

# Plattsburgh



STATE UNIVERSITY OF NEW YORK

## CENTER FOR EARTH AND ENVIRONMENTAL SCIENCE

132 Hudson Hall

101 Broad Street  
Plattsburgh, NY 12901-2681  
Tel: (518) 564-2028  
(877) 554-1041  
Fax: (518) 564-5267

December 20, 2019

Plattsburgh City Clerk,

Please accept my comments on the DGEIS for the City of Plattsburgh DRI projects. My comments represent my own thoughts and not those of SUNY Plattsburgh (where I work) or the City of Plattsburgh Planning Board (on which I serve). However, I am a professional environmental and urban planner with more than two decades of professional planning experience.

**The DGEIS does not provide adequate information to make a determination of no significant adverse impact from the DRI projects.** I will outline deficiencies in six key areas. These areas should be addressed prior to any City action/declaration on the DGEIS.

**1. The DGEIS does not adequately address impacts to community character.** At several points the DGEIS states that various DRI projects will not impact community character (e.g. Table 3, page 9), yet the document provides **no evidence** to support this claim. The DGEIS seems to take the approach that community character is felt and observed through architecture and building materials. While these physical attributes can contribute to community character they are small factors among many others that give a place its "placeness." Community character is not only visual and physical. Community character has qualitative components as well, and methods exist for studying these factors. Interviews, surveys and focus groups all help planners understand local residents' perspectives on community character as well as preferences for future development. Yet none of these are included in the DGEIS. Without them a statement such as "no significant adverse impacts to... community character... are anticipated" are unsubstantiated. My comment pertains to the DLMUD most directly. The project is the largest new development in the downtown core in recent history. It displaces our farmer's market, central parking lot, and view of the Saranac River Greenbelt. Yet the DGEIS glosses them over. Rather than state that no significant impacts will occur, a more honest statement may be something akin to, "*while impacts will occur, we believe that on balance the impacts are more positive than negative*" followed by supporting evidence to this point. Additionally, there is clear evidence that many in the community believe these projects will damage Plattsburgh's community character. North Country Public Radio has run several stories on this controversy. Consequently, ignoring the data-- which to all other stakeholders is in plain site-- is disingenuous and damages the credibility of the entire DGEIS. Furthermore, impacts to community character do not only come from the construction of new buildings. The proposed parking lots will also have impacts on community character, as vehicles and parking will be much more visible along Margaret, Oak, and Division Streets. The DGEIS provides modeled elevation images of the DLMUD building that allows residents to assess its visual impacts, but does not

provide modeled elevation images of the new parking areas so we are unable to assess the impacts of these projects. These images, as well as further assessment of community members' perspectives and preferences regarding impacts to community character, should be included in the DGEIS before we are able to ascertain whether these projects will have adverse impacts.

**2. The DGEIS does not adequately address transportation routing, connectivity, parking and bikeability.** The new transportation routing plans do not provide adequate information to assess vehicular traffic patterns/impacts. Additionally, the DLMUD includes vagueness about the types of shopping, retail and restaurant enterprises that might occupy the new commercial spaces in DLMUD, and therefore it is impossible to assess whether the parking infrastructure is adequate. Restaurants require additional parking on top of those required for retail/commercial space, and it is unclear if the current parking spaces allotted fulfill these requirements because the plan is not clear on the specific establishments that might occur in the development. Furthermore, some portions of downtown have bike lanes (Durkee Street included) while others do not. Does the DRI plan include on-street bike lanes, and how will new traffic patterns and connectivity impact current on-street bikeability? Many portions of the DGEIS state that "bike infrastructure" will be included, but the plan is not clear on what this means. Does this mean bike racks? Lanes? Signage? These questions must be answered before making a determination of environmental impacts.

**3. The DGEIS does not provide adequate information to make a determination of no significant adverse impact to fiscal/economic conditions.** The DGEIS provides estimates of the numbers of residents and jobs that might be generated by the DRI projects, but fails to consider what may occur in Plattsburgh if these irreversible projects are not as successful as intended or are unmaintained over time. What will be the economic impact of an underutilized DLMUD? What will be the impact if housing and business occupancy goals are not met? Historically, development projects have struggled to realize their full potential in Plattsburgh, and evidence to support the conclusion that these projects will be different has not been provided. Unfortunately, on this point we are left to take the project applicants and City at their word. There is some probability that portions of DLMUD site sit vacant for periods of time, struggle to fill or experience a high rate of turnover. Yet, the DGEIS does not provide adequate information to assess the probabilities of risks/rewards, and therefore informed decision making is impossible.

**4. The DGEIS does not adequately assess energy and energy economic impacts to the community.** Plattsburgh has a municipal lighting department (PMLD) and is a member of NYS's preference power program. Consequently, as long as the community's collective electricity consumption remains below our specified limit our rates are extremely low. If we surpass the limit PMLD must purchase power on the open market and all consumers' rates increase. The DGEIS does not provide evidence that the additional and collective energy consumption from the DRI projects will not impact our current electric rates by: a) keeping us at or near current consumption levels; or b) placing us in a situation in which the projects push us into the excess consumption range more frequently. A more comprehensive energy and energy efficiency analysis, including an analysis of future electric rates, must be completed before a determination of impact can be made.

**5. The DGEIS fails to adequately describe the irreversible commitment of resources associated with the DRI project.** The DLMUD represents an irreversible commitment of a large, publically owned property in the downtown core, yet the land base and natural resources of the site are not discussed in this portion of the plan (page 201). Once this project is constructed it is likely that the City will never regain the Durkee Lot space or another site with similar centrality in the downtown center. Yet, a comprehensive benefit-cost analysis of the project has not been conducted. Prior to assessing the impact of this irreversible commitment of land and other

resources, and prior to comparing the preferred alternative to others, a comprehensive ecosystem-services based benefits-cost analysis should be conducted. This relates to my final point below.

**6. The alternatives included in this DGEIS are hollow.** They do not represent the range of reasonable options for the site, nor do they represent the range of opinions in the community over the private vs. public benefit created by this project. Instead, the alternatives included simply play at the margins of the same basic development program. If this project were completed with 100% private investment the current range of alternatives might be acceptable. However, the project includes significant public funds, allocated to the community for the purpose of creating wide community benefits. Throughout the DRI planning process the public discussed a much broader range of ideas for the Durkee Lot and a long-term benefit-cost analysis of these proposals was not conducted. This is vital information to have. The current plan at Durkee does-- for all intents and purposes-- irreversibly commit the largest area of undeveloped public space in the city center for the medium term future (at least 30-75 years I'm guessing). Yet, there are alternative visions within the community of how this space could be used, and the current DGEIS does not acknowledge them. This ignores community members' requests for "eyes wide open" and evidence-based decision making. Rather than three alternatives that represent the same basic outcome, the DGEIS should include alternatives that represent a range of public-to-private benefits and public-to-private uses so that stakeholders can accurately assess the benefits and losses of all potential uses of the site. Scenario planning methodologies provide a roadmap for this type of analysis.

Sincerely,

A handwritten signature in black ink, appearing to read "Curt Gervich". The signature is fluid and cursive, with a large initial "C" and "G".

Dr. Curt Gervich  
185 Cornelia Street.  
Plattsburgh NY 12901

