses city land and school taxes on a prorated schedule for 20 years. (The schedule is reported on page 24.)

2) The land will be sold to Prime LLC for one dollar

3) The water and sewage services are a City liability

4) The upgrade and maintenance of surrounding walkways and street spaces are the responsibility of the City

5) Rental payment does not stay in the City; it will be paid to an absentee landlord, Prime LLC, an Albany based firm that is publicly traded on the stock exchange.

6) The chart on page 173 states that the Prime LLC building will require \$71,509.24 annually in municipal service expenditures.

7) New construction appears to be an asset when new, but in time will need repair and refurbishing. In 20 years, when the pilot program runs out the building will need to be refurbished and likely need a new roof. It will fall to the city to make these upgrades or demolish the building if the Prime LLC abandons its support of refurbishing.

Parking and Business During DSL Reconfiguration

The study makes no definitive statement of the adverse effect of the metered parking system on downtown employees, downtown residents and retail parking. Nor does the DGEIS mention the metered parking system that was installed and then removed when the malls went in on upper Cornelia Street in the Town of Plattsburgh. Page 164 specifically states that a kiosk managed paid parking system is under consideration by the Common Council. Page 152 states that no decision has been made on parking management downtown.

Under the current system, SAD, fees are assessed from property owners in the appropriate districts. This system was established in the 1950s as stated on page 158. The proposed change of the DSLMUD is the reason for the renewed discussion at the present time. Table 39, page 162 shows the Prime LLC building will essentially displace all of the public parking spaces in the DSL to other sites in the City. Furthermore the construction of 289 parking spaces will require a significant investment of time and material and expense to replace the parking spaces that the City has now in the DSL. The DSL serves the City now and will continue to do so into the future if it is not demolished and replaced by the Prime LLC building.

A significant problem with DSL reconfiguration is not directly stated in the DGEIS report. Table 5 Construction Activities and Sequencing page 42 shows that the demolition and reconstruction of the DSL will take 18 months, from June 2020 to December 2021. During this time access to downtown will be severely limited because of the loss of the DSL parking spaces. Businesses downtown do not operate on such a high profit margin that they can take a hit of diminished patrons for a year and a half. Further restrictions by signage and parking kiosks will not solve the problems of limited parking by eliminating 289 parking spaces demolished in the DSL. The parking space shortage may exist for

years until all of the new spaces are constructed. The DSL now contains sufficient spaces for parking without further building. Why not leave the DSL essentially as it is?

The Glens Falls National Bank Building Demolition

An urgent issue is the proposed demolition of the Glens Falls National Bank building and replacing it with a parking lot. Table 5, page 42 indicates that the demolition is scheduled to begin in January 2020. The DGEIS, ironically, makes no mention of the environmental impact of the demolition of this building. How much will it cost to take away the material from the demolished bank building? Where will it be dumped? The *Small Towns* by Charles Marohn, cited earlier, emphasizes the advantages of remodeling and reclamation of existing buildings.

Reclaiming the Glens Falls National bank building as a condominium building or apartment building would be a good service to the city. It sits on the axis of the Westelcom Park running between Margaret and Durkee Streets. It would require far less expense than new construction and already has attached parking spaces that can be used for tenants.

Page 24 quotes from the May 25, 2017 NYS Plattsburgh awards booklet that the award for the DSL "...*may* include approximately 45 residential units..." The Glens Falls National Bank building is attractive and sits on a grassed parkland. It is an ideal building for modification and reuse. The modification of the Glens Falls National bank building is one of many options other than a 115 unit Prime LLC building in the DSL, is also more conservative, therefore potentially less of a financial risk.

Conclusion

The DGEIS presents information in an orderly and comprehensive manner. The narrative presents facts for the development of the Durkee Street lot and spillover effects for the central City. Yet different conclusions can be made from the presentation. All of the issues of the DGEIS stem from the large Prime building. Four exhibits, sited previously in this narrative are chosen to highlight the potentially devastating social and economic impact to the City:

Page 20 Figure 2 Durkee Street Mixed Use Development

Contrary to the Site plans title, the DSL revision is not mixed use but is dominated by a large privately owned apartment building with parkland reduced to only four trees. How does this fit the spirit of the awarded grant?

Page 42 Table 5 Construction activities and Sequencing

The chart shows that the redevelopment of the DSL will take 18 months, restricting automobile traffic in the City core by eliminating 289 spaces during construction with devastating impact on businesses in the City core.

Page 105 Downtown Area Improvement Projects

The map graphically shows the proposed remote, and therefore undesirable location of the PFCM.

Page 162 Table 39: Public Parking Projects

The current 289 spaces of the DSL will be distributed throughout the City but at great expense and for what good purpose?

The City is in a healthy if fragile economic position. The proposed five story 200,000 SF Prime LLC building on the DSL will harm the City.