

# *Final Generic Environmental Impact Statement (FGEIS)*

## *City of Plattsburgh*

### *Downtown Area Improvement Projects*

#### **Clinton County, New York**

**Location:**

City of Plattsburgh

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## TABLE OF CONTENTS

1.0	INTRODUCTION .....	1
1.1	Coordination under SEQRA .....	1
1.2	Summary of the FGEIS.....	1
2.0	PROJECT SUMMARY .....	2
2.1	Modifications to the Proposed Project Since Issuance of the DGEIS.....	5
2.2	List of Involved and Interested Agencies .....	7
2.3	List of Approvals and Permits Required .....	8
2.4	Statement of Project Purpose and Need .....	10
2.5	Environmental Effects of the Project Modifications .....	10
2.6	Summary of Potential Significant Adverse Environmental Impacts and Mitigation Measures .....	19
2.7	Comparison of Project Alternatives .....	23
3.0	LIST OF ELECTED OFFICIALS, ORGANIZATIONS, AND INDIVIDUALS WHO COMMENTED ON THE DGEIS.....	27
3.1	Commenters at the DGEIS Public Hearing.....	27
3.2	DGEIS Comment Letters Received .....	27
4.0	RESPONSE TO COMMENTS .....	27

## LIST OF TABLES

Table 1:	List of Involved and Interested Agencies .....	7
Table 2:	Required Approvals and Permits.....	8
Table 3:	Existing and Future Publicly Accessible Parking Supply within SAD .....	11
Table 4:	Observed Vacant Public Parking Spaces within SAD on Weekdays .....	12
Table 5:	Existing and Future Parking Utilization .....	12
Table 6:	DLMUD - Estimated School-Age Children in Public Schools.....	13
Table 7:	2019-2020 PCSD Budget Functions.....	14
Table 8:	Net School Impact .....	15
Table 9:	New Household Spending .....	16
Table 10:	Annual Economic Impact of New Household Spending, City of Plattsburgh .....	16
Table 11:	DLMUD - Direct and Indirect Jobs, Wages, and Expenditures .....	17
Table 12:	DLMUD - Direct and Indirect Jobs, Wages, and Expenditures within the City of Plattsburgh ....	17
Table 13:	Summary of Potential Significant Adverse Environmental Impacts and Mitigation Measures ..	19
Table 14:	Comparison of Project Alternatives .....	23
Table 15:	Anticipated Total SAD Public Parking Spaces – During DLMUD Construction .....	69
Table 16:	Parking-related Information Per Project Site.....	75
Table 17:	Parking within 1/8-mile Radius of County’s Department of Social Services (DSS) .....	76
Table 18:	DLMUD - Estimated School-Age Children in Public Schools.....	86
Table 19:	DLMUD - Estimated School-Age Children in Public Schools.....	87
Table 20:	2019-2020 PCSD Budget Functions.....	87
Table 21:	Net School Impact .....	88

Table 22: New Household Spending ..... 90  
Table 23: Annual Economic Impact of New Household Spending, City of Plattsburgh ..... 90  
Table 24: DLMUD - Direct and Indirect Jobs, Wages, and Expenditures ..... 96  
Table 25: DLMUD - Direct and Indirect Jobs, Wages, and Expenditures within the City of Plattsburgh .... 97

**ACRONYM GLOSSARY**

**APPENDICES**

- Appendix A: State Environmental Quality Review Information
- Appendix B: Public Comments on the DGEIS
- Appendix C: Revised and New Figures
- Appendix D: Correspondence
- Appendix E: Governmental Immunity Test
- Appendix F: Parking Related Information
- Appendix G: Community Engagement Summary
- Appendix H: Clinton County’s SEQRA review - Government Center Parking Lot

### Acronym Glossary

ACM	Asbestos Containing Material
APE	Are of Potential Effect
APMPP	Arnie Pavone Memorial Parking Plaza
BID	Business Improvement District
BSMPL	Broad Street Municipal Parking Lot
BSPI	Bridge Street Parking Improvements
CCIDA	Clinton County IDA
CRIS	Cultural Resource Information System
DLMUD	Durkee Lot Mixed-Use Development
DPHD	Downtown Plattsburgh Historic District
DRI	Downtown Revitalization Initiative
DRP	Durkee Lot Redevelopment Plan
DRSI	Durkee Street Reconfiguration and Streetscape Improvements
DSMPL	Durkee Street Municipal Parking Lot
EIS	Environmental Impact Statement
FRB	Financial Restructuring Board
GEIS	Generic Environmental Impact Statement
GML	General Municipal Law
ICV	Investors Corporation of Vermont
IPAC	Information for Planning and Consulting system
ITE	Institute of Transportation Engineers
LOS	Levels of Service
LPC	Local Planning Committee
LWRP	Local Waterfront Revitalization Program
MLD	Municipal Lighting Department
NYCRR	New York Codes, Rules and Regulations
NYS	New York State
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
NYSDOS	New York State Department of State
NYSDOT	New York State Department of Transportation
NYSEG	New York State Electric and Gas Corporation
NYSESD	New York State Empire State Development Corporation
NYSOPHRP	New York State Office of Parks, Recreation and Historic Preservation
PCSD	Plattsburgh Central School District
PFCM	Plattsburgh Farmers' and Crafters' Market
PILOT	Payment in Lieu of Taxes
PPAC	Plattsburgh Parking Advisory Committee
PUD	Planned Unit Development
RI	Remedial Investigation

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ROD	Record of Decision
SAD	Special Assessment District
SEQRA	State Environmental Quality Review Act
SHPO	State Historic Preservation Office
SIP	Strategic Investment Plan
SMP	Site Management Plan
SPDES	State Pollution Discharge Elimination System
SRTG	Saranac River Trail Greenway
SSESC	Standards and Specifications for Erosion and Sediment Control
SVOCs	Semi-Volatile Organic Compounds
SWPPP	Stormwater Pollution Prevention Plan
USFWS	US Fish and Wildlife Service
UTEP	Uniform Tax-Exempt Policy
VOCs	Volatile Organic Compounds
WFP	Water Filtration Plant
WPI	Westelcom Park Improvements
WRRF	Water Resource Recovery Facility

## 1.0 INTRODUCTION

### 1.1 Coordination under SEQRA

This Final Generic Environmental Impact Statement (FGEIS) has been prepared in compliance with Article 8 of the New York State (NYS) Environmental Conservation Law, the State Environmental Quality Review Act (SEQRA), and its implementing regulations at 6 NYCRR Part 617. The FGEIS has been prepared at the request of the City of Plattsburgh Common Council, acting as Lead Agency for the environmental review of the Project.

In accordance with the New York State Environmental Quality Review Act (6 NYCRR Part 617), the following elements of the SEQRA process have been undertaken:

- The City of Plattsburgh Common Council (hereafter, “Common Council”) was designated as Lead Agency for this action on June 6, 2019.
- A public scoping session was held on August 22, 2019 at which time the public was given the opportunity to comment on the proposed contents of the DGEIS. A Final Scoping Document was adopted by the Common Council on September 5, 2019 (see Appendix A of the DGEIS) that outlined the potential significant impacts to be analyzed in the DGEIS. Upon adoption of the Final Scope, the DGEIS and associated plans, reports, and studies were prepared.
- The Common Council declared the DGEIS complete for public review and circulation on November 21, 2019. The DGEIS and Notice of Completion were duly circulated to all involved and interested agencies. The DGEIS was also posted on the City’s website. A Notice of Acceptance of Draft GEIS and Public Hearing was published in the Environmental Notice Bulletin (ENB) on December 4, 2020 (see Appendix A of the DGEIS). In accordance with Section 617.9(b)(7) of the SEQRA regulations, this FGEIS incorporates by reference the DGEIS dated November 21, 2019, and all supporting appendices.
- A public hearing allowing for public comment on the DGEIS was held by the Common Council on December 9, 2019. The public comment period remained open through December 23, 2019. Copies of the transcript from the public hearing and the written comments received on the DGEIS are provided in this FGEIS as Appendix B, respectively.

### 1.2 Summary of the FGEIS

The FGEIS includes the following:

- Section 2.0 of the FGEIS includes the project summary and clarifications, including changes that have occurred since issuance of the DGEIS and the implications of these changes on the conclusions presented therein.
- Section 3.0 of the FGEIS identifies commenters.
- Section 4.0 of the FGEIS contains all substantive comments regarding the Project received at the DGEIS public hearing and during the DGEIS comment period, and a response to each comment.

Comments are generally organized according to the structure of the DGEIS. Where applicable, similar comments have been grouped together with the initial comment presented and attributed to an individual or organization with additional commenters cited. This allows for a comprehensive response to the issue.

- The Appendices include the public hearing transcript, copies of all written comments received regarding the DGEIS, revised Figures from the DGEIS as well as reports and data referenced in the responses.

The accepted DGEIS in its entirety is incorporated by reference into this FGEIS.

## 2.0 PROJECT SUMMARY

The City of Plattsburgh is undertaking a series of revitalization efforts that are collectively described as Downtown Area Improvement Projects (collectively, the “Action” or “proposed projects”). The Downtown Area Improvement Projects are planned on City-owned property, and generally consist of infill development, parking and streetscape enhancements as well as related improvements. A total of eight projects are proposed; four of the eight projects were conceptually identified in the City’s successful Downtown Revitalization Initiative (DRI) application and Strategic Investment Plan (SIP) to New York State (“NYS”), the balance are planned by the City to complement this investment.

### *NYS Downtown Revitalization Initiative*

The City of Plattsburgh was selected by NYS to receive a DRI award in 2017. The DRI is an initiative conceived by Governor Cuomo and funded by NYS to improve the vitality of urban centers throughout the State. The City received its DRI award during the first round of DRI funding allocations and secured \$10 million in public funding for a series of projects “because strong and sustainable job growth in the region has increased the demand for housing and retail opportunities in the downtown.”

Under the DRI, Plattsburgh proposes to build on recent public and private investments, including a new municipal marina, streetscape improvements, and the renovation of historic buildings to create a vibrant downtown that serves the needs of local employees, residents, students, and visitors. The focus will be on mixed-use infill development, a greater variety of retail and housing, expansion of the successful Farmers’ Market, and providing an enhanced connection to the waterfront.”<sup>1</sup> The DRI intends to advance downtown revitalization through transformative, economic development, transportation, and community projects that will attract and retain residents, visitors and businesses - creating dynamic neighborhoods where tomorrow’s workforce will want to live, work, and raise a family.

Upon receiving notice of selection as a DRI Community, the City organized a Local Planning Committee (LPC) comprised of residents, civic leaders, and business owners to lead a planning process and create a unified vision for the role that DRI investment should play in building Plattsburgh’s future. The City was assisted by a consultant team. The LPC guided extensive community engagement, including four public events. This process worked to identify priority investments in Downtown that would form the basis for

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<sup>1</sup> “Downtown Revitalization Initiative, North Country – Plattsburgh.” New York State Downtown Revitalization Initiative. *New York State*. <https://www.ny.gov/downtown-revitalization-initiative/north-country-plattsburgh>. Webpage accessed July 23, 2019.



a SIP. The State's DRI process required the City to evaluate a variety of downtown improvements (as identified in the application) and their potential benefit to advancing the City's vision for revitalizing downtown. NYS subsequently reviewed the SIP, selected a series of projects from the SIP for funding which were deemed to best serve the goals of the DRI, and notified the City of its decision. The City then entered into several separate contracts with multiple NYS agencies to fund the selected projects. Not all projects included in the SIP were selected for DRI funding.

Several of the projects awarded DRI funding are also anticipated to receive additional funding from other sources. The Downtown Area Improvement Projects are as follows: (Note: Projects marked below with an asterisk (\*) were included in the DRI).

- Durkee Lot Mixed-Use Development (DLMUD)\*

A multi-story mixed-use development by Prime Plattsburgh, LLC (Prime). Prime was selected as the preferred developer of the DLMUD and proposes a five-story, approximately 200,000 square foot (SF) mixed-use development including approximately 115 apartments (comprised of 52 one-bedroom units, 59 two-bedroom units, and 4 three-bedroom units), 10,000 SF of commercial space, an 86-space surface parking lot featuring approximately 50 spaces to be made available for use by the public<sup>2</sup>, a 35-space surface parking lot for tenants, and a 165-space underground parking garage for tenants only. Additionally, the project proposes the rehabilitation of the existing Plattsburgh Farmers' and Crafters' Market (PFCM) building for use as a 3,400 SF commercial space and a 2,400 SF, publicly-accessible civic space in an open-air pavilion with access from the new pedestrian walkway to be constructed as part of the DLMUD.

The DLMUD would replace the existing 289-space Durkee Street Municipal Parking Lot (DSMPL) located at 22 Durkee Street. The proposed project encompasses approximately 2.8 acres and is located on a portion of tax parcel 207.20-7-15. A second tax parcel, 207.20-7-14, was recently merged with parcel 207.20-7-15 and the proposed project will occupy a portion of the former footprint of tax parcel 207.20-7-14 as well.

Tax parcel 207.20-7-15 currently contains 289 public parking spaces within the DSMPL, approximately 59 public parking spaces in the Broad Street Municipal Parking Lot (BSMPL, described below), the Gateway Office Building and its associated two-story parking structure, the PFCM building, and a pedestrian walkway along the Saranac River. The proposed DLMUD will replace the DSMPL and rehabilitate the PFCM building. The Gateway Office Building and its associated two-story parking structure (collectively, the Gateway Complex) will remain. Access to the new development will be primarily from Durkee Street, with underground parking access from Bridge Street.

Previous development of the site was completed under a General Municipal Law (GML) Redevelopment Plan. The Redevelopment Plan provided incentives to the developer at that time in order to achieve the City's goal of eliminating blight. The Redevelopment Plan and associated tax incentives will be terminated by the Common Council. The DLMUD will require two Special Use Permits from the City's Zoning Board of Appeals (ZBA): 1) to amend boundaries of an existing

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<sup>2</sup> The Development Agreement between Prime and the City stipulates that no fewer than 30 spaces must be made available for use by the public. The DLMUD is anticipated to feature approximately 50 spaces to be made available for use by the public.

Planned Unit Development (PUD) and 2) to allow apartments on the first floor of a multistory building within a PUD. The project will also require Planning Board approval for a minor subdivision to subdivide the site from the Broad Street Municipal Parking Lot; for internal subdivision of and amendments to the proposed PUD; and for Site Plan Approval.

- Saranac Riverwalk (Riverwalk)\*

Complementing the proposed DLMUD, the City is also undertaking the design and construction of a Riverwalk along the Saranac River to replace the existing pedestrian walkway. The Riverwalk will be located on tax parcel 207.20-7-15 at the top of the western bank of the Saranac River between Bridge and Broad Streets. The Riverwalk will also occupy a portion of the former footprint of tax parcel 207.20-7-14. The Riverwalk will contain a walkway with an overlook and landscape plantings that will accommodate pedestrians. It will provide connectivity to MacDonough Park to the north via a crosswalk over Bridge Street, and to the Saranac River Trail and Greenway (SRTG) to the south via a path to be constructed between the Gateway Complex and Broad Street that will connect to the existing sidewalk at the intersection of Broad and Durkee Streets. The approval for internal subdivision of the PUD required from the Planning Board will separate the footprint of the Riverwalk from that of the DLMUD;

- Durkee Street Reconfiguration and Streetscape Improvements (DRSI)\*

This project involves the reconfiguration of Durkee Street from two-way traffic to one-way, northbound traffic with streetscape improvements (wider sidewalks, street tree plantings, pedestrian lighting, transformer art covers) and the establishment of public parking spaces (angled and parallel on-street parking) on Durkee Street between Broad and Bridge Streets.

- Westelcom Park Improvements (WPI)\*

The City has proposed improvements to the existing Westelcom Park, transforming the park to meet current needs and improve connectivity to downtown. The park is located across the street from the proposed DLMUD on tax parcels 207.82-1-12, 207.82-1-13, 207.82-1-14, and 207.82-1-15 totaling approximately 0.55 acres in size. The redesign will result in a multi-tiered park that will include sculpture areas, a water feature, a plaza, bicycle infrastructure, and pedestrian walking areas with landscaping throughout. An existing, aged, 15-inch sewer line will be replaced and relocated within the project site with a new 15-inch sewer line to facilitate the proposed design;

- Bridge Street Parking Improvements (BSPI)

Streetscape improvements and approximately six new parallel, public, on-street parking spaces along the south side of Bridge Street between Durkee Street and the Veterans' Bridge;

- Arnie Pavone Memorial Parking Plaza (APMPP)

The City has committed to providing adequate replacement parking capacity in advance of redevelopment of the DLMUD by Prime. The former (and vacant) Glens Falls National Bank building and associated parking area located at 25 Margaret Street is considered a suitable location for a municipal public parking lot. The construction of the APMPP will require the demolition of the former bank building on tax parcel 207.19-3-15 (0.73 acres), which was purchased by the City in 2018. This Project will also necessitate the abandonment of an adjacent,

little-used City street (Division Street) and the incorporation of that street's footprint into the APMPP;

- Broad Street Municipal Parking Lot (BSMPL)

As noted, the City has committed to providing adequate parking capacity in advance of development of the DLMUD by Prime. The BSMPL is also considered a suitable area for public parking improvements. The 59-space BSMPL is located on a 0.72-acre part of tax parcel 207.20-7-15 to the south of Broad Street between Durkee Street and the Saranac River. The proposed improvements include minor expansion and restriping of the existing lot;

- Plattsburgh Farmers' and Crafters' Market (PFCM) Relocation and Expansion\*

The City proposes to relocate the PFCM from its current location, at 22 Durkee Street, to 26 Green Street. The relocated PFCM will operate in one of the former Plattsburgh Municipal Lighting District (PMLD) buildings, previously known as Building 4, located on part of tax parcel 207.20-1-1 within the City's Harborside Area near Green Street and Dock Street. The building proposed for the relocated PFCM is a slab-on-grade metal-framed building with metal siding and a sloped metal roof. The building is anticipated to be rehabilitated and additional improvements are to be completed to allow for future expansion of the PFCM. Also, the existing paved area, providing access from Green Street, will be reconfigured to provide parking, passive open space, and a pavilion area.

The proposed projects require the approvals and permits identified in Table 2 in Section 2.3.

## 2.1 Modifications to the Proposed Project Since Issuance of the DGEIS

The following minor changes to the proposed projects have occurred since issuance of the DGEIS as part of project refinement:

- Durkee Lot Mixed-Use Development (DLMUD): Since the acceptance of the DGEIS, it has been determined that an Article 15 Permit from the New York State Department of Environmental Conservation (NYSDEC) will be required for the DLMUD. The Saranac River is classified as Class C stream with a standard of C(TS) (trout spawning) by the NYSDEC. Accordingly, the river is regulated by the NYSDEC under Article 15 and a permit is required for regulated activities that disturb the bed or banks of the River. As part of the DLMUD project, one stormwater outlet will be installed within the bank of the River. Therefore, an Article 15 permit is required, and Table 2 in Section 2.3 of the FEIS has been updated. The stormwater outlet will be installed above the ordinary high-water line and the outside of the special flood hazard area or 100-year floodplain; therefore, no wetland or floodplain permits are anticipated to be required;

An updated conceptual plan (updated DGEIS Figure 2) has been included to show recent design updates to the pedestrian corridor that shows a curvilinear corridor connection in place of the previously shown straight corridor connection. Updated renderings (updating Figures 20 and 21) are included to demonstrate recent design adjustments to the façade. This updated figure and the renderings are provided in Appendix C.

- Durkee Street Reconfiguration and Streetscape Improvements (DRSI): Previously the DGEIS (Section 1.2 page 4) indicated that 43 additional spaces would be constructed as part of the

conceptual plan, but more recent detailed engineering analysis has determined that approximately 38 additional spaces may be constructed for a total of 53 spaces;

- Westelcom Park Improvements (WPI): An updated conceptual plan for the WPI project has been included which includes an Americans with Disabilities Act (ADA) compliant walkway featuring a less than 5% slope as shown on updated DGEIS Figure 7 included in Appendix C.

In addition, the City recently determined that the Westelcom Park was not included as part of the PUD approved in 2005. Accordingly, the Westelcom Park is not subject to the Special Use Permit approved on January 20, 2004 as was stated in Section 3.1.1.2 (page 71) in the DGEIS. The City currently maintains Westelcom Park and will continue to maintain the park in the future. The DGEIS PUD Boundary – Existing and Proposed (Figure 3) has been updated to remove Westelcom Park from the area described as the PUD and is included in Appendix C.

Lastly, as there are four existing public parking spaces at Westelcom Park, it has been determined that the WPI would result in the displacement of these parking spaces;

- Arnie Pavone Memorial Parking Plaza (APMPP): Based on a recent survey completed for the project site, the City determined that the project site was smaller than was originally understood. Therefore, an updated conceptual plan for the APMPP project has been included which proposes 103 parking spaces. Previously the DGEIS indicated that 109 parking spaces would be constructed. The handicap accessible parking has been designed along the southern edge as parallel parking to maintain sufficiently wide drive lanes within the proposed parking lot. The sidewalk adjacent to the handicap spaces is required per the ADA and New York State regulations. The DGEIS APMPP concept plan (Figure 6) has been updated to show the revised layout and is included in Appendix C. It has also been determined that development of the APMPP would result in the loss of five parking spaces on the west side of Margaret Street between Brinkerhoff and Division Streets.

In addition, the City has determined that a 10-foot wide easement will be required from the adjoining Community Bank property to allow for construction and maintenance of a maximum eight-foot wide pedestrian sidewalk that would extend between four and five feet over the Community Bank property line. The easement will permit the City to temporarily close portions of the Community Bank parking lot to complete construction of the sidewalk and for occasional maintenance activities. Per the easement, the footprint of the sidewalk would not be allowed to encroach upon the existing parking in the Community Bank lot. The easement also grants the City the right to permanently relocate one of the overhead light poles within the Community Bank lot to a nearby location and to remove a chain fence along the northern border of the Community Bank lot;

- Broad Street Municipal Parking Lot (BSMPL): The DGEIS stated in Section 1.2 (page 4) and elsewhere that the improved BSMPL would add 22 parking spaces, but more recent detailed engineering analysis has determined that 21 additional spaces may be constructed for a total of 80 spaces. The DGEIS Concept Plan for the BSMPL (Figure 8) has been updated to show the revised layout and is included in Appendix C;
- Plattsburgh Farmers' and Crafters' Market (PFCM) Relocation and Expansion: The DGEIS stated in Section 2.2.8 (page 39) that a second entrance would be constructed to improve access to the

site; a second entrance is no longer being considered as part of the proposed action due to funding constraints.

No changes to the Riverwalk or BSPI have occurred since issuance of the DGEIS.

## 2.2 List of Involved and Interested Agencies

**Table 1: List of Involved and Interested Agencies**

<b>Involved Agencies</b>	<b>Interested Agencies</b>
<ul style="list-style-type: none"> <li>• City of Plattsburgh Common Council</li> </ul>	<ul style="list-style-type: none"> <li>• Clinton County Legislature</li> </ul>
<ul style="list-style-type: none"> <li>• City of Plattsburgh Planning Board</li> </ul>	<ul style="list-style-type: none"> <li>• New York State Office of Parks, Recreation and Historic Preservation (NYSOPRHP)</li> </ul>
<ul style="list-style-type: none"> <li>• City of Plattsburgh Zoning Board of Appeals (ZBA)</li> </ul>	<ul style="list-style-type: none"> <li>• New York State Electric and Gas Corporation (NYSEG)</li> </ul>
<ul style="list-style-type: none"> <li>• Clinton County Industrial Development Agency (CCIDA)</li> </ul>	<ul style="list-style-type: none"> <li>• Clinton County Highway Department</li> </ul>
<ul style="list-style-type: none"> <li>• Clinton County Planning Board</li> </ul>	<ul style="list-style-type: none"> <li>• New York State Department of Transportation (NYSDOT)</li> </ul>
<ul style="list-style-type: none"> <li>• New York State Department of Environmental Conservation (NYSDEC)</li> </ul>	
<ul style="list-style-type: none"> <li>• Empire State Development Corporation (ESDC)</li> </ul>	
<ul style="list-style-type: none"> <li>• New York State Department of State (NYSDOS)</li> </ul>	
<ul style="list-style-type: none"> <li>• New York State Office of Community Renewal (NYSOCR)</li> </ul>	

### 2.3 List of Approvals and Permits Required

**Table 2: Required Approvals and Permits**

Agency	Project	Approval/Permit
1. City of Plattsburgh Common Council	All Projects	<ul style="list-style-type: none"> <li>• SEQRA Determination</li> </ul>
	DLMUD, WPI, BSMPL	<ul style="list-style-type: none"> <li>• Termination of the pre-existing GML Redevelopment Plan for the Downtown Area and its related tax incentive</li> </ul>
	DLMUD	<ul style="list-style-type: none"> <li>• Disposition of City-owned property and related easements</li> </ul>
	APMPP	<ul style="list-style-type: none"> <li>• Abandonment of Division Street (\$295)</li> </ul>
2. City of Plattsburgh Planning Board	DLMUD, BSMPL	<ul style="list-style-type: none"> <li>• Minor Subdivision (\$300)</li> </ul>
	DLMUD	<ul style="list-style-type: none"> <li>• Site Plan Approval (§360, Article VI)</li> <li>• PUD Amendments (§360-21) and Subdivision</li> </ul>
	Riverwalk; DRSI; BSPI; APMPP; WPI; BSMPL; PFCM Relocation to Building 4 at 26 Green Street	<ul style="list-style-type: none"> <li>• Coordination for all Projects listed</li> </ul>
3. City of Plattsburgh Zoning Board of Appeals (ZBA)	DLMUD	<ul style="list-style-type: none"> <li>• Special Use Permit (§360-31)<sup>1</sup>: 1) Special Use Permit for amended boundaries to existing Planned Unit Development; 2) Special Use Permit for Apartments on the first floor of a multistory building within a Planned Unit Development</li> </ul>
4. Clinton County Planning Board	DLMUD; Riverwalk <sup>2</sup> ; BSMPL <sup>2</sup>	<ul style="list-style-type: none"> <li>• GML Referral (§12B-239)</li> </ul>
5. Clinton County Industrial Development Agency (CCIDA)	DLMUD	<ul style="list-style-type: none"> <li>• Payment in Lieu of Taxes (PILOT) approval</li> </ul>
6. City of Plattsburgh Department of Public Works (DPW)	DLMUD; Riverwalk; DRSI; BSPI	<ul style="list-style-type: none"> <li>• Highway Work Permit for Non-Utility Work</li> <li>• Highway Work Permit for Utility Work</li> </ul>

Agency	Project	Approval/Permit
7. New York State Department of Environmental Conservation (NYSDEC)	DLMUD	<ul style="list-style-type: none"> <li>• State Pollution Discharge Elimination System (SPDES) General Permit GP-0-15-002 for Stormwater Discharges from Construction Activities</li> <li>• Article 15 Permit</li> </ul>
8. New York State Office of Community Renewal (NYSOCR)	PFCM Relocation to Building 4 at 26 Green Street	<ul style="list-style-type: none"> <li>• Notice to Proceed with work</li> </ul>
9. New York State Office of Parks, Recreation and Historic Preservation (NYSOPRHP)	All Projects	<ul style="list-style-type: none"> <li>• Consultation pursuant to Section 14.09</li> </ul>

<sup>1</sup> Both Special Use Permit requests by the City will be included in a single application to the ZBA but will constitute two separate approvals.

<sup>2</sup> The Riverwalk and BSMPL are included here only insofar as their proposed footprints occupy lands involved in the subdivision actions related to the DLMUD. Individual approval of these projects by the Clinton County Planning Board is not required.

## 2.4 Statement of Project Purpose and Need

The Downtown Area Improvement Projects are being undertaken to support downtown revitalization in the City. Several of the projects are anticipated to receive funding through the State's DRI award to advance downtown revitalization through transformative housing, economic development, transportation and community projects that will attract and retain residents, visitors and businesses - creating dynamic neighborhoods where tomorrow's workforce will want to live, work, and raise a family. Those projects that are not funded by the DRI will receive funding through alternate sources (New York State Financial Restructuring Board (FRB) and/or the City's General Fund).

According to the DRI SIP, "the population living within Downtown has grown nearly 10% since 2000. By comparison, the City and County experienced 6% and 3% growth respectively during that same period. Moreover, major investments within the region by key industrial employers – including Norsk Titanium, Bombardier Transportation, and the Plattsburgh International Airport – are working to add jobs and improve opportunities for future residents, workers, and visitors." The overall DRI project is expected to bring in 500 temporary jobs, 100 permanent jobs, about \$11 million in downtown revenue, and result in a considerable increase in tax revenue, putting the City in a more fiscally sound position.

These projects are expected to bring in temporary and permanent jobs, downtown revenue, and improve the City's fiscal status. As a result of these projects, parking resources will be spread out more evenly throughout the downtown and allow easier access for a variety of users. The City's public and private partnership with Prime to develop the DLMUD will spur economic development on the underutilized property and is consistent with policies outlined in various public policies of the City. By replacing a parking lot with mixed-use development, the project will increase visibility and economic activity in this area of the downtown and bring attention to other riverfront resources like the SRTG.

## 2.5 Environmental Effects of the Project Modifications

As presented in Section 2.1, minor changes to the proposed public parking plans have occurred since issuance of the DGEIS as part of project refinement. These include changes to the site plans and/or parking plans for the DRSI, WPI, APMPP, BSMPL, and PFCM, in addition to minor changes in the requested actions for the APMPP, WPI, and DLMUD. As the project modifications would not result in changes to proposed building bulk or density, the conclusions of all density-based analyses (e.g., municipal utilities, traffic and transportation systems, and recreation and open space), in addition to the visual resources analysis, will remain unchanged. In addition, as the proposed modifications will not result in new ground disturbance outside of the areas identified in the DGEIS, the conclusions of the environmental contamination analysis remain unchanged.

### 2.5.1 Land Use, Community Character, Zoning and Public Policy

The proposed project would not result in significant adverse impacts to land use, community character, zoning, or public policy. The fact that Westelcom Park is not located in the PUD and that the proposed project will not require the removal of the park from the PUD does not alter the conclusions of the DGEIS. In addition, as discussed in greater detail in Section 2.5.3, while the proposed project would result in a minor reduction in the overall parking supply in the SAD, supply would continue to exceed capacity, ensuring that the existing residents, workers, and visitors to the area are not adversely impacted.



### 2.5.2 Aquatic and Natural Resources

The DGEIS concluded that the proposed project would not result in significant adverse impacts to aquatic and natural resources. Currently the DSMPL discharges stormwater to the Saranac River via a stormwater culvert without any outlet protection. As a result, the stream bank is severely eroded. As part of the DLMUD project, one stormwater outlet will be installed within the bank of the Saranac River, which is classified as Class C stream with a standard of C(TS) (trout spawning) by the NYSDEC. Accordingly, the River is regulated by the NYSDEC under Article 15 and a permit is required for regulated activities that disturb the bed or banks of the River. Therefore, an Article 15 permit from the NYSDEC will be required for the DLMUD. The installation of proposed stormwater management practices and adherence to the requirements of the NYSDEC Article 15 permit, no significant adverse impacts to aquatic and natural resources will occur.

### 2.5.3 Parking

As described in Section 2.1, above, several minor changes to the proposed public parking plans have occurred since issuance of the DGEIS as part of project refinement. These changes, in addition to known and anticipated future parking changes within the SAD that would occur with or without approval of the proposed project, are summarized in Table 3. As shown in the table, in total the future publicly accessible parking supply within the SAD is expected to decrease by a total of 20 spaces to 800. This represents a 2% reduction in the total parking supply.

**Table 3: Existing and Future Publicly Accessible Parking Supply within SAD**

	Existing Public Supply <sup>1</sup>	Future Public Supply	Change in Public Supply
DSMPL (existing) / DLMUD (future)	289	50	-239
BSMPL	59	80 <sup>2,3</sup>	+21
APMPP	0	103 <sup>3</sup>	+103
Westelcom Park <sup>5</sup>	4	0	-4
Clinton County Lot	0	69 <sup>2,4</sup>	+69
Court Street Lot	44 <sup>7</sup>	44 <sup>7</sup>	0
City Hall Place Lot	17 <sup>7</sup>	17 <sup>7</sup>	0
<b>Off-Street Totals</b>	<b>413</b>	<b>363</b>	<b>-50</b>
Durkee Street (Broad St. to Bridge St.)	15	53	+38
Bridge Street (Durkee St. to Peru St.)	32	38	+6
Court Street (north side from Margaret St. to Oak St.)	28	19	-9
Margaret Street (west side from Brinkerhoff St. to Division St.)	9	4	-5
<b>On-Street Totals (All Streets within SAD)</b>	<b>407</b>	<b>437<sup>6</sup></b>	<b>+30</b>
<b>Total On- and Off- Street Spaces</b>	<b>820</b>	<b>800</b>	<b>-20</b>

Notes: <sup>1</sup> Based on a parking supply survey conducted by the City of Plattsburgh's Community Development Office. <sup>2</sup> Includes one motorcycle space. <sup>3</sup> Reflects revised plan. <sup>4</sup> Reflects additional information provided by Clinton County subsequent to issuance of the DGEIS. <sup>5</sup> The four existing off-street parking spaces at Westelcom Park will be eliminated as part of the WPI. <sup>6</sup> The nine fewer spaces on the north side of Court Street between Margaret and Oak Streets are due to adjustments to the Clinton County Lot and the loss of five spaces on the west side of Margaret Street between Brinkerhoff and Division Streets is due to construction of the proposed APMPP. <sup>7</sup> Parking numbers reflect existing supply and have been updated to correct errors contained in the DGEIS.

To address the fact that the total parking supply within the SAD is expected to slightly decrease, public parking demand within the district was assessed to determine whether there would be an adequate parking supply in the future with approval of the proposed action. To determine the existing parking demand within the SAD, the City’s Community Development Office conducted 89 separate off-street parking lot counts of the City-owned lots and 32 separate on-street parking counts of the entire SAD. Of these, 43 off-street counts and 29 on-street counts were conducted during the work week over the course of 6 months at various times of the day. The remaining counts were conducted on weekends and the utilization rates observed during these weekend counts were considerably less than those observed during the week. The results of these extensive parking counts indicate an existing peak public parking demand of 542 spaces (with 278 available empty spaces) during the weekday 1:00 – 2:00 p.m. peak hour. The results of the 72 parking counts conducted during the work week are summarized in Table 4 below. The results of the parking counts conducted during the weekend are not included in Table 4.

**Table 4: Observed Vacant Public Parking Spaces within SAD on Weekdays**

Time	On-Street Vacant	Off-Street Vacant	Total Vacant Spaces
8:00 - 9:00 am	278	194	472
10:00 - 11:00 am	213	112	325
12:00 - 1:00 pm	199	112	311
1:00 - 2:00 pm	179	99	278
2:00 - 3:00 pm	212	99	311
3:00 - 4:00 pm	191	120	311
4:00 - 5:00 pm	243	173	416

Note: Because data collection efforts did not uniformly include the 9:00 – 10:00 a.m. and 11:00 – 12:00 p.m. time period, these were not included. Peak parking demand occurs early in the afternoon.

With 820 existing parking spaces within the SAD, this represents an existing public parking utilization rate of 66.1% (see Table 5).

**Table 5: Existing and Future Parking Utilization**

	Public Parking Supply	Peak Public Parking Demand	Available Public Parking Spaces	Public Parking Utilization
Existing	820	542	278	66.1%
Future	800	542	258	67.8%
Change	-20	No change <sup>1</sup>	-20	+1.7%

Notes:

<sup>1</sup> As indicated in the DGEIS, all the DLMUD’s parking demand could be fully accommodated on-site.

As described above and shown in Table 5, future publicly accessible parking supply within the SAD is expected to decrease by 20 spaces in the future with approval of the proposed action. No changes in public parking demand are anticipated, as all the DLMUD’s parking demand could be fully accommodated on-site. Therefore, as presented in Table 5, the public parking utilization within the SAD is expected to increase by 1.7% to 67.8% with approval of the proposed action, and there would continue to be more than 250 available public parking spaces during the weekday 1:00 – 2:00 p.m. peak hour, with more spaces available at other times of the day and on weekends. See Appendix F for the City’s SAD Parking Utilization Memorandum.

### 2.5.4 Fiscal and Economic Conditions

While, as noted above, no changes to the proposed project’s density or uses are proposed, an updated analysis of fiscal and economic conditions is provided below, which accounts for refined calculations received subsequent to the DGEIS, in addition to addressing public comments.

#### *Project Generated PCSD Costs*

The analysis included in Section 3.6 of the DGEIS used a single demographic multiplier to calculate the number of new school age children, regardless of residential unit size. The number of new school age children will vary based on bedroom count of new residential units and anticipated rental rates. According to Prime, rents on these market rates units are expected to start around \$1,200/month. Using a widely accepted methodology and demographic multipliers for New York State from Rutgers University, the increase in students per grade is predicted to be lower. Table 6 below presents the updated estimate of school aged children (Table 45 of the DGEIS) and shows that by using this more specific methodology the total number of new school age children will be approximately 22. This results in a projected average increase of 1.7 students per grade.

**Table 6: DLMUD - Estimated School-Age Children in Public Schools**

# Bedrooms	Number of Units	Multiplier for School-Age Children <sup>1</sup>	Number of School-Age Children
1-bedroom	52	0.08	4
2-bedroom	59	0.23	14
3-bedroom	4	1.0	4
<b>Total</b>	<b>115</b>		<b>22</b>

<sup>1</sup> “Residential Demographic Multipliers for NY,” Rutgers University, June 2006. All multipliers are based on multifamily developments with 5+ units in NYS. Multipliers for 1-bedroom units are based on rent of \$1,000+, 2-bedroom units are based on rent of \$1,100+, and 3-bedroom units are based on rent of \$1,250+.

Based on proposed rents and the type of development, it is reasonable to expect that these units will primarily attract young professionals, empty nesters, and retirees. Therefore, the number of new school age children may in fact be less than what is portrayed by the multipliers (which are based only on unit size and rent). However, for the new school aged children that will reside in the development, the intangible benefits of having more families with children in the community, some of which include increased household spending, balancing out the aging of the community, and strengthening the community’s fabric and levels of volunteerism, will outweigh the impact on school facilities.

To determine the fiscal impact of these new students, per pupil costs and revenue were calculated. Information from the 2019-2020 Plattsburgh City School District (PCSD) budget was used and specific school budget functions were identified that would be impacted by the addition of new students. In other words, fixed costs such as administrative and facilities costs that are not impacted by the number of students are not included in this analysis. These budget functions used are referred to as “variable” items and include the following budget functions: 1670, 1910, 2110, 2250, 2610, 2630, 2850, 2855, and 2870 (as cited within the PCSD budget). These nine variable budget functions and

their corresponding expenses are outlined in Table 7. Total variable costs for the school year equal \$19,764,236.

**Table 7: 2019-2020 PCSD Budget Functions**

<b>Budget Function</b>	<b>Expenses</b>
1670 (BOCES printing and copying)	\$53,959
1910 (student insurance)	\$113,600
2110 (instructional costs-salaries and supplies)	\$11,314,059
2250 (special education staff)	\$6,337,595
2610 (library supplies)	\$492,389
2630 (computer supplies)	\$1,005,958
2850 (co-curricular)	\$76,465
2855 (sports equipment)	\$360,211
2870 (supplies)	\$10,000
<b>Total Variable Expenses</b>	<b>\$19,764,236</b>

Dividing these expenses by the 1,790 current students reveals variable expenditures per student of \$11,041. The addition of 22 new students would result in \$239,931 new expenses to the PCSD.

For the purposes of this evaluation, we have assumed a simplified method of calculating state aid to the school district and used the current aid divided by the student population. Under this method, approximately \$11,061 is provided per pupil. The addition of 22 new students would result in an additional \$240,380 in annual state aid.

Based on these calculations, the per pupil revenue from state aid covers the per pupil expenses. Total new state aid of \$240,380 covers the new expenses of \$239,931- a flat net impact. Beginning in year 5, the school district will receive \$81,178 in PILOT revenue under the most recent schedule- a positive net impact of \$81,626.

Table 8 outlines these calculations, demonstrating the positive net impact.

**Table 8: Net School Impact**

Total Variable School Expenditures	\$19,764,236
Total School Enrollment	1,790
Expenditures per Student	\$11,041
New Students	22
New Expenditures	\$239,931
Total State Aid	\$19,801,172
Total School Enrollment	1,790
Per Pupil State Aid	\$11,062
New Students	22
Estimated New State Aid	\$240,380
New PILOT Revenue (Year 5)	\$81,178
New Expenditures	(\$239,931)
New State Aid	\$240,380
New PILOT Revenue	\$70,879
<b>Net Impact</b>	<b>\$81,626</b>

*Local Economic Impact*

Additional analysis on the availability of goods within the City of Plattsburgh versus the Town was conducted using Esri Business Analyst. The DGEIS assumed 40% of total new household expenditure would occur within the City. Based on data provided by Esri’s Retail Marketplace Profile and Business Mapping capabilities, it was determined that it is reasonable to assume that 25% of Annual Per Unit Spending (APUS) will occur within the City at retailers such as Aldi, Ashley HomeStore, Aubuchon Hardware, and DressCode. This means that the estimated new household spending in the City of Plattsburgh is revised to \$841,513 per year (see Table 9). In bringing new commercial space and residential units to the area, this project is contributing to making the City a place where residents and visitors want to spend their time.

**Table 9: New Household Spending**

<b>Category</b>	<b>Annual Per Unit Spending</b>	<b>Amount Spent in City (25%)</b>	<b>Total Net New City Spending (115 units)</b>
Food	\$7,168	\$1,792	\$206,080
Household Furnishings & Equipment	\$1,970	\$493	\$56,638
Apparel & Services	\$1,514	\$379	\$43,528
Transportation	\$9,158	\$2,290	\$263,293
Health Care	\$4,739	\$1,185	\$136,246
Entertainment	\$2,392	\$598	\$68,770
Personal Care Products & Services	\$668	\$167	\$19,205
Education	\$731	\$183	\$21,016
Misc.	\$930	\$233	\$26,738
<b>Annual Discretionary Spending</b>	<b>\$29,270</b>	<b>\$7,318</b>	<b>\$841,513</b>

Based on the \$841,513 in new household spending, additional sales and new jobs and wages will be created. Table 10 outlines the related impacts.

**Table 10: Annual Economic Impact of New Household Spending, City of Plattsburgh**

	<b>Direct</b>	<b>Indirect</b>	<b>Total</b>
<b>Jobs</b>	9	2	11
<b>Earnings</b>	\$284,718	\$94,003	\$378,720
<b>Sales</b>	\$841,513	\$271,608	\$1,113,120

The developer has received interest in this site from a variety of tenant types (restaurant, retail, office, etc.). At this point in the process, it is unknown which tenants will ultimately lease the space and how the space will be divided by use type. Therefore, a standard assumption of 383 square foot per employee in generic commercial space was used to calculate the 35 new employees in the 13,400 square foot space. Assumptions of square feet per employee vary from 134 SF/employee in a restaurant to 588 SF/employee in a community retail store. At 134 SF/employee there would be 100 new employees on site while at 588 SF/employee there would be 23 new employees on site. Upon completion, it is likely that there will be a mix of use types in the development. Therefore, 383 SF/employee or 35 employees is a good estimate of what this will look like. Square feet per employee data is sourced from the Institute of Transportation Engineers, the U.S. Department of Energy, and the San Diego Association of Governments.

Following project completion, the development will have positive impacts on the City as it stimulates additional investment in the downtown area.

Direct impacts will result from on-site operations (employment and spending) as well as from new household spending by tenants. It is anticipated that approximately 32 new jobs<sup>3</sup> will be present on-site with wages totaling \$997,375 and new expenditures of nearly \$2.6 million occurring. As the businesses make purchases from suppliers and employees spend their earnings, a portion of this will also occur within the City. This is referred to as the indirect impact and will result in an additional 7 jobs, \$291,738 in earnings, and \$841,412 in sales.

**Table 11: DLMUD - Direct and Indirect Jobs, Wages, and Expenditures**

	<b>Direct</b>	<b>Indirect</b>	<b>Total</b>
<b>Jobs</b>	32	7	39
<b>Earnings</b>	\$997,375	\$291,738	\$1,289,112
<b>Sales</b>	\$2,571,669	\$841,412	\$3,413,081

A portion of spending by new households will also occur within the City and have similar ripple effects throughout the economy. The portion of spending by new households that will occur within the City equals \$841,513. This spending will result in 9 new jobs at retailers within the City, along with \$284,718 in new earnings. As these retailers and their employees make additional purchases, 2 indirect jobs, \$94,003 in earnings, and \$271,608 in sales.

**Table 12: DLMUD - Direct and Indirect Jobs, Wages, and Expenditures within the City of Plattsburgh**

	<b>Direct</b>	<b>Indirect</b>	<b>Total</b>
<b>Jobs</b>	9	2	11
<b>Earnings</b>	\$284,718	\$94,003	\$378,720
<b>Sales</b>	\$841,513	\$271,608	\$1,113,120

The positive impacts that will result from this development are not limited to the above direct and indirect impacts. Investment of this scale tends to beget additional investment, as the City becomes a more desirable place to live, work, and visit. The addition of 115 new households creates a new market for existing retailers within the City, and creates opportunities for additional retailers to move in. The result will be a more vibrant downtown area, which will expend dividends for the community for years to come.

### 2.5.5 Historic and Cultural Resources

The DGEIS indicated that the City was consulting with NYSOPRHP to assist in determining whether the proposed project may have the potential to result in adverse impacts to historic and/or cultural resources and that the City would avoid impacts to the extent practicable and comply with the NYSOPRHP findings. Since issuance of the DGEIS, NYSOPRHP provided a response letter (dated December 23, 2019, see Appendix D). The response letter stated the following:

Based upon our review the reports prepared by Curtin Archaeological Consulting, Inc (Curtin & Dymond, June 2019) and Hudson Valley Cultural Resource Consultants (Selig, October 2019) and the response to our request for additional information/clarifications

<sup>3</sup> Note that when calculating the economic impacts of the commercial space, the impacts are adjusted to account for the portion of demand that results from new household spending. This adjustment means that 32 of the 35 jobs are considered to be net new and that 32 new jobs are used as the direct impact in the economic impact model.

about the project, it is the opinion of the New York SHPO that this undertaking will result in No Adverse Effect to historic properties, including archaeological and /or historic resources. This recommendation pertains only to the Area of Potential Effects (APE) examined during the above-referenced investigation. It is not applicable to any other portion of the project property. Should the project design be changed SHPO recommends further consultation with this office.

Therefore, the proposed project will not result in significant adverse impacts to historic and cultural resources, and no measures to avoid impacts are warranted.



## 2.6 Summary of Potential Significant Adverse Environmental Impacts and Mitigation Measures

**Table 13: Summary of Potential Significant Adverse Environmental Impacts and Mitigation Measures**

DGEIS Chapter	Potential Impacts	Mitigation Measures
3.1: Land Use, Community Character, Zoning, and Public Policy	<ul style="list-style-type: none"> <li>• The projects are proposed for the revitalization of the project area and will result in permitted uses that that will beneficially affect the land use character of the project area. No significant adverse impacts to local land uses and community character are anticipated to occur.</li> <li>• The DLMUD would result in some deviations from the underlying C Zoning District requirements, which act as guidelines for the design of a PUD. The Planning Board is authorized to vary these guidelines in pursuit of a desirable project. The DLMUD will not result in significant adverse impacts related to zoning. The balance of projects will remain as City-owned property and will undergo future coordination with applicable City Boards and Commissions to ensure consistency with applicable public policy.</li> <li>• The Downtown Area has been the focus of the City’s public policy for some time. The proposed Downtown Area Improvement Projects will work in unison to capitalize on the City’s existing assets. Accordingly, the proposed projects are consistent with the City’s public policy and will implement several recommendations and goals that pertain to this area of the City.</li> </ul>	<ul style="list-style-type: none"> <li>• No significant adverse impacts to land use, community character, zoning, or public policy are anticipated to occur; therefore, no mitigation is proposed.</li> </ul>
3.2: Aquatic and Natural Resources	<ul style="list-style-type: none"> <li>• An erosion and sediment control plan will be developed for each site and a Stormwater Pollution Prevention Plan (SWPPP) will be prepared for the DLMUD. With the implementation of these best practices, no significant adverse impacts related to soil are anticipated to occur.</li> <li>• Given the limited ground disturbance and implementation of best practices to control erosion during construction, no</li> </ul>	<ul style="list-style-type: none"> <li>• No significant impacts to aquatic or natural resources will occur. Therefore, no mitigation measures are required.</li> <li>• As part of the DLMUD project, stormwater outlets will be installed within the bank of the Saranac River, which is classified as Class C stream with a standard of C(TS) (trout spawning)</li> </ul>

DGEIS Chapter	Potential Impacts	Mitigation Measures
	<p>significant adverse impacts related to soil are anticipated to occur.</p> <ul style="list-style-type: none"> <li>• With the timing restriction in place for tree clearing or under consultation with USFWS, no adverse impacts to the Northern Long-eared Bat are anticipated to occur as part of the proposed projects. Proposed activities at Building 4 at 26 Green Street are not anticipated to effect Common Loon habitat; therefore, no significant adverse impacts to this species are anticipated to occur as part of the proposed projects.</li> </ul>	<p>by the NYSDEC. An Article 15 Permit from the NYSDEC will be required for the DLMUD.</p>
<p>3.3: Municipal Utilities</p>	<ul style="list-style-type: none"> <li>• The Downtown Area Improvement Projects will not result in significant adverse stormwater related impacts through the implementation of the SWPPP and Erosion and Sediment Control plans in accordance with State regulations.</li> <li>• The City of Plattsburgh’s existing sanitary sewer and water infrastructure are anticipated to have the capacity to handle the additional sanitary and water flow. Therefore, no upgrades or improvements to the City of Plattsburgh’s sanitary or water systems are proposed.</li> <li>• The proposed DLMUD would generate 3.1 ± tons of solid waste per day, or 95.5 ± tons per month.</li> <li>• At the proposed WPI site, an existing, aged, 15-inch sewer line will be replaced and relocated within the project site with a new 15-inch sewer line to facilitate the proposed design.</li> </ul>	<ul style="list-style-type: none"> <li>• No significant adverse impacts related to stormwater runoff will occur. Therefore, no mitigation measures are required.</li> <li>• The Projects are served by public sewer and water, and no mitigation measures are proposed.</li> <li>• No significant adverse impacts related to solid waste will occur. Therefore, no mitigation measures are required.</li> </ul>
<p>3.4: Traffic and Transportation System</p>	<p>Peak hour traffic generation for each project site is shown below:</p> <ul style="list-style-type: none"> <li>• DLMUD                             <ul style="list-style-type: none"> <li>○ AM Peak Hour: 194</li> <li>○ Midday Peak Hour: 297</li> <li>○ PM Peak Hour: 242</li> </ul> </li> <li>• DSRI – One-way configuration                             <ul style="list-style-type: none"> <li>○ AM Peak Hour: 32</li> <li>○ Midday Peak Hour: 32</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• No significant adverse impacts related to traffic and transportation systems will occur. Therefore, no mitigation measures are required.</li> </ul>

DGEIS Chapter	Potential Impacts	Mitigation Measures
	<ul style="list-style-type: none"> <li>○ PM Peak Hour: 32</li> <li>● BSPI                             <ul style="list-style-type: none"> <li>○ AM Peak Hour: 4</li> <li>○ Midday Peak Hour: 4</li> <li>○ PM Peak Hour: 4</li> </ul> </li> <li>● APMPP                             <ul style="list-style-type: none"> <li>○ AM Peak Hour: 48</li> <li>○ Midday Peak Hour: 54</li> <li>○ PM Peak Hour: 60</li> </ul> </li> <li>● The traffic analyses show that the proposed projects will have minimal traffic impacts.</li> </ul>	
3.5: Parking	<ul style="list-style-type: none"> <li>● The DLMUD’s 286 parking spaces would be sufficient to accommodate the maximum parking demand.</li> <li>● The proposed project will result in a net reduction of 20 public parking spaces within the SAD. The future parking supply will more than adequately accommodate public parking demand, with a projected future peak parking utilization rate of 75.0%.</li> </ul>	<ul style="list-style-type: none"> <li>● Based on the planned projects, no mitigation measures are necessary or required.</li> <li>● The issue of parking downtown and the establishment of strategies to manage parking has long been an issue of concern to the City. Parking management is being explored regardless of whether any of the Downtown Area Improvement Projects move forward.</li> </ul>
3.6: Fiscal and Economic Conditions	<ul style="list-style-type: none"> <li>● The DLMUD would add 22 students, representing an average of 1.73 additional students per grade level and is not anticipated to have a significant impact on facilities.</li> <li>● The DLMUD will provide 236 new residents living downtown.</li> <li>● The DLMUD is projected to generate 32 direct and 7 indirect jobs, including a total of 11 jobs within the City.</li> <li>● In total, the DLMUD’s total annual economic impact on the City, which is the combination of both the impacts of on-site employment and new household spending, is expected to comprise 11 jobs, \$378,720 in earnings, and over \$1.1 million in sales.</li> </ul>	<ul style="list-style-type: none"> <li>● No significant adverse impacts related to fiscal and economic conditions will occur. Therefore, no mitigation measures are required.</li> </ul>
3.7: Historic and Cultural Resources	<ul style="list-style-type: none"> <li>● The DRSI and BSPI projects will occur within the previously disturbed street right-of-way so will not result in impacts on historic and cultural resources.</li> </ul>	<ul style="list-style-type: none"> <li>● Since issuance of the DGEIS, NYSOPRHP provided a response letter concluding that the proposed project will not result in significant adverse</li> </ul>

DGEIS Chapter	Potential Impacts	Mitigation Measures
	<ul style="list-style-type: none"> <li>•The existing building on the APMPP site is not identified as a contributing resource; therefore, the proposed demolition is not anticipated to result in significant adverse impacts to historic resources.</li> </ul>	<p>impacts to historic and/or cultural resources. Therefore, no mitigation measures are required.</p>
3.8: Environmental Contamination	<ul style="list-style-type: none"> <li>•The proposed Downtown Area Improvement Projects are not anticipated to result in significant adverse impacts related to environmental contamination issues as all handling and processing of contaminated materials and construction on controlled sites will be undertaken according to applicable codes and regulations.</li> </ul>	<ul style="list-style-type: none"> <li>• No significant adverse impacts related to environmental contamination will occur. Therefore, no mitigation measures are required.</li> </ul>
3.9: Recreation and Open Space	<ul style="list-style-type: none"> <li>•The Downtown Area Improvement Projects will not directly impact or displace any open space or recreation facilities.</li> <li>•Except for the DLMUD, no new demand for parks and recreation facilities is anticipated. Additional demand generated by the DLMUD is not expected to result in significant adverse impacts to recreation and open space facilities.</li> <li>•Two of the projects, the WPI and Riverwalk, will improve and/or expand recreational opportunities.</li> </ul>	<ul style="list-style-type: none"> <li>• No significant adverse impacts to recreation and open space will occur. Therefore, no mitigation measures are required.</li> </ul>
3.10: Visual Resources	<ul style="list-style-type: none"> <li>•The Downtown Area Improvement Projects will enhance the visual resource of the area.</li> <li>•The DLMUD will fill and existing void in the urban fabric and the remaining projects will create a more visually appealing streetscape.</li> </ul>	<ul style="list-style-type: none"> <li>• No significant adverse impacts related to visual resources will occur. Therefore, no mitigation measures are required.</li> </ul>

## 2.7 Comparison of Project Alternatives

**Table 14: Comparison of Project Alternatives**

Criteria	Proposed Action	Alternative A: No Action Alternative	Alternative B: Planned DLMUD with Downtown Parking Garage at Broad Street	Alternative C: Reduced Residential Count and Increased Commercial Square Feet
Number of Residential Units	<ul style="list-style-type: none"> <li>• 115 residential dwelling units</li> </ul>	<ul style="list-style-type: none"> <li>• No change</li> </ul>	<ul style="list-style-type: none"> <li>• 115 residential dwelling units</li> </ul>	<ul style="list-style-type: none"> <li>• 45 residential dwelling units</li> </ul>
Commercial Square Footage	<ul style="list-style-type: none"> <li>• 13,400 SF</li> </ul>	<ul style="list-style-type: none"> <li>• No change</li> </ul>	<ul style="list-style-type: none"> <li>• 13,400 SF</li> </ul>	<ul style="list-style-type: none"> <li>• 47,000 SF</li> </ul>
Municipal Utilities Demand	<ul style="list-style-type: none"> <li>• 29,355 gpd water demand and wastewater generation</li> <li>• 3.1 Tons per Day or 95.5 Tons per Month</li> </ul>	<ul style="list-style-type: none"> <li>• No change</li> </ul>	<ul style="list-style-type: none"> <li>• 29,355 gpd water demand and wastewater generation</li> <li>• 3.1 Tons per Day or 95.5 Tons per Month</li> </ul>	<ul style="list-style-type: none"> <li>• 25,620 gpd water demand and wastewater generation</li> <li>• 4.7 tons per day or 144.8 tons per month</li> </ul>
Traffic Generation	<p>Peak hour traffic generation for each project site is shown below:</p> <ul style="list-style-type: none"> <li>• DLMUD                             <ul style="list-style-type: none"> <li>○ AM Peak Hour: 194</li> <li>○ Midday Peak Hour: 297</li> <li>○ PM Peak Hour: 242</li> </ul> </li> <li>• DSRI – One-way configuration                             <ul style="list-style-type: none"> <li>○ AM Peak Hour: 32</li> <li>○ Midday Peak Hour: 32</li> <li>○ PM Peak Hour: 32</li> </ul> </li> <li>• BSPI                             <ul style="list-style-type: none"> <li>○ AM Peak Hour: 4</li> <li>○ Midday Peak Hour: 4</li> <li>○ PM Peak Hour: 4</li> </ul> </li> <li>• APMPP</li> </ul>	<ul style="list-style-type: none"> <li>• No change</li> </ul>	<ul style="list-style-type: none"> <li>• Total trips generated by the proposed project would be greater</li> <li>• DLMUD - Same as the proposed project</li> <li>• DSRI – Same as proposed project</li> <li>• BSPI – Same as proposed project</li> <li>• APMPP - Same as proposed project</li> <li>• Broad Street Parking Garage                             <ul style="list-style-type: none"> <li>○ AM Peak Hour: 80</li> <li>○ Midday Peak Hour: 74</li> <li>○ PM Peak Hour: 94</li> <li>○ This represents net increase from existing BSMPL</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• DLMUD – Additional Trips</li> <li>• DLMUD                             <ul style="list-style-type: none"> <li>○ AM Peak Hour: 298</li> <li>○ Midday Peak Hour: 482</li> <li>○ PM Peak Hour: 388</li> </ul> </li> <li>• DSRI – Same as proposed project</li> <li>• BSPI – Same as proposed project</li> <li>• APMPP – Same as proposed project</li> <li>• BSMPL – Same as proposed project</li> </ul>

Criteria	Proposed Action	Alternative A: No Action Alternative	Alternative B: Planned DLMUD with Downtown Parking Garage at Broad Street	Alternative C: Reduced Residential Count and Increased Commercial Square Feet
	<ul style="list-style-type: none"> <li>○ AM Peak Hour: 48</li> <li>○ Midday Peak Hour: 54</li> <li>○ PM Peak Hour: 60</li> <li>● BSMPL                             <ul style="list-style-type: none"> <li>○ AM Peak Hour: 12</li> <li>○ Midday Peak Hour: 12</li> <li>○ PM Peak Hour: 12</li> </ul> </li> </ul>			
Parking Provided	<ul style="list-style-type: none"> <li>● DLMUD: 286 parking spaces would be provided with an estimated 272 space demand per the ITE.<sup>1</sup></li> <li>● DRSI: 38 new parking spaces in one-way configuration</li> <li>● BSPI: 6 new parking spaces</li> <li>● APMPP: 103 new parking spaces</li> <li>● BSMPL: 21 new parking spaces</li> </ul>	<ul style="list-style-type: none"> <li>● No change</li> </ul>	<ul style="list-style-type: none"> <li>● Same as proposed project, with additional 250-space Broad Street Parking Garage in place of the BSMPL</li> </ul>	<ul style="list-style-type: none"> <li>● Additional parking demand would occur as a result of the increased commercial component. It is estimated 339 parking spaces should be provided and parking demand could approach 364 spaces for the DLMUD site<sup>2</sup></li> <li>● Remaining projects - same as proposed project</li> </ul>
Fiscal and Economic Considerations	<ul style="list-style-type: none"> <li>● The DLMUD would add 22 students, representing an average of 1.73 additional students per grade level and is not anticipated to a significant impact on facilities.</li> <li>● The DLMUD will provide 236 new residents living downtown.</li> <li>● The DLMUD's residential component is anticipated to</li> </ul>	<ul style="list-style-type: none"> <li>● No change</li> </ul>	<ul style="list-style-type: none"> <li>● This Alternative would generate the same number of residents and students as the proposed project</li> <li>● The additional 250-space garage would have higher costs to the City. Structured parking costs between \$22,000 and \$25,000 per unit. A 250-unit parking garage would cost on the order of \$5.5 and \$6.25M. The City would be required to seek grant funding and/or invest tax dollars to</li> </ul>	<ul style="list-style-type: none"> <li>● This Alternative would add fewer students to the Plattsburgh City School District (12 students total) and fewer residents (92 residents)</li> <li>● Construction of this Alternative would result in similar project costs.</li> <li>● The economic impacts would be considerably</li> </ul>

Criteria	Proposed Action	Alternative A: No Action Alternative	Alternative B: Planned DLMUD with Downtown Parking Garage at Broad Street	Alternative C: Reduced Residential Count and Increased Commercial Square Feet
	<p>generate 32 direct and 7 indirect jobs, including a total of 11 jobs within the City.</p> <ul style="list-style-type: none"> <li>In total, the DLMUD’s total annual economic impact on the City, which is the combination of both the impacts of on-site employment and new household spending, is expected to comprise 11 jobs, \$378,720 in earnings, and over \$1.1 million in sales.</li> </ul>		<p>fund the construction of the garage. Some of the costs could be recouped with the imposition of fees for parking and these costs would be assumed by residents, business owners and patrons to downtown.</p>	<p>less than the proposed project: new household spending would be less than half of the proposed project. Employment attributable to the project may increase but be low wage retail employees</p> <ul style="list-style-type: none"> <li>The project does not provide a rate of return that would make the project viable.</li> </ul>
<p>Community Character; Historic and Cultural Resource; and Visual Resource Considerations</p>	<ul style="list-style-type: none"> <li>The proposed projects are consistent with the City’s public policy and will implement several recommendations and goals that pertain to this area of the City.</li> <li>The DRSI and BSPI projects will occur within the previously disturbed street right-of-way so will not result in impacts on historic and cultural resources.</li> <li>The existing building on the APMPP site is not identified as a contributing resource; therefore, the proposed demolition is not anticipated to result in significant adverse impacts to historic resources.</li> </ul>	<ul style="list-style-type: none"> <li>No change</li> </ul>	<ul style="list-style-type: none"> <li>This Alternative is not consistent with the objectives and capabilities of the project sponsor.</li> <li>The City would be required to seek grant funding and/or invest tax dollars to fund the construction of the garage.</li> <li>A parking garage may obstruct views to the Saranac River and would likely require significant architectural façade treatments to be visually consistent with the Downtown Plattsburgh Historic District and other historic buildings located nearby.</li> </ul>	<ul style="list-style-type: none"> <li>This alternative would have similar impacts to community character, historic and cultural resources, and visual resources as the proposed action.</li> </ul>

<b>Criteria</b>	<b>Proposed Action</b>	<b>Alternative A: No Action Alternative</b>	<b>Alternative B: Planned DLMUD with Downtown Parking Garage at Broad Street</b>	<b>Alternative C: Reduced Residential Count and Increased Commercial Square Feet</b>
	<ul style="list-style-type: none"> <li>• Since issuance of the DGEIS, NYSOPRHP provided a response letter concluding that the proposed project will not result in significant adverse impacts to historic and/or cultural resources.</li> </ul>			

<sup>1</sup> The City’s Zoning Ordinance requires 317 parking spaces for the DLMUD project, while an alternative source for parking generation data, the Institute of Transportation Engineers (ITE) “Parking Generation” (5th Edition, 2019) manual identifies a demand of 272 parking spaces. The proposed DLMUD would include 286 parking spaces.

<sup>2</sup> The City’s Zoning Ordinance requires 366 parking spaces for Alternative C. The ITE manual identifies a demand of 364 parking spaces. The Alternative would include approximately 339 parking spaces.



### **3.0 LIST OF ELECTED OFFICIALS, ORGANIZATIONS, AND INDIVIDUALS WHO COMMENTED ON THE DGEIS**

#### **3.1 Commenters at the DGEIS Public Hearing**

1. Laura Palkovic
2. Tim Palkovic
3. Sylvie Beaudreau
4. Julie Baughn

The December 19, 2019 DGEIS Public Hearing transcript is provided in Appendix B.

#### **3.2 DGEIS Comment Letters Received**

1. Plattsburgh City School District – 12/9/2019
2. Tim Palkovic – 12/9/2019
3. Clinton County Planning Board – 12/10/2019
4. City of Plattsburgh Planning Board – 12/12/2019
5. Curt Gervich – 12/20/2019
6. Tom and Betsy Metz – 12/20/2019
7. Ashley Harron – 12/21/2019
8. Kay Woods – 12/22/2019
9. Danielle Erb – 12/23/2019
10. Jeff Mills and Pam Miller – 12/23/2019
11. Kim and Kye Ford – 12/23/2019
12. Laura Palkovic – 12/23/2019
13. Meyer, Fuller and Stockwell (including petition) – 12/23/2019
14. Sylvie Beaudreau – 12/23/2019

These letters are included in Appendix B.

### **4.0 RESPONSE TO COMMENTS**

Comments are generally organized according to the structure of the DGEIS. Where applicable, similar comments have been grouped together with the initial comment presented and attributed to an individual or organization with additional commenters cited. This allows for a comprehensive response to the issue.

#### **1.0 EXECUTIVE SUMMARY**

Comment 1.1: Page 9 – Table 3: Summary of Potential Significant Adverse Environmental Impacts and Mitigation Measures. This chart assumes little to no adverse environmental impacts and does not take into consideration or offer mitigation measures for many adverse impacts that will occur as a result of the proposed projects. **(Erb)**

**Response 1.1:** The proposed project’s potential to result in significant adverse impacts was analyzed in the DGEIS in Section 3.0 in accordance with SEQRA and is summarized in Table 3 of the DGEIS and in the preceding section in Table 13.

Comment 1.2: The chart on page 13 only assumes two alternatives to the proposed development at the Durkee Street Lot. This is insufficient. (Erb)

**Response 1.2:** Table 4 on Page 13 of the DGEIS summarized the alternatives analysis included in Section 4.0 in the DGEIS. Three alternatives were examined consistent with the scoping document adopted by the City on September 5, 2019 and included in Appendix A of the DGEIS: Alternative A: the No-Action Alternative; Alternative B: Planned DLMUD with Downtown Parking Garage at Broad Street; and Alternative C: Reduced Residential Count and Increased Commercial Square Feet. As outlined in the NYSDEC’s SEQR Handbook, “The goal of the alternatives discussion in an EIS is to investigate means to avoid or reduce one or more identified potentially adverse environmental impacts. Part 617 (the SEQRA regulations) further requires that the alternatives discussion include a range of reasonable alternatives which are feasible considering the objectives and capabilities of the project sponsor. In general, the need to discuss alternatives will depend on the significance of the environmental impacts associated with the proposed action. The greater the impacts, the greater the need to discuss alternatives.” The SEQR Handbook also states that “The ‘No Action’ alternative must *always* be discussed to provide a baseline for evaluation of impacts and comparisons of other impacts.” Alternative B was selected to evaluate and compare an alternative that addressed public concerns about parking impacts. Alternative C was selected to evaluate and compare an alternative, as it represents the Durkee Street Lot development scenario identified in the DRI SIP. Given the significance of the environmental impacts of the proposed action, the inclusion and analysis of the three alternatives satisfies SEQRA requirements.

Comment 1.3: Section 1.1.2 (Page 2) of the DGEIS states that “the LPC guided extensive community engagement, including four public events”. While it is true that community engagement events were held, the results of such consultations were apparently disregarded, as state and city allocated the lion’s share of the DRI funding to a project, the redevelopment of the Durkee Street Parking Lot, which was one of the least popular options. This bland opening statement makes it appear as if the City followed the DRI guidelines to the letter, and that the process involved in the selection of projects was above the board and legitimate. What the record shows is the lack of public input into the elaboration of the RFP for the Durkee Street Redevelopment. The City has heard from stakeholders AFTER inking the deal with Prime LLC, not BEFORE. The City then proceeded to the hiring of a consulting firm to elaborate the RFP for the Durkee Street Project, and at this point public input effectively ceased. Once the Prime LLC agreement was signed the City continued to proceed not only without consulting the public, but in face of a storm of public outcry. This is not how the DRI plans envisaged the accomplishment of its goals. This section fails to account for the fact that if the correct procedures were followed as per the DRI rules, why significant public opposition emerged once the City inked the deal with Prime LLC. In short, the DGEIS makes it sound like everything about this project was proceeding in a

natural, unproblematic way, failing to reflect significant local opposition to the DLMUD. (Beaudreau)

**Response 1.3:** The City has followed the guidelines associated with both the DRI's SIP and the individual DRI projects grants. For the DLMUD, the City has worked closely with Empire State Development (ESD), the state agency funding the project, throughout the development process. If the DLMUD's grant guidelines were not being followed or if the project did not align with the "Durkee Street Development Principles" contained within the City's DRI SIP, ESD would not continue to support and fund the project.

Both before and after the development agreement was signed, the City and Prime conducted several public presentations and provided ample opportunity for public input regarding Prime's proposed plans for the DLMUD. The input received during these public forums led to significant changes to Prime's proposed design including, but not limited to, the provision of significant, additional on-site parking capacity.

The City's adherence to the guidelines established by the individual DRI grants and the SIP was not intended to guarantee unanimous and unqualified public support for the DRI and its constituent projects. These guidelines are intended to ensure that the expenditure of considerable public funds is subject to a transparent and public process.

The City's website<sup>4</sup> includes a comprehensive list of various public engagement opportunities and presentations regarding the DRI, the DLMUD, and other associated projects. This list clearly illustrates that the public has been provided with ample opportunity for comment and input at every stage of the development process of the DLMUD, see Appendix G.

**Comment 1.4:** Section 1.1.5 (Page 8) speaks of the DLMUD as part of plan to "advance downtown revitalization through transformative housing, economic development..." Transformative housing is a term usually reserved for low-income or mixed income housing. The City has failed to account for where it is going to find 115 high income households that will want to rent an expensive apartment in a de-vitalized downtown. Another stated goal is to "attract and retain residents, visitors and businesses". How does building a large, bland, corporate looking apartment/retail complex make downtown Plattsburgh more attractive or interesting to residents, visitors and tourists? (Beaudreau)

**Response 1.4:** Planned rents for the proposed DLMUD are market rate. Prime indicates that it utilizes the Yardi Residential Tenant Criteria (YRTC) for qualification purposes at its properties. Although the Yardi approach is utilized for general underwriting purposes, Prime indicates that based on its 35 years of experience in the industry and their experience in managing over 2,000 residential units, Prime has also applied a less conservative approach to qualification criteria when supported by the market environment.

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<sup>4</sup> <http://cityofplattsburgh-ny.gov/603/DRI-Community-Engagement-Summary>

According to the most recent HCR / NYS report<sup>5</sup> released on 5/9/19, the Median Household Income (MHI) in Clinton County is \$68,300. Using the more conservative YRTC, the MHI for Clinton County would support a qualifying rent of \$1,707.50 per month. Clinton County, like the Capital Region, has very strong Education, Health Care and Government employers as well as growing private sector employers which further strengthen the market environment. Based on this information and experience, this approach is accurate and is the industry standard for this type of Project.

See also Responses 3.2 and 3.3.

## 2.0 PROPOSED PROJECT

Comment 2.1: 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. (T Palkovic)

Response 2.1: **The Durkee Street award consists of \$4.3 million of State funding to "redevelop the centrally-located Durkee Street parking lot, increase residential and commercial activity, return the site to the tax rolls, and better connect the historic downtown with the waterfront." The RFP for the development (issued on October 17, 2018) identifies that the City's goals for the project but also notes that the City will consider other uses as long as the project meets the primary goal to "revitalize buildings and uses on the site that fit in well with the diverse urban fabric, maintain the historical look and feel of the downtown area, add to the increasing vibrancy of downtown, are economically feasible, and help contribute to a stable tax base." Prime presented their original RFP response at a public meeting on January 8<sup>th</sup>, 2019. Throughout 2019 and over the course of multiple public meetings, the Prime development proposal was updated and refined to address public comments.**

Comment 2.2: 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? (T Palkovic) As per the initial DRI plan, "approximately 1 acre of new on-site open space" was to be created for public use. The report states that "a 2,400 SF publicly-accessible civic space with an open-air pavilion" will be one of the features of the DLMUD. What used to be the public space of the Plattsburgh Farmers and Crafters Market will now be a privately owned space. The City effectively loses control of it, and there is no guarantee that Prime LLC will

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<sup>5</sup> New York State Homes and Community Renewal. Affordable Housing Corporation/Maximum Grant Amount and Income Limits. <https://hcr.ny.gov/system/files/documents/2019/06/2019%20AHC%20Income%20Limits.pdf>. Webpage accessed January 27, 2020.

not, in future, dispose of this property as it sees fit or profitable. In this manner the text of the GEIS gives the false impression that the DLMUD has provided a significant amount of public “civic” space. It has not. **(Beaudreau)** This project deviates from the original plan, reducing the community benefits/public access portion. **(Clinton County PB)**

**Response 2.2:** The Durkee Street Site awarded funding through the DRI describes that “development of the site will be accomplished through a public-private partnership, and may include 45 residential units and almost 47,000 square feet of commercial space that will complement the character of downtown Plattsburgh.” As noted in Response 2.1, the primary goal of the project, as identified in the RFP, is to “revitalize buildings and uses on the site that fit in well with the diverse urban fabric, maintain the historical look and feel of the downtown area, add to the increasing vibrancy of downtown, are economically feasible, and help contribute to a stable tax base.” The proposed project, which was refined based on public input received during a series of public meetings throughout 2019, satisfies the primary goals of the project. The project will also provide for improved physical and visual connections to Westelcom Park and the Riverwalk, in addition to including a 2,400-SF publicly accessible open-air pavilion civic space.

Comment 2.3: The original plan stated as a goal the need to “Elevate global recognition of the region as one of the special places on the planet to visit, live, work and study.” How does building an apartment complex achieve this stated goal? **(Beaudreau)**

**Response 2.3:** The DRI SIP notes that the Durkee Street lot disrupts corridors of activity, discouraging foot traffic and further investment and that “the redevelopment of the Durkee Street site would provide a critical anchor for Downtown.” The proposed DLMUD would be consistent with this goal, creating a mixed-use pedestrian-oriented development at a key site in the City’s Downtown.

Comment 2.4: The intent of the DRI (as originally touted) was to induce greater foot traffic to downtown core. The large apartment bldg. will be a deterrent to that activity and essentially turns the site into a private enclave. **(Harron)** When you described your vision for the DRI in the early days you spoke of encouraging foot traffic in downtown to draw people from one point of interest to another. Those exciting ideas have been abandoned and as a result, the character of our downtown area will be forever ruined. The large apartment building will be a deterrent to foot traffic and the promised ambience for community members. The loss of the parking lot and reconfiguration of Durkee Street is also a deterrent to community interaction. This area will be a private residential enclave with no amenities to the public. **(Woods)**

**Response 2.4:** The proposed DLMUD would replace an auto-oriented use (a surface parking lot) with a pedestrian-oriented mixed-use development, which, in combination with the proposed improvements to the deteriorating Riverwalk, Westelcom Park, and adjacent Bridge and Durkee Streets, would bring more pedestrians to the site and to the waterfront. The proposed project will also include a 2,400-SF publicly-accessible civic space within an open-air pavilion with access from the new pedestrian walkway.

Comment 2.5: The elimination of the Durkee Street Lot, in combination with the creation of the overly cramped and fussy Westelcom parkette, both fail to accomplish the goals for a revitalized gathering space for the Plattsburgh's downtown. (Beaudreau)

**Response 2.5: One of the central components of the DLMUD is creating a new physical and visual connection between the proposed improved Riverwalk and improved Westelcom Park. The DLMUD will also include a 2,400-SF publicly-accessible civic space within an open-air pavilion with access from the new pedestrian walkway.**

Comment 2.6: Officials at City Hall told me, "Parking Lots are ugly. The Durkee Lot is ugly. Wouldn't you like to see a nice building there?" Well, by the same logic, if "parking lots are ugly", now the cars that once parked in the Durkee Lot will be parking on a new lot on Margaret Street. So the "ugliness" will be shifted from Durkee Street to Margaret Street, to our main commercial artery. So why is it OK to have ugliness on Margaret Street, but not OK to have it on Durkee Street? To some degree, the ugliness shell game cannot be won. Ours is a car-centered community, and the bulk of downtown jobs are in services to the County, and employees and visitors need places to park. One way or another the parking spaces need to go somewhere, and this plan will distribute them throughout the downtown area, making it less people and pedestrian friendly, which goes directly against the stated goals of the DRI application. (Beaudreau)

**Response 2.6: As noted in the City's DRI SIP, "While parking lots serve a critical function for Downtown, facilitating Downtown access by regional residents and visitors, the presence of surface parking lots Downtown similarly disrupt activity. For example, large parking lots on Durkee Street and Dock Street, adjacent to the WRRF, may serve important parking functions but also further disrupt corridors of activity." The proposed project, which, among other things, would redistribute parking from the DSMPL to alternate on- and off-street locations throughout the Downtown area, would be consistent with the DRI SIP.**

Comment 2.7: 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. (T Palkovic)

**Response 2.7: The new farmers market location was developed in close consultation with PFCM leadership. PFCM is in support of the relocation and believes the new site has several advantages over their current site. See also Response 2.15.**

Comment 2.8: I'm opposed to the Farmer's Markets move to the sewage treatment plant lot. I find the idea of having a market that sells fresh produce and other food located there repugnant

and repulsive. I wouldn't buy food at that location and I doubt there are many who would. Bad optics, even with improvement. (L Palkovic)

**Response 2.8: Comment noted. See Responses 2.7 and 2.15.**

Comment 2.9: Moving the farmers market can't be anything but good at this point. We are looking forward to growth, expansion. There's nothing wrong with the site. It did not smell bad. It is going to be so much better than what we have now. The current building is not the greatest. The parking is atrocious. We want something to call our own and we are getting a very nice building. (Baughn)

**Response 2.9: Comment noted. See also Response 2.15.**

Comment 2.10: 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. (Clinton County PB) Putting the farmers market so distant from the downtown area is an adverse impact. (Beaudreau)

**Response 2.10: See Responses 2.7 and 2.15. The PFCM will also continue to operate at a new, improved location in the Harborside area, less than a quarter mile (a five-minute walk) away from the existing DSMPL.**

Comment 2.11: The proposed farmers market location is not ideal because the trains disrupt foot, vehicle & bike traffic flow and also very noisy. (Metz)

**Response 2.11: See Response 2.7. It should also be noted that the Saranac River Trail Greenway Master Plan proposes a trail connection to connect Bridge Street and the existing trail that runs along the north side of the railroad tracks via Green Street.**

Comment 2.12: The proximity of the proposed farmers market location to parking, river, downtown, lake and marinas is appealing. However, the proximity to the wastewater treatment plant is not. What will be done? (Metz)

**Response 2.12: Comment noted. See Responses 2.7, 2.13 and 2.15.**

Comment 2.13: I strongly disagree with the statement on page 39 (2.2.8 Paragraph 4) and do not believe it is appropriate to classify the Farmers' Market as a "public facility" in order to allow it to be moved next to a sewage treatment plant in an industrial zone. A Farmer's Market selling fresh produce and crafts is more appropriately defined under Commercial Zoning, and should be surrounded by other commercially zoned sites, not industrial sites. This placement will have adverse impacts on the Farmers' Market itself as well as on the image and attractiveness of our city as a whole. (Erb)

**Response 2.13: A "public facility", as defined in the Code of the City of Plattsburgh (City Code), is "any facility provided by the Corporation, the appropriate public authorities or their**

agencies, or by a gas, telephone or railway company.” The City Code does not provide a definition for a “farmers’ market.” However, the Plattsburgh Farmers’ and Crafters’ Market’s (PFCM) current building is owned by the City and leased annually to the PFCM (a non-profit entity) to serve the public as a community benefit and, by definition, is classified as a public facility.

Additionally, the current “Industrial” zoning designation of tax map parcel # 207.20-20-1-1, which contains the proposed relocation site for the PFCM, is due primarily to the presence of the City’s Water Resource Recovery Facility (WRRF) and the former headquarters of the Plattsburgh Municipal Lighting Department (PMLD) within the boundaries of the parcel. The City is currently razing and clearing the former PMLD site except for the structure intended for the new home of the PFCM. Subsequent to completion of demolition of the former PMLD site, the formerly industrial nature of the parcel will be significantly altered.

The City is also developing a master plan for the Harborside area that contains parcel # 207.20-20-1-1 and is updating its Comprehensive Plan and Zoning Ordinance in anticipation of future development. It is anticipated that this area will be re-zoned to accommodate a wider range of development more suited for the City’s waterfront.

Comment 2.14: The Scoping document indicated that “The City proposes to relocate the PFCM from the DSMP to a site in the City’s Harborside area near Dock Street. The site is anticipated to become part of a larger Master Plan considering future development along the harbor, which is being pursued through funding as part of a 2019 consolidated funding application by the City.” However, according to the GEIS, the City has decided that the Plattsburgh Farmers’ and Crafters’ Market will actually be located off Green Street, not near Dock Street as stated in the scoping document. Thus, the Scoping Document step in the SEQRA process must be amended to include evaluation of the Green Street area, not Dock Street. The scoping should have been immediately amended, but was not, now the DGEIS process is flawed. (Plattsburgh Citizens Coalition)

**Response 2.14: The proposed PFCM location would be located in the Harborside area on a portion of Tax Parcel 207.20-1-1. Parcel 207.20-1-1 and adjacent 207.20-1-2.31 are two City-owned parcels that are located on the north side of the Canadian Pacific railroad tracks. The parcels have street frontage/access from Dock Street (to the south) and Green Street (to the north). As such, the proposed PFCM location is consistent with the description provided in the Scoping Document.**

Comment 2.15: “The City has proposed a relocation of the PFCM to City-owned property in Plattsburgh’s Harborside Area near downtown.” This was never envisaged by the public consultations of the DRI. Building 4 at 26 Green Street is not in the downtown business district. It is located in a remote part of town that few people every visit and is 100 feet from the municipal sewage treatment plant. Many residents and visitors have expressed opposition to this move, saying they simply will not shop for food at location so proximate to open pools of evaporating human waste. It is my view that the City should have conducted a consumer survey to see if shoppers could get over the psychological barrier



of shopping for food next to the Poop Plant. If individuals are fearful of shopping for food there just don't visit, the PFCM will fail no matter what they do to cosmetically enhance Building 4. (Beaudreau)

**Response 2.15: Preliminary proposals for the DRI developments have evolved over time in response to various factors including public input and availability of various options. Moving the PFCM to the Harborside Area was the option chosen for the Downtown Improvement Projects included in the GEIS and was described in the Final Scoping Document.**

The proposed relocation site for the PFCM at 26 Green Street is located within the City's established DRI footprint and is thus eligible for funding through the DRI. The site is also located less than half a mile from the PFCM's current building. The initial development proposal submitted by Prime included, as required by the City's RFP, 7,863 sq. ft. of interior space within the DLMUD to house the PFCM. After reviewing Prime's proposal with the leadership of the PFCM, they expressed concern regarding both the availability of parking for their customers and access to the proposed space. A poll of the PFCM's vendors revealed that there was little to no support for the originally proposed arrangement and, consequently, the City began exploring other options to accomplish the relocation of the PFCM. While not originally envisaged by the DRI, the PFCM's relocation became necessary to ensure its continued success.

After evaluating multiple proposals, the refurbishment of Building 4 on the former PMLD site was identified as the best option. The PFCM's vendors were provided by the City with tours of Building 4 and of the WRRF in order to address any concerns they had about the proposed site's proximity to the WRRF. The PFCM's leadership then conducted another survey of their vendors to gauge support for the relocation to Building 4. The results of that survey were as follows:

- 22 votes in favor of relocating to Building 4
- 4 votes against
- 2 votes who said they needed more information

On their own initiative, the PFCM has also conducted a market survey of their customers asking whether they would continue to patronize the PFCM after its relocation to the Harborside area. The results of this survey were favorable to the proposed relocation and have reinforced the City's belief in the PFCM's continued success at its new proposed location.

The City has been pursuing a redesign of the Water Resource Recovery Facility as part of the Dock Street Waterfront portion of the DRI. This is intended to both reduce odors and noise, and improve the facility's aesthetic appearance as part of the broader effort to attract people to the Harborside area of the City. In fact, City Environmental Manager Jonathon Ruff has pointed out that one of the goals of the architectural upgrades is to make the Plant a visiting destination. These WRRF upgrades themselves are receiving

**funding from various sources and are not a part of the Downtown Improvement Projects.**

Comment 2.16: We are writing to express our opposition to moving the PFCM to the proposed Green Street site. Our customers do not want to buy nor do we want to sell food in such close proximity to the plant and outside of the Plattsburgh Downtown Business District. Relocation would result in the demise of the Farmer's Market as the value of the fresh/organic products sold at this site would be put in jeopardy. Please preserve the PFCM building as its current site. If that is not possible, please select or develop a site that continues to serve the people in the Plattsburgh Downtown District. **(Mills and Miller)**

**Response 2.16: See Responses 2.7 and 2.15.**

Comment 2.17: Our City center is a "food desert" and extraordinary measures must be taken to ameliorate this problem. It is counter-intuitive to relegate the Farmer's Market to the sewer plant. **(Woods)**

**Response 2.17: Located directly north of the DSMPL is the North Country Food Co-Op, a community-owned grocery store that is open daily. This market will remain in the future with the proposed action, ensuring that there continues to be access to fresh food in the City's downtown.**

Comment 2.18: You are giving away a perfectly good building and replacing it with a like-kind metal building with asbestos, contaminated ground water, and investing \$250,000 additional money (grant or no grant, not a good investment). If the City could have used that \$250,000 for the existing building along with the Streetscapes/riverfront projects – the existing Farmers Market could have been a wonderful Community Centered pavilion. **(Ford)**

**Response 2.18: See Responses 2.7, 2.13 and 2.15.**

Comment 2.19: Small projects are better than large ones because the risk of failure in a smaller project is not potentially devastating. 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. **(T Palkovic)**

**Response 2.19: See Response 2.28.**

Comment 2.20: The DSL now contains sufficient spaces for parking without further building. Why not leave the DSL essentially as it is? **(T Palkovic)**

**Response 2.20: As noted in Response 2.6, the redevelopment of the Durkee Street Lot with a mixed-use building is consistent with the City's DRI SIP and will replace a large parking lot that disrupts "corridors of activity." See also Responses 3.2 and 3.3.**

Comment 2.21: The Durkee Street Redesign does not appear to have a separate conceptual site plan provided within the DEIS. (Clinton County PB)

**Response 2.21: The proposed Durkee Street Redesign is shown in Figure 5 of the DGEIS.**

Comment 2.22: What is the square footage of each type of apartment? I could not find any data in the DGEIS. (L Palkovic)

**Response 2.22: Although the project has not received approvals or completed the final design at this time, the current projected residential unit mix and sizes are as follows:**

1 Br A :	792 SF
1 Br B (Mezz):	659 SF
1 Br C (Mezz):	877 SF
2 Br A:	1,127 SF
2 Br B (Corner):	1,186 SF
2 Br D (Mezz):	1,130 SF
2 Br E (Mezz):	1,091 SF
2 Br F (Mezz):	1,142 SF
2 Br G (Mezz):	1,107 SF
2 BR H (Mezz):	1,355 SF
3 Br A (Mezz):	1,444 SF

Comment 2.23: What is the rental cost to tenants? Described as “market price” in the DGEIS, but no examples given. (L Palkovic)

**Response 2.23: Prime has maintained throughout the project that the residential units will be provided at market rate. Multiple factors such as the regulatory environment and costs of construction contribute to the development of a supportable project and the resultant rental rates that the market will support. At this time, Prime anticipates the market rates to start around \$1,200 / month.**

Comment 2.24: GEIS should establish as criteria that the detailed site plan must include the details and assessment of future use and that the site plan must provide adequate parking. (Plattsburgh Citizens Coalition)

**Response 2.24: As noted in Section 3.1.2.2 of the DGEIS, the DLMUD will undergo coordination with applicable boards (e.g., Planning Boards, ZBA, etc.) to ensure that the development fits with local land use and community character and other relevant public policy. One of the required Planning Board approvals for the DLMUD will be Site Plan Approval. The Site Plan Approval process will comply with the City Code. As outlined in Section 360-37 of the City Code, the site plan must include, notably, “the proposed use of land and buildings, including floor space, number of employees, housing units or any other capacity measurement, as relevant,” as well as “the location and design of any proposed off-street parking areas and/or loading areas, showing the size and location of parking bays, aisles and barriers.”**

Comment 2.25: There needs to be passageways through L building to Durkee & Bridge. Shop/restaurant entrances will be on street side. (Metz)

**Response 2.25: The Riverwalk will provide access behind the building from Bridge Street and connect to a pedestrian walkway that will meet Durkee Street.**

Comment 2.26: 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. (L Palkovic)

**Response 2.26: On October 17, 2018, the City of Plattsburgh released an RFP for “Mixed-Use Development Opportunity for the Durkee Street Site in Downtown Plattsburgh.” Responses were accepted through November 14, 2018, with an information session and site walk held on October 26, 2018.**

Comment 2.27: The GEIS discriminates against persons with disabilities and is therefore in violation of the City’s adopted Title VI Plan as well as Federal and State Civil Rights Law. One such example is the Westelcom Park plan which uses the existing non-compliant walkway to allow the population to traverse between Durkee Street and Margaret Street, a primary stated purpose of the park, but fails to provide the same opportunity for persons with disabilities. The plan makes no indication of bringing this non-compliant passage into compliance as is required by State and Federal Law. (Plattsburgh Citizens Coalition)

**Response 2.27: The non-compliance of the existing ramp within Westelcom Park was recognized and the updated plan for the park removes the existing ramp, replacing it with a walkway that will be ADA compliant, with less than a 5% slope along the path (refer to Figure 7 in Appendix C).**

Comment 2.28: Why does the DLMUD call for adding more retail space at a time when bricks-and-mortar establishments are closing nationwide? The Prime LLC plan involves the addition of significant amount of retail space on the ground level. Why is this advisable when our count reveals at least 32 empty storefronts in the city of Plattsburgh, and more in the Town? (Beaudreau)

**Response 2.28: Prime performed an internal market study on the area as part of its standard preliminary due diligence. Prime typically contracts with a national company to do a more detailed analysis, however, they were unable to assist in the Plattsburgh market due to lack of comparable inventory or products.**

**As part of ongoing due diligence Prime conducts periodic market analyses throughout the permitting process to ensure the financial feasibility of the project. An online review conducted on January 10, 2020 of reasonably ascertainable listings provided on CDC Real Estate, LoopNet (National), Century 21 Commercial, Commercial Real Estate Plattsburgh, Whitbeck Commercial and Fesette Commercial Real Estate demonstrated only three Class A commercial spaces available in the downtown area. Currently Prime anticipates lease rates for the proposed project to start at approximately \$16 per square**

foot. Although the available commercial leases in the downtown area are identified as Class A commercial spaces and are similar to the anticipated price per square foot of the proposed project; the condition, grade and desirability of the available spaces are not fully comparable with the proposed project. However, they are presented herein to show the lack of available comparable space within the downtown area.

- 20 Miller Street offering 6,209 SF of office space and 1,223 SF of garage space located at 20 Miller Street, Plattsburgh NY

Clinton County Real Property Records

Effective Year Built: 1950

Overall Condition: Normal

Overall Grade: Average

Overall Desirability: 3

Rental Rate (provided by others): \$15.00 / SF/Year (nnn)

- Investors Corporation of Vermont (ICV) offering 1,234 SF of office space located at 14 Durkee Street, Plattsburgh NY

Clinton County Real Property Records

Effective Year Built: 2007

Overall Condition: Normal

Overall Grade: Good

Overall Desirability: 3

Rental Rate (provided by others): \$14.50 / SF/Year (nnn)

- Westelcom Suites offering 800 - 1600 SF of office space located at 24 Margaret Street, Plattsburgh, NY

Clinton County Real Property Records

Effective Year Built: 1997

Overall Condition: Normal

Overall Grade: Average

Overall Desirability: 3

Rental Rate (provided by others): not provided

Although the project has not received approvals, Prime has already been contacted by various office, retail and food & beverage industry tenants with interest in the proposed space. With the lack of comparable newer / renovated commercial space in the redeveloping downtown market, the Project's commercial space will be occupied by a good mix of tenants. Amenities such as onsite parking, walkability to new downtown amenities, live/ work opportunities and built to suit options will allow for the proposed mixed-use development to be successful and revitalize the Durkee site.

Comment 2.29: The unprecedented give-away of our nearly 4-acre parking lot with no tax payer referendum is extremely troubling (**Harron**)

**Response 2.29: General City Law Section 20 authorizes a City to sell real property. Chapter 24 of the City Code sets forth the process for a potential conveyance of real property and specifically contemplates and allows the conveyance of real property. No changes were made to the process by which the City conveys real property and therefore no permissive or mandatory referendum is required pursuant to the Municipal Home Rule Law. Any conveyance of City owned lands will be done in accordance with legal requirements.**

### **3.1 LAND USE, COMMUNITY CHARACTER, ZONING, AND PUBLIC POLICY**

Comment 3.1: The Durkee Street lot is a gathering place for community (**Harron**) 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. (**T Palkovic**) A farmers market is more than a store. It is a meeting place, a place for local community. To relocate the farmers market to an area where raw sewage is being processed is an insult to all of us. (**L Palkovic**)

**Response 3.1: The DSMPL's current primary function is as a surface parking lot. On occasion, the site has accommodated public uses and with development of the DLMUD, it will continue to accommodate public gathering and use. As described in Section 2.2 of the DGEIS, the project will include a 2,400-SF civic space for public use within an open-air pavilion with access from Durkee Street via a new pedestrian walkway. The Riverwalk will be improved and will further expand public access to the waterfront. Public access provisions will be ensured through easements and/or the Developer's Agreement.**

**The conversion of Durkee Street to one-way traffic will not have a detrimental impact to traffic conditions or access as demonstrated in Section 3.4 of the DGEIS. One-way traffic is common throughout downtown.**

**The PFCM will continue to operate at a new location in the Harborside area, less than a quarter mile (a five-minute walk) away from the existing DSMPL. The new farmers market location was developed in close consultation with PFCM leadership, and, as indicated by the PFCM manager at the December 9, 2019 DGEIS Public Hearing, the PFCM is in support of the relocation and believes the new site has several advantages over their current site. See also Response 2.15.**

Comment 3.2: I don't think this project is compatible with the Victorian feel of small, human-scaled, quirky, colorful, and at times decrepit, small buildings that give Plattsburgh its unique flavor. There is nothing about this design, aside from the postmodern cornices used on the front of the building, which relates to the quaint and pleasingly chaotic architectural feel of the Durkee Street neighborhood. The most recent plans show Prime LLC has even abandoned the postmodern cornices in favor of what appear to be shelves held up by

diagonal sticks. In terms of design, such cheap attempts at mimicry are unworthy of our downtown area. I see nothing in the mock-up of the proposed building that shows “frieze and cornice detailing with contrasting metal detailing to mark fenestration and other fine details.” (86) I see no fine details...Just sticks. I object to the description on page 184 that the addition of cornices, lintels above windows, and trim details that will relate to nearby buildings. I think that’s going to be an adverse impact on our community. (Beaudreau)

**Response 3.2: NYSOPRHP provided a response letter dated December 23, 2019 (see Appendix D) stating the following:**

Based upon our review the reports prepared by Curtin Archaeological Consulting, Inc (Curtin & Dymond, June 2019) and Hudson Valley Cultural Resource Consultants (Selig, October 2019) and the response to our request for additional information/clarifications about the project, it is the opinion of the New York SHPO that this undertaking will result in No Adverse Effect to historic properties, including archaeological and /or historic resources. This recommendation pertains only to the Area of Potential Effects (APE) examined during the above-referenced investigation. It is not applicable to any other portion of the project property. Should the project design be changed SHPO recommends further consultation with this office.”

In addition to NYSOPHP’s response, the Secretary of Interior’s Standards for Rehabilitation encourage contemporary design for additions to existing properties, rather than engaging in repetition of the past. The project is intentionally contemporary to contrast with the existing character to accomplish an interesting urban dynamic. The overall design approach is based on the following strategies:

- The City’s downtown fabric has been preserved by the following architectural principles:
  - The proposed development reestablishes street edges and maintains setback lines similar to the neighboring buildings and is therefore consistent with neighboring properties and the fabric of this area of the City.
  - The “U” shape of the building creates a private interior courtyard with an amenity deck facing the river for resident use. This is typical and recommended for waterfront property within an urban setting. It provides these open space amenities while still providing the desired street scape needed in an urban area.
  - Less attractive parking uses are concealed by placing them either below the building or within the interior courtyard, thus enhancing the streetscape character.
- The development is sensitive to the City’s downtown core through the use of the following architectural principles:

- The proposed primary massing scale is similar in height to the existing four, three, and two-story buildings to the west and therefore consistent with the existing buildings in this area of the City's downtown.
- The development has been designed with strong cornice lines at the corners of the proposed buildings and along both streets to reinforce the proposed buildings relationship with the surrounding buildings.
- The proposed building includes mid-block and end sections step back above the fourth level to reduce the visual scale along both streets and the pedestrian walkway to the river, which is a common architectural strategy for downtown urban waterfront developments.
- The volume of the north side of the building steps down another level at the northeast corner to complement the Bridge Street slope and further reduces visual impacts for a pedestrian. Our direct awareness is usually limited to the first floor, with peripheral awareness extending upward one to two stories.
- The "U" shape of the building is articulated in five sections in keeping with the neighborhood scale with varied and clustered building facades.
- The corner sections of the proposed building are clad in masonry and metal panel with bracketed cornices to give them greater prominence and differentiate from mid-block sections. These serve to help articulate the development as a grouping of individual buildings similar to neighboring streetscapes, in keeping with the Secretary of the Interior's Guidelines that encourage contemporary development that is sympathetic to historic contexts.
- The end and mid-block sections have punched balcony openings to create a more unified and sympathetic façade for the neighborhood and minimize the visibility of balconies.
- The building has been designed with a mix of architectural design elements sympathetic to other downtown precedents that also offers a blend of old and new, including:
  - brick and stone masonry; metal panel; board and batten siding; clapboard siding;
  - punched openings;
  - stone sill and lintel aesthetic;
  - opening proportions similar in scale;
  - larger ground level glazing for commercial uses; and
  - strong cornice expression.

The utilization of these recognized architectural principles, employed in the design of the project by the Project Architect, ensures that the project is compatible with the downtown area of the City and the surrounding buildings while at the same time revitalizing this area of the City with modern development to facilitate a walkable downtown core.



At the December 23, 2019 City of Plattsburgh Planning Board meeting, the members of the Planning Board expressed concern with the massing of the building along Bridge Street specifically the color and the expanse of the light-colored stucco wall. In response, revisions have been made to adjust the color and break up the appearance of the façade. Updated renderings are provided in Appendix C.

The DLMUD will redevelop an existing parking area that is located along the City's waterfront and will facilitate the beautification of the City's Riverwalk, which is an aesthetic improvement from existing conditions. The project represents a proportionate urban development that enhances the waterfront qualities.

Comment 3.3: The DGEIS does not provide sufficient information in regards to the potential effects of the architectural design and height of the proposed building on the downtown community character. Please provide a visual resources survey of *existing* surrounding buildings or a similar study that considers the impacts on community character. (Plattsburgh PB) A complete inventory of housing units should be prepared for a more thorough evaluation of the question of consistency with community character. (Plattsburgh Citizens Coalition)

Response 3.3: There are many factors that go into defining community character including a variety of elements such as land use, urban design, visual and historic resources, socio economic and other elements. The DGEIS provides a robust evaluation of those elements contributing to Community Character (see Section 3.1 of DGEIS) including land use, zoning, and prior planning efforts. Additional information regarding Historic and Cultural Resources is provided in Section 3.7 and Visual Resources in Section 3.10.

The DLMUD is located in the City's Downtown/central business district. The Downtown is comprised of a diverse mix of retail, restaurant, arts/entertainment, service and residential uses. In evaluating potential impacts to community character, the DGEIS cites the City's Comprehensive Plan; which encourages "intense development", and states that "a strong downtown economy typically has a strong housing presence." The Plan also encourages a diverse mix of uses (see page 82 in the DGEIS).

The planned addition of market rate housing and restaurant/retail uses will have positive benefits to the Downtown by providing additional retail and restaurant options, expanding and improving housing opportunities. The DLMUD is a project that is fulfilling public policy objectives as stated in the City's Comprehensive Plan.

The planned DLMUD is located on a surface parking lot which contributes very little to the elements that make Downtown Plattsburgh unique. The loss of surface parking may have a positive impact on community character.

The project site is zoned C-Central Business and the proposed uses are consistent with zoning. Because the City's zoning ordinance is antiquated (like many older urban centers in New York), the applicant is utilizing the Planned Unit Development tools

included in the City's Zoning Ordinance to seek approval for a project consistent with the urban design elements that constitute Plattsburgh's urban fabric.

Much thought has gone into the building and site design to ensure it conforms and enhances the built environment. The proposed five-story building is located adjacent to the Gateway building, a four-story commercial structure and a two-tiered parking deck. Please See Response to Comment 3.2.

The DGEIS community character impact assessment also includes an extensive photo inventory of the existing conditions at the project sites (refer to Pages 48 – 69 of the document), as well as renderings of the proposed DLMUD in the existing built context (see Figures 20 and 21). As noted in Section 3.1.1.1 in the DGEIS, the buildings on the west side of Durkee Street (across from the proposed DLMUD) "are a mix of attached and detached buildings ranging in height between one and four stories, with some mixed-use buildings presenting first-floor retail with dwellings above."

The DSMPL in its current state is out of character with the surrounding built context, as the site is an open surface parking lot in a suburban form that disrupts the urban context. As noted on Page 91 of the DGEIS, "The proposed [DLMUD] design will unify the streetscape with the street wall and will provide a contextual architectural design." The proposed project was reviewed by NYSOPRHP, including a review of the proposed "site plan along with building elevations and any available renderings of the proposed new construction" (see page 183 of the DGEIS). In a letter dated December 23, 2019, NYSOPRHP concluded that the proposed project would result in no adverse effects to historic properties, including archaeological and/or historic resources. See Appendix D.

Comment 3.4: The size of the proposed building on the Durkee Street Lot is also unprecedented in Downtown Plattsburgh. The overwhelming size of this project will be imposing and overshadow the small quaint character of the surrounding buildings and destroy the character of our city and its historical and cultural vibe (Harron, Erb, Plattsburgh Citizens Coalition, Beaudreau)

Response 3.4: The proposed DLMUD will comply with the maximum number of stories permitted pursuant to the Central Business Zoning District (12 stories). As presented in DGEIS Table 12, the total height is proposed at 65 feet, which is five feet greater than permitted in the C Zoning District and may be waived per §360-21(D) of the PUD regulations. These five additional feet will be negligible from the pedestrian perspective and would not alter the Downtown's historic and cultural character. As noted in Response 3.2, in a letter dated December 23, 2019, NYSOPRHP concluded that the proposed project would result in no adverse effects to historic properties, including archaeological and/or historic resources, see Appendix D.

The proposed DLMUD is designed so that the two corner segments closer to the Saranac River read as five story elements; the three larger flanking segments along Bridge Street, Durkee Street and the pedestrian walkway are all four stories adjacent to the street, with a step back on the top mezzanine level to lessen the visual impact. The volume, character, color and material articulation respond to the neighborhood

architectural context by creating a human scaled cluster of varied expression, not a singular monolith. From a building code standpoint, this is a four-story building; the 'fifth' level is a mezzanine, not a full floor.



The photo above, facing west, illustrates how the scale and impact of the neighboring City block is in fact comparable to the development. From an urban design standpoint, the DLMUD is perceived alongside the Gateway Complex as a City block, not as an individual building. The development is designed to express a varied aesthetic for the façade, not as a singular monolith (see updated renderings in Appendix C). The Ashley Building at the corner of Durkee and Bridge Streets is nearly five stories in height, similar to the height of the corner elements of the new development.

As described, the proposed DLMUD will not have any adverse visual or community character impacts considering the community benefits being provided from re-developing this underutilized urban property.

Comment 3.5: One of the problems I see in Plattsburgh is the lack of general standards as to what is the "spirit of Plattsburgh" and what styles and materials should be encouraged. (Beaudreau)

Response 3.5: As described in Section 3.1.1.3, Public Policy, The City undertook development of Downtown design guidelines in May 2009 with the release of "Streetscape and Design Guidelines - Downtown Area" prepared by Fred Keil and Associates. The Design Guidelines were never adopted or incorporated as a component of the Zoning Ordinance but may be used for advisory purposes as they provide insight on local Downtown Area architectural context and provide a reference point for design practices that may be considered consistent with area architecture. The proposed project was evaluated according to these guidelines in Section 3.1.2.3 of the DGEIS and were found to meet many of these guidelines and were overall consistent with the spirit of the recommendations made within the report. The projects will undergo coordination with

**applicable Boards and Committees to ensure that development continues to align with local land use, community character, and other relevant public policy.**

Comment 3.6: The historical and cultural character of our City will be negatively impacted by the construction of a large, modern apartment complex in our City center. A project of this magnitude is better suited to the lakefront area that has lately been dubbed "HARBORSIDE." (Woods)

**Response 3.6: Comment noted. See Responses 3.2, 3.3 and 3.4.**

Comment 3.7: The proposed structure in the Durkee Street Parking Lot will require the allowance of residential units on the first floor as well, which is against city code for the downtown area, and out of character with the surrounding buildings space (Erb)

**Response 3.7: The DLMUD will require a Special Use Permit from the City's Zoning Board of Appeals (ZBA) to allow apartments on the first floor of a multistory building within a PUD. The use is allowed by Special Permit and is therefore not in violation of City Code.**

**The DLMUD will result in a mixed residential and commercial development within a mixed-use neighborhood that is located in the City's urbanized downtown. The proposed design will unify the streetscape with the street wall and will provide a contextual architectural design that activates the neighborhood and along with the other projects signifies the revitalization of Durkee Street. The first-floor residential units will be located within the eastern part of the building near the proposed Riverwalk and the Saranac River. Due to the elevation change, the units will appear aligned with the building's second floor as the grade lowers significantly as it nears the river, see Appendix C for a section view (looking north) of the DLMUD.**

**The first-floor units will occur only along Bridge Street and the pedestrian walkway, and these will be nearly equivalent to a full story above any adjacent sidewalk elevations. As such, the typical concerns with a first-floor dwelling unit, such as privacy and security will not apply. The interior of the first-floor units will not be visible or accessible from the adjacent exterior. See Appendix C for updated renderings showing the view directed east on Bridge Street.**

Comment 3.8: PUDs allow some latitude from underlying zoning bulk and density requirements, but it is unclear why the DLMUD proposes to deviate so broadly from underlying zoning (see DGEIS § 3.1.2.2 Zoning starting on pg. 92). For example, the northeast corner of the proposed Prime building is set back only 3 feet from the property line, rather than the 15 feet that the underlying zoning would require (Plattsburgh Citizens Coalition)

**Response 3.8: Table 12 of the DGEIS compares the bulk and dimensional requirements of the Central Business (C) Zone, PUD, and proposed Durkee Street Lots 1 and 2. As noted in the table, the DLMUD would not require deviations from the underlying zoning's minimum lot dimensions, lot width, lot depth, maximum height (stories), minimum distance between buildings, maximum building coverage, or minimum open space.**

The requested deviations are modest and limited to minimum yard and maximum height (feet) requirements focused on achieving an urban form consistent with the local context. Specifically, the requested deviations would reduce the minimum 15-foot yards to 9- and 3-foot front yards (on Durkee and Bridge Streets, respectively), a 2-foot side yard, and a 5-foot rear yard; and increase the maximum building height by 5 feet (from 60 feet to 65 feet).

The PUD procedures and regulations within the Zoning Code are specifically designed to afford the developer and the City flexibility to implement various planning principles. The City has provided reasoning for each deviation within their PUD applications to the Planning Board. That being said, the deviations that are requested from the Zoning Code, including setbacks noted by the commenter, are to facilitate a downtown development that will facilitate a walkable community. To this end, in an urban setting, most buildings should be “streetwall” buildings with continuous frontage along or near the sidewalk. This will create a more urban walkable feel that will encourage residents and visitors to walk throughout the City’s downtown area. Thus, in this instance, the deviations are requested in accordance with the PUD regulations to develop a project that is consistent with its urban setting.

Comment 3.9: The text talks about City Code Chapter 300, Subdivision of Land, and states that it is “not required to strictly adhere to the bulk and dimensional requirements stipulated in Schedule II of Chapter 360, Zoning, or to 360-18, which restricts the number of buildings and dwelling units on each lot. Instead, bulk and dimensional requirements may be varied to provide an alternative...in order to preserve the natural and scenic quality of open lands”. Currently, the Durkee Street lot constitutes the largest open space in the downtown area. It provides views of scenic streets with historic buildings eligible for listing on the National Register of Historic Places. It also has a small patch of green space, where once a gas station stood. This “little green space” is of public value, and if anything, should be enhanced or enlarged, not eliminated. As for the bulk and dimensional variance, my estimation is that the 115-unit structure being proposed by Prime LLC is at least ten times the size of surrounding structures. As is, the mega-complex stands to overpower the downtown area and significantly change its appearance and atmosphere. The average building height and the height of the buildings which were originally on the east side of Durkee Street is three stories, not five. The report suggests that the Planning Board is authorized to waive requirements stipulated in 360-21 (D), hoping that this is indeed what will happen. But in my view, the building of a massive, overpowering gated community in the most historic part of our downtown does not allow for the “maintenance of open lands” nor does it “ensure the preservation of the natural and scenic qualities of such open lands.” (Beaudreau)

**Response 3.9:** The existing DSMPL consists primarily of a large, auto-oriented, paved public parking lot and does not constitute open space. The site itself does not provide any unique or important views or vistas. The proposed DLMUD, while a departure from existing conditions on the site, would improve pedestrian and visual connections to the Saranac River from Downtown and the new Westelcom Park via a pedestrian walkway and the

**construction of the proposed improved Riverwalk. The Riverwalk will improve connectivity to the City's waterfront including historic and cultural features building on the recommendations of the SRTG Feasibility Study. The parking lot does not provide views of scenic streets.**

**The project has been specifically designed to fit the property and create more of a downtown walkable feel to Plattsburgh downtown area. The size of the project is designed to conform to the property and is intended to revitalize the downtown core and beautify the Saranac River waterfront.**

**See response to Comment 3.2 for additional information on building scale, architecture and context.**

Comment 3.10: The proposed building would be the tallest habited structure downtown exceeding the height restriction in the current zoning (**Ford**)

**Response 3.10: As presented in Table 12 of the DGEIS, the DLMUD will conform with the maximum number of stories permitted in the underlying C Zoning District (twelve stories). The total height is proposed at 65 feet, which is five feet greater than permitted in the C Zoning District. This five-foot exceedance is not notable from the pedestrian perspective and may be waived per §360-21(D) of the PUD regulations.**

Comment 3.11: The proposal does not appear to enhance the Riverwalk in accordance with the Saranac River Trail plan. (**Clinton County PB**)

**Response 3.11: This statement is incorrect. As presented in the DGEIS, one key component of the proposed project is improvements to the Saranac Riverwalk. The existing Riverwalk consists of a wooden boardwalk and paved areas that are in a deteriorated condition. In addition, the existing trail lacks connections to Bridge Street and the existing connection to Broad Street is inaccessible for safety reasons; therefore, pedestrian and bicycle use is limited under existing conditions. The proposed project will replace the existing boardwalk and create an approximately ten-foot-wide, multi-use path that will provide ADA accessibility and include an overlook, benches, bicycle infrastructure, LED lighting, and landscape plantings. The improved Riverwalk will also connect (via a crosswalk over Bridge Street) to MacDonough Park to the north and the soon to be constructed Phase II of the SRTG to the south at Broad and Durkee Streets. As such, the proposed project would enhance the Riverwalk and support the goals of the SRTG Plan.**

Comment 3.12: The *Clinton County Destination Master Plan* stipulates that "We will maintain the unique character of our region while increasing economic opportunities and quality of life for those who live here through the development of carefully planned tourism." What is carefully planned about building a giant apartment complex? How does it help to "maintain the unique character of our region"? I see no enhancement of the unique character of our region in a building which essentially is based on a template that Prime uses throughout the state. I also don't see how it will attract visitors and tourists. (**Beaudreau**)

**Response 3.12:** As stated in Section 1.2 of the DGEIS: Plattsburgh proposes to build on recent public and private investments, including a new municipal marina, streetscape improvements, and the renovation of historic buildings to create a vibrant downtown that serves the needs of local employees, residents, students, and visitors. The focus will be on mixed-use infill development, a greater variety of retail and housing, expansion of the successful Farmers' Market, and providing an enhanced connection to the waterfront."<sup>6</sup> The DRI intends to advance downtown revitalization through transformative housing, economic development, transportation, and community projects that will attract and retain residents, visitors and businesses - creating dynamic neighborhoods where tomorrow's workforce will want to live, work, and raise a family.

See also Responses 3.2 and 3.3.

Comment 3.13: The DGEIS does not provide sufficient information in regards to design and future development/expansion of the Plattsburgh Farmer's and Crafter's market to properly address potential impacts on the community character, specifically the City's waterfront overlay district. (Plattsburgh PB)

**Response 3.13:** As described in Section 2.2.8 of the DGEIS, the City-owned building proposed for the relocated PFCM (Building 4 at 26 Green Street) is a slab-on grade metal-framed building with metal siding and a sloped metal roof. The building is anticipated to be rehabilitated, including exterior façade improvement (e.g. painting), interior remodeling (e.g. painting, lighting, removal of walls), improved ventilation, reconfiguring of existing fencing, electrical upgrades, the addition of a new pavilion space, and additional restrooms. The existing paved area providing access from Green Street to the project site will be reconfigured to provide parking and passive open space, including a pavilion area.

As noted in Section 1.1 of the DGEIS, "the level of detail in a Generic Environmental Impact Statement (GEIS) is usually provided at a conceptual level of detail and presented in broader scale/prospective. The level of detail of associated technical studies and evaluations will vary within a GEIS depending on the type of action, the availability of information, the scope of the project and the planned use of the GEIS." The level of detail provided regarding the design and future development/expansion of the PFCM is consistent with the SEQRA requirements for a GEIS. Additional information on the future PFCM will be provided to the public as the plans are further refined. The proposed improvements to Building 4 at 26 Green Street (the future PFCM) will undergo future coordination with applicable City Boards and Commissions to ensure consistency with applicable public policy.

Comment 3.14: 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

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<sup>6</sup> "Downtown Revitalization Initiative, North Country – Plattsburgh." New York State Downtown Revitalization Initiative. *New York State*. <https://www.ny.gov/downtown-revitalization-initiative/north-country-plattsburgh>. Webpage accessed July 23, 2019.

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. (Gervich)

**Response 3.14: See Responses to Comments 3.2 and 3.3.**

Comment 3.15: There are many potential adverse impacts in terms of Land Use, Community Planning, Zoning, and Public Policy. The Durkee Street Parking Lot will be transferred from public ownership to private ownership. This alone has unknown and unexplored immediate and future impacts, severely limiting potential future uses. What limitations on community use and access will result from this transfer, and how can they be mitigated? The parking lot is not just used as a parking lot, but also as a public gathering (Erb)

**Response 3.15: As a component of the DLMUD, approximately 2.76 acres of a 4.66-acre parcel will be transferred to private ownership to facilitate development of mixed-use development consisting of 115 residential units and approximately 10,000 square feet of commercial space. Upon transfer the City will retain public access to the waterfront via a 30-foot-wide pedestrian corridor connecting Durkee Street to the proposed Riverwalk. Additionally, public use of 2,400 square feet of civic space with the current PFCM structure is provided. Easements and shared access agreements to be entered into by**



the City and Prime will ensure public access to and enjoyment of these features. The City will also retain and improve the Riverwalk from Broad Street to Bridge Street along the Saranac River. It is not intended that there will be public access to the residential portions of the DLMUD, the underground parking deck, or the interior portions of the rehabilitated PFCM building.

Once Prime has obtained approvals for the redevelopment of the Durkee Street Parking Lot, it will purchase the project site from the City of Plattsburgh. The commenter states that this transition in ownership has “unknown and unexplored immediate and future impacts, severely limiting potential future uses.” As set forth in the DGEIS, the transfer to private ownership will create additional taxable land in the City of Plattsburgh to the benefit of the City and its residents. Furthermore, the Project is adding beneficial uses (residential and commercial) to Plattsburgh’s downtown area, creating a walkable community that will spark downtown economic development. The economic development and enhancements to the waterfront would not be realized if the Project Site remained a municipally owned parking lot, which is not the best use for this waterfront parcel.

Future uses on the project site are governed by the City’s Zoning Ordinance. The transfer of ownership from public to private does not limit the potential uses for the project site. Instead, it allows for development to occur on the project site that might not otherwise be financially feasible. Without private development, the project site might not be redeveloped and would remain a municipal parking lot. Further, as discussed in the DGEIS, the project site is being developed as a PUD, which is a flexible zoning tool intended to permit multiple uses on the project site, which mitigates the concern that future uses will be limited on the project site.

The commenter noted that the existing parking lot is a place of “public gatherings”. However, note that the project site is a typical municipal parking lot and is not intended for public gatherings. Looking forward, public gatherings will be facilitated along the revitalized Riverwalk, additional civic space and the renovated farmers market. The development of the project site will result in more residents and visitors utilizing this part of Plattsburgh for retail shopping, restaurant use, the Riverwalk area, farmers market, etc.

The only limitations on community use and access that will result from the transfer of the project site to a private company would be the loss of municipally supplied off-street parking spaces, which are being provided throughout the City. Otherwise, the waterfront parcel is remaining municipally-owned land and available for public access and use. The farmers market is being renovated and remains available for public use. In addition, Prime has identified an area for civic space (open area pavilion) that may be used for public gatherings or other commercial uses permitted under the City’s Code. These public and semi-public areas will be accessed through the Riverwalk or the public access easement that is being provided through the project site.

Comment 3.16: All proposed projects will undergo specific changes in land use as well, which all need to be considered for adverse impacts. (Erb)

**Response 3.16: The DGEIS includes a land use impact analysis (refer to Section 3.1). The analysis includes a description of the existing land uses on the project sites, as well as the proposed future land uses on the project sites. The determination of impacts is based on this information. As stated on Page 91 of the DGEIS, “the proposed projects are proposed for the revitalization of the project area and will result in permitted uses that will beneficially affect the land use character of the project area.”**

Comment 3.17: What will be the adverse environmental impacts as a result of increased foot traffic and human population in the proposed repurposing of the PMLD building adjacent to the sewage treatment plant? This statement assumes there are none, and I strongly disagree. (Erb)

**Response 3.17: The proposed PFCM relocation will involve improvements to Building 4 at 26 Green Street. The relocated PFCM will have the positive impact of revitalizing the currently underutilized site, which is consistent with the goals of the DRI. Pedestrianization of the waterfront is a desired objective of the City and instrumental to the future master planning efforts for the Harborside. Also see Response 3.120.**

### 3.2 AQUATIC AND NATURAL RESOURCES

Comment 3.18: It seems outlandish to me that this statement suggests there will be no adverse environmental impacts to aquatic and natural resources. The statement appears to assume this simply because there are no water resources directly on the parcels of any of the proposed projects; however, several of the projects occur on land directly adjacent to both Lake Champlain, and the Saranac River. This warrants further investigation into what adverse environmental impacts might occur as a result – especially for the Durkee Street Mixed Use Development and the proposed new location of the Farmers market on Green Street. (Erb)

**Response 3.18: As described in Section 3.3.1 of the DGEIS, the project area is partially served by a municipal stormwater collection system. Some of the project sites are connected to storm drain piping, or potentially the municipal sanitary sewer system, and other sites discharge stormwater directly into the Saranac River. As the DLMUD will involve over one acre of disturbance, a SWPPP is required and the water quality volume from new impervious areas must be captured and treated accordingly. For the remaining sites, construction-phase stormwater pollution control is required, which will include implementing temporary and permanent erosion and sediment control measures. As there are no stormwater facilities, runoff quality controls, or runoff quantity controls located on any of the project sites, the proposed projects will *improve* the stormwater conditions flowing from the sites to the Saranac River.**

The existing conditions with the Durkee Street parking lot are entirely paved with no stormwater controls for water quality. The majority of the parking lot discharges

directly through a single at grade culvert laid at the top of the bank of the Saranac River. There is no outlet protection on the culvert and the bank of the Saranac has been severely eroded (pictures below).

The Durkee Street Mixed Use Development project will be designed in conformance with the NYSDEC's Stormwater Management Design Manual and Standards and Specifications for Erosion and Sediment Control. As such, it will contain water quality and erosion control measures. In addition, the project will obtain a NYSDEC General Permit GP-0-15 -002, the State Pollution Discharge Elimination System, which has been developed in accordance with Section 402 of the Clean Water Act.

In order to obtain this permit the project will develop a full Stormwater Pollution Prevention Plan (SWPPP). The SWPPP will include measures to mitigate pollution both during construction and throughout the life of the project with a maintenance program for all water quality features.

The project will also obtain an Article 15, Protection of Waters, joint permit from the NYSDEC and US Army Corp of Engineers in order to restore the eroded bank and properly install a protected discharge to the Saranac River. The NYSDEC, which will issue both of the permits is an involved agency in the DGEIS and has been provided the document for comment.





Comment 3.19: Increased foot traffic, vehicular traffic, and human population present in the area surrounding the former PMLD building should be investigated for negative impacts on both fish, bat, bird and endangered species populations in that area as well as their habitats. (Erb)

**Response 3.19:** The project area is located in an urban environment. According to the USFWS online consultation through IPaC, the Northern Long-eared Bat, a threatened species, is potentially located within the vicinity of the project area. NYSDEC Natural Heritage also determined that the Common Loon (a species of special concern) has been documented in Lake Champlain at Plattsburgh, and so could occur in the vicinity of the proposed PFCM relocation site, the DLMUD site, and the Riverwalk project site. No other endangered, threatened, or rare species were identified as potentially occurring within the vicinity of the project area. The potential for significant adverse impacts on endangered, threatened, and rare species is typically of concern when a project would interfere with a species' habitat. As noted in Section 3.2.2.2 of the DGEIS, with tree clearing timing restrictions in place or under consultation with USFWS, no adverse impacts to the Northern Long-eared Bat area anticipated to occur.

Comment 3.20: The new structure proposed for the Durkee Street Lot should be investigated for the same impacts as well as potential adverse impacts on sunlight to the wildlife and vegetation surrounding and within the river itself. (Erb)

**Response 3.20:** Refer to Response 3.19. The DLMUD building height is proposed to be 65 feet, which is a deviation from the underlying C Zoning District requirement by five feet. In general, a shadow impact occurs when the incremental shadow added by a proposed project falls on a sunlight-sensitive resource and substantially reduces or completely eliminates direct sunlight exposure, thereby significantly altering the public's use of the resource or threatening the viability of vegetation or other resources. The direction and length of shadows vary throughout the course of the day and according to the time of year. Because the sun rises in the east and travels across the southern part of the sky to set in the west, the earliest shadows would be cast almost directly westward. Throughout

**the day, they would shift clockwise (moving northwest, then north, then northeast) until sunset, when they would fall east on the Saranac River. Therefore, shadows are not anticipated significantly alter the public's use of the Saranac River or the Riverwalk.**

Comment 3.21: The DGEIS claims that there will no disturbance of Riverbank, however, it does not include Stormwater discharge piping to the river (**Plattsburgh Citizens Coalition**)

**Response 3.21: See Response 3.18.**

### **3.3 MUNICIPAL UTILITIES**

Comment 3.22: 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 (**Gervich**)

**Response 3.22: The DLMUD has and is being coordinated with the City's MLD. One of the City's main power feeds is immediately adjacent and partially within the limits of the project, with three sets of transformers on, or partially on, the property. The existing power feed will remain undisturbed throughout the project.**

**The existing Durkee Street Parking lot is fed off of the transformers on the property. In coordination with PMLD, the approach will be to re-use the existing feed for the Durkee Street Parking Lot to feed the project. The projects estimated total electrical demand is 390,000 kwh/year with a max demand of 1025kw.**

**The project is proposing highly efficient MINI Split electric climate control units. It is anticipated that two new transformers will be needed on the project site. The cost for these transformers will be paid by the project. On January 27, 2020 the PMLD issued a letter stating that the City has sufficient capacity within its electrical supply and distribution system to service the project (see Appendix D). Any potential costs associated with upgrades to the electrical system as a direct result of the project will be paid by the developer; no ROI calculation is required to be made for the developer's costs.**

**The City is currently allocated 103.5 MWh of electric power per month at very low rates. Should the City's monthly usage exceed this figure, electric rates charged to the City increase substantially and those additional costs are passed on to City residents and businesses. The bulk of additional power demand created by the GEIS projects will be attributable to the DLMUD with a maximum anticipated demand of 1,025 kWh (or 1.025 MWh). This addition represents less than 1% of the City's monthly power allocation. Additional demand for power created by the other GEIS projects is anticipated to be a fraction of that generated by the DLMUD and of little consequence.**

During the warmer months, City-wide power usage averages approximately 55 MW per month so the additional demand created by the GEIS projects should not result in the City using more than its allocated amount of power during these periods. During the winter months, City-power usage is much higher due to heating needs and fluctuates between 90 MW and 120 MW. Therefore, even without the additional demand created by the proposed GEIS projects, the City regularly exceeds its monthly power quota during the winter months. Consequently, any project requiring electric power, regardless of the size of the project, will result in the City exceeding its power allocation more frequently during the winter. However, the degree to which a new project will affect the frequency with which the City exceeds its power quota is heavily dependent on prevailing weather conditions and customer usage. Therefore, any analysis of the effect a new project would have on the City's ability to remain below its power quota would be speculative at best.

Comment 3.23: There is no mention of projected electric usage and what the potential negative impacts on the community might be as far as electric rates for city residents. Please include this information as well. What electrical zone is the project(s) located in. Is the transmission and distribution to that zone adequate to support the additional load? What will the electrical load be for the project(s)? What type of heating is being proposed? Will the existing electrical infrastructure require any upgrades to accommodate the proposed project(s). If so, will the projects return on investment be able to justify such a capital expenditure within Public Service Commission regulations. Please explain the associated costs and return on investment in detail so that the potential adverse impacts can be properly and thoroughly understood and evaluated. How will the proposed project impact the at-capacity status of the electrical system in that neighborhood? What limitations will be required? (Erb; Plattsburgh Citizens Coalition)

**Response 3.23:** See response to Comment 3.22 above.

**The Plattsburgh Municipal Lighting Department does not designate 'electrical zones' within its area of operation.**

### **3.4 TRAFFIC AND TRANSPORTATION SYSTEM**

Comment 3.24: The large apartment building already will limit activity in the DSL by blocking vehicles and pedestrians from the north. (T Palkovic)

**Response 3.24:** While the DLMUD will change access to the site, compared to existing conditions, vehicles and pedestrians will continue to be able to access the site from the north. Notably, the proposed project's underground parking garage will have its entrance on its northern (Bridge Street) frontage and pedestrians will continue to be able to access the site and points south via the improved Riverwalk and Durkee Street.

Comment 3.25: I would like to see an access/exit from the parking area behind the North L-shape building onto Bridge St. This would allow cars to flow through the parking and not get trapped if the drive between buildings is blocked/backed up. (Metz)

**Response 3.25: The site topography does not allow for the access as described in the comment. The building is sited to match the existing sidewalk elevation at the corner of Durkee and Bridge Streets. From this corner, the site topography drops off significantly in both directions (10 feet along Bridge Street, 7 feet along Durkee Street, and a further three-to-four feet along the pedestrian walkway), such that the east edge of the parking area is a full level above the neighboring Bridge Street elevation; this makes another access point to Bridge Street impractical.**

Comment 3.26: The report states that as far as Durkee Street reconfiguration goes, a one-way street is viable. The report states “The existing loading zone” is to be moved to a “to be determined location”. Based on this, it concludes that if Durkee is made into a one-way street it will “not result in significant adverse impacts to traffic conditions”. This is an inadequate description of the issues involved on Durkee Street. Durkee Street, aside from having many businesses of its own, serves as a delivery site for many of the restaurants on Margaret Street. At any given time in the day, there can be 18-wheel trucks double-parked on Durkee, as well as FedEx and UPS delivery trucks stopped in the southbound lane with emergency lights flashing. With a two-way street, cars stuck behind these double parked delivery trucks can venture into the opposite lane, but as a one way street, traffic will come to a standstill. As a northbound one-way street, Durkee will divert southbound traffic emerging along state route 9 onto upper Bridge Street, which itself often has large delivery trucks parked. So the loss of double lanes will add to the congestion of this intersection. Add to that the egress coming into and out of the Prime parking courtyard, and the diagonal parking planned, plus the double parked trucks, pedestrian crosswalks, and you have a recipe for an unworkable street. This is far from the pedestrian, cyclist and roller-friendly scenario envisaged by the Smart Streets movement’s goal of delivering safer, more welcoming urban spaces. people who live and work in the Durkee Street area seem to have a better impression of how the street functions than the fancy metrics presented in the DGEIS. The plan as envisaged has not sufficiently studied the real-world use of Durkee Street as a delivery lane nor has it suggested ways to remediate the abovementioned problems. Instead of retaining or adding to street space devoted to cars, and freeing up urban areas for mixed use or car-free spaces, this plan reduces the street space at the same time adding the potential vehicular traffic of 115 households into that reduced space where trucks will be parked to make their necessary deliveries. This is a recipe for a chaotic, congested, non-functioning, pedestrian-unfriendly street. Thus it is hard to envisage how the report can conclude that “the reconfiguration of Durkee Street to a one-way street...would not result in significant adverse impacts to traffic conditions”. **(Beaudreau)** Changing Durkee Street to one-way traffic is unsafe and inconvenient to traffic flow and biker and pedestrian traffic. **(Harron)** One-way traffic on Durkee Street will limit vehicular traffic entrance only to the south end of the proposed privately owned DSL lot. **(T Palkovic)** The Board believes that the proposed Durkee Street redesign 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. (Clinton County PB)

**Response 3.26:** Traffic volumes on Durkee Street under a one-way condition will greatly reduce the volume of vehicles travelling on Durkee Street. Under the 2022 PM No Build Condition (selected as the highest volume period) it is expected that 192 vehicles will travel north and 191 vehicles will travel south (383 vehicles). Under the 2022 PM Build (Durkee Street One Way) Condition 179 vehicles will enter from the south and 242 vehicles will exit to the north; 210 on average. Eliminating two-way travel reduces (by almost half) the number of vehicle pedestrian interactions or potential conflicts and allows a pedestrian to look one way/rather than two when crossing a street. Similar benefits flow to other non-motorized travelers.

The Durkee Street Mixed Use Development has provided an on-site loading space in accordance with the City's Zoning Code. Turning templates will be developed to address vehicular traffic within the project site. In addition, the project will require deliveries to tenants be made at off-peak demand times so as not to conflict with peak hour traffic. Any deliveries that require vehicles larger than those that can be accommodated within the projects on-site loading zone will be required to made on-street, consistent with the other businesses downtown. The DSMLD has provided an on-site loading space in accordance with the City's Zoning Code. Turning templates will be developed to address vehicular traffic within the project site. In addition, the project will require deliveries to tenants be made at off-peak demand times so as not to conflict with peak hour traffic. Any deliveries that require vehicles larger than those that can be accommodated within the projects on-site loading zone will be required to made on-street, consistent with the other businesses downtown.

As stated in this comment, large delivery trucks can often be found double parked on Durkee Street despite the provision of an on-street loading zone near the intersection of Durkee and Bridge Streets. That loading zone is not large enough to accommodate tractor trailers and even smaller delivery vehicles often block access to a crosswalk that bisects the zone. Delivery trucks can also be seen double parked on City Hall Place where they often block access to that street's marked bicycle lanes. Another loading zone exists on Durkee Street south of Broad Street but the location of this zone is impractical for most downtown deliveries and would be unaffected by the proposed improvements to Durkee Street. Clearly, this current system for managing downtown deliveries is not ideal.

The City is currently considering multiple options for how best to improve this system. These options include the provision of a new loading zone on the improved Durkee Street that would be the size of several parking spaces and which would restrict deliveries to certain hours of the day. Another option is to designate the traffic lane on the north side of Bridge Street between Durkee and Margaret Streets as a loading zone during certain hours as well. This area is large enough to accommodate tractor trailers and has been used unofficially as a loading zone by delivery drivers for years. It would



**also provide a convenient delivery location while construction activities on Durkee Street are ongoing.**

**Additional loading zones, likely with restricted hours of use, could be designated and appropriate signage installed as necessary in other downtown locations where such a designation could be expected to have a minimal effect on local businesses. In any case, the City would no longer countenance the use of traffic lane(s) on Durkee Street for parking by delivery trucks. Strict enforcement of these provisions by the City's parking enforcement staff and police department will be a key part of the success of any new delivery management system.**

Comment 3.27: 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. **(Clinton County PB)** The traffic direction proposal seems to be hurting local existing business more than helping them. the proposed parallel parking on the West side blocks 2 operating garage bays of an existing successful downtown business. the proposed one way lane of traffic will be blocked several times a week during work hours by trucks delivering to the existing business that access their stores/restaurants from Durkee St. the proposed new parking on the west side will also block JCEO's access for their food delivery truck for their clients in need **(Ford)**

**Response 3.27: As noted in Response 3.50, the plans for Durkee Street are still under development. The location of parking spaces will be updated to reflect the Vehicle and Traffic Law required setbacks from fire hydrants, crosswalks, and intersections and will also maintain access to Durkee Street properties via existing curb cuts. Also, see Response 3.26 above.**

Comment 3.28: 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. **(T Palkovic)**

**Response 3.28: NYSDOT does not uniformly discourage the use of angled on-street parking. NYSDOT's 2017 Highway Design Manual notes that "front-in diagonal parking may be retained on local streets and collectors where design speeds are 35 mph (60 km/h) or less and traffic volumes are low." Any obstruction caused by deliveries is considered temporary or short-term. Also, see Response 3.26 above.**

Comment 3.29: 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 **(Gervich)**

**Response 3.29:** While Durkee Street currently does not have a designated bike lane, the current proposal for facilitating bicycle traffic through the area surrounding the DLMUD is by routing that traffic along the proposed Riverwalk, a shared-use path that will allow cyclists to travel first between the Gateway Complex and Broad Street and then along the Saranac River to where it meets Bridge Street. This will allow bikers to avoid the frequently congested intersection at Bridge and Durkee Streets. The Riverwalk will also assist in connecting Phase II of the SRTG to a future Phase III of the SRT.

As no existing bike lanes are being removed as part of the DRI projects and as the Riverwalk will provide enhanced bikeability through an area of downtown that is not easily traversed by bicycle, the new traffic patterns and connectivity proposed as part of the GEIS projects will enhance on-street bikeability in the downtown.

New bike racks are proposed as part of the DLMUD, the Riverwalk, and the Arts Park and appropriate signage will be installed where new bike infrastructure is implemented. While no new on-street bike lanes are proposed as part of the GEIS projects, the designation of US Route 9 as part of the NYS Empire State Trail will result in new signage along existing bike routes on Durkee Street, Bridge Street, and other thoroughfares throughout the City.

Comment 3.30: The proposed farmers market location is an opportunity to continue to promote bike eco-tourism. Set up bike racks at Market. (Metz)

**Response 3.30:** Comment noted.

Comment 3.31: The Peak Hour Traffic generation numbers for each project are given in the chart, but not the current numbers. Please include those numbers for comparison. (Erb)

**Response 3.31:** Trip generation calculations are provided for the proposed projects to obtain an estimate of the volume of traffic that will be added to the road network. Estimates for current land uses are not calculated as these trips are included in the existing traffic volume count data.

Comment 3.32: The traffic count numbers are inconsistent with City commissioned traffic study conducted by Professional Traffic Engineers which indicated the Southbound City Hall Place traffic to be over three times more than the mere 110 vehicles reported in this traffic study. The City of Plattsburgh commissioned a traffic study of the same intersection as part of a NYSDOT / Federal Highway Funded Project Number PIN 7752.67 Margaret Street and City Hall Place Project and reported traffic counts of 330 vehicles compared to the 110 vehicles reported in the GEIS. While minor variations of 5% or 10% may occur over time, the City commissioned traffic study of the same intersection reported a traffic volume at the most critical leg of the most critical intersection that is 300% higher than that reported in the GEIS. There are numerous other such examples though out the traffic study portion of the GEIS, that are grossly inconsistent with the PIN 7752.67 project traffic study as well as the Route 9 traffic study. This brings into question the validity of the entire

GEIS Traffic Study. The traffic study should be repeated by an independent, objective qualified 3rd party. **(Plattsburgh Citizens Coalition)**

**Response 3.32: Traffic count data was collected for the study in September 2019 by an independent traffic data collection company. They are representative of current volume conditions. The volumes for the intersection in question are accurate and show close correlation to the volumes at adjacent intersections.**

**Traffic count data from NYSDOT PIN 7752.67 was collected in 2005 and is 14 years old. That data is outdated and should not be used as representative of current conditions. Traffic count data that is 3 to 5 years old and older would typically be updated for current conditions.**

Comment 3.33: The traffic count data provided in the GEIS traffic study also deviates significantly from available traffic data collected and published by the NYSDOT, such as NYSDOT traffic data for Station 711104. This brings into question the validity of the entire GEIS Traffic Study. The traffic study should be repeated by an independent, objective qualified 3rd party. **(Plattsburgh Citizens Coalition)**

**Response 3.33: See response to Comment 3.32. Traffic count data from NYSDOT Station 711104 was collected in 2014 and is 5 years old. That data is outdated and should not be used as representative of current conditions. In this comment, no specific instances are listed of data from the GEIS traffic study deviating significantly from traffic count data from NYSDOT Station 711104.**

Comment 3.34: The City Hall / Bridge Street intersection is very congested every day especially during morning rush hour. The traffic analysis reports the level of service E (poor levels of comfort and convenience). The traffic counts for Southbound City Hall Place presented in the report are conspicuously low and not consistent with other traffic data collected at that intersection. **(Plattsburgh Citizens Coalition)**

**Response 3.34: See response to Comment 3.32.**

Comment 3.35: The traffic county data includes only vehicle traffic, however, pedestrian and bicycle traffic counts should be also be conducted. Typically, that data is collected during spring summer and fall months as well as winter. Since walkability and bikeability has been identified in DRI documents as a key objective, it is imperative that data should also be collected for these modes of transportation so that the projects impacts to these concerns be thoroughly evaluated and understood. Within traffic and transportation systems, pedestrian traffic should also be considered and negative impacts on walkability and bikeability based on site plans for the proposed projects be detailed. **(Erb; Plattsburgh Citizens Coalition)** Pedestrian Facilities evaluation in the GEIS is limited to one sentence, "The proposed projects will improve pedestrian facilities through improved connectivity, improved crossings, and additional ADA/all access crossings." This evaluation is wholly inadequate. The overarching objective for a DRI is to create a more walkable, more bikeable, more quaint feeling downtown. The GEIS should be modified to include critical

analysis of this core aspect of the DRI. Additional study must be provided to evaluate alternatives and opportunities for increased pedestrian mobility, pedestrian safety, opportunities for additional streetscapes beyond enhancement of the existing Westelcom park and the existing river walk. The GEIS should also evaluate pedestrian safety as it relates to access control safety for all the proposed projects (**Plattsburgh Citizens Coalition**)

**Response 3.35: The traffic count data was collected in September 2019 and included counts of pedestrians and bicyclists as well as vehicle classification. The pedestrian, bicyclist, and vehicle classification data are included in the traffic count printouts in Appendix A of the Traffic Impact Study (included as Appendix C to the DGEIS). Additionally, the data was included in the traffic analysis of each intersection studied.**

Comment 3.36: The GEIS does not provide any significant evaluation of multi-modal travel within the project area. Specifically, the GEIS should evaluate bicycle circulation as documented in the City adopted Saranac River Trail Master Plan. The GEIS should, more specifically, evaluate alternatives for bicycle access on Durkee Street, Bridge Street and Green Street. The DRI Plan presented in the GEIS, however, would destroy that planned connections along Durkee Street, Bridge Street and Green Street and create an extremely unsafe passage for bicycles in the core of the downtown business district. This would potentially jeopardize the NYSOPRHP and NYSDOT grant funds for the Saranac River Trail Phase 2 project and NYSDOT grant funds for the Saranac River Trail Phase 3 project, that have been allocated to accomplish these community adopted objectives. (**Plattsburgh Citizens Coalition**)

**Response 3.36: As noted above in Response 3.35, the Traffic Impact Study includes bicycle and pedestrian counts. The 2006 SRTG Feasibility Study includes a Phase II trail to connect the intersection of Broad Street and Durkee Street north via the DSMPL, across Bridge Street, and to MacDonough Park. As noted in Response 3.11, the proposed Riverwalk improvements will include replacement of the existing deteriorated boardwalk with an approximately ten-foot-wide, multi-use path, which will connect (via a crosswalk over Bridge Street) to MacDonough Park to the north and the soon to be constructed Phase II of the SRTG to the south (via a path between the Gateway Complex and Broad Street) at Broad and Durkee Streets. The proposed Riverwalk improvements will be supportive of the recommendations of the SRTG Feasibility Study, providing a new connection from Broad and Durkee Street to MacDonough Park via the Riverwalk.**

Comment 3.37: The information provided in the DGEIS regarding the abandonment of Division St and creation of the new parking lot does not sufficiently address pedestrian facilities. Pedestrian connectivity between Oak St and Margaret St should be maintained to be in line with the City's goals for increased walkability and complete streets. (**Plattsburgh PB**)

**Response 3.37: As discussed in Section 2.1 of the FGEIS, the plans for the APMPP have been refined since issuance of the DGEIS. The updated APMPP includes a maximum eight-foot-wide sidewalk along the northern edge of the project site. The proposed improvements to Division Street, while eliminating this east-west roadway, would not significantly alter**

**pedestrian travel patterns, as alternate east-west connections between Margaret Street and Oak Street are available via Broad Street (approximately 350 feet south of Division Street) and Brinkerhoff Street (approximately 250 feet north of Division Street).**

Comment 3.38: Although a traffic impact analysis was completed, the DGEIS does not sufficiently address connectivity concerns, commercial loading/unloading, and any impacts on existing businesses on Durkee St. **(Plattsburgh PB)**

**Response 3.38: See Response 3.26.**

Comment 3.39: The new transportation routing plans do not provide adequate information to assess vehicular traffic patterns/impacts. **(Gervich)**

**Response 3.39: A detailed Traffic Impact Study was completed and is included in Appendix C of the DGEIS.**

Comment 3.40: I would also suggest that the council pursue implementing a Complete Streets policy prior to any further changes or improvements to streets, sidewalks, or parking lots as a mitigating measure. **(Erb; Plattsburgh Citizens Coalition)**

**Response 3.40: Smart Growth America defines “Complete Streets” as “streets for everyone. They are designed and operated to enable safe access for all users, including pedestrians, bicyclists, motorists and transit riders of all ages and abilities.” The proposed project would be supportive of Complete Streets policies. Notably, the proposed Riverwalk improvements would include replacing a deteriorated boardwalk with an ADA-accessible ten-foot-wide, multi-use path. In addition, the Durkee Street streetscape improvements would include addressing existing substandard pedestrian safety and access conditions, including uneven, narrow sidewalks and the prevalence of parked vehicles overhanging into the sidewalk space.**

Comment 3.41: The GEIS relies on several non-code compliant designs, which creates an adverse impact for maneuverability and safety at the individual sites and sets a precedence that is detrimental to other developments throughout the City. To mitigate this adverse impact, the GEIS should establish as criteria that all proposed work shall be compliant with generally accepted standards for highway design and traffic safety (i.e. NYSDOT Highway Design Manual, AASHTO, etc.). **(Plattsburgh Citizens Coalition)**

**Response 3.41: As this comment does not identify any specific instances of noncompliance with the City Code, this response will address the GEIS projects as a whole.**

**Formal design work for all GEIS projects will be completed by professionally licensed engineers and will, whenever practical, comply with both the City Code and NYSDOT standards. In the event a deviation from City Code or NYSDOT standards is deemed to be in the best interest of one of the GEIS projects, the deviation will be reviewed, and all potential environmental and safety concerns will be considered and addressed. The**

**City's Planning Board will provide advisory review and guidance for all proposed GEIS projects that do not require its formal approval.**

Comment 3.42: The proposed farmers market location will result in people driving from outside this area and may necessitate additional signage and/or dedicated street lanes. (Metz)

**Response 3.42: Comment noted. Signage will be reviewed during the site planning stage.**

### **3.5 PARKING**

Comment 3.43: The study makes no definitive statement of the adverse effect of the metered parking system on down town 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. (T Palkovic)

**Response 3.43: As noted in Section 3.5.1 of the DGEIS, parking issues in the City's downtown area have been a focus of the community and the City administration for many years and it has been recognized that parking management is a necessary component of downtown revitalization. Accordingly, management strategies to improve the parking conditions in downtown are being assessed and will continue to be reviewed regardless of whether any of the Downtown Area Improvement Projects move forward.**

In 2017, the City engaged Carl Walker Consulting to conduct a parking study for the downtown area (the "Carl Walker Parking Study") and several parking management options were developed for the City to consider. An evaluation of the potential impacts of displacing public parking as a result of any redevelopment of the DSMPL was included as a component of the Carl Walker Parking Study.

One of the recommendations of the Carl Walker Parking Study was to eliminate the Parking Special Assessment District in favor of parking fees. In October 2018, the Common Council adopted a Resolution supporting the transition to a paid parking system within the City's Downtown District. The City subsequently established the Plattsburgh Parking Advisory Committee (PPAC) in November 2018 to assist with further refining and implementing the Carl Walker Parking Study recommendations. At its February 19, 2019 meeting, the PPAC adopted Resolutions recommending that appropriate steps be taken by the City to implement a paid parking system in the Downtown District and that a Request for Proposals be drafted detailing the City's requirements for a paid system. On May 8, 2019, the City published a Request for Proposals for multi-space parking pay stations and remote payment systems. By its August 13, 2019 meeting, the PPAC had reviewed the proposals received in response to the City's RFP, conducted in-person interviews with all respondents and chosen IPS Group, Inc. as the vendor to be recommended to the Common Council. At that meeting the PPAC also adopted resolutions detailing several recommendations for both parking

permits and kiosks if the Common Council were to decide to implement such a parking management system. Although the Common Council has not yet awarded a contract for this new parking management strategy, it is clear that the City intends to adopt some system of paid parking in response to the Carl Walker Parking Study and PPAC recommendations, regardless of whether any of the Downtown Area Improvement Projects are implemented. The impacts of implementing any metered parking system will be evaluated prior to any future approval by the City's Common Council.

It should also be noted that the City's previous metered parking system in the downtown area was removed over 40 years ago (in 1979) and, thus, the City's previous experience with downtown metered parking bears little relevance to the current downtown situation.

Comment 3.44: Will street parking be metered for customers (Metz)

**Response 3.44:** The PPAC has provided the City's Common Council with a recommendation that, except for a standardization of on-street parking time limits within the downtown Special Assessment District, no other changes be made to the City's on-street parking management system. That recommendation is currently under consideration by the Common Council. See Response 3.43 for more information.

Comment 3.45: 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? (L Palkovic)

**Response 3.45:** Should the Common Council authorize implementation of a metered parking system, the cost to buy, install, and maintain the parking kiosks would be determined by the number of kiosks installed and by the administrative costs of the system. The PPAC has recommended to the Common Council that, should they authorize implementation of a metered system, a total of 8 kiosks should be installed in the various City-owned parking lots in the downtown area. In 2019 the City issued an RFP for a metered parking system and the firm ultimately recommended by the PPAC to the Common Council submitted a price of \$5,450 per kiosk. The purchase of 8 kiosks at this unit price would result in a total hardware cost of approximately \$43,600. Additional costs such as shipping, spare parts, software, and installation are variable.

The time it would take to recoup the initial outlay for such a system would depend upon the parking fees charged by the system and a fee structure has neither been recommended by the PPAC nor approved by the Common Council. Therefore, at this time the City is not able to estimate how long it would take to recoup its investment in a metered parking system, though if such a system is authorized by the Common Council the City will endeavor to strike a balance between the need to recoup its investment in the system and the needs of downtown businesses, residents, employees, and visitors. One of the City's goals would be to implement a system that is revenue neutral.

The City currently employs a single Parking Enforcement Officer to enforce parking regulations downtown. This officer would monitor the metered system and issue

**violations in accordance with the City Code should a metered system be authorized. Additional parking enforcement staff would be hired by the City if the results produced by the system justified the commitment of additional personnel and if it was deemed necessary by the Common Council. See Response 3.43 for more information.**

Comment 3.46: 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? (**L Palkovic**) Bricks-and-mortar retail establishments and malls are all dying due to the increased prevalence of online shopping, where you don't have to pay to park. The inauguration of a paid parking regime, a pet project of certain members of the PPAC, is a non-starter for our dying downtown. Making customers pay to park will send business up to the town, where parking is always free and plentiful, or send business onto Amazon, where parking is never an issue (**Beaudreau**)

**Response 3.46: One of the goals of the DRI is to attract and grow businesses and jobs to support economic development. The City has considered the effect paid parking will have on businesses in the City and has been studying the potential of a paid parking system in the downtown area since 2017 when it hired Carl Walker, Inc. to conduct a downtown parking study. One of that study's recommendations was "considering the impending development of the Durkee St. Lot, the City needs to administer the City Parking System." The study stated that, while charging for parking is one option for administering the City's system, it is not a requirement.**

The study notes that, if parking enforcement is the system's primary management tool, too much enforcement can create an adversarial relationship between the City and the public. Partially in response to this concern, the Common Council created the PPAC in November 2018 to further deliberate the parking situation downtown and develop a managed parking system under the Council's guidance.

City staff, members of the PPAC, and members of the Common Council have met with many downtown business owners over the course of the past year and listened to their concerns about the proposed parking system. Their feedback has informed the deliberations of the PPAC and the Common Council and has resulted in several considerable modifications to the City's originally proposed parking management plan. The most substantial change resulting from these discussions, which was included with other recommendations in the PPAC's August 2019 memo (see Appendix F) to the Common Council, was the recommendation to implement a metered parking system only in City-owned off-street lots and not in on-street areas. It was recommended that on-street areas be governed by time limits only so as to not disincentivize downtown visitation by those patrons wishing to shop or eat downtown. Those with long-term parking needs such as residents and employees would be encouraged to park in off-street lots and permits would be made available to these parkers at reasonable rates.

Regarding competition from online retailers like Amazon, the increasing prevalence of online shopping represents a structural economic shift that the implementation of a



**paid parking system in downtown Plattsburgh is not likely to substantially affect. As to competition from commercial establishments in the Town of Plattsburgh, the recommendation that on-street downtown parking areas be exempt from parking fees substantially reduces any incentive for customers to drive out to the Town in pursuit of free parking. See Response 3.43 for more information.**

Comment 3.47: The existing Durkee Street public parking lot offers free parking to downtown visitors, workers, and residents. If COP suddenly assesses exorbitant parking fees to either the special assessment district, or directly to users through a paid parking scheme, such action could have a significant adverse impact. The impact of new parking fees should be further evaluated in the DGEIS as the DLMUD is causing an instant relocation of 289 free public parking spaces (**Plattsburgh Citizens Coalition**)

**Response 3.47: As the potential system's operating costs and debt service are unknown at this time, the City cannot effectively evaluate the potential impact of any associated parking fees. Such impacts will be evaluated prior to any approval by the Common Council to implement a paid parking system. See Response 3.43.**

Comment 3.48: Will diagonal parking on one-way Durkee Street succeed? (Metz) The angled parking on the proposed Durkee St has already proven not to work (**Ford**)

**Response 3.48: Durkee Street is a local road that will be improved with additional parking through the proposed improvements. Though the specific instance of the City implementing angled parking is not listed in the comment, it is assumed the example the commenter is referencing bears little relevance to proposed plans as that prior implementation included back-in angled parking rather than pull-in angled parking which is proposed on Durkee Street.**

Comment 3.49: Unsafe angled parking on Durkee Street is proposed. The DGEIS fails to demonstrate how vehicle and bicycle traffic safety concerns will be mitigated with respect to angled street side parking. The NYS DOT has gone on record discouraging the use of angled street side parking. Angled street side parking will result in adverse impacts to traffic safety (**Plattsburgh Citizens Coalition**)

**Response 3.49: NYSDOT does not uniformly discourage the use of angled on-street parking. NYSDOT's 2017 Highway Design Manual notes that "front-in diagonal parking may be retained on local streets and collectors where design speeds are 35 mph (60 km/h) or less and traffic volumes are low." The referenced email from NYSDOT is dated January 28, 2019 and is in reference to implementing angled parking on Bridge Street. Primarily in consideration of NYSDOT's input, the City is not proposing implementing angled parking on Bridge Street.**

Comment 3.50: The proposed parking plan includes a series of new diagonal parking spaces on Durkee Street, however, some of these spaces are in violation of New York State Vehicle and Traffic Law which requires a minimum clear distance between parking and pedestrian crosswalks. See for example, NY V&T §1202(2)(b) – no parking within 20 feet of a

crosswalk at an intersection, and §1202(3)(b) – no parking within 15 feet of a fire hydrant. This diagonal parking plans presented in the GEIS are unsafe and illegal. Moreover, the plans result in a false count for the actual number of compensatory parking spaces being provided. Since accurate parking impact evaluation is key to the overall GEIS, it is imperative that the plans be corrected to provide correct number of parking spaces, otherwise it will be impossible to evaluate the adverse impacts. The on street diagonal parking plans must be re-evaluated to remove the falsely inflated number of compensatory parking spaces currently being provided. **(Plattsburgh Citizens Coalition)**

**Response 3.50: The plans for Durkee Street are still under development. The location of parking spaces will be updated to reflect the Vehicle and Traffic Law required setbacks from fire hydrants, crosswalks, and intersections and will also maintain access to Durkee Street properties via existing curb cuts. As noted in Section 2.3, with these updates, it is anticipated that a maximum of five fewer new spaces would be provided on Durkee Street, for a minimum net increase of 38 spaces over existing conditions.**

**As noted in Response 3.49, the NYSDOT correspondence regarding the unsafe nature of diagonal parking was in reference to the concept for locating such parking along Bridge Street as it does serve as a NYS highway. As Durkee Street is not a NYS highway, it is not subject to NYSDOT. Head-in diagonal parking on a one-way street, as incorporated into the design, has been shown in multiple independent studies to be a safe parking method.**

Comment 3.51: The proposed parking plan includes a series of new diagonal parking spaces on Durkee Street, however, some of these spaces block existing commercial driveways such as the commercial auto repair facility located at 17 Durkee Street which has four vehicle bays. These are the types of inaccuracies that give a false indication of the adequacy of replacement parking and lead the reader to incorrect conclusions about the viability of the City's parking plan. A thorough evaluation by a professional traffic engineer should be conducted. The GEIS should stipulate that all parking plans shall follow City, State and Federal rules and regulations and shall be designed in accordance with industry standards such as AASHTO and the New York State DOT Highway Design Manual. **(Plattsburgh Citizens Coalition)**

**Response 3.51: The plans for Durkee Street are still under development. The location of parking will maintain access to Durkee Street properties via existing curb cuts for driveways, such as that at 17 Durkee Street. The parking proposed will conform to all applicable standards, rules, and regulations. See Response 3.50.**

Comment 3.52: 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 ante 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. (T Palkovic)

**Response 3.52:** As indicated in Table 5 of the DGEIS, it is the City’s intention to have completed both the 103-space APMPP and the 21 additional spaces resulting from the BSMPL expansion prior to groundbreaking on the DLMUD. However, the new publicly accessible spaces in the DLMUD, on Durkee Street, and on Bridge Street will not be available for use during construction of those projects.

A summary of the anticipated total number of public parking spaces within the SAD during the DLMUD’s construction is included below. As indicated in Table 15, during the DLMUD’s construction, there will be a minimum of 691 publicly accessible spaces located within the SAD. With an existing, observed peak parking demand within the SAD of 542 spaces, there would be sufficient public parking capacity to accommodate peak parking demand during the DLMUD’s construction with a peak utilization rate of 78.4% within the SAD during this period. In addition, as noted in Response 3.53, Prime anticipates the ability to provide for all construction trades to park on-site during the construction process.

**Table 15: Anticipated Total SAD Public Parking Spaces – During DLMUD Construction**

	Existing Public Supply <sup>1</sup>	Change in Public Supply during DLMUD Construction	Public Supply during DLMUD Construction
Durkee Street Lot	289	-289	0
Durkee Street	15	-15	0
BSMPL	59	+21	80
APMPP	0	+103	103
Arts Park	4	-4	0
Clinton County Lot	0	+69	69
Court Street (north side between Margaret & Oak)	28	-9	19
Margaret Street (west side between Brinkerhoff & Division)	9	-5	4
<b>Total On- and Off-Street Spaces within SAD</b>	<b>820</b>	<b>-129</b>	<b>691</b>

**Comment 3.53:** The GEIS describes a temporary parking scheme during construction that relies on parking at the City Waterfront marina. Given the walking distance of 3,200-FT, the cold weather climate in the North Country (especially along the lake), human nature and published standards, this alternative is entirely unacceptable. Industry standards consider maximum acceptable walking distance for levels of services A through D for outdoor/uncovered service conditions level a through D vary from 400-feet to 1,600-ft respectively. The proposed 3,200-ft walk from the Dock Street parking lot well beyond any acceptable distance range and well beyond Level of Service E (the point of failure). This is clearly not a viable alternative whether with or without shuttle buses and is certain

to have a significant adverse impact on businesses, patrons and employees and employers. The GEIS conclusion that the interim parking during construction will not have a significant adverse impact on the community is clearly devoid of reasoned elaboration. **(Plattsburgh Citizens Coalition)** Recommendation number 6 is to “Develop a plan to utilize the Harbor parking lots during the DLMUD construction.” What is the city recommending? The use of shuttle buses to transport downtown workers and patrons to their chosen downtown destinations? This unworkable plan shows that the DLMUD has the potential of killing our downtown even before the Prime LLC project opens its doors to residents. **(Beaudreau)**

**Response 3.53: Prime anticipates the ability to provide for all construction trades to park on-site during the construction process. If at any time the need for construction vehicles to park on-site exceeds capacity Prime will arrange for additional parking outside of the downtown area and provide shuttle services for those contractors.**

**Utilizing the Harborside parking lots during construction of the DLMUD was a suggestion from the 2018 Carl Walker parking study and was briefly considered by the City. After various discussions with City staff, the PPAC, the Common Council, and members of the public, the City decided not to utilize the Harborside parking lots as the primary source of alternate parking during the DLMUD’s construction for many of the reasons noted in this comment. As noted in Response 3.52, there would be sufficient public parking capacity within the SAD to accommodate peak demand during the DLMUD’s construction.**

**The City proposes to utilize, on a temporary basis, existing on-street downtown parking capacity as long-term parking. These plans would temporarily designate certain parking areas on Broad Street, Oak Street, Couch Street, Brinkerhoff Street, Court Street, and the BSMPL as long-term parking for the duration of construction of the DLMUD, Durkee Street improvements, and Bridge Street improvements. Therefore, the City has multiple viable options for a temporary parking plan during construction of these three projects. Maps of these plans are attached as an appendix to the Final GEIS.**

Comment 3.54: I object to the omittance of the County Lot in the DGEIS as well as its construction without any review. The GEIS relies on the County Government Center parking lot renovation as the second greatest location for replacement parking to compensate for the parking lost at the Durkee public lot, the City participated in negotiations with the County Government Center for design of the County Government Center parking lot renovation including relinquishing a portion of the City Street Right of Way to the County for parking (in violation of City Code), the City entered into an agreement and provided financing for the County Government Center Parking Lot and yet omitted this parking lot from the GEIS. The parking lot design also did not receive a Building permit prior to construction, nor a Planning Board review as is required by City Code. The parking lot design is in violation of several City Code standards as well as NYSDOT Highway Design Manual Standards for pedestrian safety / access control. Not only did the city increase the number of curb cuts along Court Street in order to fit in more parking spaces, but these changes were made for the express interest of providing more parking spaces to accommodate the

construction of the proposed development at the Durkee Street lot – and is therefore an example of segmentation as they are undeniably interrelated. Either those changes should have been included in the DGEIS before completion, or those additional parking spaces should not be considered in the count of replacement parking spaces displaced by the Durkee Street lot development. **(Erb; Plattsburgh Citizens Coalition)** The GEIS parking relies heavily upon the Court Street Government Center parking lot to compensate for the loss of parking at the DLMUD. The City entered into an agreement with Clinton County for certain parking improvements to the County’s parking lot off Court Street. However, we do not see where the City underwent any SEQRA reviews related to this expenditure, nor do we see where the City coordinated any SEQRA review with Clinton County. This is a violation of the SEQR process. The parking lot design, financing and construction must be made part of this GEIS. Furthermore, the County Government Center lot is not compliant with City zoning code, did not receive a permit, did not undergo Site Plan review by the City Planning Board, does not comply with NYSDOT Highway Design Standards for number of access drives. All the design noncompliance concerns result in an unsafe streetscape for vehicles and pedestrians. **(Plattsburgh Citizens Coalition)** Why were the changes to the City/County parking lot not included in this Environmental Impact Statement? These changes were carried out to compensate for lost parking caused by the DLMUD, so why was the environmental impact not evaluated? The creation of an expanded parking lot with five entry/exit ways into the street is unconventional at best, and needed to be evaluated in this study. (Beaudreau)

**Response 3.54: As noted in the DGEIS, renovation of the County Government Center Parking Lot was undertaken by Clinton County and is not part of the Downtown Area Improvement Projects. However, the County was aware that the City was pursuing options for implementing additional downtown parking capacity and, in the spirit of intergovernmental cooperation, offered to augment their original expansion plans and make a considerable number of parking spaces in their newly reconfigured lot available for any public use, whereas before the public spaces within their lot were reserved for those on County business. In exchange, the City agreed to pay for the difference in the construction costs between the County’s original expansion plan and the augmented plan that was ultimately implemented.**

The County’s SEQRA review of its Government Center Parking Lot project was well underway prior to the City’s acceptance of the Draft Scoping Document for the DGEIS in August of 2019 (see Appendix H). This County project was one of Clinton County’s 2019 Master Plan Projects; projects for which the County Legislature created a capital account and authorized the solicitation of bids on April 10, 2019. Thereafter, the County determined that the project was an Unlisted Action under the SEQRA Regulations. The City of Plattsburgh was identified as a SEQRA Involved Agency and consented to designation of the County as Lead Agency. The County completed Part 1 of the SEQRA Short Environmental Assessment Form on July 24, 2019. The County completed its SEQRA review on August 14, 2019 when it completed EAF Parts 2 and 3, and the County Legislature adopted Resolution #598 determining that the project would not result in a significant adverse impact on the environment and adopting a SEQRA Negative Declaration. The County then awarded the bid for construction in September of 2019,

before the City authorized any agreement to participate in management of the parking lot. The County completed its Government Center Parking Lot project in November 2019. Under these circumstances, the GEIS appropriately reflects and considers the current status of the County parking lot.

Regarding the requirement that the County be subject to local (City) Planning Board review, the City's Building Inspector's Office did complete an analysis of the project based on *City of Rochester v. County of Monroe* which established a nine-point balancing test for governmental immunity from local zoning provisions. That analysis is included in the appendices to the Final GEIS and concluded that "the reconfiguration of the County Parking Lot would not require local planning or zoning board review as it is exempt from our local zoning provisions." Therefore, the project was not submitted to the City's Planning Board or Zoning Board of Appeals and the County was not required to obtain a building permit from the City.

Regarding the assertion that the County's expanded lot does not comply with NYSDOT Highway Design, Court Street is not a NYSDOT-designated highway and is therefore not subject to any associated standards. The increased number of curb cuts on Court Street, the fact that all entrances and exits to the County's expanded lot are now one-way, and the City's planned elimination of on-street parking on a portion of the north side of Court Street are anticipated to create a safer environment for motorists and pedestrians by providing clearer lines of sight, reducing the potential for accidents at the lot's entrances and exits.

Regarding the assertion that the City relinquished a portion of its Right of Way and that this was done in violation of City Code, no specific section of the City Code is cited. In any event, the City did not formally abandon a portion of its Right of Way to the extent that the City's Right of Way was not deeded or otherwise conveyed. Rather, the City and County – another public entity – reallocated the use of a portion of the City's Right of Way to further additional public uses of this property. Further, the City completed a governmental immunity analysis pursuant to *City of Rochester v. County of Monroe* as detailed above.

Comment 3.55: Table 39 Public Parking Projects is incorrect in many ways. For example, the table claims that there are an additional 65 public parking spaces being created, however, the recent renovation resulted in 60 visitor parking spaces. Even more importantly, this claim is misleading as the County already 44 visitor parking spaces prior to the renovation. Since parking is so critical to this to this DRI, it's imperative that the GEIS have a thorough and accurate analysis of compensatory parking being provided. (**Plattsburgh Citizens Coalition**)

**Response 3.55:** Based on additional information provided by the County, the renovation of the County's Government Center Lot resulted in 69 publicly available parking spaces being made available on that lot, not 60 as stated by the commenter. However, even if these 69 spaces were excluded from the public parking supply within the SAD, Table 5 above shows that over 250 publicly accessible parking spaces are projected to be vacant during

**the peak parking demand period subsequent to the completion of all the proposed GEIS projects. Therefore, even with the exclusion of the 69 public spaces on the County's lot, there would continue to be more than adequate capacity to accommodate peak demand.**

Comment 3.56: 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. **(L Palkovic)** Nowhere in the DGEIS does the report mention the adverse impact of the loss of winter parking on the Durkee Street lot as an adverse impact on downtown residents whose apartments lack off-street parking. This is a serious flaw in the DGEIS report. Plattsburgh has a winter parking regime set up that uses the Durkee Street Lot for winter emergency parking. The loss of this space will incur potential hardship on the residents of the downtown area who lack off-street parking. The GEIS does not address this question. **(Beaudreau)**

**Response 3.56: The City has been reviewing proposed changes to its snow ban parking system for several months. The PPAC has discussed this topic in detail during multiple meetings and in August 2019 the PPAC approved a recommendation to the Common Council that, once construction of the DLMUD commences, a new snow ban parking system be implemented that will utilize four City-owned off-street lots: the APMPP, the BSMPL, the City Hall Place lot, and the Court Street lot. The existing snow ban lights will be incorporated into the system in order to plow roughly 125 spaces (~50%) the first night following a snow event and roughly 125 spaces (~50%) the second night following a snow event. This proposed system will mirror the City's current snow ban parking system in which one half of the DSMPL is made available for parking while the other half is plowed. The specific order of lot plowing in the proposed system is to be determined by DPW based on prevailing conditions during and after each snow event with public notice provided by the existing light system.**

Comment 3.57: The DGEIS does not discuss plans for snow storage at the offset parking lots such as APMPP and BSPL and the DLMUD 50 space public parking area. Storing plowed up snow in existing parking spaces for any period of time will result in a significant loss of parking spaces, causing an adverse impact to downtown parking. **(Plattsburgh Citizens Coalition)**

**Response 3.57: The City will continue its current practice of storing excess snow from City-owned parking lots, including the new proposed lots, at the City's Harborside parking lots. The Harborside lots are more than capable of storing this excess snow and the City's DPW will be responsible for snow removal. With over 250 publicly available spaces projected to be vacant during future periods of peak demand as shown in Table 5 above, the City anticipates that the amount of parking capacity within the SAD lost to snow storage will be minimal and will not result in a parking supply shortage within the SAD. Prime will be responsible for the plowing and removal of snow within the DLMUD.**

Comment 3.58: Will parking on surface and in garages be included in residents' rent or extra charge? (Metz)

**Response 3.58: Prime anticipates that each apartment will have one parking stall included in the rent. Additional spaces may be leased to tenants as needed and as available.**

Comment 3.59: How many parking places are allocated per unit? (Metz)

**Response 3.59: The DLMUD will provide sufficient parking to meet all of the proposed demand from its site. As part of the Subdivision and Site Plan Approval process the project will request an alternative calculation for the residential parking demand, as stipulated in Section 360-26.B.e of the City Zoning Code.**

The Zoning Board or City's Building Inspector has the authority to approve an alternate method of parking calculation if the applicant can provide sufficient justification for the calculation. Instead of the methods stipulated in Section 360-26, the project is requesting that 1.5 spaces per dwelling unit be provided.

Prime has 35 years of experience in the residential and hospitality industry including the management of over 2000 residential units. Based upon a residential parking ratio of 1.5 spaces per 1 residential unit at a performing, comparable mixed use building in a similar environment, Prime is confident it has the experience to project the needs and demand of its project and to request relief for the same on the DLMUD.

Comment 3.60: Prime Development has said the garages are very expensive. If underground parking is eventually deemed too expensive, how will loss of parking spaces be addressed? (Metz)

**Response 3.60: As designed, the basement parking is an integral component to the success of the DLMUD. Therefore, the costs associated with the current design of the basement parking have been accounted for in the Project pro forma.**

Comment 3.61: We are extremely concerned about the impact on the North Country Coop. Sufficient, near-by parking is vitally important for people who drive from various distances (including Canada); to be able to carry heavy groceries to their car. (Metz)

**Response 3.61: The North Country Coop is located on the north side of Bridge Street, north of the DSMPL. As part of the BSPI, six new parallel parking spaces will be introduced on the south side of Bridge Street, in addition to minor streetscape improvements. As discussed in FGEIS Section 2.3, accounting for project refinements that have occurred since issuance of the DGEIS, the publicly accessible parking supply within the SAD will continue to be well in excess of demand in the future with completion of the proposed projects, with an anticipated peak utilization rate of 67.8% and a total of 258 available on- and off-street public parking spaces within the SAD.**



Comment 3.62: Will there be sufficient parking for Bass tournaments, non-event boat launching, Farmers’ Market, regular marina parking, and additional traffic from the proposed city marina expansion? (Metz)

**Response 3.62: Yes, there will be sufficient parking for these activities. While conservatively not included in the GEIS parking analysis, current plans for the new Farmers’ Market site include over 100 new parking spaces within the former PMLD site. The City’s Harborside lots will remain available for use by participants in the many bass tournaments hosted by the City as well as for non-event boat launching. Based on observed demand, the current parking lot at the City’s marina is sufficiently large to accommodate the marina’s own needs. The City has no current plans to expand its marina.**

Comment 3.63: 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. (Clinton County PB)

**Response 3.63: Comment noted.**

Comment 3.64: 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 PB)

**Response 3.64: The City currently has 90% development drawings for the APMPP and the BSMPL. Detailed construction drawings for both the Durkee Street improvements and the Bridge Street improvements are not yet available. Prime has provided a site plan for the DLMUD’s underground parking deck and related access points. A table including all the currently available parking information is included below.**

**Table 16: Parking-related Information Per Project Site**

Parking Project	Number of Publicly Accessible Parking Spaces	Size of Public Parking Spaces	Size of Handicap Accessible Spaces	Width of Drive Lanes
APMPP	103	9'x18'	9'x23'	24'
BSMPL	80	9'x18'	9'x18'	23'-4" (similar to existing conditions)
BSPI	6 additional spaces	TBD	-	-
DRSI	38 additional spaces	TBD	-	TBD
DLMUD	50	9'x18'	8x18 (spaces and loading zone)	24'
County Lot	69	9'x18'	9'x18'	24'

Comment 3.65: How heavily is the former bank building parking lot being relied upon to meet overflow parking? It won't really support the customers at the new building - too far for package carrying. (Metz)

**Response 3.65: The APMPP is intended to be used for general public parking.**

Comment 3.66: If South building will be all residential, will the residents park under or in lot for South? Still need access to their unit/elevator/back door. (Metz)

**Response 3.66: The residents will park in the below-ground garage. Secure elevator access is provided to all residential floors.**

Comment 3.67: The Board is concerned that there will be inadequate parking for the employees and customers of the Clinton County Department of Social Services Facilities at 13 Durkee Street. 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. (Clinton County PB)

**Response 3.67: Employees of the County's Department of Social Services (DSS) do utilize a significant portion of the downtown area's public parking supply. Within an 1/8-mile radius of the DSS facility – or an approximately 2.5-minute walk – there will exist, between existing parking and planned improvements, approximately 414 publicly available parking spaces. These spaces are detailed in Table 17.**

**Table 17: Parking within 1/8-mile Radius of County's Department of Social Services (DSS)**

<b>Public Parking Option</b>	<b>Publicly Available Spaces</b>
APMPP	103
BSMPL	80
DSS Off-Street Parking Lot	40
DLMUD	50
Durkee Street	53
Margaret Street	48
Broad Street	9
Oak Street	31
<b>Total</b>	<b>414</b>

**Given the number of public parking spaces that are located in close proximity to the DSS and the anticipated future public parking availability (refer to FGEIS Section 2.3), the supply of nearby public parking is more than adequate to accommodate the needs of DSS's employees.**

**The City's proposed implementation of a managed parking system in the downtown area would provide the flexibility to designate certain on-street areas as long-term parking. If it is deemed necessary and proper by City authorities to classify certain on-street parking spaces as long-term parking for employees or residents, an actively managed system allows for such a designation.**

Comment 3.68: This parking lot allows easy and convenient access to downtown business establishments and parking for city residents and visitors. (Harron)

**Response 3.68: Comment noted.**

Comment 3.69: The DGEIS should explain why the east boundary of Durkee Street and the south boundary of Bridge Street cannot be moved further back that any street side parking spaces would lie exclusively within the legal bounds of the street, thus avoiding the need to rely on an easement and indemnity agreement to accommodate street side parking. (Plattsburgh Citizens Coalition)

**Response 3.69: The City explored the possibility of adjusting the eastern boundary of Durkee Street and the southern boundary of Bridge Street so that the proposed City-owned on-street parking areas on Bridge Street and Durkee Street would have been contained entirely within City property. Unfortunately, a title search conducted by the City of the lands that constitute Bridge and Durkee Streets revealed that the City does not possess a clear chain of title to those lands. After careful consideration of various options, the City determined that maintaining the boundaries as they currently exist and executing an easement agreement with Prime to provide the City with the necessary access to the on-street parking areas and provide Prime with the necessary protection from liability for those parking areas was the best course of action.**

Comment 3.70: The parking garage exits from the building at this corner. Vehicles exiting the garage will have to drive onto the sidewalk before they can see oncoming pedestrian traffic. This condition creates a danger and adverse impact to pedestrian traffic that should be mitigated. (Plattsburgh Citizens Coalition)

**Response 3.70: Driveways crossing sidewalks are a common occurrence. To promote pedestrian connectivity the sidewalk should continue across the driveway apron. Detailed review and design of the access will occur during the design phase of the project.**

Comment 3.71: The GEIS relies on several non-code compliant designs, which creates an adverse impact for maneuverability and safety at the individual sites and sets a precedence for other future developments that is detrimental throughout the City. To mitigate this adverse impact, the GEIS should establish as criteria that all proposed parking shall be compliant with City Zoning Code. (Plattsburgh Citizens Coalition)

**Response 3.71: The Durkee Street Mixed Use Development is proposing 24' drive aisles. The parking layout is based upon the common industry standard of (2) 18' long parking stalls with a 24' drive aisle in between. This is a deviation from the City Zoning code, which requires**

**26' drive aisles. Turning templates have been performed on the proposed parking layout to ensure safe maneuverability through the site.**

Comment 3.72: The DMLUD development parking is deficient by 31 spaces as per GEIS. (Plattsburgh Citizens Coalition)

**Response 3.72: As proposed, the on-site parking supply of the DMLUD, if evaluated by the guidelines included in the City's Zoning Ordinance, is deficient by 31 parking spaces. Per the Zoning Ordinance, the DMLUD would need to provide 317 on-site spaces while 286 spaces are proposed. However, the section of the City's Zoning Ordinance detailing off-street parking requirements for various uses has not been updated in many years and is out of date. Included in the DGEIS is documentation supporting an alternative method of calculating the parking demand that can be expected to be generated by the DLMUD. This method is based on data taken from the Institute of Transportation Engineers (ITE) "Parking Generation" manual that include parking demand data for over 100 different land uses. The ITE manual is an authoritative industry publication and shows a total demand of 272 parking spaces for the DLMUD's residential and commercial components, which is 45 spaces fewer than is required by the City's Zoning Ordinance. Plans for the DLMUD include 14 spaces in excess of the 272 spaces specified by the ITE Manual. In addition, as indicated in Response 3.59, Prime's own experience with parking demand in other developments shows that a figure of 1.5 parking spaces per residential unit is sufficient for their needs.**

**Chapter § 360-21 of the City Code states that, within a Planned Unit Development, "Mixed or multiple uses. In the case of mixed or multiple uses within a single structure or building or in the use of land, the amount of off-street parking required shall be determined by the sum of the requirements of the various uses computed separately in accordance with § 360-26 of this chapter, except where the applicant can demonstrate to the satisfaction of the Planning Board that another method of computation will adequately serve the proposed mixed or multiple use." If the Planning Board is satisfied as to the adequacy of the parking supply that will be provided within the DLMUD, then the Zoning Ordinance permits the Planning Board to approve the project.**

Comment 3.73: Will parking places in front of shops be sufficient for customers and staff in shops and businesses? If not, will these people be able park behind the buildings and/or in garages? If so, not smart to force them to walk all the way around. (Metz)

**Response 3.73: The public will have access to the proposed public parking at the DLMUD, including customers and staff in the DLMUD's shops and businesses. Prime is in the process of developing a parking agreement for the site's publicly accessible parking spaces. It is possible that parking validation will be provided to customers of the DLMUD's shops and businesses.**

Comment 3.74: I disagree that the current plan is sufficient to replace all parking being lost as a result of the planned development at the Durkee Street Lot. There are also adverse environmental impacts to the walkability of the downtown area due to specific design features of the

proposed Arnie Pavone Parking Lot as well as the changes made to the County Parking Lot. Both lots seek to increase parking capacity by eliminating through lanes within the lots themselves and instead increasing the number of entrances/exits, thereby increasing the number of curb cuts – having a negative impact on walkability in the downtown area. (Erb; Plattsburgh Citizens Coalition)

**Response 3.74:** As indicated in FGEIS Section 2.3, the proposed future parking supply would be more than sufficient to accommodate peak future parking demand. Recent changes to the design of the APMPP will provide a continuous pedestrian sidewalk between Margaret Street and Court Street along the southern border of the lot that will mirror the current configuration along Division Street. The proposed APMPP will result in two additional curb cuts on Margaret Street.

As indicated in Response 3.54, the expansion of Clinton County’s Government Center Lot is not a part of the proposed project, was undertaken by the County subject to review pursuant to SEQRA, and has already been completed. The resulting increase in the number of curb cuts on Court Street, the fact that all entrances and exits to the County’s expanded lot are now one-way, and the City’s planned elimination of on-street parking on a portion of the north side of Court Street are expected to create a safer environment for motorists and pedestrians by providing clearer lines of sight and reducing the potential for accidents at the lot’s entrances and exits.

Comment 3.75: Replacement of the public parking spaces lost as a result of the proposed DMLUD project is one of the key adverse impacts to the community and must be thoroughly evaluated. While it is understood that the GEIS is conceptual in nature, the adequacy of the compensatory parking plan is critical and must be accurately detailed. There are several incorrect statements, sketches, plans and calculations that are included in the GEIS that result in a false, misleading or otherwise incorrect assessment of the parking impact. A far more thorough and accurate evaluation must be conducted and included for this GEIS to be considered complete. (Plattsburgh Citizens Coalition)

**Response 3.75:** As noted in Section 1.1 of the DGEIS, “the level of detail in a Generic Environmental Impact Statement (GEIS) is usually provided at a conceptual level of detail and presented in broader scale/prospective. The level of detail of associated technical studies and evaluations will vary within a GEIS depending on the type of action, the availability of information, the scope of the project and the planned use of the GEIS.” As presented in the FGEIS, several of the parking plans have been updated, or are anticipated to be updated, as part of the project design refinement process (refer to FGEIS Section 2.3). Accounting for project refinements that have occurred since issuance of the DGEIS, the public parking supply will continue to be well in excess of demand in the future with completion of the proposed projects, with an anticipated peak utilization rate of 67.8% and 258 available on- and off-street public parking spaces within the SAD during periods of peak during as shown in Table 5.

Comment 3.76: Section 3.4 indicates that 27 or 43 additional parking spaces will be created on DRSI in the two direction or one direction scenarios, respectively, but does not provide sufficient

plans to demonstrate those numbers. In fact, those numbers are incorrect and therefore misleading as documented within these comments. Accurate, safe, legal parking schemes designed in accordance with city, state and federal highway design standards must be adequately detailed in order to correct the errors and to support the dubious claims being made in this GEIS report (**Plattsburgh Citizens Coalition**)

**Response 3.76: As noted in Response 3.50, the plans for Durkee Street are still under development. The location of parking spaces will be updated to reflect the Vehicle and Traffic Law required setbacks from fire hydrants, crosswalks, and intersections and will also maintain access to Durkee Street properties via existing curb cuts. Accounting for these changes, the public parking supply will continue to be well in excess of demand in the future with completion of the proposed project (refer to FGEIS Section 2.3).**

Comment 3.77: The proposed parking plan is inconsistent with adopted community plans. The City accepted the parking plan conducted by professional parking consultant Carl Walker recommends that off street parking should be compensated with an equal amount of long- term off-street parking and cautions, "The current Durkee St. Lot provides 65% of the off-street public parking supply downtown. Eliminating these parking spaces without replacing them would result in hundreds of parkers being displaced during and after development." The GEIS fails to demonstrate that these objectives for alternative parking have been met. Clearly, an inadequate alternative parking plan will result in a significant adverse impact. (**Plattsburgh Citizens Coalition**)

**Response 3.77: As indicated in the DGEIS, the Carl Walker study was completed (in 2018). Subsequent to the City's resumption of active enforcement of its downtown parking regulations in January of 2019, the City's Community Development Office has conducted 89 separate off-street parking lot counts and 32 separate on-street parking counts of the entire SAD in support of the PPAC's deliberations. These 121 counts were conducted over the course of six months at various times of the day during the work week; additional surveys were conducted on the weekend. As shown in FGEIS Section 2.3, these surveys indicated a total existing on- and off-street parking supply of 820 spaces; therefore, the DSMPL's 289 spaces comprise approximately 35% of the total existing parking supply within the SAD. That supply will continue to be well in excess of demand in the future with completion of the proposed projects.**

Comment 3.78: The development plans presented to the public by the developer, by the City Common Council, by the Community Development Office and by the Parking Committee has consistently under represented the parking demand that will result from the proposed development because they did not acknowledge the restaurant component which has a higher demand than commercial. Now, during the GEIS the restaurant component of the DLMUD is acknowledged and causes additional onsite parking demand increasing the total to 317 parking spaces. This actual demand has not been accounted for in the parking calculations. The City's parking plan must be re-evaluated to provide compensatory parking for this new actual parking demand being presented in the GEIS for the first time. (**Plattsburgh Citizens Coalition**)

**Response 3.78:** This comment implies that the City endeavored to conceal the proposed restaurant component within the DLMUD and its effect on expected parking demand. This is not the case. Development plans initially developed by Prime did not include rehabilitating the current PFCM building, and early versions of the DLMUD's site plan showed that area listed as "Future Development." The City's Planning Board subsequently requested additional information relating to Prime's plans for the area. Subsequently, an inspection of the PFCM building by Prime determined that the structure could be rehabilitated and put to use rather than demolished.

The DGEIS included parking demand created by the interior portion of the PFCM building based on the most restrictive use in the City's Zoning Ordinance: restaurant space. It was only at this point that the parking requirement of the DLMUD, per the Zoning Ordinance, was increased to 317 spaces. As presented in the DGEIS, conservatively including this demand in the parking calculations, the DLMUD would provide sufficient supply to accommodate project-generated demand.

Comment 3.79: The City and developer contended that the DLMUD will provide the parking for its own demand on site. Only now during the GEIS is that standard being abandoned and the GEIS is offering that the parking supply will supposedly adhere to some nefarious national average in lieu of compliance with the City zoning code. This is unacceptable. The DLMUD must provide onsite parking to meet its own demand in strict accordance with the City code and as has been represented to the public on numerous occasions. The DLMUD parking plan and the City's parking plan must be re-evaluated to provide adequate parking onsite to meet the demand for the proposed development and to provide adequate compensatory public parking elsewhere in the downtown location. (Plattsburgh Citizens Coalition)

**Response 3.79:** See Responses 3.59 and 3.72.

Comment 3.80: 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. (Gervich)

**Response 3.80:** See Response 3.75. The DLMUD is proposing a total of 13,400 sf of commercial / retail / restaurant space. At this time, it is too early in the development process to identify tenants for the commercial space. However, Prime has been approached with requests for information on the proposed space by office, retail and food & beverage tenants. Based on this, as part of the approval Prime is requesting the maximum amount of restaurant space supported by the on-site project parking. Therefore, the project has assumed the most conservative possible scenario. The highest use demand for parking is restaurant; therefore, for the purposes of GEIS, the project is requesting approvals for maximum square footage (SF) of restaurant space allowed based on the available on-site parking spaces. The maximum allowable restaurant space that is supported by

**the current on-site parking design is up to 6,150 sf of restaurant space with a 60% (3,960 sf) front of house / 40% (2,460 sf) back of house split. The remaining 6,900 sf would be permitted as non-restaurant commercial / retail space.**

Comment 3.81: It is unclear how the 50 parking spaces that will be owned by Prime will be made available to the public. Will Prime charge for use of those spaces? If so, how much? Will there be other conditions placed on the use of those 50 spaces? The uncertainty regarding arrangements for the use of 50 downtown parking spaces results in an adverse impact on downtown parking. A draft agreement between the Prime and the City regarding arrangements for the use of those 50 parking spaces should be discussed and appended to the DGEIS. (Plattsburgh Citizens Coalition)

**Response 3.81: The City of Plattsburgh is currently working with Prime on proposed terms for a parking agreement for the publicly accessible parking spaces to be provided on the DLMUD site.**

**It is envisioned that Prime will be responsible for the management of all the off-street parking available on the project site. The off-street parking on the project site will be maintained and regulated in a similar manner to the other off-street parking provided by the City. Prime intends to charge market rates for parking and it is expected this will be at a rate consistent with other parking facilities in the City.**

Comment 3.82: 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. (Clinton County PB) The City has stated that in order to meet downtown parking demands of visitors, workers, and residents, the loss of those 289 spaces shall be compensated by developing new parking elsewhere in the downtown area. The DGEIS states that the City will offset this loss of parking by creating 289 new public parking spaces elsewhere throughout downtown. The DLMUD project claims it will make 50 public parking spaces available on the DLMUD site after construction. The City is including the above mentioned 50 parking spaces in its 289 offset total. Those 50 spaces will not be available for over one year during construction. Loss of parking spaces during the construction period will result in adverse impacts to the local economy for an unacceptable period of time. (Plattsburgh Citizens Coalition)

**Response 3.82: Accounting for project refinements that have occurred since issuance of the DGEIS, the public parking supply will continue to be well in excess of demand in the future with completion of the proposed projects (see FGEIS Section 2.5.3). Even if the 50 publicly**



**accessible parking spaces proposed as part of the DLMUD were to be excluded from the analysis, the future public parking supply within the SAD would significantly exceed capacity and remain well below 85% utilization during periods of peak demand. 85% is a standard industry benchmark and represents the ideal peak utilization rate for parking.**

Comment 3.83: Please review the parking replacement once again. Your replacement numbers are off from what we are losing as a total. We lost all 289 spots in Durkee Street, 4 spaces in Westelcom Park, 3-4 spaces on Court Street. **(Ford)**

**Response 3.83: See Response 3.82.**

Comment 3.84: 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. **(T Palkovic)**

**Response 3.84: The public parking supply will continue to be well in excess of demand in the future with completion of the proposed project (see FGEIS Section 2.3).**

Comment 3.85: The current 289 spaces of the DSL will be distributed throughout the City but at great expense and for what good purpose? **(T Palkovic)** 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. **(Clinton County PB)**

**Response 3.85: The future on- and off-street publicly accessible parking supply within the SAD is anticipated to be 800 spaces. While this represents a net loss of 20 public spaces in the SAD compared to existing conditions, the public parking supply will continue to be well in excess of projected peak parking demand in the future with completion of the proposed projects (see FGEIS Section 2.5.3). See also Comment 3.63.**

Comment 3.86: 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, 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. **(Clinton County PB)**

**Response 3.86: See Response 3.82**

Comment 3.87: 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. **(Clinton County PB)**

**Response 3.87: Accounting for project refinements that have occurred since issuance of the DGEIS, the publicly accessible parking supply within the SAD will continue to be well in excess of projected demand in the future with completion of the proposed projects (see FGEIS Section 2.5.3). Even if (1) the 50 public parking spaces proposed as part of the DLMUD were to be excluded from the analysis; and (2) only 44 new spaces were assumed for the County Lot, the future public parking supply within the SAD would be 725 spaces rather than the 800 shown in Table 5 above. That supply would still well above the peak demand of 542 spaces, and would result in a peak parking utilization rate of only 74.8%.**

**3.6 FISCAL AND ECONOMIC CONDITIONS**

Comment 3.88: Mayor Read has consistently asserted that the developers would be targeting affluent single individuals and retired couples, and that no school-age children were projected to live in this development. This assertion is now contradicted by the DGEIS. **(Plattsburgh City School District)**

**Response 3.88:** The assertions of public officials are based on the best information available at the time. Prime’s target demographic for the proposed residential units was and remains active seniors and young professionals. A conservative analysis of the DLMUD was conducted based on the assumption that all 115 units within the DLMUD would generate school aged children. However, the number of new school age children may in fact be less than what is portrayed by the multipliers (which are based only on unit size and rent).

Based on similar developments in similar markets, the proposed residential units are expected to be mostly rented by young professionals, empty nesters and retirees. While this demographic carries within the possibility of school aged children residing in the development, the school aged children analysis is calculated by the type of units within the development (e.g. studio, 1-bedroom, 2-bedroom, etc.). This analysis was provided in the DGEIS at Section 3.6 and has been refined in Section 2.5.4 of the FGEIS.

Comment 3.89: The narrative which follows Table 45 suggests that, because the districts’ student population has decreased over the past two decades, the projected increase of 2.3 students per grade “is not anticipated to have a significant impact on facilities”. This assumption is flawed. In contrast to decades past, schools currently feature much-expanded special education and student-support programming — which is highly space-intensive. So, despite a decreased student population since 2000, I assure you that our buildings are full. (Plattsburgh City School District)

**Response 3.89:** The original analysis used a single demographic multiplier to calculate the number of new school age children, regardless of residential unit size. The number of new school age children will vary based on bedroom count of new residential units and anticipated rental rates. According to Prime, rents on these market rates units are expected to start around \$1,200/month. Using a widely accepted methodology and demographic multipliers for New York State from Rutgers University, the increase in students per grade is predicted to be lower. A revised version of DGEIS Table 45 is included below in FGEIS Table 18 and shows that using this more specific methodology the total number of new school age children will be approximately 22. This results in a projected average increase of 1.7 students per grade.

Based on proposed rents and the type of development, it is reasonable to expect that these units will primarily attract young professionals, empty nesters, and retirees. Therefore, the number of new school age children may in fact be less than what is portrayed by the multipliers (which are based only on unit size and rent). However, for the new school aged children that will reside in the development, the intangible benefits of having more families with children in the community, some of which include increased household spending, balancing out the aging of the community, and strengthening the community’s fabric and levels of volunteerism, will outweigh the impact on school facilities.

**Table 18: DLMUD - Estimated School-Age Children in Public Schools**

# Bedrooms	Number of Units	Multiplier for School-Age Children <sup>1</sup>	Number of School-Age Children
1-bedroom	52	0.08	4
2-bedroom	59	0.23	14
3-bedroom	4	1.0	4
<b>Total</b>	<b>115</b>		<b>22</b>

<sup>1</sup> "Residential Demographic Multipliers for NY," Rutgers University, June 2006. All multipliers are based on multifamily developments with 5+ units in NYS. Multipliers for 1-bedroom units are based on rent of \$1,000+, 2-bedroom units are based on rent of \$1,100+, and 3-bedroom units are based on rent of \$1,250+.

Comment 3.90: The assumption that 30 additional students will be evenly spread across all grade levels is equally-flawed. Though there is no way to predict such, it is certain that the degree of enrollment increase would vary across our grade levels and schools, and it is possible that while certain grade levels may see no increase, others might increase by 5 or 8 or 10 students. Increases of this magnitude at certain grade levels would very likely necessitate the creation of an additional class section and may present physical space constraints. **(Plattsburgh City School District)**

**Response 3.90: As discussed in response to Comment 3.89, more specific demographic multipliers show that the number of new students will be closer to 22 than 30. It is correct that there is not a way to more accurately predict the number of new students in each grade level other than by taking the average of the number of new students. Therefore, the best assumption is that there will be an average of 1.7 new students in each grade level. Although there will be some variation from this in reality, the community will reap many intangible benefits from having more families with children in the community.**

Comment 3.91: The report's narrative stated that the development "...is not anticipated to have a significant impact of facilities," and did not specifically attest to non-impact on budgets and programming. But to be clear, the addition of 30 students is projected to have a significant budgetary impact. Specifically, the local costs (ie. after State aid is removed) to taxpayers for an influx of students of this magnitude is projected to be \$335,400 per year. an increase in student enrollment will most certainly result in budgetary increases. And, as the developer is petitioning for a significant payment in lieu of taxes (PILOT) abatement, these increased costs, with the developer paying an effective tax rate far below that of other taxpayers, may well have a negative impact on educational programming. **(Plattsburgh City School District)** Page 25 states that "the addition of 30 students is not anticipated to result a significant impact on facilities." According to Jay LeBrun, the Director of the Plattsburgh City School District, the cost per student is 25K per year. At that cost, 30 new students would cost the School Board \$750,000 per annum. But according to the Clinton County IDA, Prime LLC will only be paying \$75,000 in taxes per year for the first 20 years. This will result in a significant tax burden on the taxpayers of the city. The DEIS also states that the DRI will "result in a considerable increase in tax revenue, putting the City in a more fiscally sound position". Once again, this is a problematic statement. According to Plattsburgh City School Board Director the

PILOT agreement will be a significant burden to the taxpayers of the City. (Beaudreau)

**Response 3.91:** The number of new school age children was recalculated using demographic multipliers that are specific to the number of bedrooms in each unit and projected rents of approximately \$1,200/unit. Using these multipliers, 22 new school-age children are expected in the City (see response 3.89).

**Table 19: DLMUD - Estimated School-Age Children in Public Schools**

# Bedrooms	Number of Units	Multiplier for School-Age Children <sup>1</sup>	Number of School-Age Children
1-bedroom	52	0.08	4
2-bedroom	59	0.23	14
3-bedroom	4	1.0	4
<b>Total</b>	<b>115</b>		<b>22</b>

<sup>1</sup> "Residential Demographic Multipliers for NY," Rutgers University, June 2006.

To determine the fiscal impact of these new students, per pupil costs and revenue were calculated.

In calculating the per pupil costs, information from the 2019-2020 PCSD budget was used. We used the budget to determine which specific school budget functions would be impacted by the addition of new students. In other words, fixed costs such as administrative and facilities costs that are not impacted by the number of students are not included in this analysis. These budget functions used are referred to as "variable" items and include the following budget functions: 1670, 1910, 2110, 2250, 2610, 2630, 2850, 2855, and 2870 as cited in the PCSD budget. These nine variable budget functions and their corresponding expenses are outlined in Table 20. Total variable costs for the school year equal \$19,764,236.

**Table 20: 2019-2020 PCSD Budget Functions**

Budget Function	Expenses
1670 (BOCES printing and copying)	\$53,959
1910 (student insurance)	\$113,600
2110 (instructional costs-salaries and supplies)	\$11,314,059
2250 (special education staff)	\$6,337,595
2610 (library supplies)	\$492,389
2630 (computer supplies)	\$1,005,958
2850 (co-curricular)	\$76,465
2855 (sports equipment)	\$360,211
2870 (supplies)	\$10,000
<b>Total Variable Expenses</b>	<b>\$19,764,236</b>

Dividing these expenses by the 1,790 current students reveals variable expenditures per student of \$11,041. The addition of 22 new students would result in \$239,931 new expenses to the PCSD.

For the purposes of this evaluation, we have assumed a simplified method of calculating state aid to the school district and used the current aid divided by the student population. Under this method, approximately \$11,061 is provided per pupil. The addition of 22 new students would result in an additional \$240,380 in annual state aid.

Based on these calculations, the per pupil revenue from state aid covers the per pupil expenses. Total new state aid of \$240,380 covers the new expenses of \$239,931- a flat net impact. Beginning in year 5, the school district will receive \$81,178 in PILOT revenue under the most recent schedule- a positive net impact of \$81,626.

Table 21 outlines these calculations, demonstrating the positive net impact.

**Table 21: Net School Impact**

Total Variable School Expenditures	\$19,764,236
Total School Enrollment	1,790
Expenditures per Student	\$11,041
New Students	22
New Expenditures	\$239,931
Total State Aid	\$19,801,172
Total School Enrollment	1,790
Per Pupil State Aid	\$11,062
New Students	22
Estimated New State Aid	\$240,380
New PILOT Revenue (Year 5)	\$81,178
New Expenditures	(\$239,931)
New State Aid	\$240,380
New PILOT Revenue	\$70,879
<b>Net Impact</b>	<b>\$81,626</b>

Comment 3.92: I disagree that the proposed development will not have any adverse impacts on the public-school system, as does the Plattsburgh City School Board. (Erb; Plattsburgh Citizens Coalition)

Response 3.92: The new students will generate a cost of approximately \$11,041 per pupil, or \$262,014 for the anticipated 22 new students as outlined in the response to comment 3.91. This accounts for the costs that will vary based on the addition of new students. Total state

**aid per pupil is currently \$11,062, which covers the anticipated new costs per pupil. The PILOT revenue generated by the development contributes to a positive net impact of \$81,626 for the school district beginning in year 5 (see response to comment 3.91). Additionally, the addition of more households with children to the community will have a number of intangible benefits, including contributing to a vibrant culture and a strong sense of place for the City, helping to make it a place that is attractive to current and future residents and businesses.**

Comment 3.93: Page 175 states that median household income in the city is just over \$43,000. The household income in larger Clinton County is reposed 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. The DGEIS does not directly address demographics of potential tenants. This omission is the source of much speculation. The speculation is that the Prime LLC units will bring new wealth to the city based on these tenant projections. This is speculation. (T Palkovic)

**Response 3.93: Prime indicates that it utilizes the Yardi Residential Tenant Criteria (YRTC) for qualification purposes at its properties. Although the Yardi approach is utilized for general underwriting purposes, Prime indicates that based on its 35 years of experience in the industry and experience in managing over 2,000 residential units, Prime has also applied a less conservative approach to qualification criteria when supported by the market environment.**

**According to the most recent HCR / NYS report<sup>7</sup> released on 5/9/19, the Median Household Income (MHI) in Clinton County is \$68,300. Using the more conservative YRTC the MHI for Clinton County would support a qualifying rent of \$1,707.50 per month. Clinton County, like the Capital Region, has very strong Education, Health Care and Government employers as well as growing private sector employers which further strengthen the market environment. Based on this information and experience, this approach is accurate and the industry standard for this type of Project.**

Comment 3.94: 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. (T Palkovic) 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) 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? 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? Brick and mortar retail is being challenged by Internet sales. We can expect these new residents to be computer savvy. Many empty store fronts currently exist on Margaret and Clinton Streets. What plans are

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<sup>7</sup> New York State Homes and Community Renewal. Affordable Housing Corporation/Maximum Grant Amount and Income Limits. <https://hcr.ny.gov/system/files/documents/2019/06/2019%20AHC%20Income%20Limits.pdf>. Webpage accessed January 27, 2020.

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? (L Palkovic)

**Response 3.94: Additional analysis on the availability of goods within the City of Plattsburgh versus the Town was conducted using Esri Business Analyst. Based on data provided by Esri’s Retail Marketplace Profile and Business Mapping capabilities, it was determined that it is reasonable to assume that 25% of Annual Per Unit Spending (APUS) will occur within the City at retailers such as Aldi, Ashley HomeStore, Aubuchon Hardware, and DressCode. This means that the estimated new household spending in the City of Plattsburgh is revised to \$841,513 per year. In bringing new commercial space and residential units to the area, this project is contributing to making the City a place where residents and visitors want to spend their time.**

Revised DGEIS Tables 52 and 53 are shown in Tables 22 and 23, as follows:

**Table 22: New Household Spending**

Category	Annual Per Unit Spending	Amount Spent in City (25%)	Total Net New City Spending (115 units)
Food	\$7,168	\$1,792	\$206,080
Household Furnishings & Equipment	\$1,970	\$493	\$56,638
Apparel & Services	\$1,514	\$379	\$43,528
Transportation	\$9,158	\$2,290	\$263,293
Health Care	\$4,739	\$1,185	\$136,246
Entertainment	\$2,392	\$598	\$68,770
Personal Care Products & Services	\$668	\$167	\$19,205
Education	\$731	\$183	\$21,016
Misc.	\$930	\$233	\$26,738
<b>Annual Discretionary Spending</b>	<b>\$29,270</b>	<b>\$7,318</b>	<b>\$841,513</b>

Based on the \$841,513 in new household spending, additional sales and new jobs and wages will be created. Table 23 (revised DGEIS Table 53) outlines the related impacts.

**Table 23: Annual Economic Impact of New Household Spending, City of Plattsburgh**

	Direct	Indirect	Total
<b>Jobs</b>	9	2	11
<b>Earnings</b>	\$284,718	\$94,003	\$378,720
<b>Sales</b>	\$841,513	\$271,608	\$1,113,120



Comment 3.95: 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. **(Gervich)** This statement shows that only 4 full time jobs will be directly created by the developers themselves. 35 jobs are expected to be provided by the tenants of the commercial and/or restaurant space created by the developers, but there is no guarantee of occupancy in those spaces. The inclusion of an additional 58 jobs, \$1.9 million in earnings, and nearly \$5.2 million in sales is highly speculative and optimistic. I strongly object to these assertions. Will the developer be held accountable for ensuring that these projections be met within the terms of their PILOT? What protections does the community have against economic downturn in return for the large investment we are making in terms of the DRI grant money, public land, and tax incentives being offered to this developer? **(Erb; Plattsburgh Citizens Coalition)**

**Response 3.95: Prime performed an internal market study on the area as part of its standard preliminary due diligence. Prime typically contracts with a national company to do a more detailed analysis, however, they were unable to assist in the Plattsburgh market due to lack of comparable inventory or products.**

**As part of its ongoing due diligence Prime conducts periodic market analyses throughout the permitting process to ensure the financial feasibility of the project. An online review conducted on January 10, 2020 of reasonably ascertainable listings provided on CDC Real Estate, LoopNet (National), Century 21 Commercial, Commercial Real Estate Plattsburgh, Whitbeck Commercial and Fesette Commercial Real Estate demonstrated only three Class A commercial spaces available in the downtown area. Currently Prime's anticipates lease rates for the proposed project to start at approximately \$16 per square foot. Although the available commercial leases in the downtown area are identified as Class A commercial spaces and are similar to the anticipated price per square foot of the proposed project; the condition, grade and desirability of the available spaces are not fully comparable with the proposed project. However, as they are presented herein to show the lack of available comparable space within the downtown area.**

- **20 Miller Street offering 6,209 SF of office space and 1,223 SF of garage space located at 20 Miller Street, Plattsburgh NY**

**Clinton County Real Property Records**

**Effective Year Built: 1950**

**Overall Condition: Normal**

**Overall Grade: Average**

**Overall Desirability: 3**

**Rental Rate (provided by others): \$15.00 / SF/Year (nnn)**

- **Investors Corporation of Vermont (ICV) offering 1,234 SF of office space located at 14 Durkee Street, Plattsburgh NY**

**Clinton County Real Property Records**

**Effective Year Built: 2007**

**Overall Condition: Normal**

**Overall Grade: Good**

**Overall Desirability: 3**

**Rental Rate (provided by others): \$14.50 / SF/Year (nnn)**

- **Westelcom Suites offering 800 - 1600 SF of office space located at 24 Margaret Street, Plattsburgh, NY**

**Clinton County Real Property Records**

**Effective Year Built: 1997**

**Overall Condition: Normal**

**Overall Grade: Average**

**Overall Desirability: 3**

**Rental Rate (provided by others): not provided**

**Although the project has not received approvals, Prime has already been contacted by various office, retail and food & beverage industry tenants with interest in the proposed space. With the lack of comparable newer / renovated commercial space in the redeveloping downtown market, the Project's commercial space will be absorbed with a good mix of tenants. Amenities such as onsite parking, walkability to new downtown amenities, live/ work opportunities and built to suit options will allow for the proposed mixed-use development to be successful and revitalize the Durkee site.**

**Comment 3.96: "The City's public and private partnership with Prime to develop the DLMUD will spur economic development on the underutilized property..." The DLMUD will build an apartment complex for units that few downtown residents will be able to afford, and create retail space that most likely fail to attract tenants. I fail to see how that will "dynamize" the downtown economy. (Beaudreau)**

**Response 3.96: Prime indicates that it utilizes the Yardi Residential Tenant Criteria (YRTC) for qualification purposes at its properties. Although the Yardi approach is utilized for general underwriting purposes, Prime indicates that based on its 35 years of experience in the industry and experience in managing over 2,000 residential units Prime has also**

**applied a less conservative approach to qualification criteria when supported by the market environment.**

**According to the most recent HCR / NYS report<sup>8</sup> released on 5/9/19, the Median Household Income (MHI) in Clinton County is \$68,300. Using the more conservative YRTC, the MHI for Clinton County would support a qualifying rent of \$1,707.50 per month. Clinton County, like the Capital Region, has very strong Education, Health Care and Government employers as well as growing private sector employers which further strengthen the market environment. Based on this information and experience, this approach is accurate and the industry standard for this type of Project. Therefore, the Project can be reasonably anticipated to result in additional populations living in the Plattsburgh downtown area, which results in various economic development opportunities in the downtown area, as designed in the DRI.**

Comment 3.97: “The overall DRI project is expected to bring in 500 temporary jobs, 100 permanent jobs, about \$11 million in downtown revenue...” According to the Clinton County DRI PILOT agreement the main part of the DRI project, the DLMUD, will create 4 permanent jobs. But under construction jobs, which I assume are temporary, there are NONE listed. The figure of \$11 million in downtown revenue may partially be made up of people eating in downtown restaurants and drinking in bars, but as for shopping, the 114 high-income residents of the DLMUD will have precious few shopping options in the downtown core. And they will have cars and buy their groceries uptown (not in the city) and will shop online. So it is hard to see where the \$11 million figure comes from. And this statement fails to account for the significant tax burden that the PILOT agreement will impose on residents and taxpayers of the City. **(Beaudreau)**

**Response 3.97: See Response 3.94.**

Comment 3.98: The text suggests that “The positive economic impacts of the project are significant, the total economic impacts of the proposed projects construction equate to 56 jobs, nearly \$2.2 million in earnings...” Will the project be employing local/regional contractors and construction workers? If so, why does the PILOT agreement list ZERO construction jobs created for the county? **(Beaudreau)**

**Response 3.98: Prime anticipates securing a General Contractor to manage the construction of the project. The General Contractor typically utilizes a standard competitive bid process that involves the preparation of a bid package detailing the procurement process, work to be performed and bid requirements. Qualified contractors, including local, regional and others have the opportunity to respond to with a proposal for services. Please note that Section D.12 of the Application for Financial Assistance states not to include construction workers in worker estimates.**

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<sup>8</sup> New York State Homes and Community Renewal. Affordable Housing Corporation/Maximum Grant Amount and Income Limits. <https://hcr.ny.gov/system/files/documents/2019/06/2019%20AHC%20Income%20Limits.pdf>. Webpage accessed January 27, 2020.

Comment 3.99: The GEIS cites that “the restaurant component will create an additional 35 employees.” The number of employees is grossly exaggerated. Additional study should be provided that includes a survey of actual local restaurants to better document the actual number of employees that may be expected. Furthermore, the employee classification (i.e. full time vs. part time) as well as worker pay should be included in this additional analysis. **(Plattsburgh Citizens Coalition)**

**Response 3.99: The developer has received interest in this site from a variety of tenant types (restaurant, retail, office, etc.). At this point in the process, it is unknown which tenants will ultimately lease the space and how the space will be divided by use type. Therefore, a standard assumption of 383 square foot per employee in generic commercial space was used to calculate the 35 new employees in the 13,400 square foot space. Assumptions of square feet per employee vary from 134 SF/employee in a restaurant to 588 SF/employee in a community retail store. At 134 SF/employee there would be 100 new employees on site while at 588 SF/employee there would be 23 new employees on site. Upon completion, it is likely that there will be a mix of use types in the development. Therefore, 383 SF/employee or 35 employees is a good estimate of what this will look like. Square feet per employee data is sourced from the Institute of Transportation Engineers, the U.S. Department of Energy, and the San Diego Association of Governments. Note that when calculating the economic impacts of the commercial space, the impacts are adjusted to account for the portion of demand that results from new household spending. This adjustment means that 32 of the 35 jobs are considered to be net new and that 32 new jobs are used as the direct impact in the economic impact model.**

Comment 3.100: The PILOT tax exemption will burden City taxpayers. **(Harron)** The PILOT agreement flies in the face of this documents’ claim that the DLMUD will result in a significant growth of the City’s tax base. The PILOT agreement currently being sought calls for an 83% reduction in taxes for Prime LLC over a 20 year period. This means that while it should be paying approximately \$18 million in taxes over that period, it will be paying only \$2.7 million. Local taxpayers will have to make up the difference. The PILOT agreement negotiated by the Clinton County IDA should itself be considered an “adverse impact” on the Plattsburgh community. **(Beaudreau)** On page 180 Table 46: Municipal Fiscal Costs; the bottom line is that Prime Co.’s proposed development of the Durkee St lot will cost the City \$71,509.24 per year with no tax recouped for the first 3 years and only a 34% assessed value after that – the first 20 years the City will be in DEBT for associated Municipal costs. At the 20 year PILOT end the City is only receiving \$58,359.82 in tax revenue. After the 20 year PILOT, the City will receive \$834,400 in tax revenue but Prime’s development will have cost the City \$1,430,184.80; that is a loss to the City of \$595,784.80. All of this loss just for the “potential economic impact” of the project and complete loss of downtown character. **(Ford)** Homeowners and businesses will pay the taxes on the property for the next 20 years. Prime will then build a structure that will directly benefit perhaps 250 people, the tenant, at the cost of higher taxes for the rest of us. This is a plan that does not provide an incentive for people except possibly the Prime Apartment dwellers or businesses to move into Plattsburgh. On the contrary, it may well cause homeowners and businesses to move out. **(L Palkovic)** Please provide a complete analysis of potential costs

and impacts which include the effects of the proposed PILOT agreement on the rest of the taxpayers. (Erb; Plattsburgh Citizens Coalition)

**Response 3.100: Under existing conditions, no property tax revenues are accrued or collected by the City, County, or school district for the DSMPL, or any of the remaining project sites. As noted in Section 3.6.2.1 of the DGEIS, the proposed development of the DLMUD has requested a tax abatement from CCIDA; project applications are evaluated on the basis of a cost benefit analysis, the number of jobs created, spinoff employment, local business impact, and/or community investment, educational benefits, and real property value. One of the primary goals of PILOTs is to induce development by providing financial assistance to make projects work that otherwise would not be financially feasible, thereby facilitating revitalization and eliminating blight. See also Response 3.94.**

Comment 3.101: The proposed PILOT agreement is inconsistent with previous others granted in the area and will create a tax burden for the citizens, property owners and business owners throughout the City of Plattsburgh and the Plattsburgh School District. A comparative analysis should be conducted to detail and compare other PILOT agreements provided for say the last 20 or 30 years. The analysis should include, but not necessarily be limited to, the comparative number of full-time jobs created, the amount and percent of tax abatement and the duration of each PILOT. The GEIS should establish as a criteria that any PILOT agreement that results in a tax increase for citizens must be considered a significant adverse impact. (Plattsburgh Citizens Coalition)

**Response 3.101: The requested tax abatement from Clinton County IDA (CCIDA) is consistent with the CCIDA Uniform Tax Exemption Policy. The CCIDA has not yet finalized the PILOT agreement. The fiscal/economic analysis shows positive benefits. See Section 2.5.4 of the FGEIS for more information.**

Comment 3.102: The economic impact of the proposed development is grossly conflated and is presented as mitigating justification for what will in fact be a tax increase for city, school and county taxpayers. A fact-based PILOT agreement should be performed that includes the evaluation of an alternative in which there is no tax increase suffered by the taxpayers separate from the conflated economic impact used to justify the project. The analysis should factor in all of the costs (purchase of properties for alternative parking locations, demolition of buildings such as the Glens Falls National Bank, design and construction of parking lots, etc.) and loss of tax revenue (removal of Glens Falls Bank from the tax rolls, etc) that comprise the true impact of the development to taxpayers. Only through this analysis can a true evaluation of the severity of the impact be measured. (Plattsburgh Citizens Coalition)

**Response 3.102: The economic impact analysis contained in the DGEIS and FGEIS is consistent with the SEQRA Scoping document and performed according to accepted industry practices. The CCIDA will perform its own evaluation of the tax abatement application for the DLMUD consistent with its policy and practices. Each of the planned locations for increasing parking capacity is City owned. See Section 2.5.4 of the FGEIS.**

Comment 3.103: The building itself 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 page24.) (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) S) 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. **(T Palkovic)** The give-away of our land to a large corporation for profit-motive along with a PILOT scheme to evade taxation is a serious abuse of the citizenry of Plattsburgh. **(Woods)**

**Response 3.103: Following project completion, the development will have positive impacts on the City as it stimulates additional investment in the downtown area.**

**Direct impacts will result from on-site operations (employment and spending) as well as from new household spending by tenants. It is anticipated that approximately 32 new jobs will be present on-site with wages totaling \$997,375 and new expenditures of nearly \$2.6 million occurring. As the businesses make purchases from suppliers and employees spend their earnings, a portion of this will also occur within the City. This is referred to as the indirect impact and will result in an additional 7 jobs, \$291,738 in earnings, and \$841,412 in sales.**

**Table 24: DLMUD - Direct and Indirect Jobs, Wages, and Expenditures**

	<b>Direct</b>	<b>Indirect</b>	<b>Total</b>
<b>Jobs</b>	32	7	39
<b>Earnings</b>	\$997,375	\$291,738	\$1,289,112
<b>Sales</b>	\$2,571,669	\$841,412	\$3,413,081

**A portion of spending by new households will also occur within the City and have similar ripple effects throughout the economy. The portion of spending by new households that will occur within the City equals \$841,513. This spending will result in 9 new jobs at retailers within the City, along with \$284,718 in new earnings. As these retailers and their employees make additional purchases, 2 indirect jobs, \$94,003 in earnings, and \$271,608 in sales**

**Table 25: DLMUD - Direct and Indirect Jobs, Wages, and Expenditures within the City of Plattsburgh**

	Direct	Indirect	Total
<b>Jobs</b>	9	2	11
<b>Earnings</b>	\$284,718	\$94,003	\$378,720
<b>Sales</b>	\$841,513	\$271,608	\$1,113,120

The positive impacts that will result from this development are not limited to the above direct and indirect impacts. Investment of this scale tends to beget additional investment, as the City becomes a more desirable place to live, work, and visit. The addition of 115 new households creates a new market for existing retailers within the City, and creates opportunities for additional retailers to move in. The result will be a more vibrant downtown area, which will expend dividends for the community for years to come.

Comment 3.104: 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. (T Palkovic)

**Response 3.104: See Section 2.5.4.**

Comment 3.105: Does this project pay an appropriate PILOT for the impacts on County, Local and school budgets as a result of the project? (Clinton County PB)

**Response 3.105: As noted in Section 3.6.2.1 of the DGEIS, the CCIDA maintains three schedules for tax abatements. Project applications are evaluated on the basis of a cost benefit analysis, the number of jobs created, spinoff employment, local business impact, and/or community investment, educational benefits, and real property value. A copy of CCIDA’s Uniform Criteria for the Evaluation of Project Policy and the Prime PILOT application are provided in Appendix D of the DGEIS.**

Comment 3.106: The hard-working farmers, bakers, and crafters will suffer financial distress due to this worse-possible location for the Market. (Woods)

**Response 3.106: Once Building 4 of the former PMLD site was identified as a potential relocation site for the PFCM and vendors were provided with a tour of the facility, the PFCM’s leadership conducted another survey of those vendors to determine their level of support for the proposed plan. The vendors voted overwhelmingly in favor of the proposed plan. The results of that survey were as follows:**

- 22 votes in favor of relocating to Building 4
- votes against
- 2 votes who said they needed more information

On their own initiative, the PFCM has also conducted a market survey of their customers asking whether they would continue to patronize the PFCM after its relocation to the Harborside area. The results of this survey were favorable to the proposed relocation

and have reinforced the City's belief in the PFCM's continued success at its new proposed location.

### 3.7 HISTORIC AND CULTURAL RESOURCES

Comment 3.107: The project will have an impact on the historical quality of our downtown. (**Beaudreau**) The EIS fails to demonstrate how impacts to those unique historic qualities will be avoided. (**Plattsburgh Citizens Coalition**)

**Response 3.107: An analysis of the proposed project's potential impacts on historic and cultural resources is provided in Section 3.7 of the DGEIS. The proposed project was reviewed by NYSOPRHP, including a review of the proposed "site plan along with building elevations and any available renderings of the proposed new construction" (see page 183 of the DGEIS). In a letter dated December 23, 2019, NYSOPRHP concluded that the proposed project would result in no adverse effects to historic properties, including archaeological and/or historic resources. See Appendix D. See also Responses 3.2, 3.3 and 3.4.**

Comment 3.108: Nearly every area adjacent to the downtown core has been designated on the National Register of Historic Places, and somehow the actual business districts has not been designated. The DGEIS does not take into account that the entire downtown business district constitutes a largely intact collection of 19th century commercial buildings and is itself a National Register eligible historic district (see October 17, 2019 letter of the NYOPRHP cited on page 183). Given the sensitivity of the entire area which surrounds the Durkee Street Parking Lot, it very well may be that the Prime LLC project considerably alters its status as an intact historic district. More importantly, should construction be allowed to proceed in this area, it should be all the more congruent with the historic nature of this district. And nothing in the Prime LLC plan aside from color choice indicates a pleasing conformity with the chaotic, quaint jumble of buildings that surrounds it and makes this area so attractive. It is not OK to simply state, as is the case on page 184, that "the proposed project will not adversely impact the adjacent DPHD or other listed or eligible for listing resources". (**Beaudreau**) Consider pursuing the suggestions made and add the Plattsburgh Downtown Historic District to the official registry list prior to development of any land within the district to ensure protection of the historic and cultural resources of our downtown area. (**Erb; Plattsburgh Citizens Coalition**)

**Response 3.108: As noted in the *Phase 1A Literature Search and Sensitivity Assessment City of Plattsburgh Downtown Area Improvements Project* included in Appendix E of the DGEIS, the Plattsburgh Downtown Historic District is "considered eligible as an architecturally and historically significant intact city business core that reflects the growth and development of Plattsburgh as a regional commercial hub and industrial center from the early nineteenth to the mid-twentieth century." The proposed project would not result in any direct impacts to contributing features of the nineteenth and early twentieth century commercial and industrial center of downtown Plattsburgh. Nor would the proposed project alter the Plattsburgh Downtown Historic District's**



**status as an eligible historic district. In a letter dated December 23, 2019, NYSOPRHP concluded that the proposed project would result in no adverse effects to historic properties, including archaeological and/or historic resources, see Appendix D. See also Responses 3.2, 3.3, and 3.4.**

Comment 3.109: I am glad to see that the city is consulting with the NYSOPRHP to determine if there are any adverse environmental impacts; though I would prefer it to be recognized that this is required by law, as the Plattsburgh Downtown Historic District is listed as “eligible” on the State Historic Registry and the NYSOPRHP should therefore be considered an “Involved Agency” rather than an “Interested Agency” as indicated in the GEIS. (Erb; Plattsburgh Citizens Coalition)

**Response 3.109: An Involved Agency is defined in Section 6 NYCRR 617.2 of the SEQRA Regulations as “an agency that has jurisdiction by law to fund, approve or directly undertake an action.” The City is not aware of OPRHP having any authority to fund, approve or directly undertake the Downtown Improvement Projects. However, it does fit the definition of an Interested Agency, meaning “an agency that lacks the jurisdiction to fund, approve or directly undertake an action but wishes to participate in the review process because of its specific expertise or concern about the proposed action.” The definition of Interested Agency specifies that an Interested Agency “has the same ability to participate in the review process as a member of the public.”**

Comment 3.110: “The Point” historic district, which includes the area directly across the Saranac River from the proposed development on the Durkee Street Lot is listed on the National Registry of Historic Places. As such, any negative impacts on the historic and cultural integrity of that area should also be considered, and the National Park Service should also be consulted as to impacts on that area. Specifically, negative impacts of the view from the area and its character due to the imposing nature and scale of the proposed project at the Durkee Street Lot directly adjacent should be considered. (Erb; Plattsburgh Citizens Coalition) The open space also provides for unmitigated views of the river and the Point Historic District which will be almost completely blocked by the oppressive size of the proposed structure. (Erb)

**Response 3.110: The Point Historic District is a National Register-listed historic district located on the east side of the Saranac River on portions of the blocks bounded by Pike Street to the west, Bridge Street to the north, Hamilton Street to the south, and Jay Street to the east. The Point Historic District is located over 500 feet east of the Riverwalk project site and over 400 feet south of the proposed PFCM relocation site; the remaining project sites are located further from the Point Historic District. The Point Historic District is not visible from the project sites due to the distances between the project sites and the historic district and the presence of intervening buildings, topography, structures, and vegetation. The proposed project, including the new Riverwalk, will open up new viewing opportunities from the west side of the Saranac River. In a letter dated December 23, 2019, NYSOPRHP concluded that the proposed project would result in no adverse effects to historic properties, including archaeological and/or historic resources. See Appendix D.**

Comment 3.111: Inventory of all cultural and historical resources in the DRI area is incomplete. A full accounting and inventory of all resources should be thoroughly documented. (Plattsburgh Citizens Coalition)

**Response 3.111:** A *Phase 1A Literature Search and Sensitivity Assessment City of Plattsburgh Downtown Area Improvements Project* was prepared for the proposed project, which was included in Appendix E of the DGEIS. In addition, Figure 39 of the DGEIS indicates the location of all eligible and listed historic buildings, in addition to National Register building sites and districts, that are located within or in close proximity to the project area. In a letter dated December 23, 2019, NYSOPRHP concluded that the proposed project would result in no adverse effects to historic properties, including archaeological and/or historic resources. See Appendix D.

Comment 3.112: The EIS does not provide or adequately demonstrate how impacts to historic character of downtown will be mitigated. Specifically, a series of visual renderings a be provided that illustrate how views of the river will be impacted from each property along Durkee Street, Broad Street and Bridge Street. (Plattsburgh Citizens Coalition)

**Response 3.112:** See Response 3.108. Currently, due to existing vegetation and the steep bank of the Saranac River as it passes by the DSMPL, there are no views of the Saranac River from properties west, north, or south of the proposed development that would be impacted by the proposed DLMUD, therefore existing conditions will not be impacted. With the proposed project, access to the Saranac River will be enhanced and redeveloped to provide for more meaningful waterfront access for residents and visitors to enjoy.

Comment 3.113: The EIS briefly mentions the fact that the entire Downtown Plattsburgh Historic District is eligible for listing on the National and State Registers of Historic Places but fails to describe the specific unique historical and architectural characteristics of that district. (Plattsburgh Citizens Coalition)

**Response 3.113:** As noted in the *Phase 1A Literature Search and Sensitivity Assessment City of Plattsburgh Downtown Area Improvements Project* included in Appendix E of the DGEIS, the Plattsburgh Downtown Historic District is “considered eligible as an architecturally and historically significant intact city business core that reflects the growth and development of Plattsburgh as a regional commercial hub and industrial center from the early nineteenth to the mid-twentieth century.” In addition, Section 3.7.1 of the DGEIS (page 182) presents portions of NYSOPRHP’s eligibility evaluation criteria selected for the District’s inclusion in the National Register for Historic Places.

Comment 3.114: Durkee Street contains two buildings which have the potential to be listed on the National Register of Historic Places. Both Durkee Street west and the corner of Bridge and City Hall place constitute some of the most historically valuable intact 19<sup>th</sup> century commercial architecture that the city has to offer. Both of these areas offer pleasingly quaint and chaotic sightlines which contribute considerably to Plattsburgh’s historic character. If you are interested in historic preservation and placemaking, you should be

mindful that any attempt to insert a massive contemporary structure into this human-scaled cityscape poses the distinct possibility of marring its historic character and its architectural identity. **(Beaudreau)**

**Response 3.114: See Responses 3.2, 3.3, 3.4 and 3.108.**

Comment 3.115: This plan, in general, fails to coordinate the cultural and historical assets that Plattsburgh does have. While they may not all be in the Special Assessment District, how does this plan co-ordinate the Kent DeLord House, the Macdonough Monument and City Hall, the County Court House, the Strand Theater, the Monopole, Margaret Street, the Coop, the Farmers and Crafters Market, the harborfront, the Saranac River and Terry Gordon Bike trails that lead to the historic U.S. Oval, the Clinton County Historical Museum and Transportation Museum? Plunking a giant apartment complex does nothing to enhance the connectivity of these places. **(Beaudreau)**

**Response 3.115: The proposed project is intended to improve pedestrian connectivity in the City's downtown, including improving connections to the City's many historic and cultural resources. Plan components like the proposed Riverwalk will serve this goal. It should also be noted that while downtown Plattsburgh does contain many historic resources and is considered an eligible historic district, it contains both contributing and non-contributing buildings.**

Comment 3.116: How can that not adversely impact the Downtown Plattsburgh Historic District? It's going to "stick out like a sore thumb". The overwhelming size of this project means it will overpower the historic downtown area, and that in itself is an "adverse impact". The initial DRI plan called for 45 residential units and approximately 47,000 feet of retail and/or commercial space." At 115 residential units, and 200,000 SQ FT this five-story behemoth is more than three times the size of the originally proposed building. Its size, despite cosmetic elements designed to disguise its scale, will change the feel and authentic atmosphere of this historic district. **(Beaudreau)**

**Response 3.116: The DLMUD, as currently proposed, is the result of an extensive public engagement process throughout 2019. As part of this process, the Prime proposal was reduced from its original proposal, which, as outlined in their RFP response, included approximately 127 apartments, 13,515 SF of commercial space, and 7,883 SF of civic space. See also Responses 3.2, 3.3 and 3.4. In a letter dated December 23, 2019, NYSOPRHP concluded that the proposed project would result in no adverse effects to historic properties, including archaeological and/or historic resources. See Appendix D.**

### **3.8 ENVIRONMENTAL CONTAMINATION**

Comment 3.117: 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? (T Palkovic)

**Response 3.117: Temporary demolition and construction activities are discussed in DGEIS Section 2.3.2 which acknowledges that demolition and construction activities related to the development of the proposed projects may result in dust emissions. However, these impacts are expected to be temporary and short-term. In addition, the DGEIS states that fugitive dust control plans will be required as part of the contract specifications.**

**Potential environmental contamination is discussed in Section 3.8.2 of the DGEIS. Prior to demolition of the former bank building and drive-through canopy, the building will undergo abatement for ACM and lead paint. The building contains a limited amount of ACM (approximately 300 SF), which will be removed as part of the proposed rehabilitation according to applicable regulations. The proposed Downtown Area Improvement Projects are not anticipated to result in significant adverse impacts related to environmental contamination issues as all handling and processing of contaminated materials and construction on controlled sites will be undertaken according to applicable codes and regulations.**

**Section 5.0 of the DGEIS identifies an increase in solid wastes during construction as an unavoidable adverse impact. Section 3.3.3.2 of the DGEIS indicates that construction and demolition waste will be sorted so that materials can be salvaged as desired. Materials that are not salvageable will be transported to the Clinton County Landfill located on Sand Road in the Town of Schuyler Falls.**

**The contractual cost of the abatement and demolition of the Glens Falls National Bank building is \$218,110. This includes all costs related to disposal of material from the demolished bank building. All of the construction and demolition waste will be disposed of at the Clinton County Landfill. The concrete blocks will be disposed of at a hardfill site in Keeseville, NY. The abatement and demolition of the structure will be carried out in accordance with all applicable local, state, and federal regulations.**

Comment 3.118: There is known remediation of asbestos in both the former Glens Falls National Bank and the former MLD building. While the chart states that hazardous materials will be handled according to regulations, it concludes that therefore there are no mitigation measures needed. I would argue that the measures needed to dispose of the hazardous materials are the mitigating measures, and therefore need to be specified and listed along with the projected costs of such remediation. This statement should also include the results of any environmental and ground soil tests completed at all proposed project sites. (Erb)

**Response 3.118: See Appendix F of the DGEIS for environmental records related to the proposed action. See also Response 3.117.**

Comment 3.119: The report should incorporate the potential health risks associated with coal tar contamination from the current NYSEG - Saranac St. Former MGP Site (DEC Site # 510007).  
**(Plattsburgh Citizens Coalition)**

**Response 3.119: The NYSEG remediation of the Saranac River is discussed in Section 3.8 of the DGEIS. Figures 40 and 41 in the document identify the location of the NYSDEC remediation operable units in relation to the project sites. The intent of the remediation work is to address contamination and public health concerns.**

Comment 3.120: The City proposes to relocate the PFCM to a building within 200 feet of the COP sewage treatment plant. The DGEIS is silent on the impact of odors from the COP sewage treatment plant on the PFCM. Noxious odor and hauling of raw sewage adjacent to a farmer's market could have adverse impacts to the health of PFCM customers and should be addressed in the DGEIS. **(Plattsburgh Citizens Coalition)** The fact that it smells at all is reason for me and many others not to go to the Plattsburgh Farmers' and Crafters Market. But what is so troublesome to me is the fact that the settling tanks (clarifiers) are right there. What type(s) of bacteria are airborne? Escherichia coli? Staphylococcus? That is why I am asking the question about having the Plattsburgh Farmers' and Crafters Market in such close proximity to the wastewater treatment facility and if there has ever been any air samples taken? Is that part of the General Environmental Impact Statement? I am aware that such things as temperature, wind velocity and specific humidity etc. is going to influence the spread and the ability of the microorganisms to survive in the air. In the same meeting there was mention of odor abatement and the use of screens. How is this odor abatement going to work? Is it going to work by mechanical means? Chemical means? How? The use of screens is to make it more aesthetically pleasing but it is not going to prevent airborne particles from being released into the air. The Mayor has gone on record stating that he will clean up the smell, that there will be no microscopic human waste in the air, but so far we have not seen any credible plans to accomplish this goal. **(Beaudreau)** The Farmer's Market adjacent to the sewer plant is disgusting and air quality tests of contaminants have not been done. The very perception of the E-coli "possibilities" will deter shoppers to buy here. More "wholesome" produce at large grocery stores will displace these sales. **(Harron)** What airborne biological contaminants were present in air, water, and soil samples at the proposed Farmer's Market site? Were these tests even performed during the environmental study?? I suspect they were not and that, too, is reckless and unconscionable. **(Woods)**

**Response 3.120: As part of the PFCM relocation, on-site air quality tests will be conducted as required by NYS Office of Community Renewal (NYSOCR) which is providing the bulk of the funding for that project. Furthermore, the PFCM's leadership and vendors were invited to take a tour of the relocation site and the WRRF to better understand the area and the operations of the WRRF first hand. After these tours, the PFCM stated publicly that they are not concerned about perceived odor or health effects and that they are looking forward to their relocation. A survey of its customers conducted by the PFCM also indicated strong support for the relocation plans.**

While bacterial samples have not been collected near the WRRF, wastewater treatment plants are an integral part of most communities and are a critical component of protecting public health and the environment. They are frequently located in close proximity to heavily trafficked public areas. The City's WRRF is located in a frequently used public recreation area and no adverse health effects resulting from its presence there have been documented.

The City has plans to cover the plant's influent channel and primary clarifiers to provide better containment of odors. This contained air will be sent, along with air from the enclosed headworks area, to a new activated carbon scrubber for treatment. Prior to the covering of the influent channel, it is anticipated that, during the PFCM's operating hours, use of the WRRF's influent channel will be suspended to minimize the effect of odors on nearby areas.

See also Responses 2.13 and 2.15.

Comment 3.121: You are proposing moving a main food source away from a densely populated residential area to a "no-man's" land with no residences within 500ft of the building, requiring walking over the pedestrian bridge past a hazardous needle waste receptacle or walking over federal rail road tracks or walking around a sewage treatment plant to access a local food source (**Ford**)

**Response 3.121:** The proposed relocation site for the PFCM at 26 Green Street is located less than half a mile from the PFCM's current building. The various connections between the downtown core and the proposed PFCM site on Green Street noted in this comment are being considered for improvement as part of the City's planning efforts to increase the attractiveness of the Harborside area and will be addressed in a master planning document for the area for which the City has recently received grant funding.

Regarding the process that led to the proposed relocation of the PFCM to the Harborside area, the initial development proposal for the DLMUD submitted by Prime included, as required by the City's RFP, 7,863 sq. ft. of interior space within the DLMUD to house the PFCM. After reviewing Prime's proposal with the leadership of the PFCM, they expressed concern regarding both the availability of parking for their customers and access to the proposed space. A poll of the PFCM's vendors revealed that there was little to no support for the originally proposed arrangement and, consequently, the City began exploring other options to accomplish the relocation of the PFCM. While not originally envisaged by the DRI, the PFCM's relocation became necessary to ensure its continued success.

See also Response 2.15.

### 3.9 RECREATION AND OPEN SPACE

Comment 3.122: The project also has the potential to have a significant adverse impact on the Saranac River Trail (SRT) Phase 2 project which is funded by NYSOPRHP. SRT Phase 2 includes

bike lanes or an accessible bike route along Durkee Street. The DRI project proposes to abolish this important aspect of the NYSOPRHP funded SRT Phase 2 Project. Furthermore, the GEIS provides virtually no analysis or evaluation of this important concern. Also, please note that bicycles are prohibited by law from travelling on sidewalks, therefore, the Riverwalk and sidewalk along Broad Street are not a viable alternative. A full alternatives analysis should be conducted to demonstrate how this NYSOPRHP funded project will not be adversely impacted. (**Erb; Plattsburgh Citizens Coalition**)

**Response 3.122: The SRT Phase 2 project does propose the addition of a bike lane on Durkee Street but only on that portion of Durkee Street south of Broad Street and these plans are not anticipated to be affected by the GEIS projects. Between Broad Street and Bridge Street, no bike lanes are planned for implementation as part of SRT Phase II. No other improvements proposed as part of SRT Phase 2 are anticipated to be affected by any of the GEIS projects. The proposed DLMUD and Riverwalk do include improvements for cyclists and pedestrians. The Riverwalk is proposed as a 10-foot-wide multi-use trail and can accommodate cyclists. No adverse impacts to the SRT Phase II project are proposed and no additional analysis is warranted.**

Comment 3.123: I strongly object to the conclusion made that there are no adverse impacts to recreation and open space as a result of the proposed project in the Durkee Street Lot. This area is currently public land that is often used for more activities than just parking. It also has the potential to be converted to more useable and attractive public space. Multiple public attractions could be constructed in this lot to create a public destination, which was a core component of the DRI application and proposed plan to the State. This opportunity and resulting positive impacts on both the downtown economy and quality of life will be lost if we are to give the lot away to a private entity for one dollar. (**Erb**) The Durkee Street Parking Lot constitutes the city's only large open space, which hosts many events. The GEIS does not address how this open space will be replaced once the Prime LLC development is built. (**Beaudreau**)

**Response 3.123: The DSMPL is currently occupied by a paved, public parking lot and a seasonal, metal-sided building with an adjacent pavilion, and is not considered to be open space. As described in the DGEIS, the proposed project includes the development on the Durkee Street Lot of a 2,400-SF, publicly accessible civic space in an open air pavilion with access from the new pedestrian walkway. The proposed project would also include several improvements to recreation and open space facilities, including improvements to the deteriorated Riverwalk and Westelcom Park.**

Comment 3.124: The GEIS does not provide any comparative analysis of the economic impact of creating a public gathering space of interest to attract visitors to the downtown area, which was the stated goal of the DRI. It is impossible to evaluate the proposed project unless and until such a comparative economic analysis is performed. This GEIS provides a highly questionable study of the economic impact that 114 residential units might have but does not provide any alternative evaluation for the impact that attracting visitors to the downtown might have. (**Erb**)

**Response 3.124:** Three alternatives to the proposed project are analyzed in the DGEIS: Alternative A: The No-Action Alternative; Alternative B: Planned DLMUD with Downtown Parking Garage at Broad Street; and Alternative C: Reduced Residential Count and Increased Commercial Square Feet. As outlined in the NYSDEC's SEQR Handbook, "The goal of the alternatives discussion in an EIS is to investigate means to avoid or reduce one or more identified potentially adverse environmental impacts. Part 617 further requires that the alternatives discussion include a range of reasonable alternatives which are feasible considering the objectives and capabilities of the project sponsor." The three alternatives that are included in the DGEIS were identified during the public scoping process.

It should also be noted that, as part of the DRI planning process, multiple potential alternatives were discussed and assessed. Specifically, as noted in the DRI SIP, "Development at Durkee Street has been the subject of significant local study and discussion." This work effort included a Development Feasibility Study funded by Empire State Development that found that, with some gap financing, the return on investment could be sufficient to attract private sector investment to complete the development of the site.

Comment 3.125: I disagree that adding more residents to the downtown area does not increase the demand for open space. Adding residents will increase the demand for open space. (Erb)

**Response 3.125:** As presented in the DGEIS, the proposed residential units are expected to introduce 236 new residents. Based on 2017 ACS 5-Year Estimates, the City of Plattsburgh has an existing population of 19,734. Therefore, the 236 new residents would represent an increase of 0.1 percent over the City's existing population. This level of increase would not result in a notable change in open space demand. It should further be noted that the City's population has declined in recent years (from a high of 19,974 in 2010) and, therefore, the 236 residents would not increase the City's population (or associated open space demand) above its recent (2010) level.

Comment 3.126: This development will effectively curtail the potential for Saranac riverside leisure and recreational possibilities. (Harron)

**Response 3.126:** As shown in Figure 2 of the DGEIS, the DLMUD will include an open space pedestrian corridor connection to the Riverwalk. This connection will serve as both a physical and visual connection to the Riverwalk and Saranac River from points west. The proposed project will also include improvements to the Riverwalk. Specifically, the Riverwalk improvements will include replacement of the existing deteriorated boardwalk with an approximately ten-foot-wide, multi-use path, which will connect (via a crosswalk over Bridge Street) to MacDonough Park to the north and the soon to be constructed Phase II of the SRTG to the south (via a path between the Gateway Complex and Broad Street) at Broad and Durkee Streets.



### 3.10 VISUAL RESOURCES

Comment 3.127: From page 179 to page 184, the report makes it sound like this development is very much in keeping with the feeling and scale of the downtown area, and I don't really think it does. It's 8 times the size of the average building in its immediate surrounding area. So, to my view, it is not the size and scale of the surrounding area. The average height of buildings in the downtown area is three stories high, and this building is 5 stories high. So I think it's a huge building that I think will overpower the downtown area. (Beaudreau)

**Response 3.127: See Responses 3.2, 3.3, 3.4 and 3.10.**

Comment 3.128: 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. Also concerned about safety along this section of the Riverwalk if there becomes a "boxed in section" as a result of this project. (Clinton County PB)

**Response 3.128: Access to the basement parking garage is from Bridge Street. The entire eastern edge of the basement parking deck will be enclosed and screened by a heavily landscaped base, with a landscaped buffer that will blend with the Riverwalk treatment. The east edge of the courtyard will be one level above the Riverwalk and will feature an amenity terrace for housing residents with opportunities for formal and informal activities. The pedestrian walkway that provides access from Durkee Street to the Saranac Riverwalk will be appropriately illuminated. See Appendix C for more information.**

### 4.0 ALTERNATIVES

Comment 4.1: 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. (T Palkovic)

**Response 4.1: Section 4.3, page 200 of the DGEIS describes why this alternative was not selected.**

Comment 4.2: 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. 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. (T Palkovic)

**Response 4.2: Consideration and analysis of redevelopment of the Glens Falls National Bank as anything other than a parking lot improvement as part of the City's Downtown Area Improvement Projects is outside of the scope of this GEIS per the accepted scoping document for this SEQR review.**

Comment 4.3: Clear out all the offices on this floor of City Hall. Move down to the sewage treatment plant and conduct city business there. Let the farmers market set up shop here. It's a nice location and I'm sure they'll prosper. (L Palkovic)

**Response 4.3: Comment noted.**

Comment 4.4: I would prefer you give the grant money back and leave things as they are, rather than force us to bear the long term cost of such an expensive, risky endeavor that may profit a few and ultimately burn the rest of us to pay for an edifice of which the vast majority of citizens will gain little daily benefit. (L Palkovic) The analysis should leave open the option of doing nothing at the lot and leaving it as is. Please include this in the chart on page 13 (Comparison of Project Alternatives) for comparison. (Erb)

**Response 4.4: The DGEIS includes a "No Action Alternative," which assumes no changes to the project sites. The No Action Alternative is presented as Alternative A in Section 4.1 of the DGEIS and is summarized in Table 4 on Page 13 of the DGEIS.**

Comment 4.5: The City is encouraged to review the scope of the project, to see if downscaling is an option/alternative. (Clinton County PB)

**Response 4.5: The DLMUD, as currently proposed, has been shaped by an extensive public engagement process conducted throughout 2019, which has resulted in a scaling down of the project size. The initial project proposal from the January 18, 2019 meeting included two multi-story buildings encompassing approximately 127 market rate residential units with 13,515 square feet of commercial / retail space. This proposal allowed for a total of 254 parking spaces including 238 on-site parking spaces, (70 below-grade parking spaces) and 16 on-street parking spaces as well as relocating the existing Farmers Market within the site.**

**Based upon the feedback from the January meeting, in May 2019 the footprint of the buildings was adjusted to improve pedestrian access and on-street parking along Durkee Street, allow additional space for the Riverfront project and widen the pedestrian pathway that connects the proposed Arts Park with the proposed Riverwalk area. The redesign of the buildings and associated footprint increased the number of residential units to 139, reduced the commercial / retail space to 13,000 square feet and implemented underground parking in both buildings to include 288 on-site parking spaces.**

Also, as a result of this meeting the green space was increased, the residential amenities were relocated to be more enclosed and Prime agreed to work together with the City in a Public-Private partnership to relocate the Farmers Market.

The feedback from the May 19, 2019 meeting focused heavily on parking, improving the integration of the green space and concerns over the modern architecture of the proposed buildings. To incorporate the public's concerns while maintaining a successful project, significant changes were made including implementing features from a successful existing project that is similar in size and demographics.

The proposal now includes 115 residential units and approximately 13,400 square feet of commercial / retail space contained in one, U-shaped building. The revised structure of the building addresses the parking concerns with the addition of a full access-controlled parking garage below the building that allows for 165 parking spaces and 35 street level parking spaces. The removal of the second building allows for an additional 86 space open-surface lot parking for a total of 286 parking spaces. In addition to the increased parking spaces, the removal of the second building improves the visual connectivity from the proposed Arts Park to the proposed Riverwalk area while also allowing for an additional 2,300 square feet of public civic space adjacent to the proposed Riverwalk.

While increasing the areas of the project site that will be made available to the public, the overall size of the project has been reduced from two buildings to one which has reduced the residential unit count. Prime requires the current minimum of 115 units and associated commercial space to appropriately address expenses and employees required to operate the proposed Class A residential and commercial space in a manner consistent with its other properties.

Comment 4.6: Another alternative that does not appear in the DEIS is to provide closer vehicular and pedestrian access to the harborside parking area. 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. (Clinton County PB)

Response 4.6: The Harborside area is currently accessible via Green Street from the south, Dock Street from the east, and via a pedestrian bridge over the Saranac River to the west. It is proposed to remove the bulk of perimeter fencing around the former PMLD site to allow for increased pedestrian connectivity. The City is exploring future access improvements including sidewalk connectivity along Green Street and improved vehicular and pedestrian access from the Harborside parking lots. In addition, the City was recently awarded a NYS DOS grant to develop a master plan for the Harborside area. Both

**vehicular and pedestrian connectivity from downtown to the Harborside will be primary components of that master planning document.**

Comment 4.7: 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. **(Clinton County PB)**

**Response 4.7: Please refer to Response to Comment 1.2. As outlined in the NYSDEC's SEQR Handbook, "The goal of the alternatives discussion in an EIS is to investigate means to avoid or reduce one or more identified potentially adverse environmental impacts. Part 617 further requires that the alternatives discussion include a range of reasonable alternatives which are feasible considering the objectives and capabilities of the project sponsor. In general, the need to discuss alternatives will depend on the significance of the environmental impacts associated with the proposed action. The greater the impacts, the greater the need to discuss alternatives." Given the significance of the environmental impacts of the proposed action, the inclusion and analysis of the three alternatives satisfies SEQRA requirements.**

**It should also be noted that, as part of the DRI planning process, a series of potential alternatives were discussed and assessed by the City in consultation with Prime representatives (see also Response 4.5).**

Comment 4.8: 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. 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. **(Gervich)**

**Response 4.8: Please refer to Responses 1.2 and 4.7.**

Comment 4.9: I would like to see a fourth option included in this comparison which the land remains public, and DRI money is instead put towards public open space improvements to approximately one acre of the space (or about 1/3 of the lot) as well as the construction of a new Farmers Market building in its current location. The remaining land would remain a public parking lot until the improvements made attract more interest in private development more scalable to the downtown area without the need for such drastic monetary and tax incentives. This plan of action – investing DRI funds in the public land improvements first - was actually suggested in the Strategic Investment Plan for the DRI and represents a much more lucrative and less risky plan of action for the city in the long run when compared to the costs and risks associated with the current plan and its necessary PILOT. (Erb)

**Response 4.9: As described in Response 1.2, “as outlined in the NYSDEC’s SEQR Handbook, “The goal of the alternatives discussion in an EIS is to investigate means to avoid or reduce one or more identified potentially adverse environmental impacts. Part 617 further requires that the alternatives discussion include a range of reasonable alternatives which are feasible considering the objectives and capabilities of the project sponsor. In general, the need to discuss alternatives will depend on the significance of the environmental impacts associated with the proposed action. The greater the impacts, the greater the need to discuss alternatives.” The suggested alternative is outside of the scope of this GEIS per the accepted scoping document.**

Comment 4.10: A smaller, more compatible DLMUD should be added as Alternative D and evaluated. Alternative D should consider the following: A four story DLMUD (instead of five) would be more compatible with the neighborhood. The DLMUD setbacks should match or be no less than the existing street side setbacks of the Gateway building located on the south end of the site (part and purpose of the original 2004 PUD). A 114-unit apartment building is unprecedented in downtown Plattsburgh. Alternative D should include a building with significantly fewer units. It is important to note that the 2017 North Country Downtown Revitalization Initiative: Plattsburgh Award booklet acknowledged “approximately 45 residential units.” (Plattsburgh Citizens Coalition)

**Response 4.10: See Responses 1.2 and 2.1.**

Comment 4.11: The proposed parking plan relies heavily on the concept of replacing long-term off-street parking with on-street parking. This concept is inherently and fundamentally harmful to local downtown businesses who rely on short term parking in close proximity to their business establishment to maintain a viable business in a small City with a cold climate. The occupation of on street parking spaces by long-term parking will have a direct and severe impact on local businesses. The GEIS should evaluate an alternative in which the long-term off-street parking is replaced with long-term off-street parking to avoid an adverse impact to businesses. (Plattsburgh Citizens Coalition)

**Response 4.11: The City is currently evaluating a series of parking management strategies which will include both short-term and long-term parking options. The goal is to provide an adequate supply, at affordable rates, that is equitable and sensitive to the needs of local**

**businesses. The replacement of long-term parking as outlined in Section 3.5 of the DGEIS and further described in FGEIS Section 2.5.3 will occur through establishment of additional off-street spaces at multiple locations. See also Comment 3.63.**

Comment 4.12: The EIS fails to provide alternatives analysis to demonstrate that there may be better development alternatives more in keeping with the unique characteristics of downtown Plattsburgh. Size and height alternatives should be considered as part of the evaluation of consistency with community character. **(Plattsburgh Citizens Coalition)**

**Response 4.12: See Response to Comment 1.2.**

Comment 4.13: Why, as an alternative, does the City not keep the half of the Durkee Street Parking lot that will constitute the public parking, and retain the 2,400 SQ FT space occupied by the PFCM for public usage, preserved as such for generations to come? **(Beaudreau)**

**Response 4.13: See Response to Comment 1.2.**

Comment 4.14: An alternate design proposal, which is part of Prime LLC's potential offerings, seems to fit more seamlessly into the current streetscape of downtown Plattsburgh. The GEIS should note that other options for the site in terms of size, scale, and design, could be considered. **(Beaudreau)**

**Response 4.14: See Response to Comments 1.2 and 4.5.**

Comment 4.15: The GEIS should note that the now-available site of the Glens Falls National Bank could be used for something other than a parking lot. Developing a multi-use apartment complex or hotel on this site would restore the original streetscape and unify the Margaret Street corridor. **(Beaudreau)**

**Response 4.15: See Response 4.2.**

Comment 4.16: A smaller scale residential apartment building could co-exist with the current Market site and would alleviate so much of the opposition to the current plan. **(Woods)**

**Response 4.16: See Responses to Comments 1.2, 2.7 and 2.17.**

## **5.0 ADVERSE UNAVOIDABLE IMPACTS**

Comment 5.1: 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. **(Clinton County PB)**

**Response 5.1: As required by the SEQRA Regulations, this Final GEIS contains comprehensive responses to substantive comments received on the Draft GEIS at the Public Hearing and during the Public Comment Period. As noted in the SEQRA Handbook, in determining whether comments received are substantive, the Lead Agency should**

assess the relevance of the comments to identified impacts, alternatives and mitigation or whether the comments raise important new environmental issues which were not previously addressed. The Lead Agency may also explain why an impact is not significant, why a topic is not included in the Final EIS or how an alternative or proposed mitigation would address concerns in its responses to comments. Clarification of scientific terms, concepts or data interpretation may also be necessary in a Final EIS.

A Supplemental EIS may be required, at the Lead Agency's discretion, if (a) proposed Project changes may result in one or more significant adverse environmental impacts not addressed in the original EIS, (b) the Lead Agency discovers new information, not previously available, concerning significant adverse impacts, (c) a change in circumstances arises which may result in a significant adverse environmental impact or (d) site-specific or project-specific analysis of potential significant adverse environmental impact(s) is needed for actions following a Generic EIS. Supplemental EISs may be required for actions initially contemplated in a GEIS to address future site-specific or project-specific issues. However, the Common Council does not believe that there have been any changes in the Project, newly discovered information or a change in circumstance that have the potential to result in any new, previously undisclosed or unevaluated impacts that would require preparation of a Supplemental EIS at this time.

## 6.0 IRREVERSIBLE IRRETRIEVABLE COMMITMENT OF RESOURCES

Comment 6.1: This section does not properly address the large impact of the Durkee Mixed Use Development project and the long term effects of development. Please provide clarification regarding the intent of Section 6.0. (Plattsburgh PB)

Response 6.1: NYSDEC's 2019 *SEQR Handbook* indicates that "The extent to which a proposed action may cause permanent loss of one or more environmental resources should be identified as specifically as possible based upon available information. Resources which should be considered include natural and manmade resources that would be consumed, converted or made unavailable for further uses due to construction, operation, or use of the proposed project, whether those losses would occur in the immediate future, or over the long term. Examples include the filling of wetlands; paving over or construction on valuable agricultural soils; use of non-renewable, or non-recyclable materials in new structures; and use of fossil fuels in construction or operation of the project." In this context, the conversion of the Durkee Street parking lot to the DLMUD is not considered an irreversible irretrievable commitment of resources.

The DGEIS identifies that, "the various improvement projects would require the commitment and use of a variety of resources, which would no longer be available for future use. Construction related materials, including concrete, wood, steel, and fill materials and construction equipment operation utilizing water and fossil fuels would be irreversibly and irretrievably committed to the projects. The projects, in their operational state, would irreversibly and irretrievably utilize water and fossil fuels. Labor resources, during construction and operation, would be committed to the proposed projects, but this is anticipated to result in a beneficial impact."

Comment 6.2: The DLMUD represents an irreversible commitment of a large, publicly 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. **(Gervich)**

**Response 6.2: See Response 6.1.**

Comment 6.3: The Durkee Street Municipal Parking Lot is a publicly owned waterfront parking property. Conveyance of this property to a Private Development Corporation (i.e. Prime Companies) would result in an irreversible irretrievable commitment of resources. It is also noted that the parking lot here may very well also be protected by the public trust doctrine, in addition to the issues surrounding New York General City Law §20(2). In the City of Plattsburgh, this parking lot, and indeed other similar parking lots within the downtown parking district, are held for the benefit of that parking district. Taxpayers are charged a special tax for the maintenance, repair and upkeep of those parking lots, evidencing an intention by the City of Plattsburgh to hold those public parking spaces in trust for this district. Thus, no parking property may be alienated without addressing the underlying special taxing district. The continuing wrong evidenced by the Agreement in violation of New York General City Law §20(2) must be reversed. The City of Plattsburgh does not possess the legal authority to enter into the Agreement and doing so would result in an irreversible irretrievable commitment of public resources. **(Plattsburgh Citizens Coalition)**

**Response 6.3: The City does not propose to convey any waterfront property to Prime. As detailed in the DGEIS, the City proposes to retain ownership of all waterfront property on the DSMPL.**

**Additionally, public parking lots within the SAD are not constrained by the public trust doctrine. It is within the Common Council's authority to convey these parking lots and also to establish new parking.**

**Those downtown property owners subject to the special tax for maintenance, repair, and upkeep of parking within the SAD will continue to benefit from the establishment of new lots and the expansion of existing lots. In this way, parking capacity can be relocated within the SAD without resulting in an irreversible, irretrievable commitment of public resources.**



## APPENDICES

Comment A.1: DRI Strategic Investment Plan and Original Application: These documents should be included in the appendix, and appear to be omitted. (Clinton County PB)

**Response A.1: These documents are available on the City's website at <http://www.cityofplattsburgh.com/428/Downtown-Revitalization-Initiative>.**

Comment A.2: Please provide a glossary of the acronyms that appear throughout. It will help maintain coherence and comprehension (L Palkovic)

**Response A.2: An acronym glossary has been added to the FGEIS.**

Comment A.3: The DGEIS references the Development Agreement between Prime and the City. The Development Agreement should be appended to the GEIS. (Plattsburgh Citizens Coalition)

**Response A.3: The Agreement has been referenced in the GEIS only to the extent that it reflects the developer's proposed plans. It is anticipated that the Development Agreement will be amended or superseded. Any new Agreement will be made available to the commenter and any other member of the public. Nonetheless, some of the information presented in the DGEIS is that which was earlier presented by the proposed developer and is still accurate and valid, other than as modified in the FGEIS.**

## GENERAL

Comment G.1: 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. (L Palkovic)

**Response G.1: Comment noted.**

Comment G.2: It's an overall huge loss for residents and visitors – loss of parking, loss of access to open spaces, and an unacceptable financial burden with no in-kind amenities for the Plattsburgh community. Prime LLC is the ONLY winner in this ill-conceived DRI. (Harron)

**Response G.2: See Response to Comment 3.15**

*Final Generic Environmental Impact Statement (FGEIS)*  
*City of Plattsburgh*  
*Downtown Area Improvement Projects*  
**Clinton County, New York**

*Appendices*

*Appendix A:*  
*State Environmental Quality Review Information*

**State Environmental Quality Review Act (SEQRA)  
NOTICE OF COMPLETION OF DGEIS  
and  
NOTICE OF SEQRA PUBLIC HEARING**

**Lead Agency: City of Plattsburgh Common Council      Date: November 21, 2019**

This Notice is issued pursuant to Part 617 of the implementing regulations pertaining to Article 8 (State Environmental Quality Review Act) of the Environmental Conservation Law.

A Draft Generic Environmental Impact Statement (DGEIS) has been completed and accepted by the Lead Agency for the proposed action described below. A Public Hearing on the DGEIS will be held on Monday, December 9, 2019 at 5:00 p.m. in the Common Council Chambers of Plattsburgh City Hall, 41 City Hall Place, Plattsburgh, New York 12901. Written comments on the DGEIS will be accepted until 2:00 p.m. on Monday, December 23, 2019 and must be submitted in writing to the following address:

Plattsburgh Common Council  
c/o Beth Carlin, Mayor's Office  
Plattsburgh City Hall  
41 City Hall Place  
Plattsburgh, NY 12901

**Name of Action:** Downtown Area Improvement Projects

**Description of Action:** The Downtown Area Improvement Projects include: (a) Durkee Lot Mixed-Use Development (multi-story mixed-use development replacing existing 289-space Durkee Street Municipal Parking Lot located at 22 Durkee Street and rehabilitation of existing Plattsburgh Farmers' and Crafters' Market building for use as commercial space and publicly-accessible civic space); (b) Saranac Riverwalk (construction of a Riverwalk along the Saranac River to replace existing pedestrian walkway); (c) Durkee Street Reconfiguration and Streetscape Improvements (reconfiguration of Durkee Street to one-way traffic with streetscape improvements and 43 additional public parking spaces); (d) Westelcom Park Improvements (redesign of existing Westelcom Park to include multi-tiered park with sculpture areas, water feature, plaza, bicycle infrastructure and pedestrian walking areas); (e) Bridge Street Parking Improvements (streetscape improvements and six new on-street parking spaces); (f) Arnie Pavone Memorial Parking Plaza (109-space municipal public parking lot at the former Glens Falls National Bank site and associated parking area including abandonment of Division Street and incorporation of that street's footprint); (g) Broad Street Municipal Parking Lot (minor expansion and restriping of existing 59-space lot to accommodate 22 additional parking spaces); (h) Plattsburgh Farmers' and Crafters' Market (PFM) Relocation and Expansion (relocation

of PFCM to former Building 4 of Plattsburgh Municipal Lighting District buildings at 26 Green Street within City's Harborside Area.)

**Location:** City of Plattsburgh, Clinton County, New York  
See attached Location Map.

**Potential Environmental Impacts:** See attached Table 3: Summary of Potential Significant Adverse Environmental Impacts and Mitigation Measures.

**A copy of the DGEIS may be obtained from:**

**Contact Person:** Matthew Miller, Director of Community Development

**Address:** 41 City Hall Place  
Plattsburgh, NY 12901

**Telephone:** (518) 536-7520

**A copy of the DGEIS can also be accessed on the City's website at**  
<https://www.cityofplattsburgh-ny.gov/604/DRI-Environmental-Impact-GEIS>.

**A copy of this Notice and the DGEIS have been sent to:**

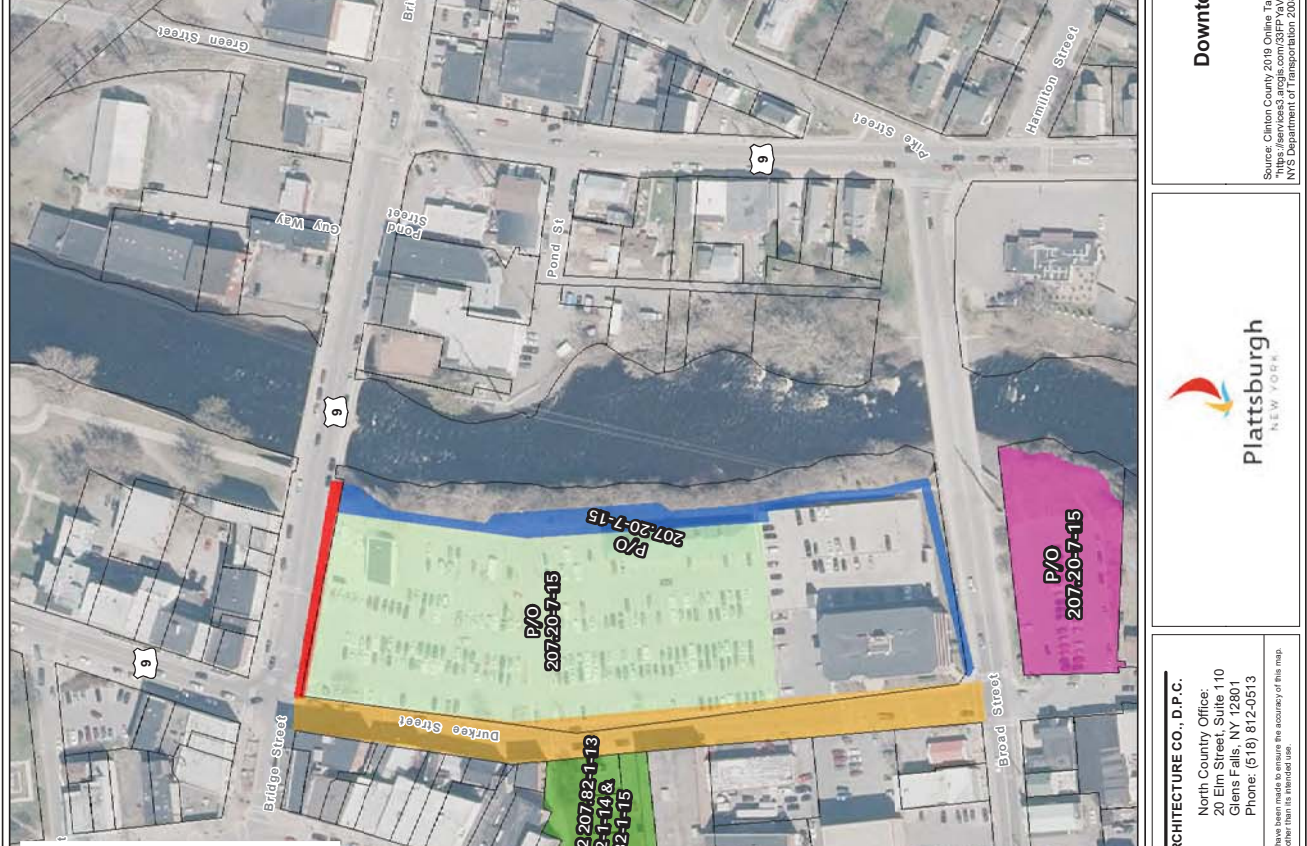
Mayor, City of Plattsburgh

City of Plattsburgh Common Council

All SEQRA Involved Agencies

Department of Environmental Conservation, Division of Environmental Permits

Any person who has requested a copy



Project Sites	
	1. Durkee Lot Mixed Use Development
	2. Saranac Riverwalk
	3. Durkee Street Reconfiguration and Streetscape Improvements
	4. Bridge Street Reconfiguration and Streetscape Improvements
	5. Arnie Pavone Memorial Parking Plaza
	6. Westelcom Park / Arts Park
	7. Broad Street Municipal Parking Lot
	8. Proposed Relocated Farmers Market

**CHAZEN ENGINEERING, LAND SURVEYING & LANDSCAPE ARCHITECTURE CO., D.P.C.**

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Glens Falls, NY 12801  
Phone: (518) 812-0513

Troy, NY 12180  
Phone: (518) 237-0055

This map is a product of The Chazen Companies. It should be used for reference purposes only. Responsibility for any errors or omissions or liabilities from the use of the map for any purpose other than its intended use. The Chazen Companies expressly disclaims any responsibility for such errors or omissions.

Drawn: MOJRL-B  
Date: 10/07/2019  
Scale: 1 inch = 50 feet  
Project: 91922.00  
Figure: 1

**City of Plattsburgh**  
Downtown Area Improvement Projects  
Clinton County, New York

Source: Clinton County 2019 Online Tax Parcel Database  
NYS Department of Transportation 2008 Roads Dataset, NYS Office of Technology, 2018 orthophoto imagery

## 1.6 Summary of Potential Significant Adverse Environmental Impacts and Mitigation Measures

**Table 3: Summary of Potential Significant Adverse Environmental Impacts and Mitigation Measures**

DGEIS Chapter	Potential Impacts	Mitigation Measures
<p>3.1: Land Use, Community Character, Zoning, and Public Policy</p>	<ul style="list-style-type: none"> <li>• The projects are proposed for the revitalization of the project area and will result in permitted uses that that will beneficially affect the land use character of the project area. No significant adverse impacts to local land uses and community character are anticipated to occur.</li> <li>• The DLMUD would result in some deviations from the underlying C Zoning District requirements, which act as guidelines for the design of a PUD. The Planning Board is authorized to vary these guidelines in pursuit of a desirable project. The DLMUD will not result in significant adverse impacts related to zoning. The balance of projects will remain as City-owned property and will undergo future coordination with applicable City Boards and Commissions to ensure consistency with applicable public policy.</li> <li>• The Downtown Area has been the focus of the City’s public policy for some time. The proposed Downtown Area Improvement Projects will work in unison to capitalize on the City’s existing assets. Accordingly, the proposed projects are consistent with the City’s public policy and will implement several recommendations and goals that pertain to this area of the City.</li> </ul>	<ul style="list-style-type: none"> <li>• No significant adverse impacts to land use, community character, zoning, or public policy are anticipated to occur; therefore, no mitigation is proposed.</li> </ul>
<p>3.2: Aquatic and Natural Resources</p>	<ul style="list-style-type: none"> <li>• There are no aquatic resources located on or within the Downtown Area Improvement Projects sites.</li> <li>• An erosion and sediment control plan will be developed for each site and a Stormwater Pollution Prevention Plan (SWPPP) will be prepared for the DLMUD. With the implementation of these best practices, no significant adverse impacts related to soil are anticipated to occur.</li> <li>• Given the limited ground disturbance and implementation of best practices to control erosion during construction, no significant adverse impacts related to soil are anticipated to occur.</li> <li>• The proposed projects do not require in-water work or disturbance to the bed or banks of the Saranac River or Lake Champlain.</li> </ul>	<ul style="list-style-type: none"> <li>• No significant impacts to aquatic or natural resources will occur. Therefore, no mitigation measures are required.</li> </ul>

DGEIS Chapter	Potential Impacts	Mitigation Measures
	<ul style="list-style-type: none"> <li>• With the timing restriction in place for tree clearing or under consultation with USFWS, no adverse impacts to the Northern Long-eared Bat are anticipated to occur as part of the proposed projects. Proposed activities at Building 4 at 26 Green Street are not anticipated to effect Common Loon habitat; therefore, no significant adverse impacts to this species are anticipated to occur as part of the proposed projects.</li> </ul>	
<p>3.3: Municipal Utilities</p>	<ul style="list-style-type: none"> <li>• The Downtown Area Improvement Projects will not result in significant adverse stormwater related impacts through the implementation of the SWPPP and Erosion and Sediment Control plans in accordance with State regulations.</li> <li>• The City of Plattsburgh’s existing sanitary sewer and water infrastructure have the capacity to handle the additional sanitary and water flow. Therefore, no upgrades or improvements to the City of Plattsburgh’s sanitary or water systems are proposed.</li> <li>• The proposed DLMUD would generate 3.1 ± tons of solid waste per day, or 95.5 ± tons per month.</li> </ul>	<ul style="list-style-type: none"> <li>• No significant adverse impacts related to stormwater runoff will occur. Therefore, no mitigation measures are required.</li> <li>• Because the properties adjacent to the DLMUD site are already served by public sewer and water, the proposed project will not require additional water supply and sanitary sewer infrastructure. As a result, no mitigation measures are proposed.</li> <li>• No significant adverse impacts related to solid waste will occur. Therefore, no mitigation measures are required.</li> </ul>
<p>3.4: Traffic and Transportation System</p>	<ul style="list-style-type: none"> <li>• DLMUD                             <ul style="list-style-type: none"> <li>○ AM Peak Hour: 194</li> <li>○ Midday Peak Hour: 297</li> <li>○ PM Peak Hour: 242</li> </ul> </li> <li>• DSRI – One-way configuration                             <ul style="list-style-type: none"> <li>○ AM Peak Hour: 32</li> <li>○ Midday Peak Hour: 32</li> <li>○ PM Peak Hour: 32</li> </ul> </li> <li>• BSPI                             <ul style="list-style-type: none"> <li>○ AM Peak Hour: 4</li> <li>○ Midday Peak Hour: 4</li> <li>○ PM Peak Hour: 4</li> </ul> </li> <li>• APMPP                             <ul style="list-style-type: none"> <li>○ AM Peak Hour: 48</li> <li>○ Midday Peak Hour: 54</li> <li>○ PM Peak Hour: 60</li> </ul> </li> <li>• The traffic analyses show that the proposed projects will have minimal traffic impacts.</li> </ul>	<ul style="list-style-type: none"> <li>• No significant adverse impacts related to traffic and transportation systems will occur. Therefore, no mitigation measures are required.</li> </ul>



DGEIS Chapter	Potential Impacts	Mitigation Measures
3.5: Parking	<ul style="list-style-type: none"> <li>The DLMUD's 286 parking spaces would be sufficient to accommodate the maximum parking demand.</li> <li>The Downtown Area parking improvements coupled with the expansion of the Clinton County Government Center Parking Lot will provide a net increase of 6 public parking spaces over the current condition.</li> </ul>	<ul style="list-style-type: none"> <li>Based on the planned projects, no mitigation measures are necessary or required.</li> <li>The issue of parking downtown and the establishment of strategies to manage parking has long been an issue of concern to the City. Parking management is being explored regardless of whether any of the Downtown Area Improvement Projects move forward.</li> </ul>
3.6: Fiscal and Economic Conditions	<ul style="list-style-type: none"> <li>The DLMUD would add 30 students, representing an average of 2.3 additional students per grade level and is not anticipated to a significant impact on facilities.</li> <li>The DLMUD will provide 236 new residents living downtown.</li> <li>The DLMUD's residential component is anticipated to generate 4 FTE, and the restaurant and retail component will create additional 35 employees.</li> <li>In total, the DLMUD's total annual economic impact on the City, which is the combination of both the impacts of on-site employment and new household spending, is expected to comprise 58 jobs, nearly \$1.9 million in earnings, and nearly \$5.2 million in sales.</li> </ul>	<ul style="list-style-type: none"> <li>No significant adverse impacts related to fiscal and economic conditions will occur. Therefore, no mitigation measures are required.</li> </ul>
3.7: Historic and Cultural Resources	<ul style="list-style-type: none"> <li>The DRSI and BSPI projects will occur within the previously disturbed street right-of-way so will not result in impacts on historic and cultural resources.</li> <li>The existing building on the APMPP site is not identified as a contributing resource; therefore, the proposed demolition is not anticipated to result in significant adverse impacts to historic resources.</li> <li>The City is currently consulting with NYSOPRHP to assist in determining whether the remaining proposed projects may have the potential to result in significant adverse impacts to historic and/or cultural resources.</li> </ul>	<ul style="list-style-type: none"> <li>The City is currently consulting with NYSOPRHP to assist in determining whether the remaining proposed projects may have the potential to result in adverse impacts to historic and/or cultural resources warranting mitigation. The City will avoid impacts to the extent practicable and comply with the NYSOPRHP findings.</li> </ul>
3.8: Environmental Contamination	<ul style="list-style-type: none"> <li>The proposed Downtown Area Improvement Projects are not anticipated to result in significant adverse impacts related to environmental contamination issues as all handling and processing of contaminated materials and construction on controlled sites will be undertaken according to applicable codes and regulations.</li> </ul>	<ul style="list-style-type: none"> <li>No significant adverse impacts related to environmental contamination will occur. Therefore, no mitigation measures are required.</li> </ul>

<b>DGEIS Chapter</b>	<b>Potential Impacts</b>	<b>Mitigation Measures</b>
3.9: Recreation and Open Space	<ul style="list-style-type: none"><li>• The Downtown Area Improvement Projects will not directly impact or displace any open space or recreation facilities.</li><li>• Except for the DLMUD, no new demand for parks and recreation facilities is anticipated. Additional demand generated by the DLMUD is not expected to result in significant adverse impacts to recreation and open space facilities.</li><li>• Two of the projects, the WPI and Riverwalk, will improve and/or expand recreational opportunities.</li></ul>	<ul style="list-style-type: none"><li>• No significant adverse impacts to recreation and open space will occur. Therefore, no mitigation measures are required.</li></ul>



Department of  
Environmental  
Conservation

## ENB - Region 5 Notices 12/4/2019

### Adirondack Park Agency Completed Applications

**County:** Essex

**Applicant:** Crowe Family Investments, LLC

**Contact for this Project:** Chris Crowe

Crowe Family Investments, LLC

P.O. Box 455

Littleton, NH 03561

**Office:** Adirondack Park Agency (APA)

P.O. Box 99, Route 86

Ray Brook, NY 12977

**Phone:** (518) 891-4050

**APA Contact:** Matthew Brown

**APA Project Number:** 2019-0153

**Project Title:** Crowe Family Investments, LLC

**Location:** Wells Hill Road in the Town of Lewis, New York.

**APA Land Use Classification:** Moderate Intensity Use

**For Adirondack Park Agency: Comment Period Ends:** December 19, 2019

**Project Description:** The project involves the operation of a sawmill using pre-existing structures.

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## Notice of Acceptance of Draft GEIS and Public Hearing

**Clinton County** - The City of Plattsburgh Common Council, as lead agency, has accepted a Draft Generic Environmental Impact Statement on the proposed Downtown Area Improvement Projects. **A public hearing on the Draft GEIS will be held on December 9, 2019 at 5:00 p.m. at the Common Council Chambers, Plattsburgh City Hall, 41 City Hall Place, Plattsburgh, NY 12901.** Written comments on the Draft GEIS will be accepted until December 23, 2019. The Draft EIS is available from the Plattsburgh City Clerk's Office, Plattsburgh City Hall, 41 City Hall Place, Plattsburgh, NY 12901 and on line at: <https://www.cityofplattsburgh-ny.gov/604/DRI-Environmental-Impact-GEIS>.

The action involves the following: (a) Durkee Lot Mixed-Use Development (multi-story mixed-use development replacing existing Durkee Street Municipal Parking Lot and rehabilitation of the existing Plattsburgh Farmers' and Crafters' Market building for use as commercial space and publicly-accessible civic space); (b) Saranac Riverwalk (construction of Riverwalk along Saranac River to replace existing walkway); (c) Durkee Street Reconfiguration/Streetscape Improvements (reconfiguration of Durkee Street to one-way traffic with streetscape improvements and 43 additional public parking spaces; (d) Westelcom Park Improvements (redesign of existing Westelcom Park; (e) Bridge Street Parking Improvements (streetscape improvements and six new on-street parking spaces; (f) Arnie Pavone Memorial Parking Plaza (109-space municipal public parking lot at former Glens Falls National Bank site; (g) Broad Street Municipal Parking Lot (minor expansion and restriping of existing

lot to accommodate 22 additional parking spaces); (h) Plattsburgh Farmers' and Crafters' Market (PFCM) Relocation/Expansion (relocation of PFCM to former Building 4 of the Plattsburgh Municipal Lighting District buildings at 26 Green Street within the City's Harborside area. The project is located in the City of Plattsburgh, New York.

**Contact:** Matthew Miller, City of Plattsburgh, 41 City Hall Place, Plattsburgh, NY 12901, Phone: (518) 356-7510, E-mail: millerma@cityofplattsburgh-ny.gov.

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## **Notice of Acceptance of Draft SEIS, Notice of Public Hearings and Public Comment Period**

**Essex, Franklin and Hamilton Counties** - The New York State Department of Environmental Conservation (NYS DEC) and New York State Department of Transportation (NYS DOT), as lead co-agencies, have accepted a Draft Supplemental Environmental Impact Statement on the proposed Draft Unit Management Plan Amendment / Draft Supplemental Environmental Impact Statement for the Remsen-Lake Placid Travel Corridor. **In accordance with applicable law, there were three previously scheduled public hearings held on the Draft UMP Amendment, Draft SEIS, and River Area Management Plans:**

**Date:** Tuesday, December 3, 2019

**Time:** 6:00 to 8:00 p.m.

**Location:** Tupper Lake Middle-High School Auditorium  
25 Chaney Avenue  
Tupper Lake, NY 12986

**Date:** December 4, 2019

**Time:** 6:00 to 8:00 p.m.

**Location:** Lake Placid Conference Center  
2608 Main Street  
Lake Placid, NY 12946

**Date:** December 5, 2019

**Time:** 6:00 to 8:00 p.m.

**Location:** The View Arts Center  
3256 Route 28  
Old Forge, NY 13420

### **A fourth public hearing has been scheduled for:**

**Date:** Thursday, December 19, 2019

**Time:** 6:00 to 8:00 p.m.

**Location:** State Office Building  
207 Genesee Street  
Utica, NY 13501

Written comments are welcome and the previous deadline, December 20, 2019, will be extended.

**Written comments will now be accepted, by mail or e-mail, by the contact person until January 8, 2019.** Copies of the [Draft UMP Amendment/Draft SEIS](#) are posted on the NYS DEC website at: <http://www.dec.ny.gov/lands/62816.html>

Copies of the Draft UMP Amendment/Draft SEIS will also be available on CD, upon request in person, at the DEC Region 5 Office, Route 86, Ray Brook, NY and DEC Headquarters, 625 Broadway, 5th Floor, Albany NY.

The action involves proposed amendment to remove the rails along the corridor between the Village of Tupper Lake and the Village of Lake Placid and convert it to a multiple-use recreational trail; to leave in place the existing rails between the Village of Remsen and the Big Moose Station; and to rehabilitate the rails between the Big Moose Station and the Village of Tupper Lake. The amendment includes River Area Management Plans, pursuant to 6 NYCRR section 666.7, for the Main Branch Saranac River, Main Branch Raquette River, Middle Branch Moose River, and North Branch Moose River.

The project is located in the Towns of North Elba in Essex County, Towns of Harrietstown, Santa Clara, and Tupper Lake in Franklin County, Town of Long Lake in Hamilton County, Town of Webb in Herkimer County, Towns of Forestport, Steuben, and Remsen in Oneida County, and Towns of Colton and Piercefield in St. Lawrence County, New York.

**Contact:** John Schmid, NYS DEC - Division of Lands and Forests, 625 Broadway, 5th Floor, Albany, NY 12233-4254, Phone:(518) 473-9518, E-mail: [AdirondackPark@dec.ny.gov](mailto:AdirondackPark@dec.ny.gov)

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*Appendix B:*  
*Public Comments on the DGEIS*

**DGEIS (DRAFT GENERIC ENVIRONMENTAL IMPACT  
STATEMENT)**

**PUBLIC HEARING  
DECEMBER 19, 2019**

**5:00 P.M.**

**COMMON COUNCIL CHAMBERS  
41 City Hall Place, Plattsburgh New York**

**Mark Schachner**, representing Miller, Mannix, Schachner & Hafner, Special Environmental Counsel for the City of Plattsburgh formally opened the public hearing at 5:02pm

**Chris Round** representing Chazen Companies gave brief presentation.

**PERSONS INTENDING TO MAKE COMMENTS AT THE PUBLIC HEARING**

**NAME**

**ADDRESS**

Laura Palkovic

Tim Palkovic

Sylvie Beaudreau

Julie Baughn

**Adjourned: 5:35PM**

**Note for transcriptionist:** on cd recording is under **VIQPlayer.exe** and we had a special meeting at the beginning of this recording. So **DGEIS Public Hearing begins at 3:38** on the recording.

# MEETING SIGN-IN SHEET

Project: DGEIS Public Hearing

Meeting Date: 12/9/2019

Facilitator: Common Council

Place/Room: City Hall, Plattsburgh NY

Name

Address

LAURA PALKOVIC

Tim Palkovics

Sylvie Beauregard

Shirley Palkovich

Name	Address
LAURA PALKOVIC	
Tim Palkovics	
Sylvie Beauregard	
Shirley Palkovich	



**DGEIS  
(DRAFT GENERIC ENVIRONMENTAL IMPACT  
STATEMENT)**

**PUBLIC HEARING**

**DECEMBER 9, 2019**

**5:00 P.M.**

**COMMON COUNCIL CHAMBERS  
41 City Hall Place  
Plattsburgh, New York 12901**

**Transcribed By: ADK Transcription Service  
Ruth A. Peterson**

DGEIS - Public Hearing  
Common Council Chambers

1 **Public Hearing**

2 **December 19, 2019**

3 **CR: Chris Rounds**

4 **MS: Mark Schachner**

5 **LP: Laura Palkovic**

6 **TP: Tim Palkovic**

7 **SB: Sylvie Beaudreau**

8 **JB: Julie Baughn**

9 **Transcribed by ADK Transcription Service**

10

11 **(DGEIS Public Hearing Starts at 5:03:01)**

12 **CR:** Chris Round with the Chazen Companies. We're  
13 here tonight, we're going to share a brief  
14 presentation with you and open up the public hearing  
15 for Generic Environmental Impact Statement.

16 **MS:** Yeah, so, I'll start up and then we'll  
17 (inaudible)

18 **CR:** Yeah, yeah. Matt, if you would just slide --  
19 a couple of slides.

20 **MS:** I'll do the intro stuff first.

21 **CR:** Yeah, so go right ahead with the next slide,  
22 Matt.

23 **MS:** Okay. So, good evening everybody. I'm Mark  
24 Schachner. I'm one of the city's special counsel,  
25 meaning special attorneys, that's helping the city

DGEIS - Public Hearing  
Common Council Chambers

1 through the process that we're about to talk about  
2 briefly, and then you'll hear something about it. With  
3 me tonight, as part of our project team, is my partner  
4 Jackie White sitting over there, and Chris Round, who  
5 just introduced himself.

6 I'm going to briefly describe the nature of  
7 the exercise that we're undertaking and why we're  
8 here. And a little of that, or maybe most or all of  
9 that, will be a little bit boring, but I'm just going  
10 to try to set the stage, so we're all on the same  
11 page, knowing what we're doing here, and a little bit  
12 of what we're not doing here.

13 Can people hear me okay? I'm seeing heads  
14 nodding yes.

15 So the nature of the exercise, and why we  
16 are here is the city -- the Common Council is pursuing  
17 its responsibilities under a New York State Law called  
18 the New York State Environmental Quality Review Act.  
19 The acronym is S-E-Q-R-A, SEQRA, it's up there on the  
20 slide, S-E-Q-R-A schedule. The general idea behind the  
21 New York State Environmental Quality Review Act, or  
22 SEQRA, is that decision makers are supposed to take  
23 potential environmental impacts when they make  
24 decisions; that's the very broad brush mandate of  
25 SEQRA.

1                   How the city is implementing that broad  
2                   brush mandate of SEQRA, in the last few months and  
3                   tonight, is that the downtown area improvement  
4                   projects, and I say projects, plural, the downtown  
5                   area improvement projects are being treated together  
6                   for the purposes of a SEQRA review analysis. That  
7                   means that the potential environmental impacts of a  
8                   slew of downtown area improvement projects are being  
9                   considered together. This is not the only way that the  
10                  city could have fulfilled its SEQRA responsibilities,  
11                  but it's an extraordinarily responsible way to do so,  
12                  because instead of looking at potential environmental  
13                  impacts of separate projects separately in a piecemeal  
14                  fashion, the city decided to prepared what's called a  
15                  Generic Environmental Impact Statement analyzing  
16                  potential environmental impacts of all of the downtown  
17                  area projects together. This occurred after convening  
18                  a public -- what's called a scoping process where  
19                  there was a public scoping session held in this very  
20                  room a number of weeks ago in which the city solicited  
21                  input on what potential environmental impacts should  
22                  be analyzed in this Generic Environmental Impact  
23                  Statement. There now has been prepared, largely by  
24                  Chazen, Chris Round introduced himself from Chazen  
25                  Companies, there has now been prepared a draft Generic

DGEIS - Public Hearing  
Common Council Chambers

1 Environmental Impact Statement analyzing potential  
2 environmental impacts of these downtown area  
3 improvement projects. The draft Generic Environmental  
4 Impact Statement by definition had to hit the topics  
5 that were identified as a result of that scoping  
6 process, as I mentioned a few minutes or a few seconds  
7 ago, and it did that, and the council accepted that  
8 draft Generic Environmental Impact Statement as  
9 complete a little while ago, and that required then  
10 scheduling a public comment period and a public  
11 hearing.

12 The public comment period goes from whenever  
13 it started until December 23rd, so written public  
14 comments will be accepted until December 23rd, and the  
15 public hearing is what we're doing right now tonight.  
16 It's a public hearing, there's a public comment  
17 period. That means that anybody who wishes to speak  
18 can do so, but let's please try to keep in mind that  
19 the purpose of comments is you should be addressing  
20 potential environmental impacts, and especially as  
21 related to or as discussed in the document, in the  
22 drafter Generic Environmental Impact Statement. So,  
23 the purpose of public comments is to address potential  
24 environmental impacts as reflected in the Generic  
25 Environmental Impact Statement. This is not really the

DGEIS - Public Hearing  
Common Council Chambers

1 time to say, I love these projects because ... I hate  
2 these projects because ... these are wonderful  
3 projects because ... these are horrible projects  
4 because ... they will be subject to further public  
5 hearings when they are reviewed by the City Planning  
6 Board and by others on a project specific basis. But  
7 the purpose of the SEQRA public hearing and public  
8 comment period is to make comments about the potential  
9 environmental impacts as discussed in the Generic  
10 Environmental Impact Statement.

11 What will happen next is that a final  
12 Generic Environmental Impact Statement will be  
13 prepared, and the most important part of that  
14 document, not the only part of that document, but the  
15 most important part of that document will be responses  
16 to comments on the draft Generic Environmental Impact  
17 Statement. Now it doesn't necessarily mean that each  
18 and every comment will be responded to, but if it's a  
19 material, relative comment about potential  
20 environmental impacts, as discussed in the Generic  
21 Environmental Impact Statement, then the final  
22 Environmental Impact Statement will respond to that  
23 comment or to those comments.

24 Now tonight is not a question and answer  
25 session. You may have questions, you can ask the

DGEIS - Public Hearing  
Common Council Chambers

1 questions, they'll be treated as comments. If they are  
2 material and relevant, they will be responded to in  
3 the final EIS. But it's not a question and answer  
4 session tonight. Just as something to keep in mind,  
5 not all environmental impacts are avoidable, and SEQRA  
6 does not require avoiding all environmental impacts.  
7 It certainly requires trying to minimize or avoid  
8 environmental impacts as much as possible.

9 And that's really me done setting the stage.  
10 We are going to establish some ground rules for the  
11 hearing, and before we finalize them, how many people  
12 intend to speak? Raise of hand please. All right. So,  
13 we're seeing a handful. I think we're going to go with  
14 the -- unless somebody tells me otherwise, we'll go  
15 with the city's usual practice of a five minute limit  
16 on comments. You can only speak once for your five  
17 minutes, but it shouldn't be a problem because we  
18 don't have a ton of people looking to speak. We are  
19 going to ask you to speak, as I hope I am doing,  
20 slowly and loudly. And the reason is because we are  
21 going to end up having a stenographic transcript  
22 prepared of the comments so that we know that we've  
23 captured them and are able to respond to those that  
24 are relevant and material. So, try to speak slowly and  
25 loudly. In our experience, it's hard to do that in a

DGEIS - Public Hearing  
Common Council Chambers

1 public setting but try to as best we can so that when  
2 the stenographer has the tapes to prepare the  
3 transcript, he or she does the best job they can.  
4 Are there any questions or comments about the setting  
5 of the stage?

6 (No audible comments)

7 MS: Then Chris, why don't you do your  
8 presentation?

9 CR: I think this is working, Matt. This is a  
10 snapshot of the Generic EIS cover. I have copies with  
11 me tonight, they are rather thick. The document is  
12 organized with an executive summary for those of you  
13 who are not interested in pouring into a document,  
14 these executive summary (inaudible, low audio) in  
15 that. It describes each of the projects, the existing  
16 conditions, and you know, the things that have been of  
17 interest that came up during scoping and they were  
18 parking, traffic, fiscal and economic impacts,  
19 historic and cultural resources.

20 So, there are a series of analyses of those  
21 subject matters, as well as others, and I'm just going  
22 to go through really what is the project that's being  
23 analyzed and then what are each of those components?  
24 And so you see, here is a map that appears in the EIS  
25 and identifies those eight component projects. And as



1 Mark said, they do look at each one of those. So, the  
2 way that EIS is organized, it describes each of the  
3 projects and then describes the impacts from each of  
4 those projects. And so, at the center is the Durkee  
5 Street municipal parking lot and then you'll see the  
6 various -- I won't go through each of them, but you'll  
7 see those locations of each of the component projects  
8 that we're analyzing.

9 It is largely focused on the mixed-use  
10 development that's being proposed, and then the  
11 parking and streetscape enhancements that are going  
12 along with the project, the Durkee lot mixed-use  
13 development is a 115 unit apartment complex and a mix  
14 of one, two and three bedroom apartments, as well as  
15 commercial space on the first floor. It's envisioned  
16 today as a restaurant. It could be for other uses. And  
17 then repurposing the former farmer's market site, both  
18 with civic space and future retail or commercial  
19 development. This project does displace public parking  
20 as it exists today and replaces that parking as I  
21 mentioned both on-site and through the distribution of  
22 new facilities across the city, the downtown area.

23 Here's two images that are in the EIS of the  
24 mixed-use development, so you see it here and you'll  
25 see a separate view from either end, so one from Bank

DGEIS - Public Hearing  
Common Council Chambers

1 and one from ...

2 UM: Bridge.

3 UF: Bridge.

4 CR: Bridge, thank you. The next component is the  
5 Saranac River Walk and that river walk is basically a  
6 replacement and improvement of the existing trail that  
7 exists along the Saranac, a much more robust, much  
8 more esthetically pleasing project component.

9 There is an addition of parking on Durkee  
10 Street with a conversion of Durkee Street to one-way.

11 This is the Westelcom Park improvements, so  
12 you see a series of pedestrian features, landscape  
13 improvements, a potential performance area, a plaza,  
14 et cetera. These components are designed to build on  
15 the DRI investments that the city is making.

16 Next is the establishment of a parking lot  
17 at the former Glens Falls National Bank building, as  
18 well as abandonment of Division Street that exists  
19 there.

20 Expansion and improvement of the Broad  
21 Street municipal parking lot.

22 Relocation, as we mentioned of the Farmer's  
23 Market and that's been a separate conversation focused  
24 on that. And you'll see it's repurposing of a building  
25 that's on the former municipal (inaudible) site. And

DGEIS - Public Hearing  
Common Council Chambers

1 if you see an image, I apologize, it's down here, this  
2 is an early rendering of what that facility might look  
3 like.

4 That's really quick. We wanted to be very  
5 brief tonight just to give you an idea with that. The  
6 EIS is available online, it's available in the City  
7 Clerk's Office, it's available in the (inaudible) Loan  
8 Office on the second floor. We encourage you, if you  
9 haven't obtained it or (inaudible) please do so. Go  
10 online, it is available in component pieces, and we  
11 look forward to your comments tonight.

12 As Mark mentioned, please use the  
13 microphone, speak your name for the record, please  
14 sign in, so when we capture your name, we get it  
15 spelled correctly. If you're not in a position to  
16 speak tonight, and you do have comments, those  
17 comments are to be directed back to the Mayor's Office  
18 and they will be accepted through the 23rd, which is a  
19 Monday before the holiday, and I'll leave with that.  
20 MS: So, it doesn't matter what order, anybody who wishes  
21 to speak, step up, state who you are and speak away.

22 LP: Sign in?

23 UF: Yes.

24 LP: Good afternoon. My name is Laura Palkovic  
25 and I live with my husband, Tim, in a home that we own

1 in Plattsburgh. And I would like to give my opinion on  
2 two areas of the drafter Generic Environmental Impact  
3 Statement.

4 First, I would like to voice my support for  
5 the Farmer's and Crafter's Market located in the  
6 Durkee Street lot; hereafter, referred to as DSL, and  
7 my opposition to its forced removal to the sewage  
8 treatment plant lot. I find the idea of having a  
9 market that sells fresh produce and other food located  
10 there repugnant and repulsive. I wouldn't buy food at  
11 that location and I doubt there are many who would.

12 A farmer's market is more than a store. It  
13 is a meeting place, a place for the local community to  
14 gather, to talk, to exchange news and ideas and  
15 opinions and to honor the people who grow food, bake  
16 food and in so many ways use the work of their hands  
17 to make their living and enrich the lives of their  
18 friends, neighbors and visitors to the City of  
19 Plattsburgh.

20 To relocate the Farmer's and Crafter's  
21 Market to an area where raw sewage is being processed  
22 is an insult to all of us. I know the city has said  
23 that the area will be cleaned up; there will be odor  
24 abatement and hopefully there will be some sort of  
25 screening to avoid visual pollution. That being said I

1 suggest the city lead by example. Here's how you do  
2 it. Clear out all the offices on this floor of City  
3 Hall. Move down to the sewage treatment plant and  
4 conduct city business there. Let the Farmer's and  
5 Crafter's Market set up shop here. It's a nice  
6 location and I'm sure they'll prosper.

7 Second, if the Prime LLC Plan is adopted,  
8 the city will sell DSL to Prime for one dollar and the  
9 city, that is the homeowners and businesses, will pay  
10 the taxes on the property for the next 20 years. Prime  
11 will then build a structure that will directly benefit  
12 perhaps 250 people, the tenants, at the cost of higher  
13 taxes for the rest of us. This is a plan that does not  
14 provide an incentive for people except possibly the  
15 Prime Apartment dwellers or businesses to move into  
16 Plattsburgh. On the contrary, it may well cause  
17 homeowners and businesses to move out.

18 Now I want to address the price tag the city  
19 has put on the DSL. One dollar for Prime LLC to buy  
20 the lot, tear it up, build an apartment building and  
21 destroy the parking spaces and the Farmer's Market  
22 Pavilion. One dollar. Well, I can make you a better  
23 deal. Here's two dollars. Sell the DSL to me with the  
24 provision that everything stays as it is. No  
25 apartment. Farmer's Market stays. City continues to

DGEIS - Public Hearing  
Common Council Chambers

1 provide maintenance and the local businesses support  
2 costs as part of the special assessment district.

3 You may think my commitments -- my comments  
4 are frivolous. You may think they are insulting. But I  
5 would just like to finish by saying that if the Prime  
6 LLC is what you really want, if it must be that or  
7 nothing, then personally I would prefer you give the  
8 grant money back and leave things as they are, rather  
9 than force us to bear the long term cost of such an  
10 expensive, risky endeavor that may profit a few, and  
11 ultimately burn the rest of us to pay for an edifice  
12 of which the vast majority of citizens will gain  
13 little daily benefit. Thank you.

14 MS: Anyone else wish to speak?

15 TM: I'm Tim Palkovic. I live with Laura in town.  
16 I am a city dweller. I took environmental to mean  
17 social environment as Laura did, so I have some  
18 comments, I've been studying the report.

19 The document and the report shows the  
20 proposed Durkee lot mixed-use development will have a  
21 potentially devastating impact on the economic and  
22 social life of a city.

23 Page 24 quotes from the awards booklet that  
24 the award "may include approximately 45 residential  
25 units." I take that statement to mean that the

1           apartment building is not required at all to fulfil  
2           the requirements of this grant.

3                       Page 18 states that all of the Durkee Street  
4           lot will be owned by the Farmer -- the Prime LLC. Of  
5           the 86 space surface parking lot proposed to remain at  
6           the south end of the lot, only 50 spaces will be  
7           available for public parking. The Prime LLC will  
8           purchase all of the DSL turning the new public space  
9           into an exclusively, private space.

10                      The park land part of the Durkee Street lot  
11           will be limited to only four trees, the park land  
12           element essentially vanishing. The DSL together with  
13           the Trinity Park are now traditional sites of outdoor  
14           community activity. The restructuring of the Durkee  
15           Street lot will be reformed into a private use  
16           apartment building. This is a civic loss. I have  
17           witnessed and participated in countless activities in  
18           the Durkee Street lot over the years. Even Mayor Read  
19           has chosen to make a community presentation in his  
20           proposed restructuring of the center city in the  
21           parking pavilion, the Plattsburgh Farmer's Market  
22           Pavilion.

23                      The land use map on page 17, which you just  
24           saw behind us here, graphically shows the remote  
25           location of the proposed Farmer's and Crafter's

1 Market. This alone shows the undesirable proposed  
2 location of the Farmer's and Crafter's Market. To  
3 mention, no mention is made of the market, just one  
4 city lot from the sewage treatment pools, nor is any  
5 mention made of the need for odor abatement.

6 The safety of angled parking on the proposed  
7 one-way traffic reconfiguration on Durkee Street is a  
8 hazard. It limits traffic on the street and service  
9 trucks will block oncoming traffic when unloaded.  
10 Angled parking on a narrow one-way street creates a  
11 hazard; reversing cars backing into oncoming traffic.

12 The report does not directly address the  
13 demographics of proposed tenants. The omission is the  
14 source of much speculation. For example, my Ward 4  
15 Councilor, Peter Ensel, has stated in a conversation  
16 with me that the tenants of a new building may come  
17 from Burlington, workers who find housing on the other  
18 side of the lake too expensive. This speculation is  
19 that the Prime LLC units will bring new wealth to the  
20 city based on the tenant projections. This is  
21 speculation.

22 Table 52 estimates that one and a third  
23 million dollars per year will be spent in the city by  
24 the new tenants of the City of Plattsburgh. The graph  
25 fails to mention that goods and services are not



DGEIS - Public Hearing  
Common Council Chambers

1           located in the city but in the town of Plattsburgh.  
2           For example, the city does not have a department  
3           store, a clothing store or a movie theater.  
4           Furthermore, none of the services mentioned, except  
5           for the North County Food Co-op exists in downtown  
6           Plattsburgh.

7                        No reference is made to current thinking and  
8           strong tones. The book proposes a guiding principle  
9           that small projects are better than large ones because  
10          the risk of failure is smaller in a smaller project  
11          and not as potentially devastating. If a large  
12          building fails to attract tenants that can afford the  
13          rental fees, the city will suffer the consequences.

14                       Table five shows that the demolition and  
15          reconstruction of the Durkee Street lot will take 18  
16          months, from June 2020 to December 2021. During that  
17          time access to the downtown will be severely limited  
18          because of the loss of the Durkee Street lot parking  
19          spaces. The Durkee Street lot now contains sufficient  
20          spaces for parking without further building. Why not  
21          leave the Durkee Street lot essentially as it is?

22   MS:                       Excuse me for interrupting. You're over --  
23                               you're just at your five minutes. Are you close,  
24                               somewhat near?

25   TP:                       This much.

DGEIS - Public Hearing  
Common Council Chambers

1 MS: Go right ahead.

2 TP: An urgent issue is the proposed demolition  
3 of the Glens Falls National Bank and replacing it with  
4 a parking lot. Table 5 indicates that the demolition  
5 is scheduled to begin in January 2020. The report  
6 ironically states no mention of the environmental  
7 impact of a demolition of the building. How much will  
8 it cost to take away the material from a demolished  
9 bank building and where will it be dumped? Reclaiming  
10 the Glens Falls National Bank building as a  
11 condominium building or apartment building would be a  
12 good service to the city. It sits on the access of the  
13 Westelcom Park, running between Margaret and Durkee  
14 Streets. It would require less expense than new  
15 construction and already has attached parking spaces  
16 that can be used by tenants. The modification of the  
17 Glens Falls National Bank building is one of many  
18 option, other than the 115 unit Prime LLC building in  
19 the Durkee Street lot, and more conservative;  
20 therefore, potentially less of a financial risk. This  
21 is just one of many options that should be reconsider.

22 All of the issues in the report stem from  
23 the large Prime LLC building slated for development on  
24 the Durkee Street lot. The city is healthy, if  
25 fragile, in its current economic position. The

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Common Council Chambers

1 proposed five-story, 200,000 square foot Prime LLC  
2 building on the Durkee Street will harm the city.

3 MS: Would you be able to give us a copy of that  
4 perhaps?

5 TP: Yes, well it's sort of messed up, but sure.

6 MS: Well, it could be a prettier one, you can  
7 submit it. I feel like it just would help us  
8 (inaudible, voice over) that's all.

9 TP: Oh, sure.

10 MS: Anyone else wish to speak?

11 (No audible response)

12 MS: Okay, if no one else wishes to speak, then  
13 we can close -- oh, you wish to speak?

14 SB: Yeah.

15 UF: (Inaudible) are on the table.

16 SB: (Inaudible) are on the table. All right. My  
17 name is Syl Beaudreau. I live at -- I live here in  
18 Plattsburgh and would have a lot of various areas I  
19 would like to address, but given that I only have five  
20 minutes, I'm just going to talk about the historical  
21 impact or the impact on the historical quality of our  
22 downtown.

23 My comments stem from the fact that I think  
24 that cities do well and attract residents and visitors  
25 and tourists when they -- why they stay faithful to

DGEIS -- Public Hearing  
Common Council Chambers

1           what they are and don't try to be something they're  
2           now. I'd like to point maybe your attention a city,  
3           you probably never heard of it, it's called Galena,  
4           Illinois, and it's nothing to write home about, but  
5           what Galena, Illinois has done is preserved its  
6           Victorian character. It's considered one of the best  
7           preserved Victorian small towns in America, and as a  
8           result is constantly referred to as a model and a  
9           place to visit.

10                         And my concern with the GDEIS statement, the  
11           one that regards the historical quality of the area,  
12           is that the statement sort of -- on page 184 or from  
13           page 179 to page 184, the report makes it sound like  
14           this development is very much in keeping with the  
15           feeling and the scale of the downtown area, and I  
16           don't really think it does. Because I was looking at  
17           the introductory slide, and I saw the size of the  
18           Prime development, and it looked as if there were  
19           eight on the other side of Durkee Street, I counted  
20           eight different building. So it's eight times the size  
21           of the average building in its immediate surrounding  
22           area. So, to my view it is not the size and scale of  
23           the surrounding area. The average height of buildings  
24           in the downtown area is three stories high, and this  
25           building is five stories high. So, I think it's a huge

1 building which I think will overpower the downtown  
2 area.

3 I also would object to the description on  
4 page 184 that the addition of cornices, lintels above  
5 windows and trim details that will relate to nearby  
6 buildings. I see this as a modern, cookie cutter  
7 building. Prime has built similar buildings in other  
8 cities like Saratoga, virtually the same building  
9 exists as a luxury hotel in Saratoga. So essentially  
10 we have these postmodern elements like these cornices  
11 that are going to apparently make it blend in with the  
12 downtown area. And I don't think it does blend in, I  
13 think it really is -- and the use of various materials  
14 also is attempting to make it look like less of a  
15 monolith. But in my humble opinion, I think it looks  
16 like a very high scale chicken coop, and I don't think  
17 it's attractive. And I don't think people are going to  
18 leave Montreal to come down to Plattsburgh to see what  
19 a nice, big, corporate-looking building we now have in  
20 our downtown area.

21 In short, I don't think the building of this  
22 project is compatible with the Victorian feel of  
23 small, human-scaled, quirky, colorful and at times  
24 decrepit, small buildings that we feel give this town  
25 a rather unique flavor. And I also feel really bad

1           about the fact that nearly every area adjacent to the  
2           downtown core has been designated on the National  
3           Register of Historic Places, and somehow the actual  
4           business district has not been designated. I know it's  
5           eligible, but it's not. <sup>v</sup> And I would prefer to see our  
6           city value what we have that's unique instead of  
7           trying to become a cookie-cutter and have some  
8           corporate apartments. I honestly don't think -- I  
9           think that's going to be an adverse impact on our  
10          community. I would have a lot more to say about this,  
11          but the time is limited.

12                   I also want to echo Laura's comments about  
13          putting the Farmer's Market so distant from the  
14          downtown area. I think that's another adverse impact.

15                   So with that being said, I will limit my  
16          comments at that. Thank you very much.

17 MS:                   Thank you. Anybody else wish to speak?

18 JB:                   Oh yeah. My name is Julie Baughn. I am the  
19          manager of the Farmer's and Crafter's Market that  
20          everyone is pointing out here. And I'm going to stand  
21          like this because this is just (inaudible, low audio)

22                   The impact on the environment where the  
23          market is moving. You know what? It can't be anything  
24          but good at this point. I know no one sees it, and I  
25          apologize for that. But we are really looking forward

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Common Council Chambers

1 to a wonderful first season. We're looking forward to  
2 an awesome first day. We are looking forward to  
3 growth, expansion and we just had an event in West  
4 Chazy and people came to see us (inaudible, low audio)  
5 Now moving around the corner by the (inaudible) Plant  
6 is not what everybody thinks. Has anybody bothered to  
7 go on tour of the (inaudible) Plant?

8 UF: Not to the (inaudible) Plant, but I've gone  
9 to (inaudible)

10 JB: So did I, three times. Two of them  
11 unexpected. There's nothing wrong. I've been misquoted  
12 that I said something about it smells -- a litter box  
13 smells worse. It was a small misquote, very small. The  
14 time that I was there, it did. It did not smell that  
15 bad and I've been there three times and it did not  
16 smell that bad.

17 The impact, I'm trying to keep this comment,  
18 what it's going to do towards the environment. I think  
19 environmentally, let's see. We are going to get some  
20 positive outlooks down there. We are going to get --  
21 it's going to be so much better. We're going to start  
22 with the market and then we're going to move onto a  
23 children's playground, maybe a dog park, maybe -- why  
24 no one wants to take into consideration the  
25 development down there. I don't understand. Is it bad

DGEIS - Public Hearing  
Common Council Chambers

1           that we're going to be near a sewage plant? I don't  
2           know. How do we know? You all have written it off and  
3           we don't even know what is going to happen yet.  
4           Environmentally speaking, it's better than nothing.  
5           It's better than what we have now and you've been at  
6           that market. The building is not the greatest. The  
7           parking is atrocious. We want something to call our  
8           own and we are getting a very nice building. We're  
9           getting very nice everything down there. But nobody  
10          has taken the time to really kind of ask what we  
11          wanted. Nobody. And I just think that it would be nice  
12          if people took the time to come and ask the Farmer's  
13          Market Board of Directors, ask me. Ask me. I mean  
14          you're not going to like my answers, but I'm sorry. I  
15          really am. I know I am letting you down in this, I'm  
16          sorry, but we are looking forward to it. It's going to  
17          make a great area if we just allow that to happen if  
18          we all stop being so negative. We are due for a move,  
19          we're due for something better and we're due for  
20          something nicer and we're going to take it up on it  
21          and we're going -- we're going to make it awesome. We  
22          are going to make a great, great place down there.

23                   They are doing studies. They are doing --  
24                   they are doing things to prove that it's going to  
25                   be -- or to show, not to prove, to show that it's



DGEIS - Public Hearing  
Common Council Chambers

1 going to be okay, that we're going to, you know, get  
2 things underway down there. I don't even know how to  
3 say it. I'm -- I'm -- in honor of a great man that  
4 just passed away, and that I just went to the service  
5 for, Mike Agoney, who has been there for 20 years. If  
6 we let this go, if we let this pass us by, he would be  
7 so upset, and we're going to dedicate that to him and  
8 we're going to let him know that we are going to make  
9 it phenomenal down there. I just wish everyone would  
10 just give it a shot. That's it. Thank you.

11 MS: Anybody else wish to speak? Okay, at this time I think  
12 we really don't see anybody additional, so we can  
13 close the public hearing. As we said earlier, public  
14 comments will be accepted until December 23rd and I  
15 think we've already explained what the rest of the  
16 process will entail. So thank you for your comment and  
17 thank you for attending.

18 **(DGEIS Public Hearing Ends at 5:36:45)**

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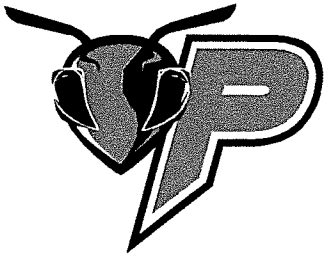
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CERTIFICATION

I, Ruth A. Peterson, certify that the foregoing transcript of the Public Hearing on City of Plattsburgh Common Council's Generic Environmental Impact Statement on December 19, 2019 was prepared using the required transcription equipment and is a true and accurate record of the Public Hearing.

Ruth A. Peterson

ADK TRANSCRIPTION SERVICE  
30 Old Schroon Road  
Schroon Lake, New York 12980  
DATE: December 14, 2019



# PLATTSBURGH CITY SCHOOL DISTRICT

Jay Lebrun

Superintendent of Schools

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December 9, 2019

Matthew Miller  
Director of Community Development  
City of Plattsburgh  
41 City Hall Place  
Plattsburgh, NY 12901

Mr. Miller:

This correspondence will serve as the Plattsburgh City School District's official response to the Draft Generic Environmental Impact Statement (DGEIS) for the Downtown Area Improvement Projects, as prepared by Chazen Engineering, Land Surveying & Landscape Architecture Co.. We would like for this correspondence to be made part of the official record of the approval proceedings for that document, and to be referenced at the public hearing scheduled for December 9, 2019.

The DGEIS features a great deal of information, and the district offers no position on most of the topics covered therein. One subject, however – the Estimated School-Age Children in Public Schools (and the related costs associated therewith) – is of great interest and concern. In sum:

- The estimate is wholly contrary to all information which the district has thus far been provided by the City of Plattsburgh. Mayor Read has consistently asserted that the developers would be targeting affluent single individuals and retired couples, **and that no school-age children were projected to live in this development.** This assertion is now contradicted by the DGEIS.
- The narrative which follows Table 45 suggests that, because the districts' student population has decreased over the past two decades, the projected increase of 2.3 students per grade "is not anticipated to have a significant impact on facilities". This assumption is flawed. In contrast to decades past, schools currently feature much-expanded special education and student-support programming – which is highly space-intensive. So, despite a decreased student population since 2000, I assure you that our buildings are full.

#### MISSION

*Our mission is to educate each student of the Plattsburgh City School District by creating challenging, supportive, and interactive learning that advances intellectual, physical, social, and cultural development.*

- The assumption that 30 additional students will be evenly spread across all grade levels is equally-flawed. Though there is no way to predict such, it is certain that the degree of enrollment increase would vary across our grade levels and schools, and it is possible that while certain grade levels may see no increase, others might increase by 5 or 8 or 10 students. Increases of this magnitude at certain grade levels would very likely necessitate the creation of an additional class section, and may present physical space constraints.
- Of greatest concern is the impression created by the DGEIS – whether intended or not – that the addition of 30 students would not have any significant budget impact. To be fair, the report’s narrative stated that the development “...is not anticipated to have a significant impact **on facilities**”, and did not specifically attest to non-impact on budgets and programming. But to be clear, the addition of 30 students is projected to have a significant budgetary impact. Specifically, **the local costs (ie. after State aid is removed) to taxpayers for an influx of students of this magnitude is projected to be \$335,400 per year.** This figure blends the State-verified local education costs for elementary and secondary, special education and regular education students, reflecting the district’s current populations for each. The calculation which yielded this figure is straightforward, and it would be my pleasure to share such with you. Again, of great importance to any conversation about the DRI/PRIME Plattsburgh proposed development is that an increase in student enrollment **will most certainly result in budgetary increases.** And, as the developer is petitioning for a significant payment in lieu of taxes (PILOT) abatement, these increased costs, with the developer paying an effective tax rate far below that of other taxpayers, may well have a negative impact on educational programming.

The district continues to support economic development in the City of Plattsburgh, and offers no concern about the proposed DRI plan, *per se*. Rather, the district objects to such an extensive abatement of taxation, as this will concentrate the burden on existing taxpayers. Moreover, we are very concerned that the information which we have been provided previously – that no new students are expected from this development – now appears to be false. Finally, it should always be understood that an increase in student enrollment may or may not necessitate an expansion of the district’s facilities, but will absolutely entail an increase in expense... any suggestion otherwise is irresponsible and unfair to the district’s taxpaying constituents.

With thanks, and on behalf of the Board of Education,



Jay Lebrun  
Superintendent of Schools

Copy: Plattsburgh Common Council, Clinton County Legislature, Press Republican

**MISSION**

*Our mission is to educate each student of the Plattsburgh City School District by creating challenging, supportive, and interactive learning that advances intellectual, physical, social, and cultural development.*

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.

RECEIVED DEC 10 2019

*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.





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## CLINTON COUNTY PLANNING DEPARTMENT

135 Margaret Street, Suite 124 · Plattsburgh, New York 12901  
Planning (518) 565-4711 • C.C.P.T. (518) 565-4713 • Facsimile (518) 565-4885

City of Plattsburgh Common Council  
41 City Hall Place  
Plattsburgh, NY 12901

City of Plattsburgh  
Matthew Miller, Director  
Community Development Office  
41 City Hall Place  
Plattsburgh, NY 12901

To the Honorable Members of the Plattsburgh City Common Council:

The Clinton County Planning Board met December 4<sup>th</sup>, 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



**CITY OF PLATTSBURGH**  
**PLANNING BOARD**  
COMMUNITY DEVELOPMENT OFFICE

James A. Abdallah, Chairman  
Maurica Gilbert, Member  
Derek Rosenbaum, Member  
Richard Perry, Member  
Reginald Carter, Member

Curt Gervich, Alternate  
Loretta Rietsema, Alternate  
Malana Tamer, Planner  
Shelise Marbut, Secretary

December 12, 2019

Dear Honorable Mayor Read and Members of the Common Council,

The City of Plattsburgh Planning Board held a special meeting on Wednesday, December 4, 2019 to discuss the Draft Generic Environmental Impact Statement (DGEIS) for the Downtown Area Improvement Projects, including the Durkee Mixed Use Development, Saranac River Walk, Durkee St. Reconfiguration and Streetscape Improvements, Westelcom Park Improvements, Bridge Street Parking Improvements, Arnie Pavone Memorial Parking Plaza, Broad Street Municipal Parking Lot, and Plattsburgh Farmer's and Crafter's Market Relocation and Expansion. The Planning Board has reviewed the document and offers the following comments for consideration:

**Durkee Mixed Use Development:**

- *Section 3.1: Land Use, Community Character, Zoning and Public Policy*

The DGEIS does not provide sufficient information in regards to the potential effects of the architectural design and height of the proposed building on the downtown community character. Please provide a visual resources survey of *existing* surrounding buildings or a similar study that considers the impacts on community character.

**Durkee Street Reconfiguration and Streetscape Improvements**

- *Section 3.4: Traffic and Transportation System*

Although a traffic impact analysis was completed, the DGEIS does not sufficiently address connectivity concerns, commercial loading/unloading, and any impacts on existing businesses on Durkee St.

**Arnie Pavone Memorial Parking Plaza**

- *Section 3.4: Traffic and Transportation System*

The information provided in the DGEIS regarding the abandonment of Division St and creation of the new parking lot does not sufficiently address pedestrian facilities. Pedestrian connectivity between Oak St and Margaret St should be maintained to be in line with the City's goals for increased walkability and complete streets.

The disbursement of parking throughout the downtown provides increased equality for downtown businesses and residents.

**Plattsburgh Farmer's and Crafter's Market Relocation and Expansion**

- *Section 3.1: Land Use, Community Character, Zoning and Public Policy*

The DGEIS does not provide sufficient information in regards to design and future development/expansion of the Plattsburgh Farmer's and Crafter's market to properly address potential impacts on the community character, specifically the City's waterfront overlay district.

**Other**

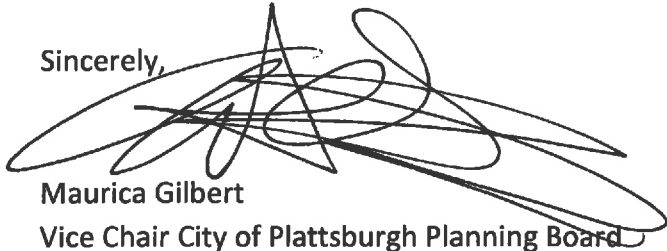
- *Section 6.0-pg 201*

**Irreversible Irretrievable Commitment of Resources**

This section does not properly address the large impact of the Durkee Mixed Use Development project and the long term effects of development. Please provide clarification regarding the intent of Section 6.0.

Please accept this letter as written comment from the City of Plattsburgh Planning Board for inclusion in the Final Generic Impact Statement as deemed necessary. For further clarification, please contact City Planner, Malana Tamer in the Community Development Office.

Sincerely,



Maurica Gilbert  
Vice Chair City of Plattsburgh Planning Board

# Plattsburgh



STATE UNIVERSITY OF NEW YORK

## CENTER FOR EARTH AND ENVIRONMENTAL SCIENCE

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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

Plattsburgh Common Council  
c/o Beth Carlin  
Plattsburgh City Hall  
41 City Hall Place  
Plattsburgh, NY 12901

December 20, 2019

To: Mayor Colin Read, Councilor Rachele Armstrong, Councilor Michael Kelly, Councilor Elizabeth Gibbs, Councilor Peter Enzel, Councilor Patrick McFarlin, and Councilor Jeffrey Moore

Re: Downtown Revitalization Project Comments

Many aspects are very positive. Public walking and biking along the Saranac River, the proposed terraced art corridor and increased green space around the proposed buildings are appealing for residents, area people and the ever-growing eco-tourism. A kayak/canoe launch site would be an additional asset. The proposed residential lodging is within walking distance to many businesses and services: Coop, library, YMCA, Strand Center for the Arts, Kent Delord House museum, Lions' bandshell, churches, shops, restaurants, Stafford Middle School and government offices/post office.

Comments re. the design of buildings', on-site and street parking and impact to local business:

1. Would like to see an access/exit from the parking area behind the North L-shape building onto Bridge St. This would allow cars to flow through the parking and not get trapped if the drive between buildings is blocked/backed up.

2. NEED passageways through L building to Durkee & Bridge. Shop/restaurant entrances will be on street side. Will parking places in front of shops be sufficient for customers and staff in shops and businesses? If not, will these people be able to park behind the buildings and/or in garages? If so, not smart to force them to walk all the way around. How heavily is the former bank building parking lot being relied upon to meet overflow parking? It won't really support the customers at the new building – too far for package carrying. If South building will be all residential, will the residents park under or in lot for South? Still need access to their unit/elevator/back door. Will parking on surface and in garages be included in residents' rent or extra charge? How many parking places are allocated per unit? Will street parking be metered for customers?

Create partnership for these residents with the Y - swimming, sports, physical fitness. This option would be perceived as a high-end benefit. They would still have to pay for their usage.

Prime Development has said the garages are very expensive. If underground parking is eventually deemed too expensive, how will loss of parking spaces be addressed?

Will diagonal parking on one-way Durkee Street succeed? Court Street was modified to one-way with diagonal parking places beside MAI... The post office experiment maintained two-way parking.

We are extremely concerned about the impact on the North Country Coop. The major renovation project significantly expanded merchandise and provided accessibility for everyone. The Coop is a business magnet for the City. Sufficient, near-by parking is vitally important for people who drive from various distances (including Canada); to be able to carry heavy groceries to their car. This enables drivers to support the downtown, meet most/all of their grocery needs and buy products from "green sources".

3. Additional thoughts/questions:

Farmers' market in Harborside city lot between railroad station and waterfront

- Trains disrupt foot, vehicle & bike traffic flow, also very noisy.
- Is there only one entrance to area? How about connecting Green Street parking with Harborside lot?
- Can pavilion be constructed to accommodate 360-degree access for vendors and customers?
- Will there be sufficient parking for Bass tournaments, non-event boat launching, Farmers' Market, regular marina parking, and additional traffic from the proposed city marina expansion?
- Location is beneficial for boaters and people living in Macdonough district. Driving from outside this area may necessitate additional signage and/or dedicated street lanes.
- Opportunity to continue to promote bike eco-tourism. Set up bike racks at Market.
- If there are NOT restrooms at Market, where will people find facilities? Porta-potties are acceptable ONLY during initial construction of real restrooms. Consider setting up multiple single / family restrooms rather than only multi-stall M, F.
- Proximity to parking, river, downtown, lake and marinas is appealing. Proximity to wastewater treatment plant is not. What will be done?

4. The businesses which have invested in and helped keep the City viable need the support of the City.

All our area residents should convey their gratitude for your fine work. With hopes for the future and that the outcome will support and enhance the city - the arts, special events, opportunities to enjoy the remarkable assets of our area. The City should continue as the center for surrounding communities

Best wishes in the development of this project.

A handwritten signature in blue ink, appearing to read "Thomas M. J. Betsy". The signature is fluid and cursive, with the first name "Thomas" being the most prominent.

Tom & Betsy

Dec. 21, 2019

Office of Plattsburgh Mayor Colin Read:

I am a resident of the city of Plattsburgh and I have several concerns about the impact of the Downtown Revitalization projects, especially regarding the Durkee Street parking lot "give-away" and the relocation of the Plattsburgh Farmers' and Crafters Market.

1) The unprecedented give-away of our nearly 4 acre parking lot with no tax-payer referendum is extremely troubling. This parking lot allows easy and convenient access to downtown business establishments and parking for city residents and visitors. It is a gathering place for community especially on days the farmers' market, and Battle of Plattsburgh events.

The intent of the DRI (as originally touted) was to induce greater foot-traffic to downtown core. The large apartment bldg. will be a deterrent to that activity and essentially turns the site into a private enclave. Changing Durkee Street to one-way traffic is unsafe and inconvenient to traffic flow and blker & pedestrian traffic.

2) The Farmers' Market adjacent to the sewer plant is disgusting and air quality tests of contaminants have not been done. The very perception of the E-Coli "possibilities" will deter shoppers to buy here. More "wholesome" produce at large grocery stores will displace these sales.

Signed: Ashley E. Harzon

119 Maine Road

Plattsburgh, NY 12903

3) The large apartment building will destroy the character of our city and it's historical and cultural vibe. In addition,

this development will effectively curtail

the potential for Saranac river-side leisure and recreational possibilities such as kayak-launch site, outdoor rest spots/seating for community members.

The PILOT tax exemption will burden city tax payers. So it's an overall huge loss for residents & visitors — loss of parking, loss of access to open spaces, and an unacceptable financial burden with NO in-kind amenities for the Plattsburgh community. PRIME LLC is the ONLY ~~winner~~ winner in this ill-conceived DRI.

4.

Dec. 22, 2019

What airborne biological contaminants were present in air, water, and soil samples at the proposed Farmers' Market site? Were these tests even performed during the environmental study?? I suspect they were not and that, too, is reckless and unconscionable. There is no doubt that the hard-working farmers, bakers, and crafters will suffer financial distress due to this worse-possible location for the market. I will not purchase foodstuff from the sewer plant location and I guarantee that I will not be alone.

The give-away of our land to a large corporation for profit-motive along with a PILOT scheme to evade taxation is a serious abuse of the citizenry of Plattsburgh. It is not too late to steer this project back to a scale that benefits the Plattsburgh populace. Please reconsider and do the smart and right thing. Kay A. Woods

To: Mayor Colin Read  
City Hall, Plattsburgh, NY

From: Kay A. Woods  
119 Maine Road, Plattsburgh, NY

Negative impact of certain aspects of the DRI are of grave concern to me and many City residents. My greatest concern is the transfer of the city's Durkee Street parking lot to Prime LLC and the relocation to the sewer plant of the Farmers' Market.

The original concept for revitalization involved enhancement and expansion of the Market at its current location which would be a huge magnet for increased foot-traffic in our downtown while providing an attractive venue for community to gather, shop, converse, and interact with fellow residents. A smaller scale residential apartment building could co-exist with the current Market-site and would alleviate so much of the opposition to the current plan.

2.

Mr. Mayor, you were inspirational during an interview with Tom Hallock of Mountain Lake PBS when you described your vision for the DRI in the early days of your mayoral role.

You spoke of encouraging foot-traffic in downtown... a fountain, a mural, seating, the market perhaps... to draw people from one point of interest to another - e.g. the Strand, the library, the McDonough monument - even the Kent-Delord museum and Gazebo.

Those exciting ideas have been abandoned and as a result, the character of our downtown area will be forever ruined.

The large apartment building will be a deterrent to foot-traffic and the promised ambience for community members.

The loss of the parking lot and reconfiguration of Durkee street is also a deterrent to community interaction. This area will be a private residential enclave with no amenities for the public.

3.

The historical and cultural character of our city will be negatively impacted by the construction of a large, modern apartment complex in our city center.

A project of this magnitude is better suited to the lakefront area that has lately been dubbed "HARBORSIDE." The apartment dwellers will want to be near the "action" of downtown, but not right in the midst of the city core. Especially the retiree-clientele would prefer the lake view over the cityscape of Durkee and Bridge Street... and such a locale would certainly justify the proposed \$1K rental fee for a small apartment.

And lastly, our city center is a "food desert" and extraordinary measures must be taken to ameliorate this problem. It is counter-intuitive to relegate the Farmers' market to the sewer plant. It is outrageous and unconscionable!

From: Kim & Kye Ford

Tax Payers, City Residents, local real estate developers

Developed over \$7million in assessed property value in the City

To City Council Members, Mayor, Members of the Community Development Office, and all others concerned,

**We have the following concerns with the proposed GEIS for the downtown projects:**

**1) One way northbound traffic on Durkee St**

- the proposed parallel parking on the West side blocks 2 operating garage bays of an existing successful downtown business (owned by a volunteer Planning Board member), Big Apple Audio
- the proposed one way lane of traffic will be blocked several times a week during work hours by trucks delivering to the existing business that access their stores/restaurants from Durkee St.
- the proposed new parking on the west side will also block JCEO's access for their food delivery truck for their clients in need.
- the traffic direction proposal seems to be hurting local existing business more than helping them

**2) Farmers Market relocation**

- You are proposing moving a main food source away from a densely populated residential area to a "no-man's" land with no residences within 500ft of the building, requiring walking over the pedestrian bridge past a HAZARDOUS NEEDLE WAST RECEPICLE or walking over FEDERAL RAIL ROAD TRACKS or walking around a SEWAGE TREATMENT PLANT to access a local food source.
- You are giving away a perfectly good building and replacing it with a like-kind metal building with asbestos, contaminated ground water, and investing \$250,000 additional money (grant or no grant, not a good investment). If the City could have used that \$250,000 for the existing building along with the Streetscapes/riverfront projects – the existing Farmers Market could have been a wonderful Community Centered pavilion.
- You're giving our Farmers Market building to Prime for FREE that was built with tax payer \$

**3) Cost to Tax Payers**

- On page 180 Table 46: Municipal Fiscal Costs; the bottom line is that Prime Co.'s proposed development of the Durkee St lot will cost the City \$71,509.24 per year with no tax recouped for the first 3 years and only a 34% assessed value after that – the first 20 years the **City will be in DEBT** for associated Municipal costs. At the 20 year PILOT end the City is only receiving \$58,359.82 in tax revenue. After the 20 year PILOT, the City will receive \$834,400 in tax revenue but Prime's development will have cost the City \$1,430,184.80; that is a **loss to the City of \$595,784.80**. All of this loss just for the "potential economic impact" of the project and complete loss of downtown character.

**4) Inadequate parking**

- Please review the parking replacement once again. Your replacement numbers are off from what we are losing as a total. We lost all 289 spots in Durkee St, 4 spaces in Westelcom park, 3-4 spaces on Court St,
- The angled parking on the proposed Durkee St has already proven not to work (Court St)

**5)Zoning Prime Development**

- The proposed building would be the tallest habited structure downtown exceeding the height restriction in the current zoning.

**Table 42: DLMUD - PILOT Schedule**

<b>PILOT Year/ Tax Year</b>	<b>Proposed PILOT</b>	<b>City Share of PILOT</b>	<b>County Share of PILOT</b>	<b>PCSD Share of PILOT</b>
Year 1/2020	\$0.00	\$0.00	\$0.00	\$0.00
Year 2/2021	\$0.00	\$0.00	\$0.00	\$0.00
Year 3/2022	\$0.00	\$0.00	\$0.00	\$0.00
Year 4/2023	\$125,400	\$36,409.56	\$18,110.80	\$70,879.64
Year 5/2024	\$125,400	\$36,409.56	\$18,110.80	\$70,879.64
Year 6/2025	\$145,400	\$42,216.50	\$20,999.29	\$82,184.21
Year 7/2026	\$145,400	\$42,216.50	\$20,999.29	\$82,184.21
Year 8/2027	\$145,400	\$42,216.50	\$20,999.29	\$82,184.21
Year 9/2028	\$145,400	\$42,216.50	\$20,999.29	\$82,184.21
Year 10/2029	\$145,400	\$42,216.50	\$20,999.29	\$82,184.21
Year 11/2030	\$178,200	\$51,739.90	\$25,736.41	\$100,723.70
Year 12/2031	\$178,200	\$51,739.90	\$25,736.41	\$100,723.70
Year 13/2032	\$178,200	\$51,739.90	\$25,736.41	\$100,723.70
Year 14/2033	\$178,200	\$51,739.90	\$25,736.41	\$100,723.70
Year 15/2034	\$178,200	\$51,739.90	\$25,736.41	\$100,723.70
Year 16/2035	\$201,000	\$58,359.82	\$29,029.28	\$113,610.90
Year 17/2036	\$201,000	\$58,359.82	\$29,029.28	\$113,610.90
Year 18/2037	\$201,000	\$58,359.82	\$29,029.28	\$113,610.90
Year 19/2038	\$201,000	\$58,359.82	\$29,029.28	\$113,610.90
Year 20/2039	\$201,000	\$58,359.82	\$29,029.28	\$113,610.90
<b>Totals</b>	<b>\$2,873,800</b>	<b>\$834,400.20</b>	<b>\$415,046.48</b>	<b>\$1,624,353.32</b>

The application to the Clinton County IDA also requests further incentives including sales tax abatement on project construction and acquisition estimated at \$680,000 as well as relief from the Mortgage Recording Tax (estimated at \$165,000). These abatements are standard incentives provided by Clinton County IDA. Prime and the DLMUD must meet the CCIDA's requirements to receive these incentives.

As noted previously all other Downtown Area Improvement Projects will be located on City-owned lands and will owned and maintained by the City and will remain wholly tax exempt; no tax revenues would be generated, consistent with the existing condition.



**Table 46: Municipal Fiscal Costs**

<b>City of Plattsburgh 2019 Municipal Operating Budget</b>	
Total Variable Municipal Expenditures	\$9,816,360.00
<b>Taxable Parcels</b>	
Total Parcels	5,108
Residential Parcels	4,002
Residential Parcel Percentage	78%
<b>Assessed Value</b>	
Total Assessed Value	\$1,489,926,104.00
Residential Parcel Assessed Value	\$627,991,400.00
Residential Value Percentage	42%
<b>Expenditure Parameters</b>	
Estimated Share of Residential-Associated Expenditures	60%
Estimated Municipal Residential-Associated Expenditures	\$5,889,816
Total Local Population	19,438
Municipal Expenditure per capita	\$303.01
Project Population	236
<b>Project Costs</b>	<b>\$71,509.24</b>

December 23, 2019

Plattsburgh Common Council  
c/o Beth Carlin, Mayor's Office  
Plattsburgh City Hall  
41 City Hall Place  
Plattsburgh, NY 12901

Dear Councilors, Planning Board Members, Zoning Board Members, County Planning Board Members, Involved Agencies, Interested Agencies:

Please accept and enter into the public record the comments below concerning the Draft Generic Environmental Impact Statement for the Plattsburgh Area Downtown Improvement Projects:

1. Page 9 – Table 3: Summary of Potential Significant Adverse Environmental Impacts and Mitigation Measures
  - This chart assumes little to no adverse environmental impacts, and does not take into consideration or offer mitigation measures for many adverse impacts that will occur as a result of the proposed projects. Please consider the following:
    - Land Use, Community Character, Zoning and Public Policy - There are several issues not considered or mentioned here. While the Potential impacts mention there will be deviations from the Zoning code for a PUD which require Zoning board approval, it assumes that there are no adverse impacts. There are many potential adverse impacts in terms of Land Use, Community Planning, Zoning, and Public Policy. The Durkee Street Parking Lot will be transferred from public ownership to private ownership. This alone has unknown and unexplored immediate and future impacts, severely limiting potential future uses. What limitations on community use and access will result from this transfer, and how can they be mitigated? The parking lot is not just used as a parking lot, but also as a public gathering space used for many public events and activities throughout the year. The proposed structure in the Durkee Street Parking Lot will require the allowance of residential units on the first floor as well, which is against city code for the downtown area, and out of character with the surrounding buildings. The size of the proposed building on the Durkee Street Lot is also unprecedented in Downtown Plattsburgh. The structure will be imposing and overshadow the small quaint character of the surrounding buildings. All proposed projects will undergo specific changes in land use as well, which all need to be considered for adverse impacts. What will be the adverse environmental impacts as a result of increased foot traffic and human population in the proposed repurposing

of the PMLD building adjacent to the sewage treatment plant? This statement assumes there are none, and I strongly disagree.

- Aquatic and Natural Resources – It seems outlandish to me that this statement suggests there will be no adverse environmental impacts to aquatic and natural resources. The statement appears to assume this simply because there are no water resources directly on the parcels of any of the proposed projects; however, several of the projects occur on land directly adjacent to both Lake Champlain, and the Saranac River. This warrants further investigation into what adverse environmental impacts might occur as a result – especially for the Durkee Street Mixed Use Development and the proposed new location of the Farmers market on Green Street. Increased foot traffic, vehicular traffic, and human population present in the area surrounding the former PMLD building should be investigated for negative impacts on both fish, bat, bird and endangered species populations in that area as well as their habitats. The imposing new structure proposed for the Durkee Street Lot should be investigated for the same impacts as well as potential adverse impacts on sunlight to the wildlife and vegetation surrounding and within the river itself.
  
- Municipal Utilities – This section discusses water and sewer resources and how they are adequate enough to handle the capacity needed for the proposed development in the Durkee Street Lot; however, there is no mention of projected electric usage and what the potential negative impacts on the community might be as far as electric rates for city residents. Please include this information as well. What electrical zone is the project(s) located in. Is the transmission and distribution to that zone adequate to support the additional load? What will the electrical load be for the project(s)? What type of heating is being proposed? Will the existing electrical infrastructure require any upgrades to accommodate the proposed project(s). If so, will the projects return on investment be able to justify such a capital expenditure within Public Service Commission regulations. Please explain the associated costs and return on investment in detail so that the potential adverse impacts can be properly and thoroughly understood and evaluated. In recent years nearby projects were told they could not install certain types of electrical equipment because the infrastructure was at or near its peak capacity (i.e. Plattsburgh Public Library, Catherine Gardens, Senior Center, etc.). How will the proposed project impact the at-capacity status of the electrical system in that neighborhood? What limitations will be required?
  
- Traffic and Transportation System - The Peak Hour Traffic generation numbers for each project are given in the chart, but not the current numbers. Please include those numbers for comparison. The traffic county data includes only vehicle traffic, however, pedestrian and bicycle traffic counts should be also be conducted. Typically, that data is

collected during spring summer and fall months as well as winter. Since walkability and bikeability has been identified in DRI documents as a key objective, it is imperative that data should also be collected for these modes of transportation so that the projects impacts to these concerns be thoroughly evaluated and understood. Within traffic and transportation systems, pedestrian traffic should also be considered and negative impacts on walkability and bikeability based on site plans for the proposed projects be detailed – some of which I discuss in the next section. I would also suggest that the council pursue implementing a Complete Streets policy prior to any further changes or improvements to streets, sidewalks, or parking lots as a mitigating measure.

- Parking – I disagree that the current plan is sufficient to replace all parking being lost as a result of the planned development at the Durkee Street Lot. There are also adverse environmental impacts to the walkability of the downtown area due to specific design features of the proposed Arnie Pavone Parkin Lot as well as the changes made to the County Parking Lot. Both lots seek to increase parking capacity by eliminating through lanes within the lots themselves and instead increasing the number of entrances/exits, thereby increasing the number of curb cuts – having a negative impact on walkability in the downtown area. I also object to the ommittance of the County Lot in the DGEIS as well as its construction without any review. The GEIS relies on the County Government Center parking lot renovation as the second greatest location for replacement parking to compensate for the parking lost at the Durkee public lot, the City participated in negotiations with the County Government Center for design of the County Government Center parking lot renovation including relinquishing a portion of the City Street Right of Way to the County for parking (in violation of City Code), the City entered into an agreement and provided financing for the County Government Center Parking Lot and yet omitted this parking lot from the GEIS. The parking lot design also did not receive a Building permit prior to construction, nor a Planning Board review as is required by City Code. The parking lot design is in violation of several City Code standards as well as NYSDOT Highway Design Manual Standards for pedestrian safety / access control. Not only did the city increase the number of curb cuts along Court Street in order to fit in more parking spaces, but these changes were made for the express interest of providing more parking spaces to accommodate the construction of the proposed development at the Durkee Street lot – and is therefore an example of segmentation as they are undeniably interrelated. Either those changes should have been included in the DGEIS before completion, or those additional parking spaces should not be considered in the count of replacement parking spaces displaced by the Durkee Street lot development.

- Fiscal and Economic Conditions – I disagree that the proposed development will not have any adverse impacts on the public-school system, as does the Plattsburgh City School Board. Please provide a complete analysis of potential costs and impacts which include the effects of the proposed PILOT agreement on the rest of the taxpayers. I also disagree with the assumed projected economic outcomes of this project. This statement shows that only 4 full time jobs will be directly created by the developers themselves. 35 jobs are expected to be provided by the tenants of the commercial and/or restaurant space created by the developers, but there is no guarantee of occupancy in those spaces. The inclusion of an additional 58 jobs, \$1.9 million in earnings, and nearly \$5.2 million in sales is highly speculative and optimistic. I strongly object to these assertions. Will the developer be held accountable for ensuring that these projections be met within the terms of their PILOT? What protections does the community have against economic downturn in return for the large investment we are making in terms of the DRI grant money, public land, and tax incentives being offered to this developer?
  
- Historic and Cultural Resources – I am glad to see that the city is consulting with the NYSOPRHP to determine if there are any adverse environmental impacts; though I would prefer it to be recognized that this is required by law, as the Plattsburgh Downtown Historic District is listed as “eligible” on the State Historic Registry and the NYSOPRHP should therefore be considered an “Involved Agency” rather than an “Interested Agency” as indicated in the GEIS. The project will receive significant amounts of State Funding. The project also has the potential to have a significant adverse impact on the Saranac River Trail (SRT) Phase 2 project which is funded by NYSOPRHP. SRT Phase 2 includes bike lanes or an accessible bike route along Durkee Street. The DRI project proposes to abolish this important aspect of the NYSOPRHP funded SRT Phase 2 Project. Furthermore, the GEIS provides virtually no analysis or evaluation of this important concern. Also, please note that bicycles are prohibited by law from travelling on sidewalks, therefore, the Riverwalk and sidewalk along Broad Street are not a viable alternative. A full alternatives analysis should be conducted to demonstrate how this NYSOPRHP funded project will not be adversely impacted. It should also be recognized that “The Point” historic district which includes the area directly across the Saranac River from the proposed development on the Durkee Street Lot is listed on the National Registry of Historic Places. As such, any negative impacts on the historic and cultural integrity of that area should also be considered, and the National Park Service should also be consulted as to impacts on that area. Specifically, negative impacts of the view from the area and its character due to the imposing nature and scale of the proposed project at the Durkee Street Lot directly adjacent should be considered. I also would ask the council to read the following Summary Statement of Significance from the State Registry, and consider

pursuing the suggestions made and add the Plattsburgh Downtown Historic District to the official registry list prior to development of any land within the district to ensure protection of the historic and cultural resources of our downtown area:

**Summary Statement of Significance:**

Previously identified by SHPO as a potential historic district, the Downtown Plattsburgh Historic District meets Criteria A and C at the local level in the areas of architecture, commerce, and community planning and development. The district is architecturally and historically significant as a largely intact city business core, reflecting the growth and development of Plattsburgh as a regional commercial hub and industrial center from the early nineteenth to the mid-twentieth century. Preliminary boundaries were drawn based on the available desktop resources. The district is roughly bounded by Cornelia Street to the north, City Hall Place, the Saranac River, and Durkee Street to the east, Broad Street to the south, and Oak Street to the west. Further investigation would be required in order to identify all contributing and non-contributing resources. The district includes primarily commercial, institutional and religious buildings that were designed in a variety of styles including Greek Revival, Italianate, Colonial Revival, Renaissance Revival, and Art Deco. Attached commercial masonry buildings are primarily found along Clinton, Margaret and Bridge Streets. The district also retains free-standing buildings, which are occupied by religious and civic institutions. Key buildings that are listed in the National Register include: the Paul Marshall House on Cornelia Street, City Hall on City Hall Place, Clinton County Courthouse Complex on Margaret Street, the First Presbyterian Church and Strand Theater on Brinkerhoff Street, and the St. John the Baptist Roman Catholic Church and Rectory at the corner of Broad and Margaret Streets. The downtown district also includes the MacDonough Monument and Park located along the Saranac River, and Trinity Park between Trinity Place and Court Street. The City of Plattsburgh is located on the west shore of Lake Champlain at the mouth of the Saranac River. The potential water power of the Saranac and military bounty lands lured spectators and permanent settlers to the region after 1785. From this period to the middle of the nineteenth century, industrial and commercial development was concentrated near the river with residences dotting Margaret, Broad, and Brinkerhoff Streets, as well as "The Point" area east of the Saranac. Plattsburgh prospered as a lumber milling and lake shipping hub, and became a government center as the seat of Clinton County. The City's physical growth and economic expansion reached a peak during the second quarter of the twentieth century. Subsequent development has extended the City's boundaries to the west and north since the 1940s. The basic configuration of the City's nineteenth century

commercial and residential areas has changed little over time despite several devastating fires and subsequent redevelopment in the mid-nineteenth century, especially within the central business district. Two National Register-listed historic districts are immediately west of the Downtown: Brinkerhoff Street and Court Street. Both districts are residential and represent the City's major growth period from about 1800 to 1910. The buildings in these two districts are generally large and imposing in scale, although the Brinkerhoff Street district contains several modest worker dwellings.

- Environmental Contamination – I would disagree that there are no potential adverse impacts on environmental contamination. There is known remediation of asbestos in both the former Glens Falls National Bank and the former MLD building. While the chart states that hazardous materials will be handled according to regulations, it concludes that therefore there are no mitigation measures needed. I would argue that the measures needed to dispose of the hazardous materials are the mitigating measures, and therefore need to be specified and listed along with the projected costs of such remediation. This statement should also include the results of any environmental and ground soil tests completed at all proposed project sites.
- Recreation and Open Space – I strongly object to the conclusion made that there are no adverse impacts to recreation and open space as a result of the proposed project in the Durkee Street Lot. This area is currently public land that is often used for more activities than just parking. It also has the potential to be converted to more useable and attractive public space once the city's parking issues are resolved, which can be designed to better highlight the natural resource of the Saranac River and attract more visitors to the area as a result. Multiple public attractions such as a skating rink, garden, landmark or other public gathering spaces could be constructed in this lot to create a public destination, which was a core component of the DRI application and proposed plan to the State. This opportunity and resulting positive impacts on both the downtown economy and quality of life will be lost if we are to give the lot away to a private entity for one dollar. It is often used as a convenient and highly visible gathering and event space in the heart of the downtown, attracting many visitors to the area. The GEIS does not provide any comparative analysis of the economic impact of creating a public gathering space of interest to attract visitors to the downtown area, which was the stated goal of the DRI. It is impossible to evaluate the proposed project unless and until such a comparative economic analysis is performed. Using the 2009 Colin Read Study conducted for the Adirondack Visitors Bureau as a benchmark, it is clear that attracting visitors to this area (in that case fishermen) is guaranteed to result in over \$8 million impact annually. This GEIS provides a highly questionable study of the economic impact

that 114 residential units might have, but does not provide any alternative evaluation for the impact that attracting visitors to the downtown might have. Clearly a thorough evaluation is required before a reasoned elaboration can be conducted. The open space also provides for unmitigated views of the river and the Point Historic District which will be almost completely blocked by the oppressive size of the proposed structure. I also disagree that adding more residents to the downtown area does not increase the demand for open space. Adding residents will increase the demand for open space.

2. Page 13 – Comparison of Project Alternatives

- This chart only assumes two alternatives to the proposed development at the Durkee Street Lot. This is insufficient. I ask for the following alternatives to also be included:
  - a) The analysis should leave open the option of doing nothing at the lot and leaving it as is. Please include this in the chart for comparison
  - b) I would like to see a fourth option included in this comparison which - instead of allotting the \$4.3 million to a private developer and giving prime public land away for \$1 - the land remains public, and DRI money is instead put towards public open space improvements to approximately one acre of the space (or about 1/3 of the lot) as well as the construction of a new Farmers Market building in its current location. The remaining land would remain a public parking lot until the improvements made attract more interest in private development more scaleable to the downtown area without the need for such drastic monetary and tax incentives. We must first focus on improving the quality of life for those already living downtown and creating public space that is an attraction for visitors and tourists before adding more housing and storefronts to the market. This plan of action – investing DRI funds in the public land improvements first - was actually suggested in the Strategic Investment Plan for the DRI, and represents a much more lucrative and less risky plan of action for the city in the long run when compared to the costs and risks associated with the current plan and its necessary PILOT.

3. Page 39 – 2.2.8 Paragraph 4

- This paragraph states the following: The project site is zoned for industrial use and is located within the City's Harborside Area immediately west of the City's Water Resource Recovery Facility (WRRF). Per Schedule I of Permitted Uses of the City's Zoning Ordinance, a public facility is a



permitted principal use within areas zoned for industrial use. A farmers' market is not a specifically defined use in the City's Zoning Ordinance and thus it's classification as a public facility for zoning purposes is an appropriate substitute."

- a) I strongly disagree with this statement, and do not believe it is appropriate to classify the Farmers' Market as a "public facility" in order to allow it to be moved next to a sewage treatment plant in an industrial zone. A Farmer's Market selling fresh produce and crafts is more appropriately defined under Commercial Zoning, and should be surrounded by other commercially zoned sites, not industrial sites. This placement will have adverse impacts on the Farmers' Market itself as well as on the image and attractiveness of our city as a whole.

Thank you for your time and consideration of these matters.

Best,  
Danielle Erb

Cc: Ms. Sylvia Parrotte, City Clerk

City of Plattsburgh  
41 City Hall Place  
Plattsburgh, N.Y.  
12901

Jeff Mills and Pam Miller  
270 Clark Street  
West Chazy, N.Y.  
12992

December 23, 2019

Dear Common Council Members  
and DGEIS Review Members,

My wife and I are founding members of the Adirondack Farmers Market Cooperative (AFMC) as well as having served as Board members, Officers and Co-Market Managers. We have been ~~in~~ with the market also as vendors selling organic vegetables, herbs, flowers and floral design. We are writing this letter in response to the City of Plattsburgh's Draft Generic Environmental Impact Statement (DGEIS) of the Downtown Revitalization Initiative (DRI) request for public input. We are writing this letter as members of the Plattsburgh Farmers and Crafters Market (PFCM) and not as officials of the market.

We began selling at the Farmers Market in Plattsburgh

at the Trinity Park site in 1988 and were involved in the relocation to the current pavillion site in the Downtown Durkee Street Parking Lot. We just completed our 31<sup>st</sup> season of selling in the Plattsburgh Market.

We are writing to express our opposition to moving the PFCM to the proposed Green Street site near the Plattsburgh Sewage Treatment Plant. Not only are we, but also some of our customers are strongly opposed to this relocation. They do not want to buy nor do we want to sell food in such close proximity to the plant and outside of the Plattsburgh Downtown Business District. Many of us feel the relocation would result in the demise of the Farmers Market as the value of the fresh/organic products sold at this site would be put in jeopardy. We not only provide this valuable service to City residents but also many who come from surrounding communities and visitors from out of the area. We do not feel the customers would be properly served with the relocation of the PFCM to this site. Please preserve the PFCM building at its current site. If that is not possible please select or develop a site that continues to serve the people in the Plattsburgh Downtown District.

Thank you,  
Jeff Miller, Pam Miller

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

Submitted by: Laura Palkovic  
December 23, 2019

Hand delivered at 11:50am

Laura Palkovic

21 Champlain Street

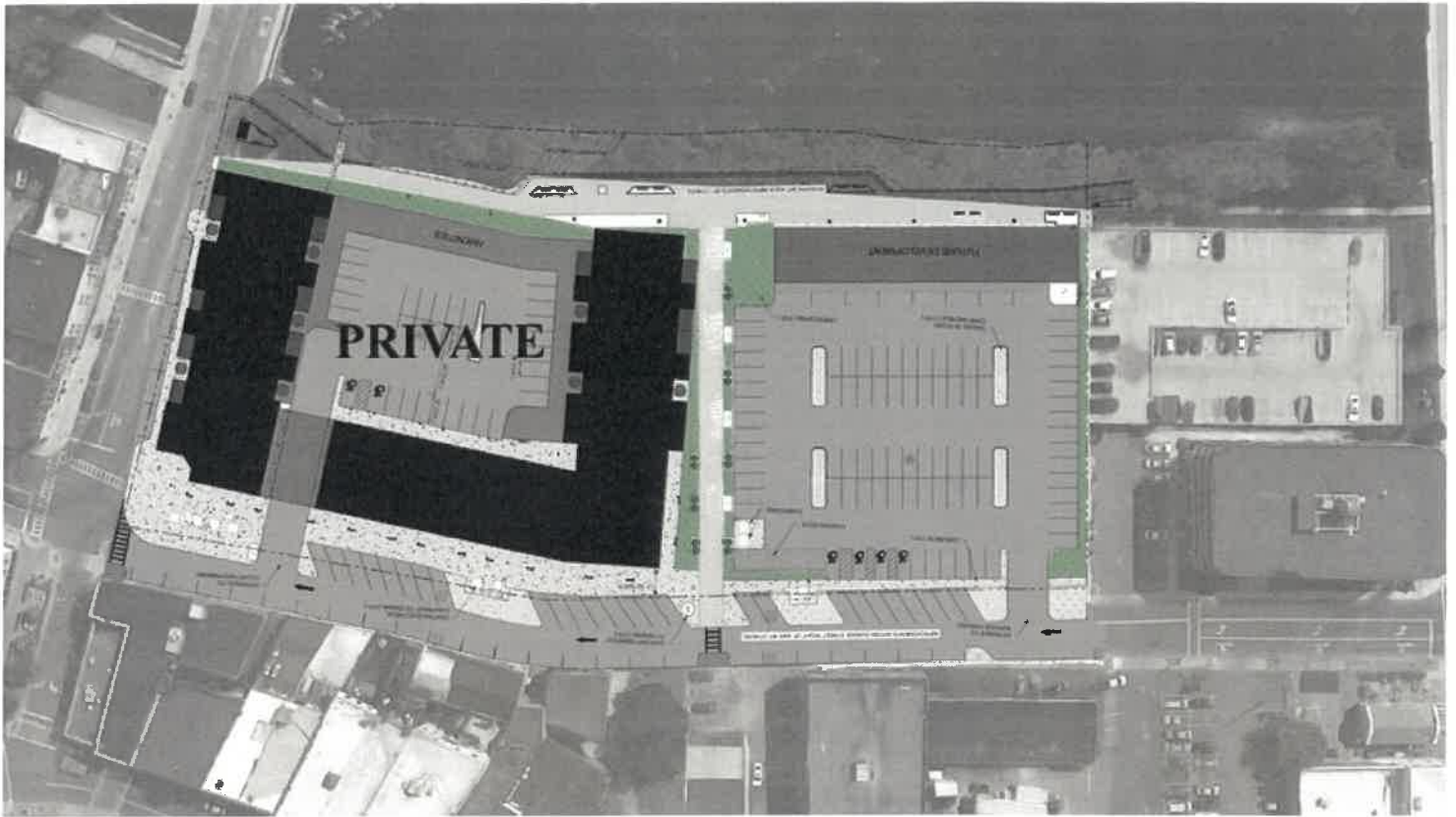
Plattsburgh, New York 12901



## **Local Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot.**

The attached physical and online signature pages compile approximately 2,000 people all of whom are either current or past City residents, business owners or patrons, visitors, employers or employees, service providers, service recipients, landlords and tenants or citizens who are concerned for Plattsburgh and all of whom are united in opposition to the Prime Development Plan for Durkee Street Parking Lot.

# Stop the Prime Company's Development of the Durkee Street Parking Lot



**1,368 have signed. Let's get to 1,500!**



**[concerned citizens](#) started this petition to [City of Plattsburgh Planning Board & Zoning Board of Appeals and Concerned Citizens](#)**

**Say "NO" to the Prime Company's Durkee Street Development Plan that is bad for our community.**

- \$4.3 million of public tax dollars going to a large corporation for private gain.
- Transfer of a full city block of public land to a private developer for \$1, harming Special Assessment District property owners who paid for and maintained the public parking lot for over 30 years.
- Development plan which grossly violates the guidelines laid out by the DRI Strategic Investment Plan:
  - Prime's plan to build 114 apartment units is grossly over the 45 units in the DRI Plan.
  - Prime's plan displaces 289 public spaces and introduces new demand in excess of the parking spaces provided for its own massive private development.
  - Prime's plan eliminates the 1-acre of open public riverfront space promised and instead leaves less than 1/10th of an acre.
- A PILOT (Payment in Lieu of Taxes) Agreement which will cost the City and School more than Prime will pay in taxes over the next 20 years.
- Increased taxes for local property owners and increased rental rates alike.

- Decreased public access to the riverfront and lack of public gathering space.
- Elimination of Farmers & Crafters Market.
- A resulting City Parking Plan harmful to the accessibility, walkability and safety of our community.
- Increased cost of living for downtown residents, employees and visitors due to resulting paid parking system.

**Say "YES" to support Development Plans for Durkee Street that actually benefit our community.**

**change.org**

Recipient: City of Plattsburgh Planning Board & Zoning Board of Appeals and  
Concerned Citizens

Letter: Greetings,

Stop the Prime Company's Development of the Durkee Street Parking Lot

# Signatures

<b>Name</b>	<b>Location</b>	<b>Date</b>
concerned citizens	US	2019-06-13
Benjamin Goff	Elizabethtown, US	2019-06-14
Robert French	Plattsburgh, NY	2019-06-14
Patrick Boyde	Plattsburgh, NY	2019-06-14
Erik Falkengren	Bedford, NH	2019-06-14
Taylor Trombley	Plattsburgh, US	2019-06-14
Aaron Patterson	Plattsburgh, US	2019-06-14
Emily Buskey	Plattsburgh, US	2019-06-14
Shannon Vogt	Plattsburgh, US	2019-06-14
Kevin Farrington	Plattsburgh, US	2019-06-14
Michael Metcalf	Plattsburgh, US	2019-06-14
Pravallika Pothula	Plattsburgh, US	2019-06-14
Brad Noviski	Plattsburgh, US	2019-06-14
Amber Desjardins	Plattsburgh, US	2019-06-14
Logan Brien	Plattsburgh, US	2019-06-14
Julie Baughn	Plattsburgh, US	2019-06-14
Anika Fullum	Plattsburgh, NY	2019-06-14
Thomas Hathaway	Central Falls, RI	2019-06-14
Penny Gaudreau	Plattsburgh, NY	2019-06-14
Terry Broderick	Plattsburgh, US	2019-06-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
Kathleen Williamson	Plattsburgh, US	2019-06-14
Carla Brancato	Plattsburgh, US	2019-06-14
steve graf	Plattsburgh, US	2019-06-14
pamela lefevre	Plattsburgh, NY	2019-06-14
Nastasia Lauzon	Plattsburgh, US	2019-06-14
Scott Friedman	Plattsburgh, NY	2019-06-14
Brooke Elizabeth	US	2019-06-14
Christina Nori	Plattsburgh, NY	2019-06-14
Tanner Charland	Plattsburgh, US	2019-06-14
Alex Fuller	Plattsburgh, NY	2019-06-14
David Rabideau	Upper Jay, US	2019-06-14
Siena Allen	Plattsburgh, US	2019-06-14
Travis Brunet	Plattsburgh, US	2019-06-14
Joanna Laplant	West chazy, US	2019-06-14
Paige Luton	Plattsburgh, US	2019-06-14
Shirley Leblanc	Plattsburgh, NY	2019-06-14
Chasidy Corbel	Plattsburgh, US	2019-06-14
Michael Nori	Mooers forks, US	2019-06-14
lizabeth allen	plattsburgh, NY	2019-06-14
Alexander Cribb	Plattsburgh, US	2019-06-14
Joyce Cepeda	Plattsburgh, NY	2019-06-14
Deliah Lorey	Plattsburgh, US	2019-06-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
Allan O'Brien	Plattsburgh, NY	2019-06-14
Kristen Robinson	Plattsburgh, NY	2019-06-14
April Wood	Chazy, US	2019-06-14
Margali Rae	Plattsburgh, NY	2019-06-14
Lance Arnold	Plattsburgh, US	2019-06-14
David Long	Plattsburgh, US	2019-06-14
Michelle Goddeau	Saranac, US	2019-06-14
Alane Manor	Mooers Forks, NY	2019-06-14
Keith Germain	Alton, US	2019-06-14
Courtney Willey	Plattsburgh, US	2019-06-14
Jonathan schneiderman	Plattsburgh, NY	2019-06-14
Kristine Roberts	Plattsburgh, NY	2019-06-14
Bradi Almodovar	West Chazy, NY	2019-06-14
Lorri Boucher	Plattsburgh, US	2019-06-14
Leeann Engler	Plattsburgh, US	2019-06-14
Danielle Erb	Plattsburgh, NY	2019-06-14
Amanda DeCicco	plattsburgh, US	2019-06-14
Sadie DuBray	Plattsburgh, NY	2019-06-14
Cierra Armstrong	Plattsburgh, NY	2019-06-14
Nate Holmes	Saranac, NY	2019-06-14
Claudio Zantana	Plattsburgh, NY	2019-06-14
Ramona Killam	Chazy, US	2019-06-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
Jeremiah Ward	Plattsburgh, NY	2019-06-14
Carla Brotherton	Plattsburgh, NY	2019-06-14
Crystal Drew	Plattsburgh, NY	2019-06-14
Alsaisha Scott	Niagara Falls, US	2019-06-14
Jerry Cadieux	Plattsburgh, NY	2019-06-14
paul bardis	Plattsburgh, NY	2019-06-14
Cameron Jersey	Plattsburgh, US	2019-06-14
colleen lester	plattsburgh, NY	2019-06-14
Jillian Palumbo	Plattsburgh, NY	2019-06-14
Audra Green	Peru, NY	2019-06-14
Sandra Goodhue	Chazy, US	2019-06-14
Justin Stroup	Plattsburgh, US	2019-06-14
KATHY BAUMGARTEN	Plattsburgh, US	2019-06-14
Jennifer Garrant	New York, US	2019-06-14
Jarred LaValley	Plattsburgh, US	2019-06-14
Paul Stevens	Plattsburgh, NY	2019-06-14
Cynthia Snow	Plattsburgh, NY	2019-06-14
Kieron Britto	Plattsburgh, US	2019-06-14
Karen Trombley	Rouses Point, US	2019-06-14
Jordan Hill	Plattsburgh, US	2019-06-14
Tricia Frampton	Secaucus, NJ	2019-06-14
Ben Key	Plattsburgh, US	2019-06-14



<b>Name</b>	<b>Location</b>	<b>Date</b>
Amanda Kresge	Plattsburgh, NY	2019-06-14
Timothy Barber	Plattsburgh, US	2019-06-14
Colin Fergusson	Plattsburgh, NY	2019-06-14
Bryan Smith	Plattsburgh, NY	2019-06-14
Sarah Rougier	Plattsburgh, US	2019-06-14
Alan Mussen	Peru, NY	2019-06-14
Nicole Annis	Plattsburgh, NY	2019-06-14
Amanda Lepage	Plattsburgh, NY	2019-06-14
Lianna Savage	Saranac, NY	2019-06-14
Jordon Hicks	Plattsburgh, US	2019-06-14
Garrett Cleland	Newport News, VA	2019-06-14
Alexandra Farrington	Secaucus, US	2019-06-14
Gerald Trombley	Chazy, US	2019-06-14
Victoria Hufendick	Plattsburgh, US	2019-06-14
Krystal Lambert	Plattsburgh, US	2019-06-14
Heather Skehan	Austin, US	2019-06-14
Sarah Mundy	Secaucus, US	2019-06-14
Linda Dubay	AuSable Forks, US	2019-06-14
Ben Calhoun	Plattsburgh, US	2019-06-14
Nicky Preston	Plattsburgh, NY	2019-06-14
Anthony Hill	Plattsburgh, US	2019-06-14
Crystal Bonesteel	Malone, US	2019-06-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
Linda Barnes	Plattsburgh, US	2019-06-14
Judy Laramie	plattsburgh, US	2019-06-14
Dustin Towle	Plattsburgh, US	2019-06-14
Dianna Leclair	US	2019-06-14
Kelly Normandin	Plattsburgh, NY	2019-06-14
CHAD Taylor	Plattsburgh, US	2019-06-14
Jessie LaRose	Potsdam, US	2019-06-14
Kelley Leclair	Cadyville, NY	2019-06-14
Kathleen Weaver	Plattsburgh, US	2019-06-14
Cory Vassar	Plattsburgh, US	2019-06-14
Geana Nephew	US	2019-06-14
Megan Perez	Plattsburgh, NY	2019-06-14
Stephanie Griffin	Plattsburgh, US	2019-06-14
Stephen Monahan	Plattsburgh, US	2019-06-14
Dana Berry	Plattsburgh, NY	2019-06-14
Jenarae Beaudin	Plattsburgh, US	2019-06-14
Tim Fergusson	Altona, NY	2019-06-14
Deborah Yokum	Saranac, US	2019-06-14
Adam Drollette	Plattsburgh, NY	2019-06-14
Jill Perreira	Worcester, US	2019-06-14
Kerilyn Guynup	Morrisonville, US	2019-06-14
Matthew Guay	Plattsburgh, US	2019-06-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
Arnold Barretto	Plattsburgh, US	2019-06-14
beth gebo	plattsburgh, NY	2019-06-14
James Dolan	Morrisonville, NY	2019-06-14
Joyce Chambers	Cadyville, Suriname	2019-06-14
Maria Cadieux	US	2019-06-14
Jill Mitchell	Champlain, US	2019-06-14
nicholas dubay	plattsburgh, NY	2019-06-14
Matthew Rock	Plattsburgh, NY	2019-06-14
Nick Plouffe	Saint Albans, US	2019-06-14
John McMahon	Plattsburgh, NY	2019-06-14
Ashley Harron	Plattsburgh, US	2019-06-14
Joe Cashin	Delmar, US	2019-06-14
Stephanie Theobald	Plattsburgh, NY	2019-06-14
John Gordon	Plattsburgh, NY	2019-06-14
Chastity Connell	Peru, NY	2019-06-14
Jodie Lapier	Champlain, NY	2019-06-14
cornelia forrence	Peru, US	2019-06-14
Michael Marbut	Plattsburgh, NY	2019-06-14
John Cech	Plattsburgh, NY	2019-06-14
Brianna Hepburn	Plattsburgh, US	2019-06-14
Kyle Okusky	Plattsburgh, US	2019-06-14
Luke LaPointe	Plattsburgh, US	2019-06-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
Brianna Howie	Peru, US	2019-06-14
Christine OBrien	Plattsburgh, US	2019-06-14
Amanda Miller	Plattsburgh, NY	2019-06-14
Marybeth Valentine	Chazy, NY	2019-06-14
Klaus Baumgarten	Plattsburgh, US	2019-06-14
Jean LaFave	Plattsburgh, US	2019-06-14
Kate Mahoney-Myers	Plattsburgh, US	2019-06-14
Kayla Barber	Plattsburgh, US	2019-06-14
Terry Norcross	Plattsburgh, NY	2019-06-14
Derek Cote	Plattsburgh, US	2019-06-14
Steve Mahoney	Altona, NY	2019-06-14
Scott Allen	Plattsburgh, NY	2019-06-14
Jennifer Pecore	Keeseville, NY	2019-06-14
Christine Clinton	Lake Ronkonkoma, NY	2019-06-14
Caitlyn Johnston	schuyler falls, NY	2019-06-14
Christopher Strebendt	Potsdam, US	2019-06-14
Cynthia Lathrem	Plattsburgh, US	2019-06-14
Christina Kester-Tallman	Cadyville, US	2019-06-14
Cheryl Blair	Plattsburgh, US	2019-06-14
Benjamin Irwin	Plattsburgh, NY	2019-06-14
Aubrey O'Hagan	Plattsburgh, NY	2019-06-14
Courtney Khristiansen	Plattsburgh, US	2019-06-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
sally jarvis	champlain, NY	2019-06-14
Olivia Collins	Plattsburgh, NY	2019-06-14
Wong IAN FU	San Diego, US	2019-06-14
Allison Swick-Duttine	Plattsburgh, US	2019-06-14
Bernie Clifton	Morrisonville, NY	2019-06-14
Felicia Herzog	Plattsburgh, NY	2019-06-14
Jennifer Trudeau	Plattsburgh, NY	2019-06-14
Sydney Sturgen	Plattsburgh, NY	2019-06-14
Scott Pierce	Plattsburgh, NY	2019-06-14
Kay Woods	Plattsburgh, US	2019-06-14
Sabrina Steele	Plattsburgh, US	2019-06-14
Erica Lefebvre	Plattsburgh, US	2019-06-14
Scott Lamoy	West Chazy, NY	2019-06-14
Jason Trudeau	Plattsburgh, US	2019-06-14
Kimberly Cummins	Plattsburgh, US	2019-06-14
carla cowdrey	Collinsville, US	2019-06-14
Natalie Ward	Plattsburgh, US	2019-06-14
Hannah Fisher	Plattsburgh, US	2019-06-14
Peter Garnot	West Chazy, US	2019-06-14
Courtney Sill	Plattsburgh, NY	2019-06-14
James Fleury	Plattsburgh, NY	2019-06-14
Felicia Harn	Plattsburgh, US	2019-06-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
Linda Hatch	Plattsburgh, US	2019-06-14
Lane Buzzell	Saranac Lake, US	2019-06-14
Derrick Racette	Plattsburgh, US	2019-06-14
Kara Lennon	Plattsburgh, US	2019-06-14
Michael Coughlin	Plattsburgh, US	2019-06-14
Kate Giroux	Plattsburgh, US	2019-06-14
Denise Thibodeau	US	2019-06-14
Jessica Hoffman	Saranac, US	2019-06-14
Emma Mahoney	Altona, US	2019-06-14
Jacqueline Barcomb	Plattsburgh, US	2019-06-14
Stephen Prandato	Plattsburgh, US	2019-06-14
Jennifer Dwyer	Plattsburgh, NY	2019-06-14
cathy mallory	plattsburgh, NY	2019-06-14
Jeremy Keach	Willsboro, NY	2019-06-14
Cassidy Thompson.	Plattsburgh, US	2019-06-14
Ashley Bushmoore	Plattsburgh, NY	2019-06-14
Clinton Robinson	Keeseville, US	2019-06-14
jason monto	West Chazy, US	2019-06-14
Olivia Williams	Plattsburgh, US	2019-06-14
Susan Larche	West Chazy, NY	2019-06-14
Jordyn Boisseau	Plattsburgh, NY	2019-06-14
amy m miller	vermontville, NY	2019-06-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
Kim Latour	Plattsburgh, US	2019-06-14
Jennifer Jenkins	Montpelier, VT	2019-06-14
Sean Gerolimos	Plattsburgh, US	2019-06-14
Thomas Gadway	Plattsburgh, US	2019-06-14
Mike Marcinkowski	Burlington, VT	2019-06-14
Matt McDonald	Champlain, US	2019-06-14
Katy Grant	US	2019-06-14
Katie Currier	West Chazy, NY	2019-06-14
Diane Beaudoin	Plattsburgh, US	2019-06-14
Sylvia Laduke	Plattsburgh, US	2019-06-14
Elise DeCante	Plattsburgh, NY	2019-06-14
Julia Capone	Plattsburgh, US	2019-06-14
Leanna thalman	Chazy, US	2019-06-14
Marci Gillett	Plattsburgh, US	2019-06-14
Lisa Pendleton Corral	Plattsburgh, NY	2019-06-14
Kristina Premo	Churubusco, US	2019-06-14
Beth Calhoun	Plattsburgh, NY	2019-06-14
Danielle Duprey	Plattsburgh, US	2019-06-14
Tamara Beaudette	Richfield Springs, NY	2019-06-14
Mark Quesnel	Ellenburg, NY	2019-06-14
Dorie Rivers	Plattsburgh, US	2019-06-14
Allison LaMountain	Ellenburg Depot, US	2019-06-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
Jeff Mars	Peru, US	2019-06-14
Dustin Smith	Plattsburgh, NY	2019-06-14
Carrie Gleason	Littleton, CO	2019-06-14
Adrienne LABOMBARD	Plattsburgh, NY	2019-06-14
Nathan Gilmore	Glens Falls, US	2019-06-14
Corey Bourgeois	Rouses Point, US	2019-06-14
Jacob Goddeau	Plattsburgh, US	2019-06-14
Sue Drumgould	Scranton, US	2019-06-14
Gerri Lambert	Peru, US	2019-06-14
Jeremy Drowne	West Chazy, NY	2019-06-14
Tammy Brinson	Plattsburgh, US	2019-06-14
noelle tedford	Plattsburgh, NY	2019-06-14
Michele Duprey	Peru, NY	2019-06-14
Naomi Lemieux	Denver, US	2019-06-14
Jenilee Gillespie	Champlain, US	2019-06-14
Ece Akturk	Framingham, MA	2019-06-14
Elizabeth Yokum	Plattsburgh, NY	2019-06-14
April Hardin	Plattsburgh, NY	2019-06-14
Cindy Potts	Ellenburg Center, US	2019-06-14
Lynn Bezio	Plattsburgh, NY	2019-06-14
Shayla Decker	Saranac, US	2019-06-14
Thomas Phillips	Hudson, US	2019-06-14



<b>Name</b>	<b>Location</b>	<b>Date</b>
Jeremy Baker	Plattsburgh, NY	2019-06-14
Tim Lemieux	Jacksonville, US	2019-06-14
John Friedrich	Chazy, US	2019-06-14
David Nogle	Glen Burnie, US	2019-06-14
David duprey	peru, NY	2019-06-14
Luis Sierra	Plattsburgh, NY	2019-06-14
Pauline McCauley	Palm Bay, FL	2019-06-14
Claire Larson	Plattsburgh, NY	2019-06-14
Shawn Raudenbush	Plattsburgh, US	2019-06-14
nichole lintz	US	2019-06-14
Nathan Bull	Plattsburgh, US	2019-06-14
Claire Deon	Plattsburgh, US	2019-06-14
Sean Howie	Plattsburgh, NY	2019-06-14
Anita Weigelt	Sterling, NY	2019-06-14
James LaPierre	Champlain, US	2019-06-14
Joseph Fountain	Plattsburgh, US	2019-06-14
Criss Bass	AuSable Forks, NY	2019-06-14
Anna Grubb	keeseville, NY	2019-06-14
Annette Hosler Hosler	Chazy, NY	2019-06-14
Mike Pinelli	Port Orange, US	2019-06-14
Nicholas Barcomb	Plattsburgh, US	2019-06-14
Brandy Morse	Plattsburgh, US	2019-06-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
Bryant Robinson	Plattsburgh, US	2019-06-14
Elizabeth Davies	Plattsburgh, US	2019-06-14
patti bradshaw	New York, NY	2019-06-14
Larry Dolan	Plattsburgh, US	2019-06-14
Christina Battinelli	Plattsburgh, US	2019-06-14
Christopher Huchro	Plattsburgh, US	2019-06-14
Bridgid Murnane	Plattsburgh, NY	2019-06-14
Sherry Scofield	Chazy, US	2019-06-14
Shanna Cross	Plattsburgh, US	2019-06-14
Annette St Pierre	Plattsburgh, US	2019-06-14
Jesse Terry	Plattsburgh, NY	2019-06-14
Thomas Tennian	Keeseville, US	2019-06-14
Shawn Mulvaney	Plattsburgh, US	2019-06-14
Kim Sanger	West Chazy, NY	2019-06-14
Jennifer Fuller	Plattsburgh, US	2019-06-14
Dustin Lindsay	Highgate Center, US	2019-06-14
Deborah Wells	Plattsburgh, NY	2019-06-14
Gordon Duprey	Peru, NY	2019-06-14
Pamela Terry	Redford, NY	2019-06-14
Theresa Luperi-koenig	Crescent City, CA	2019-06-14
Amy Rock	Plattsburgh, NY	2019-06-14
yvette tillema	Keene, NY	2019-06-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
Susan Rogers	Plattsburgh, NY	2019-06-14
Lorraine Cole	Chazy, NY	2019-06-14
Anthony Natoli	Sacramento, US	2019-06-14
Ken Van Stockum	West chazy, US	2019-06-14
rosemary maglienti	morrisonville, NY	2019-06-14
Shelley Fracalossi	Plattsburgh, NY	2019-06-14
tanya brandmeier	Plattsburgh, NY	2019-06-14
jeanne COUCHEY	Saranac, US	2019-06-14
Jennifer Kelley	Morrisonville, NY	2019-06-14
Emily Estus	New York	2019-06-14
John Baxter	Greer, US	2019-06-14
Kris Petrashune	Plattsburgh, US	2019-06-14
Anne Kirby	Secaucus, US	2019-06-14
Stacy Edwards	Plattsburgh, NY	2019-06-14
Stephanie McCaughan	Chazy, US	2019-06-14
Megan Aubrey	Rouses Point, US	2019-06-14
catherine van nortwick	east syracuse, NY	2019-06-14
Penny Mesel	West Chazy, NY	2019-06-14
Bradley Knapp	Plattsburgh, US	2019-06-14
Brittany Cohen	Plattsburgh, NY	2019-06-14
Daphne Vassar	Plattsburgh, US	2019-06-14
Natalie Sharlow	Plattsburgh, US	2019-06-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
Patricia Amore	Plattsburgh, NY	2019-06-14
Allison Lambert	Cameron, US	2019-06-14
Holly Baker	Plattsburgh, NY	2019-06-14
Christopher Krohn	Plattsburgh, NY	2019-06-14
Timothy Hill	Plattsburgh, NY	2019-06-14
Marc Woodley	Plattsburgh, US	2019-06-14
Sarah Ormsby	Plattsburgh, US	2019-06-14
Mary Lee Giambruno Fuge	Waxahachie, US	2019-06-14
Robert Stansbury	Cottondale, US	2019-06-14
Ashley Heming	Plattsburgh, US	2019-06-14
Jessica Hayden	Peru, US	2019-06-14
Tina A	Plattsburgh, US	2019-06-14
Angela Garrand	Ellenburg Center, NY	2019-06-14
Nicholas Graton	Plattsburgh, NY	2019-06-14
Luella May	Prairie Farm, US	2019-06-14
Kevin Bedard	Plattsburgh, NY	2019-06-14
Rachael Everleth	Mooers, NY	2019-06-14
Lisa Cotter	Newport, US	2019-06-14
Barbara Ducatte	saranac, NY	2019-06-14
Jana Wynn	Plattsburgh, NY	2019-06-14
Kim Schafer	Johnstown, US	2019-06-14
samantha allen	plattsburgh, NY	2019-06-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
Deborah Ribis	Albany, US	2019-06-14
Beth Walker	Champlain, US	2019-06-14
Christopher Boucher	Peru, NY	2019-06-14
Kevin McTague	Plattsburgh, US	2019-06-14
Elizabeth Thomas	Plattsburgh, NY	2019-06-14
Camren LeDuc	Saranac, NY	2019-06-14
Lauren Lavorando	Plattsburgh, NY	2019-06-14
Joanne Circelli	Albany, NY	2019-06-14
Timothy Holmes	West Chazy, NY	2019-06-14
nanci williams	peru, NY	2019-06-14
Amanda Boshart	Plattsburgh, US	2019-06-14
Ashlee Rule	Plattsburgh, US	2019-06-14
Abigail St. Onge	Mooers, US	2019-06-14
Vincent O'Driscoll	Plattsburgh, US	2019-06-14
Deanna Mero	Plattsburgh, US	2019-06-14
Derek Bradt	Plattsburgh, US	2019-06-14
Janice Washburn	Keeseville, NY	2019-06-14
Patricia Kalenak	Tupper Lake, NY	2019-06-14
James Yanulavich	Plattsburgh, NY	2019-06-14
Adrienne Smith	Plattsburgh, US	2019-06-14
Charles Burke	Plattsburgh, US	2019-06-14
Lydia Mieses-Monette	Plattsburgh, US	2019-06-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
Angela LaPorte	Plattsburgh, NY	2019-06-14
Kira LaRose	Potsdam, NY	2019-06-14
Eric Trudeau	Plattsburgh, US	2019-06-14
John Kaczowski	Springfield, US	2019-06-14
Ann Marie LeClair	West Chazy, NY	2019-06-14
johanna Consoli	Fredonia, NY	2019-06-14
William Brault	Morrisonville, US	2019-06-14
Caroline Hillyard	Plattsburgh, NY	2019-06-14
Bobby Annis	New York, US	2019-06-14
Krystal Reyell	Plattsburgh, US	2019-06-14
Melissa Jennette	Plattsburgh, US	2019-06-14
Tyler Elliott	Malone, US	2019-06-14
Elizabeth Jost	Plattsburgh, US	2019-06-14
Nicole Seymour	Chazy, NY	2019-06-14
Shane Passino	US	2019-06-14
Autumn Edmonston	Plattsburgh, US	2019-06-14
Darlene Rabideau	Allentown, US	2019-06-14
Rita Santamore	Texas	2019-06-14
Margaret Clermont	Plattsburgh, NY	2019-06-14
Daniela Gitlin	Plattsburgh, US	2019-06-14
Andra Hogle	US	2019-06-14
Jennifer Barrett	Plattsburgh, US	2019-06-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
Emily Morales	Rancho Cordova, US	2019-06-14
MARY ALBERT KEMP	PLATTSBURGH, NY	2019-06-14
Janelle Bausman	Plattsburgh, US	2019-06-14
Heather Jock	Ogdensburg, US	2019-06-14
Taylor Cassevah	Plattsburgh, US	2019-06-14
Gwen Eamer	Plattsburgh, NY	2019-06-14
Steven Googin	Keeseville, NY	2019-06-14
Jane Reome	Plattsburgh, US	2019-06-14
Heather Darrah	Cadyville, US	2019-06-14
Eileen O'Connor	New York, US	2019-06-14
Kim Ford	Plattsburgh, NY	2019-06-14
Josh Foster	Plattsburgh, US	2019-06-14
Jenn Decarlo	Plattsburgh, US	2019-06-14
Karrie Bouissey	Plattsburgh, NY	2019-06-14
matt tynon	Ogdensburg, NY	2019-06-14
Michelle Drollette	Plattsburgh, NY	2019-06-14
Christy Ladue	Plattsburgh, US	2019-06-14
Kenneth Hausrath	Plattsburgh, US	2019-06-14
Mindy Fay	Plattsburgh, US	2019-06-14
Morgan Maye	Plattsburgh, US	2019-06-14
Lisa Desotell	Plattsburgh, US	2019-06-14
michael bendaravicius	Rouses Point, US	2019-06-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
Shari Miner	US	2019-06-14
Karen Batchelder	Plattsburgh, NY	2019-06-14
Chad Rowe	Plattsburgh, US	2019-06-14
James Hubbard	East Haven, US	2019-06-14
Margo Beyer	Plattsburgh, US	2019-06-14
Scott Monette	US	2019-06-14
Mary Labonte	Guilderland, US	2019-06-14
KRISTA BULL	Plattsburgh, US	2019-06-14
Nick Seiden	Plattsburgh, US	2019-06-14
Larissa Deitering	Chazy, NY	2019-06-14
Sylvia Duquette	Cadyville, US	2019-06-14
Norma Hill	Plattsburgh, NY	2019-06-14
Jordan G	Plattsburgh, US	2019-06-14
RoseMary Huebner	Montpelier, VT	2019-06-14
Hope Edie-Provost	Plattsburgh, US	2019-06-14
Brittany Rousseau	Newport, US	2019-06-14
Nicole Dollar	Stephens City, VA	2019-06-14
Tamayra Rice	Westport, US	2019-06-14
Elliott Harris	Plattsburgh, US	2019-06-14
Marcy McNally	Plattsburgh, US	2019-06-14
aidan keefe	peru, NY	2019-06-14
Ryan Walsh	Buffalo, US	2019-06-14



<b>Name</b>	<b>Location</b>	<b>Date</b>
Jessica Hammer	Peru, US	2019-06-14
Laurie Duprey	Schuylerfalls, US	2019-06-14
Robert Hoff	East Haven, CT	2019-06-14
Christopher Brachio	Plattsburgh, US	2019-06-14
Melanie Bliss-Hall	Plattsburgh, US	2019-06-14
Sarah McCarty	Plattsburgh, US	2019-06-14
Katie Wolson	Plattsburgh, US	2019-06-14
Benjamin McKenzie	Bakersfield, US	2019-06-14
Carol Diliberto	Massapequa Park, US	2019-06-14
Shelly OConnor	Las Vegas, US	2019-06-14
Marilyn Duprey	Altona, US	2019-06-14
Cassie King	Mooers, NY	2019-06-14
Kelly Roberts	Mooers, NY	2019-06-14
Elaine / Jim Sherman	Plattsburgh, US	2019-06-14
Madonna Howard	Fitchburg, MA	2019-06-14
Ivel Kelly	US	2019-06-14
Michael Mason	Chazy Lake, NY	2019-06-14
Christien Gilman	Plattsburgh, US	2019-06-15
MARYANN LEFEVRE	Plattsburgh, NY	2019-06-15
Lois Putnam	Plattsburgh, US	2019-06-15
Denise Ryder	Plattsburgh, US	2019-06-15
Patricia Nelson	Plattsburgh, US	2019-06-15

<b>Name</b>	<b>Location</b>	<b>Date</b>
Lucy McCarthy	Plattsburgh, US	2019-06-15
William Prevo	Plattsburgh, US	2019-06-15
Sarah Titherington	Plattsburgh, US	2019-06-15
Juliette Lynch	Plattsburgh, NY	2019-06-15
Caitlin Jackson	Plattsburgh, NY	2019-06-15
Tracy LaCount	Champlain, NY	2019-06-15
donna dixon	Plattsburgh, US	2019-06-15
Teresa Lemieux	Plattsburgh, NY	2019-06-15
Sierra Harkey	Plattsburgh, NY	2019-06-15
Cassandra Abellard	Plattsburgh, NY	2019-06-15
Allan Trombley	Morrisonville, US	2019-06-15
Linda Trombley	Rouses Point, US	2019-06-15
Maria Flores	East Berne, NY	2019-06-15
S Bush	Plattsburgh, NY	2019-06-15
Robert Dolan	Plattsburgh, US	2019-06-15
Vickie Martineau	US	2019-06-15
Margaret Canning	Plattsburgh, NY	2019-06-15
Kenny Morrison	Camden, US	2019-06-15
Ellen Rogers	Plattsburgh, US	2019-06-15
chris shutts	Plattsburgh, NY	2019-06-15
Nick Kirk	Roseville, US	2019-06-15
Terry Doran	Chazy, US	2019-06-15

<b>Name</b>	<b>Location</b>	<b>Date</b>
Megan Elms	Hartford, US	2019-06-15
Erin Norcross	Morrisonville, US	2019-06-15
Tim Nolan	Fairport, NY	2019-06-15
Courtney Moriarty	Plattsburgh, US	2019-06-15
Adrianna Kowalczyk	Plattsburgh, US	2019-06-15
Jannell Nickols	Saranac, NY	2019-06-15
Kim Skolnick	Plattsburgh, NY	2019-06-15
Stephanie Drown	Mooers, US	2019-06-15
Matthew Arless	Mooers, US	2019-06-15
Caitlin Stebbins	Plattsburgh, NY	2019-06-15
Ian Rogers	Plattsburgh, US	2019-06-15
Jennifer Weeks	Mooers, US	2019-06-15
Renee Yampolsky	Delray Beach, FL	2019-06-15
Andree Sapp	Morrisonville, NY	2019-06-15
Joshua Mitch	Tonawanda, NY	2019-06-15
Alisha Ducatte	Stamford, US	2019-06-15
Chelsea Arrington	University Place, WA	2019-06-15
Kimberly Donnelly	West Chazy, US	2019-06-15
Josh Seymour	Plattsburgh, US	2019-06-15
Heather Willey	Plattsburgh, NY	2019-06-15
Nicholas Sprague	Chazy, US	2019-06-15
Lucas Tooker	Plattsburgh, US	2019-06-15

<b>Name</b>	<b>Location</b>	<b>Date</b>
Margret Felty	Peru, NY	2019-06-15
Ryan West	Wilmington, US	2019-06-15
Hollie Flores	Estero, US	2019-06-15
Penny Bowers	Plattsburgh, US	2019-06-15
Kathleen Sciole	Plattsburgh, US	2019-06-15
Maureen Wright	Leominster, MA	2019-06-15
Jerome Johnson	Plattsburgh, US	2019-06-15
Paul Loner	Plattsburgh, US	2019-06-15
Richard Taylor	Pasadena, US	2019-06-15
Judy Lampros	Humboldt, US	2019-06-15
Tim Savoir	Champlain, US	2019-06-15
Edwin Darrah	Plattsburgh, US	2019-06-15
Andre Lacombe	Eatontown, US	2019-06-15
Matthew Stroinski	Plattsburgh, NY	2019-06-15
Deborah Filion	Sarasota, FL	2019-06-15
Brendan Moneypenny Hall	Delmar, US	2019-06-15
Joseph Akey	Plattsburgh, NY	2019-06-15
Courtenay Miller	Plattsburgh, US	2019-06-15
Frederic Mahieu	Brossard, Canada	2019-06-15
Michelle Mitchell	Plattsburgh, US	2019-06-15
Ngoc Hoang	Arlington, US	2019-06-15
Penny Allen	Plattsburgh, NY	2019-06-15

<b>Name</b>	<b>Location</b>	<b>Date</b>
Phil Drollette	Schuyler Falls, US	2019-06-15
Heather LaBarre	Plattsburgh, US	2019-06-15
Pamela Morgan	Silver City, US	2019-06-15
Kathryn Wendling	Plattsburgh, US	2019-06-15
Steven Willey II	Ballston Spa, US	2019-06-15
Chelsea Johnston	Plattsburgh, US	2019-06-15
James Duerr	Lake placid, US	2019-06-15
Michael Hollis	Brookline, MA	2019-06-15
Levi Lewis	Chazy, US	2019-06-15
Mike Bola	AuSable Forks, US	2019-06-15
Pamela McCarthy	Plattsburgh, US	2019-06-15
Anja Bouchard	Morrisonville, US	2019-06-15
Karen Suydam	Delmar, NY	2019-06-15
Kevin Defayette	Plattsburgh, US	2019-06-15
Lauren kneeobne	Swanton, VT	2019-06-15
Joshua Scheunemann	Plattsburgh, US	2019-06-15
Beth Dobson	Isle la Motte, VT	2019-06-15
julie houghton	Plattsburgh, US	2019-06-15
Neil Sedlak	Silver Spring, US	2019-06-15
Victoria Waple	Lewiston, US	2019-06-15
Keegan Defayette	Dannemora, US	2019-06-15
emery corbine	Canton, US	2019-06-15

<b>Name</b>	<b>Location</b>	<b>Date</b>
Tina Smith	Advance, US	2019-06-15
Lynda Mussen	Peru, US	2019-06-15
Brittany Bracy	Plattsburgh, US	2019-06-15
Isabel MIKSA	North Royalton, US	2019-06-15
Carter Jones	Plattsburgh, US	2019-06-15
Jeffery Laundry	Plattsburgh, US	2019-06-15
Lysandra DeZalia	Peru, US	2019-06-15
Dianne Gizowski	Smyrna, US	2019-06-15
Abby Carr	Plattsburgh, NY	2019-06-15
Gerald Girard	Morrisonville, US	2019-06-15
Faith Zuckerberg	Morrisonville, NY	2019-06-15
Trisha Sessums	Plattsburgh, US	2019-06-15
Marilyn Plishka	Keeseville, US	2019-06-15
Ashley Holmes	Plattsburgh, US	2019-06-15
Shawn Adas	Plattsburgh, NY	2019-06-15
circe hewey	New Russia, NY	2019-06-15
Karen Lassell	Plattsburgh, US	2019-06-15
Jaime Cameron	Milton, US	2019-06-15
Sean Bump	Plattsburgh, NY	2019-06-15
David Gabrault	Morrisonville, US	2019-06-15
Laura Palkovic	Plattsburgh, NY	2019-06-15
Lori Woodley	West Chazy, US	2019-06-15

<b>Name</b>	<b>Location</b>	<b>Date</b>
Jason Brannen	Rouses Point, US	2019-06-15
Lorraine Broderick	Plattsburgh, US	2019-06-15
Jessica McCafferty	Plattsburgh, US	2019-06-15
Nora Connolly	Hackensack, NJ	2019-06-15
Sean Vannostrand	tupper lake, NY	2019-06-15
Charles Grimshaw	Plattsburgh, NY	2019-06-15
Dustin Relation	Altona, US	2019-06-15
Michael Bennett	Montgomery Center, US	2019-06-15
Merissa Barcomb	Rouses Point, NY	2019-06-15
Melissa Fritsch	Sarasota, US	2019-06-15
Justin Prue	Plattsburgh, US	2019-06-15
Susan Tourville	Plattsburgh, NY	2019-06-15
Krysta Stonier	Tiffin, OH	2019-06-15
Samuel Davis	Plattsburgh, US	2019-06-15
Ryan Fessette	Plattsburgh, NY	2019-06-15
Peter Myers	Altona, US	2019-06-15
Sabrina Walker	Willsboro, NY	2019-06-15
James O'Connell	Plattsburgh, US	2019-06-15
Daniel Clermont	Plattsburgh, US	2019-06-15
Gretel Schueller	Arlington, US	2019-06-15
Brittany Lapham	Chazy, US	2019-06-15
Adelia Clifford	New Hartford, NY	2019-06-15

<b>Name</b>	<b>Location</b>	<b>Date</b>
Erin Farrell	Cadyville, US	2019-06-15
Patricia Holmes	Stamford, CT	2019-06-15
Courtney Merrihew	Plattsburgh, NY	2019-06-15
Sarah Randall	Plattsburgh, NY	2019-06-15
Sam Engelhart	Plattsburgh, US	2019-06-15
Chelsea Cooley	Plattsburgh, US	2019-06-15
Rachel Brown	Plattsburgh, US	2019-06-15
Kathy Adamy Broda	Browns Mills, US	2019-06-15
Michelle Randall	Merrill, US	2019-06-15
Travis Nelson	Cadyville, US	2019-06-15
Lynn Miller	DeKalb Jct, NY	2019-06-15
Teshia Hutt	Plattsburgh, US	2019-06-15
Elisa LaFave	Plattsburgh, US	2019-06-15
Michelle Nink	Plattsburgh, NY	2019-06-15
KIM MOUSSEAU	plattsburgh, NY	2019-06-15
Adam Yasin	Beaumont, US	2019-06-15
Josh Woodley	Chazy, US	2019-06-15
Kim Ashlaw	Plattsburgh, NY	2019-06-15
Sharon Dutil	West Chazy, NY	2019-06-15
Peter House	Hartford, CT	2019-06-15
Todd Brenner	Plattsburgh, US	2019-06-15
Kelly Flax	Plattsburgh, NY	2019-06-15



<b>Name</b>	<b>Location</b>	<b>Date</b>
Carrie Robare	Altona, US	2019-06-15
Jared Carson	Pensacola, US	2019-06-15
Shannon Lapham	Plattsburgh, US	2019-06-15
Joshua Dubray	Plattsburgh, NY	2019-06-15
Daniel Khoshkepazi	Plattsburgh, NY	2019-06-15
Judith Palmer	Dannemora, NY	2019-06-15
george bennett	south salem, NY	2019-06-15
Brandon Lalone	Cadyville, US	2019-06-15
Adam Mars	Peru, NY	2019-06-15
Morgan Parse	Wadsworth, US	2019-06-15
Tristyn Moser	Ellenburg Depot, US	2019-06-15
Jerry Senecal	Plattsburgh, US	2019-06-15
Brendan Coyle	Vermont	2019-06-15
Carrie Healy	Morrisonville, NY	2019-06-15
Clara Giroux	Chazy, US	2019-06-15
Donna Calvelo	Plattsburgh, US	2019-06-15
Ruth Graton	Plattsburgh, US	2019-06-15
Bethany Arthur	Peru, NY	2019-06-15
Matthew Nugent	Verona, US	2019-06-15
John Broderick	Plattsburgh, US	2019-06-15
Amy Matott	Plattsburgh, US	2019-06-15
Nelson Moore	Plattsburgh, US	2019-06-15

<b>Name</b>	<b>Location</b>	<b>Date</b>
Sheila Arruda	Mooers, NY	2019-06-15
Taylor Gohlke	Plattsburgh, US	2019-06-15
Phil Henry	Rutland, US	2019-06-15
Maria LeClair	Plattsburgh, US	2019-06-15
Jessica King	Morrisonville, US	2019-06-15
Heather Lavalley	Plattsburgh, US	2019-06-15
Sebas Jo	Astoria, US	2019-06-15
Chantel Dumont	West Chazy, NY	2019-06-15
Amon Na	Plattsburgh, NY	2019-06-15
Matt Loach	Plattsburgh, NY	2019-06-15
Debra Dutcher	Saranac Lake, US	2019-06-15
Ruth Fox	Medina, US	2019-06-15
Susanna Uaeta Ndisiro	Los Angeles, US	2019-06-15
Ann Spilling	Willsboro, NY	2019-06-15
April Pizarro	Plattsburgh, NY	2019-06-15
shannon alexander	Plattsburgh, US	2019-06-15
Nicole Maille	Plattsburgh, US	2019-06-15
Kate Harrica	Plattsburgh, US	2019-06-15
Mary Lou Leavitt	Plattsburgh, NY	2019-06-15
Mary Clifford	Schenectady, US	2019-06-15
Candace Baker	Plattsburgh, US	2019-06-15
Kathryn Nichols	Chazy, NY	2019-06-15

<b>Name</b>	<b>Location</b>	<b>Date</b>
Kyle Dupee	Rouses point, US	2019-06-15
Summer MacAdam	Highland, NY	2019-06-15
Lindsay Reome	Plattsburgh, NY	2019-06-15
George Flynn	Plattsburgh, US	2019-06-15
Karen Willey	Plattsburgh, US	2019-06-15
Cassie Jenkins	Plattsburgh, US	2019-06-15
Jose Gutiérrez de Piñerez Jimenez	Ridgewood, US	2019-06-15
Deb and David Goraj	Plattsburgh, US	2019-06-15
Lisa Bousquet	Plattsburgh, US	2019-06-15
Lorene Easter	ALTONA, US	2019-06-15
Gretchen Rabideau	Plattsburgh, US	2019-06-15
Mary Lou Craumer	Plattsburgh, US	2019-06-15
Mary Blaine	Plattsburgh, NY	2019-06-15
alan karp	sparks, MD	2019-06-15
Raymond Saint-Pierre	Plattsburgh, US	2019-06-15
Chad Baker	Plattsburgh, NY	2019-06-15
Kayla Paige	Plattsburgh, NY	2019-06-15
Deborah Yokum	Saranac, NY	2019-06-15
Harold Moore	Saranac, NY	2019-06-15
patsy liberty	cadyville, NY	2019-06-15
Christopher Brewster	Flushing, NY	2019-06-15

<b>Name</b>	<b>Location</b>	<b>Date</b>
Terry Spinner	Altona, NY	2019-06-15
John Drumm	Plattsburgh, NY	2019-06-15
Darienne Judware	Plattsburgh, US	2019-06-15
stephen harris	Altona, NY	2019-06-15
Rosalie Hardy	Winchendon, US	2019-06-15
Janice Minckler	Plattsburgh, NY	2019-06-15
John Gillen	plattsburgh, NY	2019-06-15
Alyssa hart	Keeseville, NY	2019-06-15
Kevin Connelly	Morrisonville, US	2019-06-15
Spencer Christon	Morrisonville, US	2019-06-15
Kathy Fatta	Canajoharie, US	2019-06-15
Sylvie Beaudreau	Plattsburgh, US	2019-06-15
Garrett Mclean	Plattsburgh, US	2019-06-15
Shawna Mefferd Kelty	Plattsburgh, NY	2019-06-15
Phillip Seror	Plattsburgh, US	2019-06-15
Vienna Ainsworth	Plattsburgh, US	2019-06-15
Debbie McNamee	Morrisonville, US	2019-06-15
Shelby Snell	Altona, US	2019-06-15
Lori Titherington	Plattsburgh, US	2019-06-15
Nicole Ayotte	Plattsburgh, US	2019-06-15
Ovi Ho	Philadelphia, US	2019-06-15
Robert Easter	Augusta, US	2019-06-15

<b>Name</b>	<b>Location</b>	<b>Date</b>
Carolyn Welch	Plattsburgh, NY	2019-06-15
Savanah Rabideau	West Chazy, NY	2019-06-15
Keisha Mccray	Plattsburgh, US	2019-06-15
Ian Spellman	New York	2019-06-15
Pat Bright	Ticonderoga, US	2019-06-15
Asher Feroze	US	2019-06-15
Codie Peryea	Plattsburgh, NY	2019-06-15
Kathleen Patrick	Plattsburgh, US	2019-06-15
Amanda Favreau	Plattsburgh, NY	2019-06-15
Spencer Brodhead	Bethlehem, US	2019-06-15
Nathan Halaburda	Plattsburgh, NY	2019-06-15
Ronald Mesick	Hernando, US	2019-06-15
Sarah Dyer	Plattsburgh, US	2019-06-15
Michael Lawliss	Plattsburgh, US	2019-06-15
Laura Carmichael	Plattsburgh, NY	2019-06-16
Edith Rabideau	West Chazy, US	2019-06-16
K Willingham	Plattsburgh, NY	2019-06-16
Brandi Meseck	Plattsburgh, US	2019-06-16
Bill ALLAN	Peru, NY	2019-06-16
Stuart Bailey	Plattsburgh, NY	2019-06-16
Ingy Adam	Teaneck, US	2019-06-16
Emily Partridge	Renton, US	2019-06-16

<b>Name</b>	<b>Location</b>	<b>Date</b>
Travis Lautenschuetz	Plattsburgh, US	2019-06-16
Scael Andriamahefa	Plattsburgh, NY	2019-06-16
Quintin Jackson	Plattsburgh, US	2019-06-16
Joey Whalen	Plattsburgh, US	2019-06-16
Kristina Kintzel	Plattsburgh, NY	2019-06-16
Sharon Maze	Morrisonville, US	2019-06-16
Ashley Cote	Plattsburgh, US	2019-06-16
Rian Hunt	Plattsburgh, NY	2019-06-16
Christine Lemieux	Plattsburgh, NY	2019-06-16
David Lengel	Brooklyn, US	2019-06-16
Sarah Rascoe	West Chazy, US	2019-06-16
Christina Walton	Plattsburgh, US	2019-06-16
Amber Bleau	Latham, NY	2019-06-16
Rhonda Bailey	Plattsburgh, US	2019-06-16
September Torres	Endicott, US	2019-06-16
Bill Warner	Bethel, US	2019-06-16
Kim Mousseau	Plattsburgh, NY	2019-06-16
Kyle Ferguson	Binghamton, US	2019-06-16
Andrew Gladwin	Plattsburgh, US	2019-06-16
Anita Looby	Port Kent, US	2019-06-16
Joshua Bassler	Secaucus, US	2019-06-16
Teresa Larsen	South Padre Island, TX	2019-06-16

<b>Name</b>	<b>Location</b>	<b>Date</b>
Janice Madden	Morrisonville, US	2019-06-16
Ralph Houghtaling	Plattsburgh, US	2019-06-16
Kelley Cook	Plattsburgh, US	2019-06-16
sherry miller	plattsburgh, NY	2019-06-16
Debbie Walker	Plattsburgh, NY	2019-06-16
Robin Graham	Plattsburgh, US	2019-06-16
Dianne Lavarney	Plattsburgh, NY	2019-06-16
Lanai Monahan	Naples, US	2019-06-16
Kristin Collins	Plattsburgh, NY	2019-06-16
Elizabeth Coon	Dannemora, NY	2019-06-16
Maureen LaPerriere	Montreal, Canada	2019-06-16
Pam Annis	Cornish, US	2019-06-16
Jennifer Cordick	Plattsburgh, US	2019-06-16
Tami Smith	Plattsburgh, US	2019-06-16
Matthew Jabaut	Plattsburgh, US	2019-06-16
William Stranahan	Peru, NY	2019-06-16
David Guay	Mooers, NY	2019-06-16
Charles Tallman	cadyville, NY	2019-06-16
Jessica Sloan	Troy, US	2019-06-16
Susan Scott	Secaucus, US	2019-06-16
Ashley Besaw	Plattsburgh, US	2019-06-16
Kevin Bulriss	Chazy, US	2019-06-16

<b>Name</b>	<b>Location</b>	<b>Date</b>
Jessica Colburn	Plattsburgh, NY	2019-06-16
Casey Colburn	Plattsburgh, NY	2019-06-16
Lisa Latour	Plattsburgh, US	2019-06-16
Nathaniel Whitten	Plattsburgh, NY	2019-06-16
Caitlin Roy	Plattsburgh, US	2019-06-16
Ethan Giroux	Vienna, Austria	2019-06-16
Lynden Davies	Plattsburgh, US	2019-06-16
Patricia Hensley	Los Alamos, US	2019-06-16
Debra Fuller	Plattsburgh, US	2019-06-16
Tristan Dupigny	Plattsburgh, US	2019-06-16
Thomas Warren	West chazy, NY	2019-06-16
Judith Robinson	Pittsford, US	2019-06-16
Alisha Oakes	plattsburgh, NY	2019-06-16
Ashleigh Leavine	Plattsburgh, US	2019-06-16
Richard Tucker	plattsburgh, US	2019-06-16
Albert Basilio	Renton, US	2019-06-16
Tim Knipp	Philadelphia, US	2019-06-16
Jakub Sosinski	US	2019-06-16
Hannah Miltiades	Winder, US	2019-06-16
Amanda Sexton	Plattsburgh, US	2019-06-16
Brenda Yelle	Oneonta, NY	2019-06-16
Luis Joel Gonzalez	New York, US	2019-06-16



<b>Name</b>	<b>Location</b>	<b>Date</b>
Faith Vital	Plattsburgh, US	2019-06-16
Windy Custode	Plattsburgh, NY	2019-06-16
Karen Macey	US	2019-06-16
Marvin Chu	Brooklyn, US	2019-06-16
Deana Ekpiken	Sanford, US	2019-06-16
James Jones	Lancaster, US	2019-06-16
John Ford	Plattsburgh, US	2019-06-16
Deborah Wood	Plattsburgh, US	2019-06-16
Richard Rolston II	Plattsburgh, NY	2019-06-16
Elizabeth Brokos	Peru, US	2019-06-16
RICHARD CAMARENA	Canoga park, US	2019-06-16
Riley Henne	lake oswego, US	2019-06-16
Susan McGee	Atoka, US	2019-06-16
Jada Woullard	Hollywood, US	2019-06-16
Jake Darragjati	Jacksonville, US	2019-06-16
Kayla Lepage	Peru, US	2019-06-16
Jessica Wood	Plattsburgh, US	2019-06-16
Madisen Hackley	Oakland, US	2019-06-16
Matt H.	Baton Rouge, US	2019-06-16
cristina cummings	Kailua, US	2019-06-16
Maggie Bordeau	US	2019-06-16
Jeff Crawford	Jeffersonville, US	2019-06-16

<b>Name</b>	<b>Location</b>	<b>Date</b>
Candy Riker	Keeseville, US	2019-06-16
Kristen Roushia	Plattsburgh, US	2019-06-16
Kuron Conner	Virginia Beach, US	2019-06-16
Tiffany Tharp	Washington, US	2019-06-16
Christina Pilibyan	North Hollywood, US	2019-06-16
Toni Pelno	Plattsburgh, NY	2019-06-16
Robin Drake	Saint Petersburg, FL	2019-06-16
Leonard Halstensen	Shirley, US	2019-06-16
Dianne Smith	East Aurora, US	2019-06-16
Dawn Leblanc	Fuquay Varina, NC	2019-06-16
Deborah Peryer	Malone, US	2019-06-16
Jamie Guynup	Peru, US	2019-06-16
Lea Mitchell	Plattsburgh, NY	2019-06-16
craig lamere	Plattsburgh, NY	2019-06-16
Joanne Britner	Plattsburgh, US	2019-06-16
Carley Ellis	Coeur D Alene, US	2019-06-16
April Jones	Merritt Island, US	2019-06-16
John Burgess	Plattsburgh, US	2019-06-16
CANDIS ROSS	COLONIAL BEACH, US	2019-06-16
Krista Tousignant	Plattsburgh, US	2019-06-16
Marie Aristide	Brooklyn, US	2019-06-16
Jorge Mireles	Fontana, US	2019-06-16

<b>Name</b>	<b>Location</b>	<b>Date</b>
Betty Lennon	Plattsburgh, NY	2019-06-16
Eric Sacramento	East Elmhurst, US	2019-06-16
Dianna Harvey	Champlain, NY	2019-06-16
Cathy Hickman	Hermiston, US	2019-06-16
Emily Richards	Malone, US	2019-06-16
Benjamin Abrams	West Chazy, NY	2019-06-16
Tom LaPrad	Mooers forks, US	2019-06-16
Robert Annis	Peru, US	2019-06-16
Deborah Aruto	Keeseville, NY	2019-06-16
Rebekah Pritchard	Plattsburgh, US	2019-06-16
Betty Robert	Plattsburgh, NY	2019-06-16
Angela Robert	Rouses Point, NY	2019-06-17
Betty Clinebell	Plattsburgh, US	2019-06-17
Jacob Coleman	Saint Petersburg, US	2019-06-17
Elizabeth LaHart	Plattsburgh, NY	2019-06-17
whitney rasco	Plattsburgh, NY	2019-06-17
Katherine Sullivan	Sandwich, MA	2019-06-17
Danielle Garger	Newnan, US	2019-06-17
Carie Mattox	Plattsburgh, US	2019-06-17
Carol Gokey	Rouses Point, US	2019-06-17
Amy Lopez	Plattsburgh, NY	2019-06-17
Michael Tallman	Malone, NY	2019-06-17

<b>Name</b>	<b>Location</b>	<b>Date</b>
Robin Janendo	Rouses Point, US	2019-06-17
Shelby LaPrad	Mooers forks, US	2019-06-17
David Fuller	Plattsburgh, US	2019-06-17
BARBARA MINER	Plattsburgh, US	2019-06-17
Jacob Gleghorn	Pittsburgh, US	2019-06-17
Melissa Ham-Ellis	Saranac, US	2019-06-17
Deidrie Soucia	Plattsburgh, US	2019-06-17
Maliana Giddings	Plattsburgh, US	2019-06-17
Jahdia Smith	La Plata, US	2019-06-17
Beth Ashabranner	Peru, NY	2019-06-17
Valerie York	Morrisonville, US	2019-06-17
Terrie Jarvis	Plattsburgh, NY	2019-06-17
Louis Mazure	Fayetteville, US	2019-06-17
Heather Jubert	Plattsburgh, US	2019-06-17
Sarah Johnson	Los Angeles, US	2019-06-17
Cameron Colburn	Plattsburgh, US	2019-06-17
Craig Cadotte	Saint Ignace, US	2019-06-17
Jonathan Merrihew	Plattsburgh, US	2019-06-17
Russell Bess	Gastonia, US	2019-06-17
Heather McCarty	Plattsburgh, NY	2019-06-17
Brandy Snide	Malone, US	2019-06-17
Luis Majuelo	Valencia, US	2019-06-17

<b>Name</b>	<b>Location</b>	<b>Date</b>
Jeremy Hicks	Plattsburgh, US	2019-06-17
Gabe Benjamin	Bar harbor, US	2019-06-17
Adam Allen	Plattsburgh, NY	2019-06-17
Ryan Brienza	Plattsburgh, US	2019-06-17
Cori Cooper	Murrieta, US	2019-06-17
Alli DeVaul	New York, NY	2019-06-17
Rachel Pitcher	Secaucus, US	2019-06-17
Gina Lindsey	Plattsburgh, US	2019-06-17
Stacy Lauzon	Plattsburgh, US	2019-06-17
H B	Ontario, Canada	2019-06-17
Ashley Maynard	Burlingame, US	2019-06-17
Darryl Heine	Inverness, US	2019-06-17
Faraz Ahmed	Sachse, US	2019-06-17
Lena Emmery	San Francisco, US	2019-06-17
Linda Dolly	Elizabethton, US	2019-06-17
Diana Busha	Morrisonville, NY	2019-06-17
Sarah Midiros	Shawnee, US	2019-06-17
Aldin Radoncic	brooklyn, US	2019-06-17
Paige Kreckel	Plattsburgh, NY	2019-06-17
Carl Berry	Cocoa, US	2019-06-17
Cole Rock	Plattsburgh, US	2019-06-17
Jesse Thompson	Seneca, US	2019-06-17

<b>Name</b>	<b>Location</b>	<b>Date</b>
Kate DeWitt	Panama City, US	2019-06-17
Martha Camacho	Carolina, US	2019-06-17
Chris Culpeper	Roanoke, US	2019-06-17
Travis Strong	Playa del Rey, US	2019-06-17
Nicole Babu	Plattsburgh, US	2019-06-17
Eugene Banker	Plattsburgh, US	2019-06-17
LISA CRAIN	Plattsburgh, US	2019-06-17
Elyssa Pennington	Plattsburgh, US	2019-06-17
Francesca Bieber	Plattsburgh, NY	2019-06-17
Dominick Monette	Plattsburgh, US	2019-06-17
cory riturban	Waimanalo, US	2019-06-17
Kathleen McCann	Whitesto, US	2019-06-17
QUINN RUFA	Plattsburgh, US	2019-06-17
Jocelyn Racette	Plattsburgh, US	2019-06-17
Justin Dechen	Plattsburgh, US	2019-06-17
Deidre Lacey	Plattsburgh, NY	2019-06-17
Jaspreet Singh gill	Silver Spring, US	2019-06-17
jane houghton	plattsburgh, NY	2019-06-17
Anirudh Srinivas	Plattsburgh, US	2019-06-17
Daniel Evans	Plattsburgh, US	2019-06-17
wayne ryan	Plattsburgh, US	2019-06-17
Tracey Martineau	Plattsburgh, US	2019-06-17

<b>Name</b>	<b>Location</b>	<b>Date</b>
Karen Cecchini-Kemp	Plattsburgh, US	2019-06-17
Jessica Forster	Plattsburgh, NY	2019-06-17
Caitlyn LaPier	Plattsburgh, US	2019-06-17
Julie Woodley	Plattsburgh, NY	2019-06-17
Justine Rotz	plattsburgh, US	2019-06-17
Colleen Pennington	Rensselaer, US	2019-06-17
Dan Burnside	Salt Lake City, UT	2019-06-17
Devin Wolson	Plattsburgh, US	2019-06-17
Dove Phillips	plattsburgh, NY	2019-06-17
meaghan mcnamara	Minnetonka, MN	2019-06-17
Ashley Bunn	Plattsburgh, US	2019-06-17
linsey vega	eustis, US	2019-06-17
rodrigo lopez	Chicago, US	2019-06-17
Jeremiah Bahr	Plymouth, US	2019-06-17
Iris Purvis	Big Spring, TX	2019-06-17
Bailey Waterbury	Plattsburgh, US	2019-06-17
Maryjean Shuknecht	Plattsburgh, NY	2019-06-17
Janielle Freeman	Fort Pierce, US	2019-06-17
Keirston Stalberte	Snellville, US	2019-06-17
Janet Ryan	Winnetka, US	2019-06-17
Stefanie Hanson	Watertown, US	2019-06-17
Suzanne soden	Columbus, GA	2019-06-17

<b>Name</b>	<b>Location</b>	<b>Date</b>
Tyler LaPier	Plattsburgh / Watertown, US	2019-06-17
Rodney Ducharme	Rouses Point, NY	2019-06-17
Ron Kahn	San Francisco, US	2019-06-17
Thomas Ross	New York, US	2019-06-17
Jada Henry	Ewa Beach, US	2019-06-17
Kent Shepherd	Sierra Vista, US	2019-06-17
Jessica Bashaw	Newington, US	2019-06-17
Ashley Ahrent	Willsboro, NY	2019-06-17
Aubrey Frenyea	Plattsburgh, NY	2019-06-17
Leeann Rizzie	Plattsburgh, NY	2019-06-17
Harrison Clodgo	Southbury, US	2019-06-17
jennifer duprey	Cadyville, US	2019-06-17
Annie Charvat	Kirkland, US	2019-06-17
Julia Ramsey	Des Moines, US	2019-06-17
Martine Mousseau	Plattsburgh, US	2019-06-17
Joanne Collins	Ashburn, US	2019-06-17
Evie Ford	Plattsburgh, US	2019-06-17
Julie Whitesell	Plattsburgh, NY	2019-06-17
Emma Ducharme	Rouses point, US	2019-06-17
Dylan Williams	Jersey City, NJ	2019-06-17
Casey Manor	Plattsburgh, US	2019-06-17
Marissa Panton	Piscataway Township, NJ	2019-06-17



<b>Name</b>	<b>Location</b>	<b>Date</b>
Kristen Walker	Saranac, US	2019-06-17
Chris Cayea	Morrisonville, US	2019-06-17
Marc Gendron	Plattsburgh,, NY	2019-06-17
Montana Lil	San Ramon, US	2019-06-17
Heidy Squires	Plattsburgh, NY	2019-06-17
Matthew Gorman	Plattsburgh, NY	2019-06-17
Anni Crahan	Plattsburgh, US	2019-06-17
Adam Smith	Plattsburgh, US	2019-06-17
Tammy Dadds	Peru, NY	2019-06-17
Nicholas Leonard	Plattsburgh, NY	2019-06-17
Alexander Francis	Plattsburgh, US	2019-06-17
Annie Taylor	Cadyville, NY	2019-06-17
Ryan Lynch	Plattsburgh, US	2019-06-17
Kathie Anne McCorry	Plattsburgh, NY	2019-06-17
Katelin Guerin	Altona, US	2019-06-17
Michele Danville	Plattsburgh, US	2019-06-17
Maggie W	Apopka, FL	2019-06-17
Sean O'Neal	San Clemente, US	2019-06-17
Kris Roberts	West Chazy, NY	2019-06-17
Shane Ratliff	Jay, US	2019-06-17
Daljeet Singh	Union City, US	2019-06-17
stephanie hemingway	Peru, US	2019-06-17

<b>Name</b>	<b>Location</b>	<b>Date</b>
Breyana Boyer	Plattsburgh, NY	2019-06-17
Mary Ann P. Chargualaf	Tuckerton, US	2019-06-17
Kevin Turner	Tupper lake, US	2019-06-17
Chr Kni	Plattsburgh, NY	2019-06-17
Jill Mclean	Plattsburgh, US	2019-06-17
Melissa Dominy	US	2019-06-17
Lindsey Post	Plattsburgh, US	2019-06-17
Naomi Fleming	Plattsburgh, US	2019-06-17
Katelyn Hoover	Plattsburgh, US	2019-06-17
Cody Brunet	Plattsburgh, US	2019-06-17
Jeffrey Buskey	Champlain, US	2019-06-17
Kevin Santos	Ridgefield Park, NJ	2019-06-17
Janet Morgan	Jay, NY	2019-06-17
Mandy Treadwell	Plattsburgh, NY	2019-06-17
megan Wolfshadow	Redford, NY	2019-06-17
Jim King	Plattsburgh, NY	2019-06-17
mary ann van de car	los angeles, US	2019-06-17
Roberta Firenze	Plattsburgh, US	2019-06-17
Alex Udrys	Frisco, US	2019-06-17
Twanisha Hart	Palm Bay, US	2019-06-17
Angella Mendez	Salinas, US	2019-06-17
avenging tom	upland., US	2019-06-18

<b>Name</b>	<b>Location</b>	<b>Date</b>
Peggy Eaglefeather	Plattsburgh, US	2019-06-18
Patrick Malark	West Chazy, US	2019-06-18
MICHELLE DRAGON	Silver Spring, US	2019-06-18
Linda Sabourin	Alma, US	2019-06-18
Lorrie Mandigo	Plattsburgh, US	2019-06-18
Kathleen Corrigan-Dumas	Malone, NY	2019-06-18
Michelle Tolosky	West Chazy, NY	2019-06-18
Anne Holshek	Plattsburgh, US	2019-06-18
Aleister Crowley	Plattsburgh, US	2019-06-18
Jacque Barshow	Plattsburgh, US	2019-06-18
Tara Glynn	Plattsburgh, NY	2019-06-18
Nicholas Puccia	Plattsburgh, NY	2019-06-18
Theresa Mesec	Mooers, US	2019-06-18
Karen Kenworthy	Saranac, NY	2019-06-18
David Johnson	Mountain View, US	2019-06-18
Teressa Martichonok	San Francisco, US	2019-06-18
Janessa Harmon	Georgetown, CO	2019-06-18
Melissa Bushey	Plattsburgh, US	2019-06-18
Melissa Zielinski	Keeseville, US	2019-06-18
Theresa DesOrmeaux	Plattsburgh, US	2019-06-18
John Abrams	Philadelphia, US	2019-06-18
Kailah Easton	US	2019-06-18

<b>Name</b>	<b>Location</b>	<b>Date</b>
Rachael Greminger	Plattsburgh, NY	2019-06-18
Noelle Desormeaux Fitzgerald Fitzgerald	Plattsburgh, US	2019-06-18
Ryan Annis	Plattsburgh, US	2019-06-18
Cory Weidenbach	Walton, NY	2019-06-18
Sue Donohue	Greenville, US	2019-06-18
stephen williams jr	plattsburgh, NY	2019-06-18
Nicole Lewis	Davenport, US	2019-06-18
Marlene Sarbou	Plattsburgh, US	2019-06-18
KL Thomas	Snellville, US	2019-06-18
Jamie Templar	Natick, MA	2019-06-18
Laura Trombley	Plattsburgh, US	2019-06-18
Mary Jo Boslet Sweet	Chazy, NY	2019-06-18
Kelly Hosler	Chazy, US	2019-06-18
Linda Harwood	Plattsburgh, NY	2019-06-18
Jamie Facticeau-Gadbois	Cadyville, US	2019-06-18
Dawn Ashline	Plattsburgh, US	2019-06-18
Anastasia Reil	Saranac, NY	2019-06-18
Robin Gwinn	Plattsburgh, US	2019-06-18
carrie desilets	plattsburgh, NY	2019-06-18
Nancy Lavigne	Plattsburgh, US	2019-06-18
Christy Minck	Champlain, US	2019-06-18

<b>Name</b>	<b>Location</b>	<b>Date</b>
Whitney LaCroix	Plattsburgh, NY	2019-06-18
MaryAnne Cox	Plattsburgh, NY	2019-06-18
Kristen Hendrie	Rouses Point, NY	2019-06-18
Jonisa Bombard	Plattsburgh, US	2019-06-18
Curtis Viens	US	2019-06-18
Joni Carr	Plattsburgh, NY	2019-06-18
Billie Davignon	Plattsburgh, NY	2019-06-18
Maria Ely Santoyo	Los Angeles, US	2019-06-18
Conor Handley	Forest City, US	2019-06-18
Kelly Krapf	Lynnwood, WA	2019-06-18
Susan Thomas	Seattle, US	2019-06-18
Alexa Buxkemper	Houston, TX	2019-06-18
Shannan Ray	Ridgeland, US	2019-06-18
Derek Rose	Plattsburgh, US	2019-06-18
Darleen Hernandez	Anaheim, US	2019-06-18
Cheryl Laizure	New York, NY	2019-06-18
April Wood	Morrisonville, US	2019-06-18
Shaunna Santos	Merritt Island, US	2019-06-18
Hunter Sessions	American Fork, US	2019-06-18
William Zakasky	Irvine, US	2019-06-18
Paige Alsabrook	Marietta, US	2019-06-18
Kelly Pratt	Austin, US	2019-06-18

<b>Name</b>	<b>Location</b>	<b>Date</b>
matt sellers	Somerset, US	2019-06-18
Stacia Archie	Steubenville, US	2019-06-18
Bette Brohel	Plattsburgh, NY	2019-06-18
Ingrid Almaguer	Plattsburgh, US	2019-06-18
Taylor Boyer	Plattsburgh, US	2019-06-18
Linden Barrett	Plattsburgh, NY	2019-06-18
Jennifer Galietta	Plattsburgh, US	2019-06-18
Krystina Robert	Rouses Point, NY	2019-06-18
Colby Graves	Plattsburgh, US	2019-06-18
Brenda Taft	Plattsburgh, US	2019-06-18
Janet Booth	Plattsburgh, NY	2019-06-18
Emily Barber	Plattsburgh, NY	2019-06-18
Marsha Fenimore	Elizabethtown, NY	2019-06-18
Emily Hemingway	Plattsburgh, NY	2019-06-18
Shawn Raimo	Plattsburgh, US	2019-06-18
Glenn Rivers	Chesterhill, OH	2019-06-18
Jessica Rivers	Attleboro, US	2019-06-18
Chelsey Trombley	US	2019-06-18
Kari Kipp	Plattsburgh, US	2019-06-18
Shelley Wing	Essex, US	2019-06-18
Rebecca Chauvin	Plattsburgh, NY	2019-06-18
matt carter	schenectady, NY	2019-06-18

<b>Name</b>	<b>Location</b>	<b>Date</b>
Molly Martindale	Saranac, US	2019-06-18
Shannon Forkey	Plattsburgh, US	2019-06-18
Roxanne Coleman	Plattsburgh, US	2019-06-18
Denise Merrill	Plattsburgh, US	2019-06-18
Kelly Lareau	Plattsburgh, US	2019-06-18
Michelle LaDuke	Plattsburgh, NY	2019-06-18
Karen Nolan	Plattsburgh, NY	2019-06-19
Chris Allen	Saranac, US	2019-06-19
Michelle Fowler's	Plattsburgh, US	2019-06-19
Makayla Vincent	Colchester, VT	2019-06-19
Elizabeth Canne	Plattsburgh, NY	2019-06-19
Joe Parshall	Clarkston, US	2019-06-19
Melinda Griffin	Plattsburgh, NY	2019-06-19
Mike Rivers	Plattsburgh, US	2019-06-19
Sandra Geddes	Plattsburgh, US	2019-06-19
Steve Fuller	Plattsburgh, US	2019-06-19
Michelle Gokey	Logan, US	2019-06-19
Christine Hubbell	Decatur, US	2019-06-19
Austin Sotak	Keeseville, US	2019-06-19
Wendy Ewald	Lewis, US	2019-06-19
Tami LaDuke	Plattsburgh, US	2019-06-19
John Figart	Saranac Lake, US	2019-06-19

<b>Name</b>	<b>Location</b>	<b>Date</b>
Ken Fenimore	Elizabethtown, US	2019-06-19
Chad Robart	Cadyville, US	2019-06-19
Steve Miller	Chazy, US	2019-06-19
Brandon Giddings	US	2019-06-19
Allen Anderson	Chazy, NY	2019-06-19
Colleen Smith	North Kingstown, US	2019-06-19
SallyA Freeman	Plattsburgh, US	2019-06-19
B WINGLER	Plattsburgh, US	2019-06-19
Jason Pageau	Dannemora, US	2019-06-19
Julie Spencer	Plattsburgh, US	2019-06-19
Brian Miller	Dannemora, US	2019-06-19
Jodi Faucher	Plattsburgh, NY	2019-06-19
Susan Pennington	Pensacola, FL	2019-06-19
Jesse Hutti	Dillon, US	2019-06-19
Cheyenne Virtue	Minot, ND	2019-06-19
Erin Allison	Plattsburgh, NY	2019-06-19
Patricia Hartshorn	Plattsburgh, US	2019-06-19
Sean Harrigan	Morrisonville, NY	2019-06-19
Ashley Gaul	Plattsburgh, US	2019-06-19
Mary Buckley	Burlington, US	2019-06-19
Brian Thurber	Plattsburgh, US	2019-06-19
Melissa Peck	Plattsburgh, NY	2019-06-19



<b>Name</b>	<b>Location</b>	<b>Date</b>
Emma Puglisi	Marblehead, US	2019-06-19
Ashley Grosskopf	Plattsburgh, US	2019-06-19
Kelsey Norwood	Plattsburgh, NY	2019-06-19
Alexis Hutchins	Plattsburgh, NY	2019-06-19
Nicholas Carter	Plattsburgh, US	2019-06-19
Tyler Carter	Monroe, US	2019-06-20
Dave Neiman	Plattsburgh, US	2019-06-20
Christine Colascione	Brattleboro, VT	2019-06-20
Nichole Carter	Esko, US	2019-06-20
Kristin Forttrell	Chazy, NY	2019-06-20
jared hogle	Plattsburgh, US	2019-06-20
amy robinson	Morrisonville, US	2019-06-20
Michael Lynch	Chazy, US	2019-06-20
Maddy Shiflett	Plattsburgh, NY	2019-06-20
Margaret Hutchins	Plattsburgh, NY	2019-06-20
Mary LaDue	Plattsburgh, NY	2019-06-20
Robert Belcher	Plattsburgh, US	2019-06-20
Connie Markowicz	Peru, NY	2019-06-20
Bryan Bradley	Brooklyn, US	2019-06-20
Maritza Alexander	Paterson, US	2019-06-20
Jordan Rund	Bronx, US	2019-06-20
Arthur Piatt	Woodland Hills, US	2019-06-20

<b>Name</b>	<b>Location</b>	<b>Date</b>
JEREMY BERGH	Livermore, US	2019-06-20
Quinn Stebbins	Plattsburgh, NY	2019-06-20
Judy Bombardier	Mooers, US	2019-06-20
Paul Deyo	Plattsburgh, US	2019-06-20
Nathaniel Horn	Plattsburgh, US	2019-06-20
Lorrielle Racette	Plattsburgh, NY	2019-06-20
Andrew Hurlock	Plattsburgh, US	2019-06-20
Patricia Loughan	Plattsburgh, NY	2019-06-20
Julia Tansor	Plattsburgh, US	2019-06-20
Gary Benoit	Palm Beach Gardens, US	2019-06-21
David Harris	Plattsburgh, NY	2019-06-21
Carol Ann Covey	Chazy, US	2019-06-21
Tina LeFevre	Plattsburgh, US	2019-06-22
Amy Longemps	Cadyville, NY	2019-06-22
Janet Kinne	Plattsburgh, US	2019-06-22
Teri Prunier	West Chazy, US	2019-06-22
Abigail Stgermaine	Plattsburgh, NY	2019-06-22
justin gumlaw	Rouses Point, NY	2019-06-22
Shawna DeAngelo	Morrisonville, NY	2019-06-22
Sarah Forkey	Plattsburgh, US	2019-06-22
Craig Avery	Plattsburgh, NY	2019-06-22
Kevin Butler	Plattsburgh, NY	2019-06-22

<b>Name</b>	<b>Location</b>	<b>Date</b>
Edward Knapp	Plattsburgh, US	2019-06-22
Trevor Deyo	Chazy, US	2019-06-22
Abigail Burdo	Elizabethtown, US	2019-06-22
Cat Taylor	Burlington, US	2019-06-22
Sheryl MacKinnon	Rouses Point, US	2019-06-22
Rob Rivers	Plattsburgh, US	2019-06-22
Megan Kirkland	Lapeer, US	2019-06-22
Ashley Dupra	Plattsburgh, NY	2019-06-22
Robert Inglis	Plattsburgh, NY	2019-06-22
Sara Lincoln	Plattsburgh, US	2019-06-22
Melissa Facticeau	Plattsburgh, NY	2019-06-22
Lisa Frennier	Plattsburgh, US	2019-06-22
Jessica Bezruczyk	Plattsburgh, US	2019-06-22
Erick Stevenson	Dover, NH	2019-06-22
Bradley Rushford	Churubusco, US	2019-06-22
Charles Bruce	Westport, NY	2019-06-22
Margaret Murat	Plattsburgh, NY	2019-06-23
Lisa Fisher	Plattsburgh, NY	2019-06-23
Giovanna Harvey	Plattsburgh, US	2019-06-23
Eileen Wood	Saranac, NY	2019-06-23
Murat Rosanne	Milton, US	2019-06-23
Linda Miller	Plattsburgh, US	2019-06-23

<b>Name</b>	<b>Location</b>	<b>Date</b>
Gretchen Vincent	Keene, NY	2019-06-23
rochelle ginis	plattsburgh, NY	2019-06-23
Jaime Simpson Mooney	Plattsburgh, US	2019-06-24
Greg Terry	Salem, US	2019-06-24
Devin Conner	Ellenburg Center, NY	2019-06-24
Vanessa Dickinson	Chazy, NY	2019-06-24
William Johnston	Plattsburgh, US	2019-06-24
Chris Mcfadden	Plattsburgh, NY	2019-06-24
Dale Juneau	Plattsburgh, US	2019-06-24
nikki lang	Moriah, NY	2019-06-24
Stephanie chauvin	West Chazy, NY	2019-06-24
kellan Wheeler	Plattsburgh, US	2019-06-25
Sherry Frenia	Schuyler Falls, US	2019-06-25
Beth Walker	Plattsburgh, NY	2019-06-25
Neil Walker	Champlain, US	2019-06-25
Jeremy Drayton	Lombard, US	2019-06-25
Mary Rietbrock	Warrensburg, US	2019-06-25
Dominique Giroux	Plattsburgh, US	2019-06-25
Timothy Palkovic	Plattsburgh, NY	2019-06-26
Daniel Sturrock	Plattsburgh, US	2019-06-26
Stephanie Phillips	Plattsburgh, US	2019-06-26
Stephen Schwartz	US	2019-06-26

<b>Name</b>	<b>Location</b>	<b>Date</b>
Shawna Weaver	West Chazy, NY	2019-06-26
Ron LaFountain	Plattsburgh, US	2019-06-26
Casey Myers	Plattsburgh, US	2019-06-26
Kaitlyn Mroczka	Plattsburgh, US	2019-06-26
Ethan Worley	Plattsburgh, NY	2019-06-26
Michael Racine	Plattsburgh, US	2019-06-26
Eugene Solomon	Roselle, US	2019-06-26
Jada Sisneros	Pueblo, US	2019-06-26
Ileas Harb	Derry, US	2019-06-26
Brea Hunt	Bakersfield, US	2019-06-26
Jaymon Resquer-Yorkman	Makaweli, US	2019-06-26
David Boucher	Delmar, US	2019-06-27
Brian Walsh	Plattsburgh, US	2019-06-27
Amanda Passino	Plattsburgh, US	2019-06-28
Ryan Imondi	Plattsburgh, NY	2019-06-28
Ryan Beebie	Plattsburgh, NY	2019-06-28
Terry Broderick	Plattsburgh, NY	2019-06-29
Robin Brown	Plattsburgh, NY	2019-06-30
Allison Hulbert-Bruce	Peru, US	2019-06-30
Diane Fine	Plattsburgh, US	2019-06-30
Jason McNabb	Aubrey, US	2019-06-30
Janet McDowell	Plattsburgh, US	2019-06-30

<b>Name</b>	<b>Location</b>	<b>Date</b>
Sharon Ratner	Plattsburgh, NY	2019-06-30
Susan Spissinger	Plattsburgh, US	2019-06-30
Lyndon Bohanan	Santa Rosa, US	2019-06-30
Josh Lezcano	Walnut Creek, US	2019-06-30
Monica Keith	Hyattsville, MD	2019-06-30
renee cao	Corona, US	2019-06-30
Tommy Dinet	US	2019-06-30
Sandra Murray	Bakersfield, US	2019-06-30
Edward Ackey	Plattsburgh, NY	2019-06-30
Robert Wolf	Plattsburgh, NY	2019-06-30
Casey McClain	Plattsburgh, NY	2019-07-01
Lisa Barron	Yelm, US	2019-07-01
Mindy Goldsmith	Plattsburgh, NY	2019-07-01
Noor Chalabi	Iraq, US	2019-07-01
Michelle Angelo	Nyack, US	2019-07-01
Autumn Sesta	Miami, US	2019-07-01
isabella garcia	Orlando, US	2019-07-01
Jolean Field	Central, US	2019-07-01
Shannon Bond	Plattsburgh, NY	2019-07-02
Henry Prewitt	Lexington, US	2019-07-02
Allissa Destini Miller	Ocala, US	2019-07-02
Alban Reci	Brooklyn, US	2019-07-02


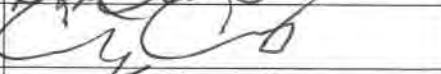


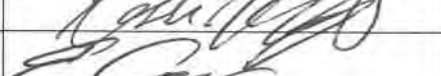

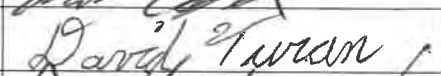

<b>Name</b>	<b>Location</b>	<b>Date</b>
Kyle Jarchow	Englewood, US	2019-07-02
Heather Norcross	Champlain, US	2019-07-02
Ian Isenhour	Brooklyn, US	2019-07-02
Angelica Garza	Madera, US	2019-07-02
Johnathan Ortega	Phoenix, US	2019-07-02
Noah Contreras	Lakeside, US	2019-07-02
Ruben Savelson	Brooklyn, US	2019-07-02
Dominique Olivas	Riverside drive, US	2019-07-02
Derrick Almeida	Pompano Beach, US	2019-07-02
Josiah Henderson	Bakersfield, US	2019-07-02
Tammy LaBonte	West Chazy, NY	2019-07-02
Grant Walters	Seneca, US	2019-07-02
Brennain Degenhardt	Kirksville, US	2019-07-02
Francesca Julian	Plattsburgh, US	2019-07-02
Edmund Hohls	Apex, US	2019-07-02
Kevin Bryan	Fort Pierce, US	2019-07-02
Adam Bullis	Dunnellon, US	2019-07-02
Ethan Partee	Pendleton, US	2019-07-02
Brittany Bain	US	2019-07-02
Jameel Charles	Brooklyn, US	2019-07-02
John Chapa	La Quinta, US	2019-07-02
Carly Smith	Plattsburgh, NY	2019-07-02

<b>Name</b>	<b>Location</b>	<b>Date</b>
Roscoe Duquette	Plattsburgh, NY	2019-07-03
Kara Bouyea	Plattsburgh, US	2019-07-03
Rachael Maurer	Plattsburgh, NY	2019-07-03
Nallely Zavala	San Diego, US	2019-07-04
Wendy Bridges	Champlain, US	2019-07-06
Kristi Pottichen	Plattsburgh, NY	2019-07-06
Jeremiah Benjamin	Plattsburgh, NY	2019-07-06
Brian McGinley Jr	Plattsburgh, US	2019-07-07
Heather Rager	Dallas, US	2019-07-10
kyleigh cemensky	Henderson, US	2019-07-10
Janet Lear	Fort Collins, US	2019-07-10
sebastian cole	medford, US	2019-07-10
Tamara Kcehowski	El Segundo, US	2019-07-10





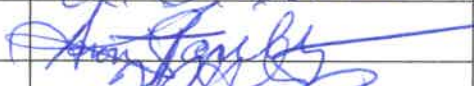


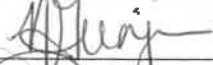
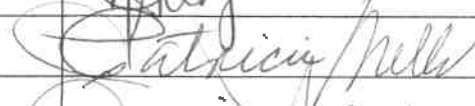



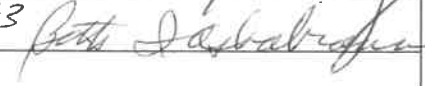
- Decreased public access to the riverfront and lack of public gatherings space.
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**Say "YES" to support Development Plans for Durkee Street that actually benefit our community.**

PRINT NAME	ADDRESS	SIGNATURE
Robin Davis	25 Hickory St Plattsburgh NY	
Cory L Cereske	25 Hickory St Plattsburgh NY	
Lenny VNEPP	24 CLINTON ST PLATS NY	
<del>Scott</del> Scott MACEY	7 Crown Pointe Rd Plattsburgh, NY	
Jesse Macey	Plattsburgh NY	
Evan Conway	Plattsburgh NY	
Mike Cotter	Plattsburgh N.Y.	
David Turan	Plattsburgh, NY	David Turan
Randolph Jennings	Plattsburgh	Randolph Jennings
KRISTEN NEVRETT-BROWN	85 MARGARET ST	

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PRINT NAME	ADDRESS	SIGNATURE
Ronald A Marino	47 SANDRA Ave City	
Alan B. Booth	9 Faglar Drive 20 BETH KASHOFF ST	
AARON Stanley	257 S. Peru St.	
William Lopez	13 Court St	
Chris Garza	28 City Hall Pl	
Nora Gunjan	88 Cooper Dr	
Patricia Miller	Miller St	
Jeanine Sawyer	85 Miller	
Hannah McLearty	105 Montcalm Ave	
Kevin Kearney	9 Crosby Creek Pk	
Beth Ashabanner	604 St. Jere 22B, Unit 3 Perth NY 12972	

7/9/09

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<u>PRINT NAME</u>	<u>ADDRESS</u>	<u>SIGNATURE</u>
Susan E Bruno	Wilkbore, NY	Susan E. Bruno
Tamber Shepard	37 Elizabeth St, Platts.	Tamber Shepard
Travis Shepard	"	Travis Shepard
CLAYTON WRAY	423 CUMBERLAND HEAD RD	Clayton Wray
LISA RICHARDS	PO BOX 15 Morrisville NY	Lisa Richards
Katharine Preston	SSEX, NY	Katharine M. Preston
Kolleen Duley	SARANAC, NY	Kolleen Duley
SUSAN FRESN	1480 Ch. Rd. P'burgh	Susan Fresn
JACQUELINE CIAMPORCO	16 Champlain, Plattsburgh	Jacqueline Ciamporco
Jillie Charlbon	2 Pinebrook Dr 12962	Jillie Charlbon
Emily Furmeny	309 Mason Rd Westport 12993	Emily Furmeny
Joe Steel	7 High St.	Joe Steel
E. Gadona	288 Cumberland	E. Gadona
Caye Grabowski	City of Plattsburgh	Caye Grabowski
Mitch Willette	City of Plattsburgh	M. Willette

# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot


PRINT NAME	ADDRESS	SIGNATURE
MICHELLE HILLS	PLATTSBURGH, NY	<i>Michelle Hills</i>
Cheryl Lynn	Platts. NY	<i>Cheryl Lynn</i>
Maria Del Rio	Platts. NY	<i>Maria Del Rio</i>
Jane Lincoolt	Plattsburgh NY	<i>Jane M. Lincoolt</i>
Lauren Benjamin	Lake Placid, NY	<i>Lauren Benjamin</i>
Mary Turner	Chazy, NY	<i>Mary Turner</i>
Heather Schlitt	Peru NY	<i>Heather Schlitt</i>
<del>Tom Nicholas</del>	" "	<del>Tom Nicholas</del>
T. G. Wiesthoff	Peru, NY	<i>T. G. Wiesthoff</i>
Lynn C. Valenti	Plattsburgh, N.Y.	<i>Lynn C. Valenti</i>
Autumn Edmonston	Ellenburg Depot, NY	<i>Autumn Edmonston</i>
<del>AYLOR EDMONSTON</del>	" "	<del>Aylor Edmonston</del>
Cindy Arnold	Plattsburgh NY	<i>Cindy Arnold</i>
Jennifer Luther	Morrisville, NY	<i>Jennifer Luther</i>
Deborah Allen	Plattsburgh NY	<i>Deborah Allen</i>
Heather Netzstein	Plattsburgh NY	<i>Heather Netzstein</i>
Arthur Hallinger	Champlain NY	<i>Arthur Hallinger</i>
Russell McCarthy	Moore's NY	<i>Russell McCarthy</i>
Kailey Maher	Rouses Point, NY	<i>Kailey Maher</i>
Sharon Schenkus	Peru NY	<i>Sharon Schenkus</i>
Mary-Wee Boekman	Whitcomb NY	<i>Mary-Wee Boekman</i>
Kathy Livingston	University Plattsburgh NY	<i>Kathy Livingston</i>
ELLEN MICHAELS	36 DURKEE ST Plattsburgh NY	<i>Ellen Michaels</i>
<del>Jessica O'Brien</del>	plattsburgh NY	<del>Jessica O'Brien</del>

*Jessica O'Brien*

7/9/19

- Decreased public access to the riverfront and lack of public gatherings space.
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PRINT NAME	ADDRESS	SIGNATURE
Paul Dubuque		
Stephanie Snide		Stephanie Snide
Karie Matthews		Karie Matthews
Elizabeth Eldredge	11 Tioga Lane Plattsburgh	Elizabeth Eldredge
Martha Chase	27 Catalan Standish	Martha Chase
Lily Volann	7 Point New York	Lily Volann
Jana Schumde	87 Elizabethtown	Jana Schumde
Lori Schumde	42 Elizabeth St	Lori Schumde

8

6/17/2019

91

- Decreased public access to the riverfront and lack of public gatherings space. 492
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PRINT NAME	ADDRESS	SIGNATURE
Torrie Atkinson-Waldron	13 Durkee St Plattsburgh	Torrie Atkinson Waldron
SONYA DUBESI	13 DURKEE ST PLATTSBURGH	Sonya D
Shannan Gillespie	131 Durkee St. Plattsburgh	Shannan Gillespie
Angie Boyea	13 Durkee St. Platts	Angie Boyea
Laura Irwin	13 Durkee St Plattsburgh	Laura Irwin
Megan Verkey	13 Durkee St. Plattsburgh	Megan Verkey
Amy Brown	13 Durkee St Plattsburgh	Amy Brown
Kelly Clukey	13 Durkee St. Plattsburgh	Kelly Clukey
Ann McCarty	13 Durkee St Plattsburgh	Ann McCarty
Catherine LeBlanc	13 Durkee St Plattsburgh	Catherine LeBlanc
Kathy Atkinson	13 Durkee St Plattsburgh	Kathy Atkinson
Dawn Rushford	B Durkee St. Plattsburgh	Dawn Rushford
Deelan Guinard	13 Durkee St	Deelan Guinard
Jason Pageau	13 Durbee St	Jason Pageau
Jayden King	13 Durkee St	Jayden King
Heather Mason	13 Durkee St	Heather Mason
Debra Guynup	13 Durkee St.	Debra Guynup
Nancy Crowthers	13 Durkee St	Nancy Crowthers
William J Wells	13 Durkee St	William J Wells

14

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<u>PRINT NAME</u>	<u>ADDRESS</u>	<u>SIGNATURE</u>
MARCIÉ WYAND	CC-DSS/13 Durkee	Marcie Wyand
Shelly Peryes	CCDSS/13 Durkee	Shelly Peryes
AMANDA THERRIAN	CCDSS 13 DURKEE ST	Amanda Therrian
Christine Allard	CCDSS 13 Durkee St.	Christine Allard
Travis Gorham	CCDSS 13 Durkee St	Travis Gorham
Lorene Easter	13 Durkee St Platts	Lorene Easter
KRISTEN DELORIA	CCDSS - 13 Durkee St	Kristen Deloria
Alane Manor	CCDSS - 13 Durkee St.	Alane Manor
Katie Coleman	CCDSS - 13 DURKEE ST	Katie Coleman
Stephanie Howes	CCDSS - 13 Durkee St	Stephanie Howes
Maria Gushlaw	CCDSS - 13 Durkee St.	Maria Gushlaw
Amanda LePage	CCDSS 13 Durkee St.	Amanda LePage
Stacey Senecal	CCDSS 13 Durkee St	Stacey Senecal
Cristina Bordeau	CCDSS 13 Durkee Street	Cristina Bordeau
Suzanne L. Neale	CCDSS - 13 Durkee St.	Suzanne L. Neale
Lisa Berger	CCDSS - 13 Durkee St.	Lisa Berger
Brooke Maynard	CCDSS - 13 Durkee St.	Brooke Maynard
Jennifer Smith	CCDSS - 13 Durkee St	Jennifer Smith
Nicole Rowe	CCDSS - 13 Durkee St.	Nicole Rowe

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WORK ADDRESS if you like

<u>PRINT NAME</u>	<u>ADDRESS</u>	<u>SIGNATURE</u>
Liz Allen	156 cornelia ST	
Jean MCK	13 Durkee St	
Megann Janniller	80 Sally Ave	
Daisy Robertin	13 Durkee St	
Christy Palmer	13 Durkee St	
John HHALE	13 DURKEE ST	
Cassandra Fletcher	13 Durkee St	
Melinda Todd	13 Durkee St.	
Claudia Drollette	13 Durkee St	
Sherrre Siskerich	13 Durkee St.	
Lisa Jordan	13 Durkee St.	
Sheryl Moore	13 Durkee Str.	
Susan Aley SUSAN ALEY	13 Durkee St.	
Tonya Greene	13 Durkee St.	
Kim Peels	13 Durkee St	
Jean Foley	13 Durkee St	
Ed Darragh / ED DARRAGH	CORNELIA ST.	
Robert J. Waldron	13 Durkee St.	
Barbara Hollenbach	13 Durkee St	



# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot

PRINT NAME	ADDRESS	SIGNATURE
Anne Arthur	13 Durkee St, Plattsburgh	Anne Arthur
Vivonne Hampton	5219 North Catherine Platts	Vivonne Hampton
Laura Drum	3331 North Catherine Platts	Laura Drum

1/10


# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot

PRINT NAME	ADDRESS	SIGNATURE
Alison Kurofsky	21 Linda Ln. P'burgh	Alison Kurofsky
Bunker	4383 STRT 3 RED FOX	[Signature]
Tammie Pappan	PO Box 202 Dannemora, NY	Tammie Pappan
Lynn LaPiere	263 Cornelia St Platts	Lynn LaPiere
Anne Kirby	194 Rand Hill Rd Morrisville	[Signature]
Maren Favaro	DSS	Maren Favaro
Jenna Kilcayne	726 Jersey Swamp Rd West Chazy, NY 12992	Jenna Kilcayne
Alycia Cooney	DSS 13 Durkee Platts 12901	A Cooney
Gisselle Cooper	13 Durkee St. Platts	Gisselle Cooper
Kevin Simpson	13 Durkee St Platts	Kevin Simpson
Debra O'Dair	14 Matthew Way #2 Plattsburgh	Debra O'Dair
Lois J. Jenkins	172 Rugar St	Lois J. Jenkins
Ray Clark	58 Lynne St.	Ray Clark
Charles Anteur	13 Durkee St	[Signature]
Sally Rock	4 Durand St Plattsburgh NY	Sally Rock
Kim Case	Rt 27 Plattsburgh NY 12901	Kim Case
Lolita Trent	13 Durkee St Plattsburgh 12901	Lolita Trent
Carol A Chawin	Plattsburgh NY	Carol A Chawin

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WORK ADDRESS

<u>PRINT NAME</u>	<u>ADDRESS</u>	<u>SIGNATURE</u>
Thomas Webb	13 Durkee St.	

8

# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot

PRINT NAME	ADDRESS	SIGNATURE
Kaylee Murnane	CCDSS-13 Durkee St	<i>[Signature]</i>
Janice Minckler	CCDSS-13-Durkee St.	<i>[Signature]</i>
Jessica Gainer	CCDSS - 13 Durkee St	<i>[Signature]</i>
Kendra Bertsch	CCDSS-13 Durkee St	<i>[Signature]</i>
Keely Connolly	CCDSS-13 Durkee St	<i>[Signature]</i>
Paula K Dew	13 Durkee St, Plainborough 01290	<i>[Signature]</i>
Paula Hobbs	CCDSS-13 Durkee St	<i>[Signature]</i>
Judy McKee	CCDSS-13 Durkee St.	<i>[Signature]</i>
Peggy Way	CCDSS 13 Durkee St	<i>[Signature]</i>
Tressor St. Clair	CCDSS 13 Durkee ST	<i>[Signature]</i>
Heather Contessa	CCDSS 13 Durkee St	<i>[Signature]</i>
Starr Burke	CCDSS 13 Durkee St	<i>[Signature]</i>

S

TO BE BROUGHT TO CITY ZONING COMMITTEE ON MONDAY!

19x3

- Decreased public access to the riverfront and lack of public gatherings space.
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<u>PRINT NAME</u>	<u>ADDRESS</u>	<u>SIGNATURE</u>
Tess Bailey	CCDSS	Tess Bailey
William T. McHenry	CCDSS	William T. McHenry
Karen Ales	CCDSS.	Karen Ales
Mandy Probst	CCDSS	Mandy Probst
Juanita Blanchard	CCDSS	SAME

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PRINT NAME	ADDRESS	SIGNATURE
<del>CHRISTOPHER TOLLY</del>	<del>123 3rd Street</del>	<del>[Signature]</del>
<del>KAREN WILK</del>	<del>123 3rd Street</del>	<del>[Signature]</del>
Wahy HOSUW	42 King Ave	Wahy Hosu
Jon Parker	13 Lorraine St	[Signature]
HALEIGH WILLETTE	13 Lorraine ST	[Signature]
Tyler RIVERS	110 Bridge St.	Tyler Rivers
End over	35 Clardy St	Buller
[Signature]	43 Pike St.	Ray Senary
Jonathan BRAD	4 Carmel Drive	Jonathan BRAD
DILLON CASHMAN	5483 Perost	DILLON CASHMAN
Dennis Barkem	118 SAILLEY #21	Dennis Barkem
Mark LaPointe	24 Broad St Apt 11	Mark LaPointe
Joey Ormby	64 Elizabeth	Joey Ormby
Chris Savvas	30 Cob Spring	Chris Savvas
<del>[Signature]</del>		
Lillie COEN		Lillie COEN
Steven Murray	7 Pine St. Apt 2	Steven Murray
Tara Daly	5045 S. Catherine #5	Tara Daly
Julie Bouyer	8 Hamilton St Apt A	Julie Bouyer

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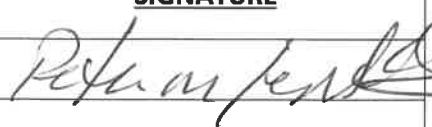
<u>PRINT NAME</u>	<u>ADDRESS</u>	<u>SIGNATURE</u>
Ashley Taylor	27 Macomb St	Ashley Taylor
Melissa Jernette	8 Hamilton St Apt 3	Melissa Jernette
David Turan	15 bridge st	David Turan

3

3

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PRINT NAME	ADDRESS	SIGNATURE
PETER M. CENTRELLA	3 O'CONNELL WAY #11 PLATTSBURGH, NY 12901	



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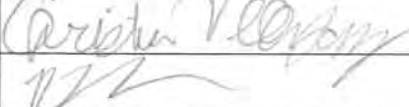
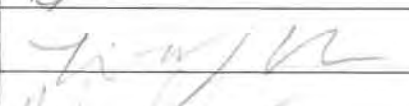
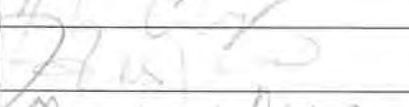
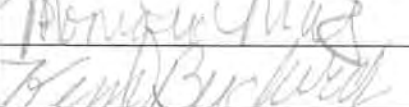


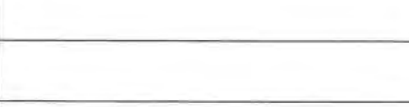
<u>PRINT NAME</u>	<u>ADDRESS</u>	<u>SIGNATURE</u>
Ana Trombley	46 1/2 montcalm Ave	Ana Trombley
Myranda Carr	5155 North Cat. Street	
Doreen Best	8 Macomb St	
STANLEY ROCK	P.O. Box 1707 Pittsburgh	STANLEY ROCK
Gabrielle Rose	71 Clinton St Apt 11	
Matthew Sullivan	81 Champlain St #2	
Shawn Switzer	40 Saily Ave	Shawn Switzer

7

~~25~~  
7

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<u>PRINT NAME</u>	<u>ADDRESS</u>	<u>SIGNATURE</u>
David Brown	3954 RY 22 PLATS	
Christian Velazquez	64 Broad St.	
Nicole Fisher	314 Insh [unclear] (296)	
Lisa Hoover	32 Broad St. [unclear]	
Wesley Brown	32 Broad St Plats 129d	
John Zinger	27 [unclear] St	
Margaret White	27 Broad St.	
Kim O. Buckwick	4 Cornelia St	

# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot

PRINT NAME	ADDRESS	SIGNATURE
Natalie Ward	383 CHR Plattsburgh	Natalie Ward
Draiko Shirley	44 main mill st	Draiko Shirley
William Ashabraner	5059 S. Catherine St	William Ashabraner
Brandon O'Connell	76 Oak street	Brandon O'Connell
CHRIS BYRNE	178 CORNELIA ST.	Chris Byrne

5

5

# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot

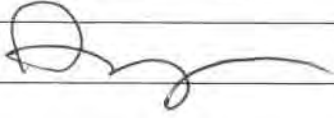
PRINT NAME	ADDRESS	SIGNATURE
RANDALL MARTIN	17 Kennedy Ave ? Bayh	Randall Martin
BETH MARTIN	"	Beth Martin
Christian Rodriguez	Plattsburgh, NY	Christian Rodriguez
Carole Mottin	Mulone, NY	Carole Mottin
Alan Kay	80 Maryland St	Alan Kay
Charles Shatraw	4850 St. Rt. 374 Lyon MA	Charles Shatraw
Janelle Michowski	123 RIVER RD. PERU, NY	Janelle Michowski
Sonia Hazelden	132 Prospect St Blooming	Sonia Hazelden
Bill Jeter	PO Box 49 Rainbow Ln	Bill Jeter
Jason Dalaboch	5289 N. Catherine St Plattsburgh	Jason Dalaboch
Jim Stafford	667A Collins Rd Peru	Jim Stafford
Kate Laney	1022 Cumberland Rd	Kate Laney
Isabelle Trayah	170 Irish Settlement Rd	Isabelle Trayah
Shawn Lyons	40 US Ave	Shawn Lyons
Carla Hausrath	1 Mc Martin St. Plattsburgh	Carla Hausrath
Anita Bouray	63 Cumberland	Anita Bouray
Marie-Josée Ménot	1620 ch. St-Charles, Greenfield Park	Marie-Josée Ménot
Tommy Aho	53 Mason Rd. Champlain	Tommy Aho
Nick DiVita	5225 N. Catherine St.	Nick DiVita
VICTORIA GARROW	178 WALLACE Hill Rd Plattsburgh	Victoria Garrow
Kelsey Chatelle	342 Mt. Washington Hill Rd West Chazy, NY	Kelsey Chatelle
Jim Fleury	PLATTSBURGH 100 CORNELIA ST.	Jim Fleury
Patrick Malley	6 City Hall Place	Patrick Malley
Kellie Brean	1668 Ashley Rd #2	Kellie Brean

West Chazy, NY 12992

24

24

**Petition to Stop the Prime Company's  
Development of the Durkee Street  
Parking Lot**

<u>PRINT NAME</u>	<u>ADDRESS</u>	<u>SIGNATURE</u>
April King	401 Bashaw Road Maverick Mass	

1

1

# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot

PRINT NAME	ADDRESS	SIGNATURE
Halie Simmons	117 Court St.	<i>Halie Simmons</i>
Jathy Moran	30 Macomb St	<i>Jathy Moran</i>
M. RISLEY	100 RUMFORD	<i>M. Risley</i>
Aubrey O'Hagan	9 Elizabeth St.	<i>Aubrey O'Hagan</i>
Ryan Demers	15 Tom Miller Rd	<i>Ryan Demers</i>
Paul J. Miller	25 Bridge Street	<i>Paul J. Miller</i>
Amanda Miller	25 Bridge Street	<i>Amanda Miller</i>
Lauren Parnes	22 US Oval Site 115	<i>Lauren Parnes</i>
Carnie Wray	203 Patour Rd Pen	<i>Carnie Wray</i>
Patrick Caff	39 Bridge St.	<i>Patrick Caff</i>
Jess / Mitchell	207 John Boswell Rd	<i>Jess / Mitchell</i>
BRIDGET St. John	306 Lake <sup>Peru NY</sup> Serenity Rd	<i>Bridget St. John</i>
Susan Griskonis	2871 Silver Lake Rd <sup>Saranac NY 12981</sup>	<i>Susan Griskonis</i>
Calvin Tubo	802 Route 9 <sup>Plattsburgh NY</sup>	<i>Calvin Tubo</i>
Brandon Becket	13 City Hall <sup>Plattsburgh NY</sup>	<i>Brandon Becket</i>
Laurie Dabay	9 Champlain St	<i>Laurie Dabay</i>
MATHEW HALL	28 CITY HALL PL. #8	<i>Matthew Hall</i>
Lawrence Paola	433 <sup>Point Au Roche Rd</sup> Plattsburgh, NY	<i>Lawrence Paola</i>
Margaret Snide	5329 Rt 374 <sup>Merrill NY 12955</sup>	<i>Margaret Snide</i>
Lynn Nephew	787 Durand Rd <sup>Plattsburgh NY 12901</sup>	<i>Lynn Nephew</i>
Cacey Nephew	787 Durand Rd <sup>Plattsburgh NY 12901</sup>	<i>Cacey Nephew</i>
Victoria Babbie	185 <sup>Plattsburgh NY</sup>	<i>Victoria Babbie</i>
Kim LeClaw	111 Elizabeth -	<i>Kim LeClaw</i>
Barbara Cok	56 Robert Rd <sup>Keeseville</sup>	<i>Barbara Cok</i>

# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot

PRINT NAME	ADDRESS	SIGNATURE
Ruth Yourdon	Keeseville	Ruth Yourdon
Andra Green	Cadyville	Andra Green
Tyler Richoff	Plattsburgh	Tyler Richoff
Claudio Zanfava	Plattsburgh	Claudio Zanfava
Sarah Mundy	Plattsburgh	Sarah Mundy
Alexandra Jarone	Plattsburgh	Alexandra Jarone
Libby Yokum	Plattsburgh	Elizabeth (Libby) YOKUM
Bonita Torigawa	Plattsburgh	Bonita Torigawa
LOAN BRIEN	Plattsburgh	Loan Brien
Andrew S. Wilson	Lebanon, NY	Andrew S. Wilson
Sydney Durham	Plattsburgh	Sydney Durham
Jordan A. Smith	Plattsburgh	Jordan A. Smith
JAMES SORRELL	AS SABLE FORKS	James Sorrell
ALLAIRE MORONT	PLATTSBURGH	Allaire Moront
Brenda Laune	Plattsburgh NY	Brenda Laune
DANA DONAHUE	Saranac, NY	Dana Donahue
Carol Pennell	Willsboro, NY	Carol Pennell
AUSTIN PETRASHUNE	PLATTSBURGH, NY	Austin Petrashune
PAT OSTRANDER	Plattsburgh, NY	Pat Ostrander
Jeannie Howard	Plattsburgh, NY	Jeannie Howard
Samuel Breyette	Plattsburgh, NY	Samuel Breyette
Maureen Desrocher	Plattsburgh	Maureen Desrocher
Hollie Desrocher	Plattsburgh (Downtown)	Hollie Desrocher
Amanda Reil	Plattsburgh	Amanda Reil

# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot








PRINT NAME	ADDRESS	SIGNATURE
CAROLE DUBOIS	65 FORT BROWN Rd	Carole Dubois
Megan Morica	Plattsburgh NY	Megan Morica
John S SEDEN	Durkee St	John Seden
Bryan Kieser	Plattsburgh NY	Bryan Kieser
DIANA STAHL	KEESEVILLE NY	Diana Stahl
MATT LOACH	PLATTSBURGH, NY	Matt Loach
MARY MAIER	157 Miller Pkwy	Mary Maier
Dakota Flynn	64 US OVAL	Dakota Flynn
Erica Brooks	40 Under Street	Erica Brooks
Collin Fuller	Keeseville NY	Collin Fuller
Jennifer Fiske	18 Covey Way, Peru	Jennifer Fiske
H.S. MURPHY	10 City Hall Pl	H.S. Murphy
Eddie Vega	10 City Hall Pl	Eddie Vega
Sharon Latham	153 Margaret St APT 3 Plattsburgh NY	Sharon Latham
CRIS ROWLES	124 Margaret St. #202	Cris Rowles
Lynn Foley	41 Hillcrest Ave	Lynn Foley
Dennis Tribolet	1 Howard Dr Peru NY	Dennis Tribolet
Donald E. Tribolet	1 Howard Dr. Peru NY	Donald E. Tribolet
Linda Hayes	32 Sand Hill Rd Morrisville NY	Linda Hayes
Kimberly LaRuan	1353 Cumberland Head Road	Kimberly LaRuan
Michelle Randoer	Meavill, NY 12955	Michelle Randoer
<del>Tessia Hult</del> TESSIA HULT	907 State Route 226	Tessia Hult
GEORGE Flynn	71 Clinton St APT 9	George Flynn
Greg Gaul	13 Blueberry Road, Peru	Greg Gaul

24



- Decreased public access to the riverfront and lack of public gatherings space.
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**Say "YES" to support Development Plans for Durkee Street that actually benefit our community.**

PRINT NAME	ADDRESS	SIGNATURE
Paul Adams	Poco, NY	
Victoria Marsh	Plattsburgh, NY	
Joseph Brown	Pere Street	
Jesse Nauff	Ellenburg, NY	
Olivia Winterbottom	Plattsburgh, NY	
Nicole Clukey	<del>NY</del> Plattsburgh, NY	N.A. Cl
Elizabeth Herkalo	Shamrock, et. Plattsburgh, NY	
Heather Labarrie	Plattsburgh NY	

8

# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot

PRINT NAME	ADDRESS	SIGNATURE
DAVE GAINER	231 Margaret St	D Gainer
Tan Matthews	3 Miller St.	Tan Matthews
ALEX NABAU	1 DOC STREET	Alex
Sony Math	134 Margaret St	Sony Math
TAVIS Gorham	14 LeBlanc Lane	Tavis Gorham
<del>Amber Mosso</del>	<del>14 LeBlanc Lane</del>	<del>Amber Mosso</del>
<del>Essyie Gorham</del>	<del>14 LeBlanc Lane</del>	<del>Essyie Gorham</del>
<del>Amara Gorham</del>	<del>14 LeBlanc Lane</del>	<del>Amara Gorham</del>
<del>Deval Gorham</del>	<del>14 LeBlanc Lane</del>	<del>Deval Gorham</del>
<del>Karin Gorham</del>	<del>14 LeBlanc Lane</del>	<del>Karin Gorham</del>
<del>Astoria Gorham</del>	<del>14 LeBlanc Lane</del>	<del>Astoria Gorham</del>
<del>Luxen Gorham</del>	<del>14 LeBlanc Lane</del>	<del>Luxen Gorham</del>
<del>Joseph Mosso</del>	<del>67 Grace Ave Al.</del>	<del>Joseph Mosso</del>
Justin	70 broad st	Justin
Lynn Boulton	7673 Rt 9	Lynn Boulton
Kathy BAKER	7673 Rt 9	Kathy Baker
Angelica Esposito	Harvey Ct	Angelica Esposito
Meghan O. Toole	7673 Rt 9	Meghan O. Toole
Jon-Paul Deshaies	7675 Rt 9	Jon-Paul Deshaies
Judy LaBounty	93 Mgt St	Judy LaBounty
Cor St. John	131 Cornelia St	Cor St. John
Christina Elliott	131 Cornelia St.	Christina Elliott
Brad Fizzo	189 Parker Rd west	Brad Fizzo
Adam Lagrave	7714 Gilmore Lane	Adam Lagrave

16

16  
159

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<u>PRINT NAME</u>	<u>ADDRESS</u>	<u>SIGNATURE</u>
<del>Favian Vera</del>	21 Wells Street	<del>Favian Vera</del>
John C. LARABEE	72 Clinton St	John C. Larabee
Daniel Cole	3884 Rt 22 Apartment 2	Daniel Cole
Kayla Sorrell	3884 Rt 22 Apt. 2	Kayla Sorrell
Kira Miller	8 green tree drive	Kira Miller
Edwin Gonzalez	73 Cornelia APT	Edwin Gonzalez
Andrew Kovaris	Plattsburgh	Andrew Kovaris
Joshua DuBray	24 city Hall PL	Joshua DuBray
Danielle Law	75 Treckman	Danielle Law
Scotty Miller	2 margarett	Scotty Miller
Christopher Buerkett	26 Cornelia St.	Christopher Buerkett
Jamie Christensen	214 Ganong Dr. Saranac	Jamie Christensen
John Zayas	96 margaret	John Zayas
Richard Gray	225 Regent	Richard Gray
Larry Dotan	84 Wall St.	Larry Dotan
Les Cosgrove	84 Wall St.	Les Cosgrove
Spencer Forgoeson	170 Monty Rd	Spencer Forgoeson
Chelsea Furber	170 Monty Rd	Chelsea Furber
Hannah Furber	175 Monty Rd	Hannah Furber

# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot

	PRINT NAME	ADDRESS	SIGNATURE
1	ROBERT LAFFEUR	23 SAUBOEN AV	<i>[Signature]</i>
2	MARY LEVASSEUR	53 Champlain St	Mary L.
3	Allison Tatro	5498 Peru St.	Allison Tatro
4	M. Sheikh	63 Bridge St	<i>[Signature]</i>
5	Laura Salka	90 Bridge St	Laura Salka
6	JEAN LAFAVE	Cliff Haven	Jean M Lafave
7	Jane Fiehling	90 Bridge St	Jane Fiehling
8	Allison Anctil	44 Bndge St	Allison Anctil
9	Earl Dahl	60 Bridge St	Earl Dahl
10	DJ King	60 Bridge St	DJ King
	TYLER WHITE	280 CORNELIA ST	Tyler White
	Richard Masick	13 Pond Street	Richard Masick
	<i>[Signature]</i>	5446 Peru St	Marcus Raine
	Brigitte Duhamel	33 Fort Brown Drive	Brigitte Duhamel
	Michelle Mosher	184 Maple St	Michelle Mosher
	<i>[Signature]</i>	121 Miller Street	Alex Gagnier
	Kelsey Cutcher	141 Beekman St	Kelsey Cutcher
24			

17

# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot

PRINT NAME	ADDRESS	SIGNATURE
Nicole L. Hamilton	7 Renaissance Village Way	<i>Nicole Hamilton</i>
Vincent Tricozzi	39 Clinton St.	<i>Vincent Tricozzi</i>
Lynn Neale	37 Clinton St.	<i>Lynn Neale</i>
Terry Engler	1 Brookview Dr	<i>Terry Engler</i>
Linda Gremich Blake	23 Clinton St	<i>Linda Gremich Blake</i>
David H. Murchison	89 Margaret St	<i>David H. Murchison</i>
Corey Dequette	Plattsburgh	<i>Corey Dequette</i>
Cameron Guerh	Plattsburgh	<i>Cameron Guerh</i>
Corey Dragoon	Plattsburgh	<i>Corey Dragoon</i>
Daryn Johnston	Plattsburgh	<i>Daryn Johnston</i>
<del>Tony Egan</del>	<del>Plattsburgh</del>	<del><i>Tony Egan</i></del>
Zach R Moore	Plattsburgh	<i>Zach R Moore</i>
Wendy F Cribb	5861 South Catherine St Plattsburgh, NY 12901	<i>Wendy F Cribb</i>
Kyle McArthur	88 Pine St	<i>Kyle McArthur</i>
Dakota Gowett	9 Macombs St	<i>Dakota Gowett</i>
Suzanna Barker	205 Route 9N	<i>Suzanna A Barker</i>
<del>Tyler Vance</del>	<del>4 Westwood</del>	<del><i>Tyler Vance</i></del>
Donovan Schiraldi	61 Ladyette	<i>Donovan Schiraldi</i>
Will Griffith	40 Tiffany Way	<i>Will Griffith</i>
Tonya Orimette	706 Salmon River Rd	<i>Tonya Orimette</i>
Catherine Hernandez	5116 North Catherine	<i>Catherine Hernandez</i>
Natasha Lambert	40 Tiffany Way	<i>Natasha Lambert</i>
Gara Keph	Westgate Way	<i>Gara Keph</i>
Carla Brotherton	23 SANDY AVE	<i>Carla Brotherton</i>

24

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24

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	<u>PRINT NAME</u>	<u>ADDRESS</u>	<u>SIGNATURE</u>
1	Andrie Whittard	4819 #10	Andrie Whittard
2	Peter Forster	63 Margaret St	Peter Forster
3	Danielle Wiebel	4057 S Catherine St Apt B Plattsburgh, NY 12901	Danielle Wiebel
4	Alesha Bailey	Waterhouse St	Alesha Bailey
5	Chad Dickson	7 Protection Ave	Chad Dickson
6	Brittany Evens	28 Clinton St.	Brittany Evens
7	DEBRA WILKIE	28 Clinton Street	Debra Wilkie
8	GAIL WILFORE	50 CLINTON ST.	PLATTSBURGH, NY 12901
9	Kasey Young	43 Clinton St	Kasey Young
10	Marietta Schaefer	43 Clinton St.	Marietta Schaefer
11	Michelle Phillips	P.O. Box 177 Ellenburg Depot, NY 12935	Michelle C. Phillips
12	Ramona L. Kellan	194 Olena Rd. W. Chazy, NY 12992	Ramona L. Kellan
13	JANE DESOTELLE	61 RILEY AVE. PLATTSBURGH, NY	Jane Desotelle
14	MARVIN C. BECHARD	41 Saenger Ln West Chazy, NY	Marvin C. Bechard
15	CONNIE CASSEVAUGH	Farmers' MKT Vendor	Connie Cassevaugh
16	Bonnie Gonyo	308 W Church St W. Chazy	Bonnie Gonyo
17	Debbie Hughes	2 Flanagan Dr Plough	Debbie Hughes
18	Lou Lesniak	239 ADAMS RD MALONE	Lou Lesniak
19	Kimberly Oniff	239 Adams Rd Malone	Kimberly Oniff

19

2/8  
19

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	<u>PRINT NAME</u>	<u>ADDRESS</u>	<u>SIGNATURE</u>
1.	Marcus Gookey	PO Box 46 Saranac <sup>12981</sup>	Marcus Gookey
2	Rebecca Casale	432 BUCKS cross rd <sup>NY 12981</sup> Saranac	Rebecca Casale
3	Aaron Cross	10 Sunborn Ave	Aaron Cross
4	Richard Corbel	1469 Rt 9 Kville	Richard Corbel
5	Robin BURL	347 BRADDOCK rd <sup>12981</sup> Catsburgh	Robin Burl
6	Josh Rivers	158 ANELSON Rd <sup>12981</sup> Catsburgh	Josh Rivers
7	James Vincent	WARREN TNS	James Vincent
8	William McCar	warren tns	William McCar
9	Todd LaMere	Body Art Tattoo	Todd LaMere
10	Joseph Lamoy	456 Eoyer Street	Joseph Lamoy
11	Stephanie Gray	37 Broad St. Apt 4	Stephanie Gray
12	Christopher Nicholson	122A Robare Rd. Keeseville, NY	Christopher Nicholson
13	MELISSA Poirier	Farmers market vendor 93 Earlville Rd Chateaugus NY	Melissa Poirier
14	Lance Agard Id	21 Quality Dr Catsburgh	Lance Agard
15	Eody Reed	15 bridge st	Eody Reed
16	Jesse Christy	6 Glen St Catsburgh NY 12981	Jesse Christy
17	JOHN A. COOK	27 MACOMB. Street	John A. Cook
18	LARRY Church	14 WEE D ST	Larry Church
19			

# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot

	<u>PRINT NAME</u>	<u>ADDRESS</u>	<u>SIGNATURE</u>	
1	Mary Tudetto	608 R 122 Platt	Mary Tudetto	
2	Jamaine Noone	377 Caratony Rd	Jamaine Noone	(Vendor P buy from)
3	Van Tran	16 Brinkerhoff St	Van Tran	
4	Sheila Deso	12 Brinkerhoff St	Sheila Deso	
5	Shelley Fracalossi	12 Brinkerhoff St	Shelley Fracalossi	
6	JANE GALLETI	11 LAFAYETTE ST APT A	Jane Galletti	
7	Shawna Bonnia	11 Lapham Mills Rd	Shawna Bonnia	
8	James Blusher	135 Tully Rd	James Blusher	
9	Brooke Hughes	17 Court Street	Brooke Hughes	
10	Tina Ashline	24 S Aves Mainway	Tina Ashline	
11	Melissa Rielator	West Chazy	Melissa Rielator	
12	Barry Goeman	Plattsburgh	Barry Goeman	
13	Michael Agony	Po Box 700	Michael Agony	
14	Michael Ucciardino	3 Stoneway Apt 2	Michael Ucciardino	Vendor @ The Farmer Market.
15	Praxedis Adolfo Leyva	4 Terrace West Way	Praxedis Adolfo Leyva	(Vendor @ PFCM)
16	James Cayea	Vendor	James Cayea	
17	Rita Santamore	264 Santamore Rd Churubusco NY	Rita Santamore	
18	Susan Carusone	Vendor - 432 Emery Rd Moores Forks NY	Susan Carusone	
19	Susan Aspinwall	Patron, VT	Susan Aspinwall	
20	Crystal Georgeson	376 Margaret St. Platts.	Crystal Georgeson	
21	Sean Ferrell	376 Margaret St. Platts	Sean Ferrell	
22	Ashley Levasseur	73 Blaine Rd Moores NY 12958	Ashley Levasseur	
23	Kathleen Craig	62 Nasho. Hill Rd Saranac	Kathleen Craig	
24	Terril A Bausha	27 Appons St	Terril A Bausha	

P/K HSBITH

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PRINT NAME	ADDRESS	SIGNATURE
Michael Holdridge	20 Brown RD Peru NY	<i>Michael Holdridge</i>
Travis Dumais	30 Saily RD NY	<i>Travis Dumais</i>
LEONARD SEMBLY	12 Eddie Drive	<i>Leonard D Sembly</i>
Tina M. Dameron	12 Eddie Drive NY	<i>Tina Dameron</i>
Cynthia Lathrem	24 Grace Ave	<i>Cynthia Lathrem</i>
Shawn Reid	82 Montcalm Ave	<i>Shawn Reid</i>
Cathy Sterlin	9450 rt 9 Chazy	<i>Cathy Sterlin</i>
Sarah Leuomb	21 Danforth Pl Massena NY	<i>Sarah Leuomb</i>
JON LAYO	14398 st. buy 37 Massena NY	<i>Jon Layo</i>
Joseph Badette	4 College Ave	<i>Joseph Badette</i>
Jordan Barrett	100 OAK	<i>Jordan Barrett</i>
<del>John J. Galloway</del>	12 Miller Westland Ave	<del><i>John J. Galloway</i></del>
Diane Same	12 Westland Ave	<i>Diane Same</i>
Abby Labounty	34 Champaign St.	<i>Abby Labounty</i>
MARC SOLA	24 BROAD ST #11	<i>Marc Sola</i>
Teresa Minardi	44 Grace Ave	<i>Teresa Minardi</i>
Jesse Hoffman	44 Grace Ave	<i>Jesse Hoffman</i>
Mike Slominski	5 Broad	<i>Mike Slominski</i>
Mitchell Terry	102 Oak St	<i>Mitchell Terry</i>

# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot


PRINT NAME	ADDRESS	SIGNATURE
Joe Garcia	53 Court St	Joe Garcia
Jesse Hoffman	44 Grace Ave	Jesse Hoffman
Teresa Minardi	44 Grace Ave	Teresa Minardi
Nicholas Thanz	6 Palmer Street Apt 3	Nicholas Thanz
Joey Jamison	116 Cornelia St Apt C	Joey Jamison
Michael Cahill	59 MARGARET ST	Michael Cahill
<del>Bob</del> Troy Burdick	85 Margaret St	Troy Burdick
Tammy Russell	5045 S. Catherine St. Apt 14	Tammy D. Russell
Mike Obert	44 Court St	Mike Obert
Steel Cannon	54 Palmer	Steel Cannon
Suzanne Daley	4 Lexington Ave 5th Floor	Suzanne Daley
Jay Robblee	13 Couch St	Jay Robblee
Zach Mulady	22 Pleasant St	Zach Mulady
Ashley Rasco	10 Goff Ave	Ashley Rasco
Brenda Doble	2016 apt C South Catherine	Brenda Doble
Vickie Carport	35 DENNIS A	Vickie Carport
Beth Johnson	5263 No Catherine	Beth Johnson
ERIN K. CASEY	5263 No. Catherine	ERIN K. CASEY
Rob Hough	74 Brinkhoff St	Rob Hough
Lawrence Dygert	17 Pike St.	Lawrence Dygert
Matt Stowe	273 Birt An Locke Rd	Matt Stowe
Scott Stowe	62 BART MERRILL Rd	Scott Stowe
Nathan Ames	421 Barney Downs Rd	Nathan Ames
Victoria Rattliff	81 Sand Rd	Victoria Rattliff

24

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323

- Decreased public access to the riverfront and lack of public gatherings space.
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PRINT NAME	ADDRESS	SIGNATURE
Trudell Ingbreton	PO Box 189, Keeseville, N.Y.	Judy Y
Samuel Marotte		Pat M...
SHARON BLESC	Miller St	Sue K...
Jefo Watts	87 Maynard St	

4

4

# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot

<u>PRINT NAME</u>	<u>ADDRESS</u>	<u>SIGNATURE</u>
Andrew Duben	64 Margaret	

1

7

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<u>PRINT NAME</u>	<u>ADDRESS</u>	<u>SIGNATURE</u>
Patrick Collins Jr		Patrick Collins Jr
Dustin Honsinger		Dustin Honsinger
Dimitri Hagar	41 Couch St.	Dimitri Hagar
KRISTIN Conway	138 Montreal Ave	Kristin Conway
Nathan Giroux	95 oak st.	Nathan Giroux
Olivia Gonye	164 Herrick Road	Olivia Gonye
Sierra Gonye	164 Herrick Road	Sierra Gonye
Bradley Gonye	500 Mulvey	Bradley Gonye
Bobby Gonye	15 Charles Way	Bobby Gonye
Sarah Gonye	12 Delord St	Sarah Gonye
Elyse M Cameron	80 Scilly Ave	Elyse M Cameron
Taylor Manor	10 Joyce Ave	Taylor Manor
SARAH WOLF	143 Connelia St Apt 8	Sarah Wolf
Chips Rzepie	102 Broadway St	Chips Rzepie


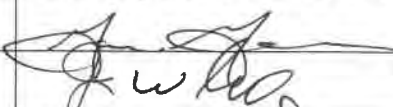


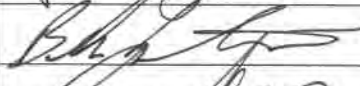

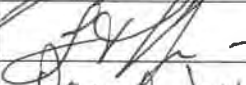

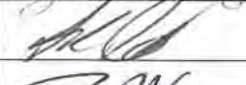


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3/12

# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot

PRINT NAME	ADDRESS	SIGNATURE
Jennifer Bayer	17 Hechtung Dr. Pittsburg	
	9 Pond St	KARLA OEHLE R
Kim J Carpenter	1673 Rock St	Kim J Carpenter
Stacy Tawenier	8e Arno Rd	Stacy Tawenier
Jody Leavens	24 Margaret St.	
Christine Seller	23 Brinkerhoff	Christine Seller
BRIANNE KENNEDY	59 BROAD STREET	Brianne Kennedy
Pat MacMannis	486 Miner Farm Rd	Pat MacMannis
Tenzin Dorjee	78 Margaret St	Tenzin Dorjee
Laura Cochran	80 Margaret St.	Laura Cochran
Aer Graves	110 MARGARET ST.	
Emily HUTCHINS	103 Margaret St.	Emily Hutchins
Ariel Voss	103 Margaret St.	
Matthew Waldron	50 Plank, Ellenburg	
Peter KALYZIOTIS	103 MARGARET ST	
David A. MacIntosh	1138 Cumberland Head Rd	David A. MacIntosh
Victoria Goddeau	5013 Southcathrine st	
Shane Fordham	70 Margaret St	Shane Fordham
Camera Dan	28 City Hall	Camera Dan
Jerry Dan	28 City Hall	Jerry Dan
RYAN Lynch	37 Set Point	
Kelly Lynch	37 Set Pt	Kelly Lynch
Stephen Jackson	6 Janelle Ave	Stephen Jackson
Dave Bourn	29 Tom Miles	Dave Bourn

# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot

PRINT NAME	ADDRESS	SIGNATURE
Sam Nelson	6 Shelburne st	
Theresa Mesec	562 St. Johns Rd. Champlain, NY	Theresa Mesec
Jim Reid	53 Clinton St. 42 SET POINT	
WILLIAM VERSHAY	53 Clinton St	William Verhay
Ziad Sassine	Hobie's	
Joey Whalen	58 Saily Ave	Joey Whalen
Rachael Deminger	5080 S. Cath	
Brandon Martineau	35 Clinton St.	
Jacy Swill	5498 Peru St.	
PATERIO MINARDI	93 MARGARET ST.	
Pamela Minardi	93 Margaret St	Pamela Minardi
Nick Ratliff	28 Nichols Rd	Nick Ratliff
Jac Malaga	91 Margaret St	Jac Malaga
Divy Adams	53 Broad St	Divy Adams
Kylee Snider	12 Sonya way	Kylee Snider
Shawn Lushia	55 Cross Rd.	Shawn Lushia
Dylan Clark	16 Lion Lane	
Richard Gladd	12 Lion Lane Champlain	
Jim Waldron	8 Tanelli Ave	
MINARDI GIAN F.	103 DAK	

# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot

<u>PRINT NAME</u>	<u>ADDRESS</u>	<u>SIGNATURE</u>
Covey Rapp	803 Margaret St.	Covey Rapp
Timmy Blaze	2014 Northcut	Timmy Blaze
Jeff Watts	87 Margaret St.	Jeff Watts
Shannon Drown	77 Margaret St.	Shannon Drown
x Jeremy Drown	77 Margaret St	Jeremy Drown
MARK MESCHINELLI	9 CITY HALL PL	Mark Meschinelli
Meg Leary	13 City Hall	Meg Leary



Please support our Downtown Community!

- Decreased public access to the riverfront and lack of public gatherings space.
- Elimination of Farmers & Crafters Market.
- A resulting City Parking Plan harmful to the accessibility, walkability and safety of our community.
- Increased cost of living for downtown residents, employees and visitors due to resulting paid parking system.

**Say "YES" to support Development Plans for Durkee Street that actually benefit our community.**

<u>PRINT NAME</u>	<u>ADDRESS</u>	<u>SIGNATURE</u>
Rya M Guyonp	350 Stargate way	
Brian Thurston	198 Fox Farm rd	
Julie Duquette	24 Margaret Street	
Collin McAllough	444 Elm St. Apt. 2	
David Parovel	35 Clinton St. Apt 2	
Joyce Samonek	1305 Fiave Rd, Chap 24	Joyce Samonek
Kyle Reeves	534 salmon river	
Emalie Nestle	53 4 salmon river	Emalie Nestle
Joe M + L Sperry	91 Margaret	
Tim Cable	84 mgott st	Tim Cable
Maurice Daniels	134 Brinkerhoff St Apt 3	
Nichole Dominy	2091 Alderbend Rd	
Michael Carey	46 miller st Apt 6	
Julius Burres	128 Court st	
Ms. Dupree	194 Oak St.	Ms Dupree
William Price	63 Brinkerhoff	
Nancy Price	63 Brinkerhoff	Nancy Price
Mark Lattenschlager	44 Grace Ave	
Melanie Taylor	44 Grace Ave	Melanie Taylor

# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot

PRINT NAME	ADDRESS	SIGNATURE
<del>Brianna Willman</del> Brianna Willman	M Cross Rd	Brianna Willman
Nathaniel Barber	9 Lafayette St	<del>Nathaniel Barber</del>
Maurice Green	419 St Rt 11 <sup>Chaplin</sup> Chaplin	<del>Maurice Green</del>
Keely Ann Alexx Henders	4897 US AV 1200 85 Gynup Ln	<del>Keely Ann</del> <del>Alexx Henders</del>
Bradley B. Mott	6 Mohican Ln	Bradley B. Mott
RODWARD RAY	37 Wm Broad St	<del>Rodward Ray</del>
WALTER MOURSAI	Chapel Ln	<del>Walter Moursai</del>
Ken DeLafrance	29 Cedar St Chaplin	<del>Ken DeLafrance</del>
Adam Jaegus	15 Holland Ave	<del>Adam Jaegus</del>
<del>Aut hleen Lee</del>	81A Cornelia	<del>Aut hleen Lee</del>
<del>Daniel / Anprock</del>	6 Leonard St. Apt. 35	<del>Daniel / Anprock</del>
<del>Jack Wisniewski</del>	790 State St. 22	Javier R Wisniewski
<del>Spencer Brachy</del>	100 Cornelia St.	Spencer Brachy
<del>David Mackay</del>	25 Hartwell St.	<del>David Mackay</del>
<del>Kevin Sanchez</del>	CARLOS RAMON JR JR	<del>Kevin Sanchez</del>
Toni Shahbazova		Toni Shahbazova
Shanna Brayne	Bob Vanumer	Shanna Brayne
Mary Hanson	15 CV Way	<del>Mary Hanson</del>
Limby Neenan	4067 State Route 72	Limby Neenan
Tim Schwerk	4063 Route 72	<del>Tim Schwerk</del>
Bryan Fulgencio	57 Broad St	Bryan Fulgencio
Jack baboa	55 Broad St	Jackie baboa

# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot

PRINT NAME	ADDRESS	SIGNATURE
RYAN G PARROTTI	239 MANNING BLVD	Ryan Parrotti
Roberta Firenze	7 Arrowhead Dr	Roberta Firenze
Nathan Ames	621 Barney Downold	Nathan Ames
Debra A. Lopez	Box 1113 Plattsburgh	Debra A. Lopez
Keith M. Caughan	8 Pond St. Apt. 106	Keith M. Caughan
Jennifer Anne Rock	183 So. Peru St.	Jennifer Anne Rock
Andrew Kramer	25 Sheep Lane	Andrew Kramer
Taylor Olmstead	73 Vew St. W	Taylor Olmstead
Susan Bri	8 Spawdus Dre	Susan Bri
Dustin King	24 Broad st	Dustin King
Dustin Naba	87 Matcaln	Dustin Naba
CHRIS GRAMMI	2. Cornelia	Chris Grammi
Greg Phelix	36 Weed st	Greg Phelix
Marayle Suddars	6 Hardwood Dr	Marayle Suddars
Brittany Sayah	1 Mill St.	Brittany Sayah
Josh Mihuc	56 Sandra Ave	Josh Mihuc
Kyle Braver	182 Brinkerhoff	Kyle Braver
Kathryn Muspy	73 Margaret St	Kathryn Muspy
Arcular Elka	164 Royal St.	Arcular Elka
Paul M. Wolcott	16 Centre St. Ft. Lee, NY	Paul M. Wolcott
Doug Smith	215 Wollach Hill	Doug Smith
Steven Ziners	110 Bridge Street	Steven Ziners
William Badger	12 Lafayette St Apt 3	William A Badger

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**Say "YES" to support Development Plans for Durkee Street that actually benefit our community.**

<u>PRINT NAME</u>	<u>ADDRESS</u>	<u>SIGNATURE</u>
Valerie Mero	15 Holland Ave. <sup>Plattsburgh</sup>	Valerie J Mero
Kate Friedrich	Dannemora NY <sup>Plattsburgh</sup>	Kate Friedrich
Aubrey Ottagan	9 Elizabeth St Plattsburgh	Aubrey Ottagan
Peggy Couray	Curry Rd w. Curry	Peggy Couray
Phil Benson		Phil Benson
Alex Benson		Alex Benson
Carol Thompson	2554 State St Colville NY	Carol Thompson
Amy Newgarden	21 Ash St P'burgh	Amy Newgarden
Jaxon Gowett	56 Hermon's line <sup>Plattsburgh</sup>	Jaxon Gowett
Mackenzie Ring		Mackenzie Ring
Tim Rhea	742 Daniel Rd	Tim Rhea
Vern Withorbee	2048 State Rt 220 Morrisville	Vern Withorbee
Caitlyn LaPier	10 City Hall Place Plattsburgh	Caitlyn LaPier
Luis F. Sram	7 Pt-Viam Terrace	Luis F. Sram
Lynn Trombly	144 Ratta Rd. Chazy	Lynn Trombly
Andy Kohn	7A Elizabeth St	Andy Kohn
Tom Friedrich	47 Set Pt, Plattsburgh	Tom Friedrich
Kate Friedrich	47 Set Pt, Plattsburgh	Katherine Friedrich
PER NICOLINE GUERRIER	4 Palmer St Plattsburgh	Nicole Guerrier

# Petition to Stop the Prime Company's Development of the Durkee Street Parking Lot

PRINT NAME	ADDRESS	SIGNATURE
Jessica Hoffman	PO Box 134 Saranac, NY	Jessica Hoffman
Reagan Monarch	Pera NY	Reagan Monarch
Shawn Strach	Plattsburgh, NY	Shawn Strach
Nancy Armitage	66 Pine Plattsburgh	Nancy Armitage
<del>Judith Hunt</del>	133 Broad	<del>Judith Hunt</del>
Judith A. Baughn	27 Adloms st	Judith A. Baughn
Dawn Palmer		Dawn Palmer
Ju St, Mayor	46 Maryland Rd	Ju St
E MURPHY	288 Cumberland	E Murphy
Lori PROVOS	307 Kugan & <sup>1st Rd</sup> Plattsburgh	Lori Provos
Raehleena Marant	295 Ore Bed Rd <sup>Schuyler Falls</sup>	Raehleena Marant
Sandi Freeborn	69 Swamp Rd Fairfax VT	Sandi Freeborn
Jaeline Strick	1005 Plattsburgh	Jaeline Strick
Linda Weisman	10 Olivetti Pl.	Linda Weisman
Luther Weisman	" "	Luther Weisman
Charlene Barry	23 Club Rd #3 Plattsburgh	Charlene Barry
Helen Nerska	87 Jabez Ale Rd Peru	Helen Nerska
SHANNON BEDDOCK	87 Jabez Ale Rd Peru	Shannon Beddock
Brooke Marbut	36 Main Mill <sup>town</sup>	Brooke Marbut
Susan Barber	27 Faden Ave	Susan Barber
ARLETTE PROTHIN	19 Dennis Ave	Arlette Prothin
PATRICIA BEST	314 MacChesna Rd	Patricia Best
Beverly White	925 Green St Jay	Beverly White
Matthew Cincinatti	256 Margaret St.	Matthew Cincinatti

Kat Ryan 273 Mustang Ave West Chazy Kat Ryan

December 23, 2019

Ms. Beth Carlin, Assistant to the Mayor  
41 City Hall Place  
Plattsburgh, NY 12901  
[carlinb@cityofplattsburgh-ny.gov](mailto:carlinb@cityofplattsburgh-ny.gov)

Ms. Sylvia Parrotte, City Clerk  
41 City Hall Place  
Plattsburgh, NY 12901  
[parrottes@cityofplattsburgh-ny.gov](mailto:parrottes@cityofplattsburgh-ny.gov)

**RE: Comments related to Downtown Revitalization Initiative Project –  
Draft Generic Environmental Impact Statement (DGEIS)**

Dear Ms. Carlin and Ms. Parrotte:

As you may know, our firm is been retained by the Plattsburgh Citizens Coalition, Inc., a not for profit coalition and its members, of concerned citizens, property owners, and business owners in the City of Plattsburgh relative to the City's proposed development plans with Prime Plattsburgh, LLC. We offer the following comments in coordination with our client relative to the City's DRI project, and more particularly, the Draft Generic Environmental Impact Statement (DGEIS).

The following abbreviations are used in this correspondence:

APMPP	Arnie Pavone Memorial Parking Plaza
BSPL	Broad Street Parking Lot
COP	City of Plattsburgh
DGEIS	Draft Environmental Impact Statement
DLMUD	Durkee Lot Mixed-Use Development
PFCM	Plattsburgh Farmers' and Crafters' Market

Our comments are as follows:

1. Unsafe angled parking on Durkee Street is proposed. The DGEIS fails to demonstrate how vehicle and bicycle traffic safety concerns will be mitigated with respect to angled street side parking. The NYS DOT has gone on record discouraging the use of angled street side parking. Angled street side parking will result in adverse impacts to traffic safety.
2. Inadequate public parking during DLMUD construction period. The DLMUD project will cause the loss of 289 public parking spaces. The COP has stated that in order to meet downtown parking demands of visitors, workers, and residents, the loss of those 289 spaces shall be compensated by developing new parking elsewhere in the downtown area. The DGEIS states that the COP will offset this loss of parking by creating 289 new public parking spaces elsewhere throughout downtown. The DLMUD project claims it will make 50 public parking spaces available on the DLMUD site after construction. The COP is including the above mentioned 50 parking spaces in its 289 offset total. Those 50 spaces will not be available for over one year during construction. Loss of parking spaces during the construction period will result in adverse impacts to the local economy for an unacceptable period of time.
3. It is unclear how the 50 parking spaces that will be owned by Prime will be made available to the public. Will Prime charge for use of those spaces? If so, how much? Will there be other conditions placed on the use of those 50 spaces? The uncertainty regarding arrangements for the use of 50 downtown parking spaces results in an adverse impact on downtown parking. A draft agreement between the Prime and the City regarding arrangements for the use of those 50 parking spaces should be discussed and appended to the DGEIS.
4. Street side parking on private property. The Prime project proposes that portions of the proposed street side parking on the east side of Durkee Street and the south side of Bridge Street extend beyond the street boundary, on to the Prime parcel. Prime proposes to grant an easement back to the City for this condition. This is a highly unconventional arrangement for street side parking. The DGEIS should explain why the east boundary of Durkee Street and the south boundary of Bridge Street cannot be moved further back that any street side parking spaces would lie exclusively within the legal bounds of the street, thus avoiding the need to rely on an easement and indemnity agreement to accommodate street side parking.
5. The existing Durkee Street public parking lot offers free parking to downtown visitors, workers, and residents (although the parking lot is funded by a special assessment fee borne by property owners within the downtown parking district). The DLMUD will force the relocation of 289 of these parking spaces. If COP suddenly assesses exorbitant parking fees to either the special assessment district, or directly to users through a paid parking scheme, such action could have a significant adverse impact. The impact of new

parking fees should be further evaluated in the DGEIS as the DLMUD is causing an instant relocation of 289 free public parking spaces.

6. Table 4 – Comparison of Project Alternatives. A smaller, more compatible DLMUD should be added as Alternative D and evaluated. Alternative D should consider the following:
  - A four story DLMUD (instead of five) would be more compatible with the neighborhood.
  - The DLMUD setbacks should match or be no less than the existing street side setbacks of the Gateway building located on the south end of the site (part and purpose of the original 2004 PUD).
  - A 114-unit apartment building is unprecedented in downtown Plattsburgh. Alternative D should include a building with significantly fewer units. It is important to note that the 2017 North Country Downtown Revitalization Initiative: Plattsburgh Award booklet acknowledged “*approximately 45 residential units*”.
7. PUD variance/deviations from underlying zoning requirements. Yes, PUD’s allow some latitude from underlying zoning bulk and density requirements, but it is unclear why the DLMUD proposes to deviate so broadly from underlying zoning (see DGEIS § 3.1.2.2 Zoning starting on pg. 92). For example, the northeast corner of the proposed Prime building is set back only 3 feet from the property line, rather than the 15 feet that the underlying zoning would require. Worse yet, the parking garage exits from the building at this corner. Vehicles exiting the garage will have to drive onto the sidewalk before they can see oncoming pedestrian traffic. This condition creates a danger and adverse impact to pedestrian traffic that should be mitigated.
8. Snow storage at alternative parking lots. The DGEIS does not discuss plans for snow storage at the offset parking lots such as APMPP and BSPL and the DLMUD 50 space public parking area. Storing plowed up snow in existing parking spaces for any period of time will result in a significant loss of parking spaces, causing an adverse impact to downtown parking.
9. Development Agreement. The DGEIS references the Development Agreement between Prime and the City. The Development Agreement should be appended to the GEIS.
10. Relocation of PFCM next door to COP sewage treatment plant. The COP proposes to relocate the PFCM to a building within 200 feet of the COP sewage treatment plant. The DGEIS is silent on the impact of odors from the COP sewage treatment plant on the PFCM. Noxious odor and hauling of raw sewage adjacent to a farmer’s market could have adverse impacts to the health of PFCM customers and should be addressed in the DGEIS.



11. The GEIS relies on several non-code compliant designs, which creates an adverse impact for maneuverability and safety at the individual sites and sets a precedence for other future developments that is detrimental throughout the City. To mitigate this adverse impact, the GEIS should establish as criteria that all proposed parking shall be compliant with City Zoning Code.
12. The GEIS relies on several non-code compliant designs, which creates an adverse impact for maneuverability and safety at the individual sites and sets a precedence that is detrimental to other developments throughout the City. To mitigate this adverse impact, the GEIS should establish as criteria that all proposed work shall be compliant with generally accepted standards for highway design and traffic safety (i.e. NYSDOT Highway Design Manual, AASHTO, etc.).
13. The DMLUD development parking is deficient by 31 spaces as per GEIS.
14. The development plans presented to the public by the developer, by the City Common Council, by the Community Development Office and by the Parking Committee has consistently under represented the parking demand that will result from the proposed development because they did not acknowledge the restaurant component which has a higher demand than commercial. This flaw has been pointed out to these committees but ignored. Now, during the GEIS the restaurant component of the DLMUD is acknowledged and causes additional onsite parking demand increasing the total to 317 parking spaces. This actual demand has not been accounted for in the parking calculations. The City's parking plan must be re-evaluated to provide compensatory parking for this new actual parking demand being presented in the GEIS for the first time.
15. Furthermore, the City and developer contended that the DLMUD will provide the parking for its own demand on site. Only now during the GEIS is that standard being abandoned and the GEIS is offering that the parking supply will supposedly adhere to some nefarious national average in lieu of compliance with the City zoning code. This is unacceptable. The DLMUD must provide onsite parking to meet its own demand in strict accordance with the City code and as has been represented to the public on numerous occasions. The DLMUD parking plan and the City's parking plan must be re-evaluated to provide adequate parking onsite to meet the demand for the proposed development and to provide adequate compensatory public parking elsewhere in the downtown location.
16. Additionally, the GEIS cites that "the restaurant component will create an additional 35 employees." The number of employees is grossly exaggerated. Additional study should be provided that includes a survey of actual local restaurants to better document the actual number of employees that may be expected. Furthermore, the employee classification (i.e. full time vs. part time) as well as worker pay should be included in this additional analysis.

17. GEIS should establish as criteria that the detailed site plan must include the details and assessment of future use and that the site plan must provide adequate parking
18. Replacement of the public parking spaces lost as a result of the proposed DMLUD project is one of the key adverse impacts to the community and must be thoroughly evaluated. While it is understood that the GEIS is conceptual in nature, the adequacy of the compensatory parking plan is critical and must be accurately detailed. There are several incorrect statements, sketches, plans and calculations that are included in the GEIS that result in a false, misleading or otherwise incorrect assessment of the parking impact. A few examples will be provided. A far more thorough and accurate evaluation must be conducted and included for this GEIS to be considered complete.
19. The proposed parking plan includes a series of new diagonal parking spaces on Durkee Street, however, some of these spaces are in violation of New York State Vehicle and Traffic Law which requires a minimum clear distance between parking and pedestrian crosswalks. See for example, NY V&T §1202(2)(b) – no parking within 20 feet of a crosswalk at an intersection, and §1202(3)(b) – no parking within 15 feet of a fire hydrant. This diagonal parking plans presented in the GEIS are unsafe and illegal. Moreover, the plans result in a false count for the actual number of compensatory parking spaces being provided. Since accurate parking impact evaluation is key to the overall GEIS, it is imperative that the plans be corrected to provide correct number of parking spaces, otherwise it will be impossible to evaluate the adverse impacts. The on street diagonal parking plans must be re-evaluated to remove the falsely inflated number of compensatory parking spaces currently being provided.
20. The proposed parking plan includes a series of new diagonal parking spaces on Durkee Street, however, some of these spaces block existing commercial driveways such as the commercial auto repair facility located at 17 Durkee Street which has four vehicle bays. The proposed plan, as shown, would eliminate access to two of those bays. These are the types of inaccuracies that give a false indication of the adequacy of replacement parking and lead the reader to incorrect conclusions about the viability of the City's parking plan. A thorough evaluation by a professional traffic engineer should be conducted. The GEIS should stipulate that all parking plans shall follow City, State and Federal rules and regulations and shall be designed in accordance with industry standards such as AASHTO and the New York State DOT Highway Design Manual.
21. Section 3.4 indicates that 27 or 43 additional parking spaces will be created on DRSI in the two direction or one direction scenarios, respectively, but does not provide sufficient plans to demonstrate those numbers. In fact, those numbers are incorrect and therefor misleading as documented within these comments. Accurate, safe, legal parking schemes designed in accordance with city, state and federal highway design standards must be adequately detailed in order to correct the errors and to support the dubious claims being made in this GEIS report.

22. The proposed parking plan relies heavily on the concept of replacing long-term off-street parking with on-street parking. This concept is inherently and fundamentally harmful to local downtown businesses who rely on short term parking in close proximity to their business establishment to maintain a viable business in a small City with a cold climate. The occupation of on street parking spaces by long-term parking will have a direct and severe impact on local businesses. The GEIS should evaluate an alternative in which the long-term off-street parking is replaced with long-term off-street parking to avoid an adverse impact to businesses.
23. The proposed parking plan is inconsistent with adopted community plans. The City accepted the parking plan conducted by professional parking consultant Carl Walker recommends that off street parking should be compensated with an equal amount of long-term off-street parking. The proposed plan does not accomplish this community adopted objective, but instead replaces long-term off-street parking with on-street parking.
24. The proposed parking plan is inconsistent with adopted community plans. The City accepted the parking plan conducted by professional parking consultant Carl Walker warns that on-street parking is recommend that off street parking should be compensated with an equal amount of long-term off-street parking.
25. The proposed parking plan is inconsistent with adopted community plans. The City accepted the parking plan conducted by professional parking consultant Carl Walker cautions, “The current Durkee St. Lot provides 65% of the off-street public parking supply downtown. Eliminating these parking spaces without replacing them would result in hundreds of parkers being displaced during and after development.”. The parking plan presented in the GEIS is flawed in several ways documented within the body of these comments and, therefore, fails to demonstrate that these objectives for alternative parking have been met. Clearly, an inadequate alternative parking plan will result in a significant adverse impact.
26. The GEIS discriminates against persons with disabilities and is therefore in violation of the City’s adopted Title VI Plan as well as Federal and State Civil Rights Law. One such example is the Westelcom Park plan which uses the existing non-compliant walkway to allow the population to traverse between Durkee Street and Margaret Street, a primary stated purpose of the park, but fails to provide the same opportunity for persons with disabilities. The plan makes no indication of bringing this non-compliant passage into compliance as is required by State and Federal Law.
27. The GEIS does not provide any significant evaluation of multi-modal travel within the project area. Specifically, the GEIS should evaluate bicycle circulation as documented in the City adopted Saranac River Trail Master Plan. The GEIS should, more specifically, evaluate alternatives for bicycle access on Durkee Street, Bridge Street and Green Street. The Saranac River Trail Phase 2 included bicycle access alternatives on Durkee Street

which would complete the connection of the Saranac River Trail from the City limit upstream by the Plattsburgh High School and SUNY College all the way to the downtown business district. The DRI Plan presented in the GEIS, however, would destroy that planned connections along Durkee Street, Bridge Street and Green Street and create an extremely unsafe passage for bicycles (see attached email from Region 7 Traffic Safety engineer concerning angled parking) in the core of the downtown business district. This would potentially jeopardize the NYSOPRHP and NYSDOT grant funds for the Saranac River Trail Phase 2 project and NYSDOT grant funds for the Saranac River Trail Phase 3 project, that have been allocated to accomplish these community adopted objectives.

28. Pedestrian Facilities evaluation in the GEIS is limited to one sentence, “The proposed projects will improve pedestrian facilities through improved connectivity, improved crossings, and additional ADA/all access crossings.” This evaluation is wholly inadequate. The overarching objective for a DRI is to create a more walkable, more bikeable, more quaint feeling downtown. The proposed plans significantly degrade walkability, increase within the pedestrian experience in several ways. The GEIS should be modified to include critical analysis of this core aspect of the DRI. Additional study must be provided to evaluate alternatives and opportunities for increased pedestrian mobility, pedestrian safety, opportunities for additional streetscapes beyond enhancement of the existing Westelcom park and the existing river walk. The GEIS should also evaluate pedestrian safety as it relates to access control safety for all the proposed projects (i.e. APMPP, the City – County cooperative renovation of the County Government Center Parking Lot, diagonal parking, cross walk locations, proposed driveways,
29. Plattsburgh drivers know that the City Hall / Bridge Street intersection is very congested every day especially during morning rush hour. The traffic analysis reports the level of service E (poor levels of comfort and convenience). The traffic counts for Southbound City Hall Place presented in the report are conspicuously low and not consistent with other traffic data collected at that intersection.
30. The traffic count numbers are inconsistent with City commissioned traffic study conducted by Professional Traffic Engineers which indicated the Southbound City Hall Place traffic to be over three times more than the mere 110 vehicles reported in this traffic study. The City of Plattsburgh commissioned a traffic study of the same intersection as part of a NYSDOT / Federal Highway Funded Project Number PIN 7752.67 Margaret Street and City Hall Place Project and reported traffic counts of 330 vehicles compared to the 110 vehicles reported in the GEIS. While minor variations of 5% or 10% may occur over time, the City commissioned traffic study of the same intersection reported a traffic volume at the most critical leg of the most critical intersection that is 300% higher than that reported in the GEIS. There are numerous other such examples though out the traffic study portion of the GEIS, that are grossly inconsistent with the PIN 7752.67 project traffic study as well as the Route 9 traffic study. This brings into question the validity of the entire GEIS Traffic Study. The traffic study should be repeated by an independent, objective qualified 3<sup>rd</sup> party.

31. The traffic count data provided in the GEIS traffic study also deviates significantly from available traffic data collected and published by the NYSDOT, such as NYSDOT traffic data for Station 711104. This brings into question the validity of the entire GEIS Traffic Study. The traffic study should be repeated by an independent, objective qualified 3<sup>rd</sup> party.
32. Report claims no disturbance of Riverbank, however, it does not include Stormwater discharge piping to the river.
33. The report should incorporate the potential health risks associated with coal tar contamination from the current NYSEG - Saranac St. Former MGP Site (DEC Site # 510007).
34. Inventory of all cultural and historical resources in the DRI area is incomplete. A full accounting and inventory of all resources should be thoroughly documented.
35. The EIS does not provide or adequately demonstrate how impacts to historic character of downtown will be mitigated. Specifically, a series of visual renderings a be provided that illustrate how views of the river will be impacted from each property along Durkee Street, Broad Street and Bridge Street.
36. The EIS briefly mentions the fact that the entire Downtown Plattsburgh Historic District is eligible for listing on the National and State Registers of Historic Places but fails to describe the specific unique historical and architectural characteristics of that district.
37. Additionally, the EIS fails to demonstrate how impacts to those unique historic qualities will be avoided. The EIS also fails to provide alternatives analysis to demonstrate that there may be better development alternatives more in keeping with the unique characteristics of downtown Plattsburgh. Size and height alternatives should be considered as part of the evaluation of consistency with community character.
38. The proposed 114-unit apartment complex will be by far the largest apartment complex in downtown Plattsburgh. A complete inventory of housing units should be prepared for a more thorough evaluation of the question of consistency with community character.
39. The Scoping document indicated that *“The City proposes to relocate the PFCM from the DSMPL to a site in the City’s Harborside area near Dock Street. The site is anticipated to become part of a larger Master Plan considering future development along the harbor, which is being pursued through funding as part of a 2019 consolidated funding application by the City.”* However, according to the GEIS, the City has decided that the Plattsburgh Farmers’ and Crafters’ Market will actually be located off Green Street, not near Dock Street as stated in the scoping document. Thus, the Scoping Document step in the SEQRA process must be amended to include evaluation of the Green Street area, not

Dock Street. The scoping should have been immediately amended, but was not, now the DGEIS process is flawed.

40. The GEIS parking relies heavily upon the Court Street Government Center parking lot to compensate for the loss of parking at the DLMUD. The City entered into an agreement with Clinton County for certain parking improvements to the County's parking lot off Court Street. However, we do not see where the City underwent any SEQRA reviews related to this expenditure, nor do we see where the City coordinated any SEQRA review with Clinton County. This is a violation of the SEQR process. The parking lot design, financing and construction must be made part of this GEIS.
41. Furthermore, the County Government Center lot is not compliant with City zoning code, did not receive a permit, did not undergo Site Plan review by the City Planning Board, does not comply with NYSDOT Highway Design Standards for number of access drives. All the design noncompliance concerns result in an unsafe streetscape for vehicles and pedestrians.
42. Table 39 Public Parking Projects is incorrect in many ways. For example, the table claims that there are an additional 65 public parking spaces being created, however, the recent renovation resulted in 60 visitor parking spaces. Even more importantly, this claim is misleading as the County already 44 visitor parking spaces prior to the renovation. Since parking is so critical to this to this DRI, it's imperative that the GEIS have a thorough and accurate analysis of compensatory parking being provided. For reference, we have attached hereto as "Exhibit A" a correction to GEIS Table 39.
43. PILOT Agreement. The proposed PILOT agreement is inconsistent with previous others granted in the area and will create a tax burden for the citizens, property owners and business owners throughout the City of Plattsburgh and the Plattsburgh School District. A comparative analysis should be conducted to detail and compare other PILOT agreements provided for say the last 20 or 30 years. The analysis should include, but not necessarily be limited to, the comparative number of full-time jobs created, the amount and percent of tax abatement and the duration of each PILOT. The GEIS should establish as a criteria that any PILOT agreement that results in a tax increase for citizens must be considered a significant adverse impact.
44. The economic impact of the proposed development is grossly conflated and is presented as mitigating justification for what will in fact be a tax increase for city, school and county taxpayers. A fact-based PILOT agreement should be performed that includes the evaluation of an alternative in which there is no tax increase suffered by the taxpayers separate from the conflated economic impact used to justify the project. The analysis should factor in all of the costs (purchase of properties for alternative parking locations, demolition of buildings such as the Glens Falls National Bank, design and construction of parking lots, etc) and loss of tax revenue (removal of Glens Falls Bank from the tax rolls, etc) that comprise the true impact of the development to taxpayers. Only through this analysis can a true evaluation of the severity of the impact be measured.

#### 45. IRREVERSIBLE IRRETRIEVABLE COMMITMENT OF RESOURCES

The Durkee Street Municipal Parking Lot is a publicly owned waterfront parking property. Conveyance of this property to a Private Development Corporation (i.e. Prime Companies) would result in an irreversible irretrievable commitment of resources.

In reviewing the “Development Agreement” between the City of Plattsburgh and Prime Plattsburgh, LLC dated March 29, 2019 (hereinafter the “Agreement”), we believe this Agreement is a nullity. The City of Plattsburgh is without power to convey the waterfront property, or any portion of it, identified in the Agreement broadly as “40 Bridge Street and 22 Durkee Street” (hereinafter the “Properties”).

The City may not legally convey these Properties. Pursuant to New York General City Law §20(2), a city is empowered to: “*To take, purchase, hold and lease real...property within...the limits of the city;..., and to sell and convey the same, but the rights of a city in and to its water front,...streets,...avenues, parks, and all other public places, are hereby declared to be inalienable, except in the cases provided for by subdivision seven of this section.*” **Emphasis added.** In this instance, New York General City Law §20(7) included in the foregoing exception does not apply as there connection to any of the exceptions contained therein. There is no question that this river front property, which includes the entirety of the Properties, constitutes “water front” as set forth in New York General City Law §20(2). See for example, *Gladsky v. City of Glen Cove*, 164 A.D.2d 567, 2nd Dept. 1991 for a thorough discussion of this issue now posed to the City of Plattsburgh.

- As in this instance, the City of Glen Cove attempted to convey a portion of property that included “frontage on Glen Cove Creed”. *Id.* at 567.

- The question of whether or not the property in Glen Cove, as with the property along the Saranac River here, had ever been “used, acquired or dedicated” to public purpose is irrelevant. “*While other forms of City-owned property may be converted to public use and thereby be rendered inalienable under the statute, waterfront property has been expressly declared to be inalienable, regardless of the manner in which the property is used. Although we recognize that the statutory restriction against the alienation of certain municipal property emanates, to a large extent, from the “public trust” doctrine (see, Matter of Lake George Steamboat Co. v. Blais, 30 N.Y.2d 48, 330 N.Y.S.2d 336, 281 N.E.2d 147; Brooklyn Park Commrs. v. Armstrong, 45 N.Y. 234, supra; Matter of Central Parkway, 140 Misc. 727, 729–730, 251 N.Y.S. 577; Gewirtz v. City of Long Beach, 69 Misc.2d 763, 330 N.Y.S.2d 495, aff’d 45 A.D.2d 841, 358 N.Y.S.2d 957) the Legislature did not see fit to include a public-use limitation in the statute, and we decline to engraft such a limitation in a statute which is otherwise clear and unequivocal on its face.*” *Id.* at 571. **Emphasis added.** Thus, in this instance, we need not delve into whether or not the City ever “dedicated” this property to protection under the public trust doctrine. New York General City Law §20(2) preempts that decision or action.’

- The exceptions of New York General City Law §20(7) do not include alienation of water front property. See again, *Gladsky*: “*Nor does General City Law § 20(7), upon*

*which the plaintiff relies, compel a contrary result. This subdivision creates a “discontinuance” exception to the statute’s blanket prohibition against the alienability of public property by empowering a municipality to “lay out, establish, construct, maintain and operate markets, parks, playgrounds and public places, and upon the discontinuance thereof to sell and convey the same” (emphasis supplied). Notably absent from the enumeration of the type of property which may be freely sold by a municipality upon the discontinuance of its public use is waterfront property. The reason for this absence is clear—waterfront property, as we have noted, is entitled to special protection by virtue of its geographical location rather than by virtue of its use. Unlike a public playground, which may cease to be a playground if its use is altered, waterfront property is intrinsically unique. That the discontinuance exception does not, and should not, apply to waterfront property becomes all the more compelling given the significant ecological, scenic, and aesthetic qualities inherent in it.” Emphasis added.*

In addition, it is also noted that the parking lot here may very well also be protected by the public trust doctrine, in addition to the issues surrounding New York General City Law §20(2) above. See generally *10 East Realty, LLC v. Incorporated Village of Valley Stream*, 49 A.D.3d 764, Second Department 2008, as well as the related *10 East Realty* cases at 17 A.D.3d 474, 49 A.D.3d 770. Although the Second Department found in the case of the village in *10 East Realty* that the public trust doctrine was not violated by the conveyance of a parking lot there, here, we have a bit of a different scenario. In the City of Plattsburgh, this parking lot, and indeed other similar parking lots within the downtown parking district, are held for the benefit of that parking district. Taxpayers are charged a special tax for the maintenance, repair and upkeep of those parking lots, evidencing an intention by the City of Plattsburgh to hold those public parking spaces in trust for this district. Thus, no parking property may be alienated without addressing the underlying special taxing district.

The continuing wrong evidenced by the Agreement in violation of New York General City Law §20(2) must be reversed. The City of Plattsburgh does not possess the legal authority to enter into the Agreement and doing so would result in an irreversible irretrievable commitment of public resources

46. Municipal Utilities – This section discusses water and sewer resources and how they are adequate enough to handle the capacity needed for the proposed development in the Durkee Street Lot; however, there is no mention of projected electric usage and what the potential negative impacts on the community might be as far as electric rates for city residents. Please include this information as well. What electrical zone is the project(s) located in. Is the transmission and distribution to that zone adequate to support the additional load? What will the electrical load be for the project(s)? What type of heating is being proposed? Will the existing electrical infrastructure require any upgrades to accommodate the proposed project(s). If so, will the projects return on investment be able to justify such a capital expenditure within Public Service Commission regulations. Please explain the associated costs and return on investment in detail so that the potential adverse impacts can be properly and thoroughly understood and evaluated. In recent years nearby projects were told they could not install certain types of electrical equipment



because the infrastructure was at or near its peak capacity (i.e. Plattsburgh Public Library, Catherine Gardens, Senior Center, etc). How will the proposed project impact the at-capacity status of the electrical system in that neighborhood? What limitations will be required?

47. Traffic and Transportation System- The traffic count data includes only vehicle traffic, however, pedestrian and bicycle traffic counts should be also be conducted. Typically, that data is collected during spring, summer and fall months as well as winter. Since walkability and bikeability has been identified in DRI documents as a key objective, it is imperative that data should also be collected for these modes of transportation so that the projects impacts to these concerns be thoroughly evaluated and understood. Within traffic and transportation systems, pedestrian traffic should also be considered and negative impacts on walkability and bikeability based on site plans for the proposed projects be detailed – some of which I discuss in the next section. I would also suggest that the council pursue implementing a Complete Streets policy prior to any further changes or improvements to streets, sidewalks, or parking lots as a mitigating measure.
48. Parking – The GEIS claim that the current plan is sufficient to replace all parking being lost as a result of the planned development at the Durkee Street Lot is incorrect and not sufficiently supported with accurate data and information. There are also adverse environmental impacts to the walkability of the downtown area due to specific design features of the proposed Arnie Pavone Parking Lot (e.g. no mention in the GEIS that the Division Street sidewalk will be destroyed) as well as the changes made to the County Parking Lot. Both lots seek to increase parking capacity by eliminating through lanes within the lots themselves and instead increasing the number of entrances/exits, thereby increasing the number of curb cuts – having a negative impact on walkability in the downtown area. We also object to the omittance of the the County Lot in the DGEIS as well as its construction without any review. The GEIS relies on the County Government Center parking lot renovation as the second greatest location for replacement parking to compensate for the parking lost at the Durkee public lot, the City participated in negotiations with the County Government Center for design of the County Government Center parking lot renovation including relinquishing a portion of the City Street Right of Way to the County for parking (in violation of City Code), the City entered into an agreement and provided financing for the County Government Center Parking Lot and yet omitted this parking lot from the GEIS. The parking lot design also did not receive a Building permit prior to construction, nor a Planning Board review as is required by City Code. The parking lot design is in violation of several City Code standards as well as NYSDOT Highway Design Manual Standards for pedestrian safety / access control. Not only did the city increase the number of curb cuts along Court Street in order to fit in more parking spaces, but these changes were made for the express interest of providing more parking spaces to accommodate the construction of the proposed development at the Durkee Street lot – and is therefore an example of segmentation as they are undeniably interrelated. Either those changes should have been included in the DGEIS before completion, or those additional parking spaces should not be considered in the count of replacement parking spaces displaced by the Durkee Street lot development.

49. Fiscal and Economic Conditions – We disagree that the proposed development will not have any adverse impacts on the public-school system, as does the Plattsburgh City School Board. Please provide a complete analysis of potential costs and impacts which include the effects of the proposed PILOT agreement on the rest of the taxpayers. I also disagree with the assumed projected economic outcomes of this project. This statement shows that only 4 full time jobs will be directly created by the developers themselves. 35 jobs are expected to be provided by the tenants of the commercial and/or restaurant space created by the developers, but there is no guarantee of occupancy in those spaces. The inclusion of an additional 58 jobs, \$1.9 million in earnings, and nearly \$5.2 million in sales is highly speculative and optimistic. My clients strongly object to these assertions. Will the developer be held accountable for ensuring that these projections be met within the terms of their PILOT? What protections does the community have against economic downturn in return for the large investment we are making in terms of the DRI grant money, public land, and tax incentives being offered to this developer?
50. Historic and Cultural Resources – We are glad to see that the city is consulting with the NYSOPRHP to determine if there are any adverse environmental impacts; though we would prefer it to be recognized that this is required by law, as the Plattsburgh Downtown Historic District is listed as “eligible” on the State Historic Registry and the NYSOPRHP should therefore be considered an “Involved Agency” rather than an “Interested Agency” as indicated in the GEIS. The project will receive significant amounts of State Funding. The project also has the potential to have a significant adverse impact on the Saranac River Trail (SRT) Phase 2 project which is funded by NYSOPRHP. SRT Phase 2 includes bike lanes or an accessible bike route along Durkee Street. The DRI project proposes to abolish this important aspect of the NYSOPRHP funded SRT Phase 2 Project. Furthermore, the GEIS provides virtually no analysis or evaluation of this important concern. Also, please note that bicycles are prohibited by law from travelling on sidewalks, therefore, the Riverwalk and sidewalk along Broad Street are not a viable alternative. A full alternatives analysis should be conducted to demonstrate how this NYSOPRHP funded project will not be adversely impacted. It should also be recognized that “The Point” historic district which includes the area directly across the Saranac River from the proposed development on the Durkee Street Lot is listed on the National Registry of Historic Places. As such, any negative impacts on the historic and cultural integrity of that area should also be considered, and the National Park Service should also be consulted as to impacts on that area. Specifically, negative impacts of the view from the area and its character due to the imposing nature and scale of the proposed project at the Durkee Street Lot directly adjacent should be considered. I also would ask the council to read the following Summary Statement of Significance from the State Registry, and consider pursuing the suggestions made and add the Plattsburgh Downtown Historic District to the official registry list prior to development of any land within the district to ensure protection of the historic and cultural resources of our downtown area.
51. Temporary Parking during construction. The GEIS describes a temporary parking scheme during construction that relies on parking at the City Waterfront marina. Given the walking distance of 3,200-FT, the cold weather climate in the North Country (especially along the lake), human nature and published standards, this alternative is

entirely unacceptable. Industry standards consider maximum acceptable walking distance for levels of services A through D for outdoor/uncovered service conditions level a through D vary from 400-feet to 1,600-ft respectively. The proposed 3,200-ft walk from the Dock Street parking lot well beyond any acceptable distance range and well beyond Level of Service E (the point of failure). This is clearly not a viable alternative whether with or without shuttle buses and is certain to have a significant adverse impact on businesses, patrons and employees and employers. The GEIS conclusion that the interim parking during construction will not have a significant adverse impact on the community is clearly devoid of reasoned elaboration.



We appreciate the incorporation of the foregoing and look forward to the City addressing these in the comments to the DGEIS.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Fuller".

Matthew F. Fuller, Esq.  
[mfuller@meyerfuller.com](mailto:mfuller@meyerfuller.com)

cc: Plattsburgh Citizens Coalition, Inc.

# EXHIBIT A

## Corrections to GEIS Table 39 Public Parking Projects

Location	Existing Public Spaces		Proposed Public Spaces		Net Change		
	City Claims	Actual	City Claims	Actual	City Claims	Actual	
APMPP	0	0	109	109	109	109	
DLMUD	289	289	50	19	-239	-270	The GEIS finally acknowledges what the PCC has stated for a long time: The DLMUD does NOT provide adequate onsite parking. It is deficient by 31 spaces (See GEIS Table 35)
County Govt Center	0	44	65	60	65	16	The City neglects to recognize that this lot had 44 Visitor Parking Spaces BEFORE the reconfiguration. It also neglects to factor in the 5 on street spaces lost as a result of the reconfiguration.
Bridge st parking	32	32	38	32	6	0	Short-term on-street parking is not an acceptable substitute for long-term off-street parking. Also this number is inflated and includes spaces that would block existing driveways, too close to crosswalks, hydrants, etc.
BSMPL	59	59	81	81	22	22	
Durkee St parking	15		58	15	43	0	Short-term on-street parking is not an acceptable substitute for long-term off-street parking. Also this number is inflated and includes spaces too close to crosswalks, hydrants, etc.
TOTAL	395	424	401	316	6	<b>-123</b>	<b>CITY PARKING PLAN CLAIMS TO CREATE A NET INCREASE OF 6 SPACES, BUT IN FACT IS DEFICIENT BY 123 SPACES!</b>

### Abbreviations

APMPP - Arnie Pavone Parking lot (former Glens Falls Bank)

DLMUD - Durkee Lot Development

BSMPL - Bridge St Municipal lot

**From:** Bibbins, Ken (DOT)  
**Sent:** Monday, January 28, 2019 1:12 PM  
**To:** Bessette, Michael <BessetteM@cityofplattsburgh-ny.gov>  
**Cc:** Basil, Valmekie (DOT); Ricalton, Al (DOT); Kokkoris, Steve (DOT); Docteur, Aaron (DOT); Ortlieb, Craig H. (DOT);

**Subject: Angled Parking Proposal, Bridge Street/US Route 9**

Hello again Mike,

I've been in contact with a number of folks in the Department's Main Office, to try to establish all of the information that the City needs in order to make an informed decision about potential changes to Bridge Street/US Route 9/NY Bicycle Route 9.

There are two main questions on the table here:

The first question is relative to jurisdiction. **It does not appear to me that the right of way that Bridge Street falls within has sufficient width to allow angled parking** without severely impacting its lane widths.

The second question is relative to the likely impacts that angled parking would have on traffic safety. It is well established, by multiple studies, that **angled parking causes an increase in accidents**. This is due to a number of reasons, including the need for a backing maneuver that is made where the operator of the parked vehicle must back into traffic when exiting the parking space, while their visibility is impaired by adjacent vehicles. This maneuver is **particularly dangerous if the roadway in question has a significant volume of bicycle traffic, such as this one**. **There is also an increase in accidents due to the stop-go nature of drivers searching for an open space**, which is more difficult with angled parking because the empty spaces are harder to see. There are some locations in our country where back-in angled parking has been used because that provides somewhat improved visibility when exiting the parking space. That improvement would only exist if there was sufficient space to accommodate the angled parking and it would not address the difficulty with spotting empty parking spaces far enough upstream to avoid a quick stop.

I can tell you that, **based on the concept and its traffic safety implications, I would use the strongest language possible to discourage the institution of this change.**

**Kenneth M. Bibbins, P.E.**  
Regional Traffic Engineer  
**New York State Department of Transportation, Region 7**  
317 Washington Street, Watertown, NY 13601  
[\(315\)785-2321](tel:(315)785-2321) | [ken.bibbins@dot.ny.gov](mailto:ken.bibbins@dot.ny.gov)  
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# EVALUATION OF THE GEIS WITH A FOCUS ON THE PRIME LLC DEVELOPMENT OF THE DURKEE STREET PARKING LOT

By Syl Beaudreau

## 1.1 SEQRA and Generic Environmental Impact Statement

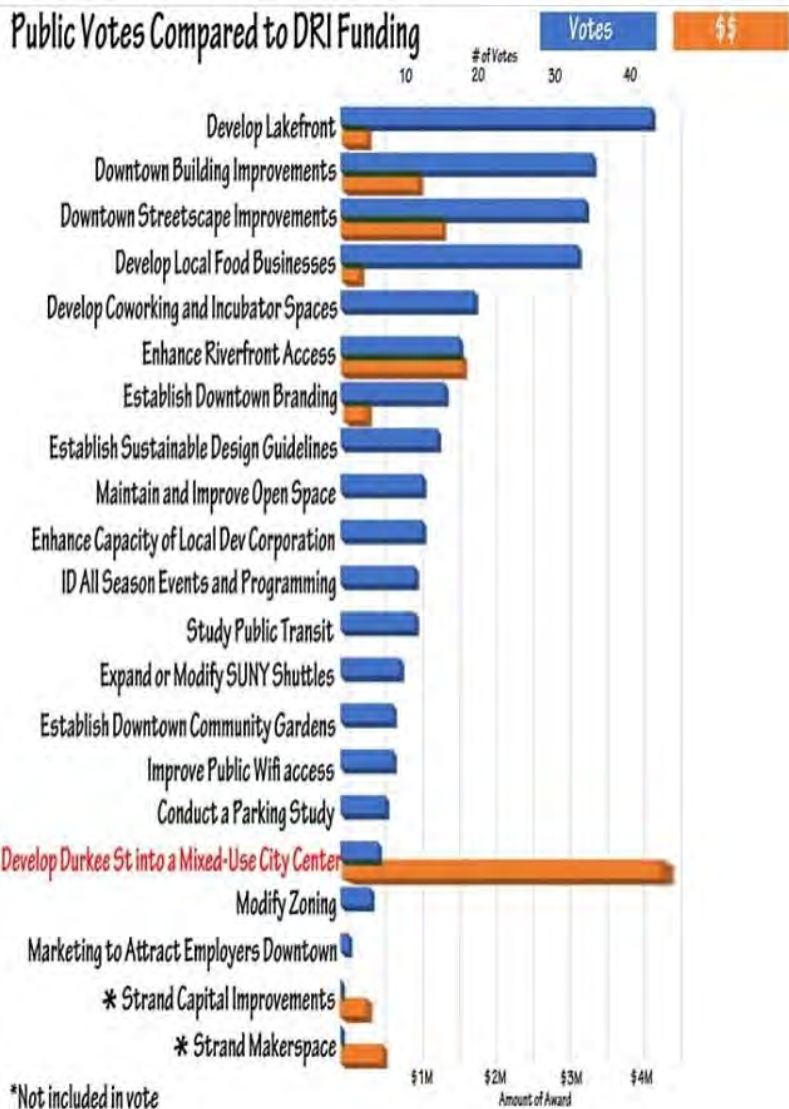
### 1.1.2 Description of proposed action. (Page 2)

Report states that “the LPC guided extensive community engagement, including four public events”. This raises the issue of process and procedure. Extensive and continuous public consultation was required by DRI rules. While it is true that community engagement events, including “dot polling” were held, the results of such consultations were apparently disregarded, as state and city allocated the lion’s share of the DRI funding (\$4.3 million) to a project, the redevelopment of the Durkee Street Parking Lot, which, according to the SUNY Plattsburgh dot polls, was one of the least popular options.

This bland opening statement makes it appear as if the City followed the DRI guidelines to the letter, and that the process involved in the selection of projects was above the board and legitimate. What the record shows is the lack of public input into the elaboration of the RFP for the Durkee Street Redevelopment. A not-for-profit community group, the Plattsburgh Citizens Coalition, has had to FOIL the city to find out about a “secret” Public Advisory Committee, made up of two city employees, Matt Miller and Ethan Vinson, and a city representative on the County Legislature, Chris Rosenquest. Apparently the committee never met, and Matt Miller was left to elaborate the RFP with no input from stakeholders. The original plan stated that “The City of Plattsburgh City Council will approve the selection considering input from Downtown business owners, residents, and the public.”\* The City proceeded to approve the selection with no input from stakeholders, which is in part why we are now in this mess. The City has heard from stakeholders AFTER inking the deal with Prime LLC, not BEFORE.

The City then proceeded to the hiring of a consulting firm to elaborate the RFP for the Durkee Street Project, and at this point public input effectively ceased. One could seriously question the basis of these “experts” calculation of economic viability of building a massive private apartment/retail complex on the site, significantly deviating from previous plans like 2017’s “Durkee Street ReImagined”. The resulting RFP produced by consultants White & Burke was notable for the near-complete lack of public amenities and the elimination of Farmers and Crafters Market from the Durkee Street site and the downtown business area.

Once the Prime LLC agreement was signed, City immediately proceeded to redesign the downtown area in terms of closing certain streets, making others one way, using diagonal parking and turning other areas of the downtown into a pedestrian-unfriendly parking lot. Despite considerable public criticism and opposition to these plans, resignations of PPAC committee members, and a petition to stop this plan, the City continued to proceed not only without consulting the public, but in face of a storm of public outcry. This is not how the DRI plans envisaged the accomplishment of its goals.



“Develop the Durkee St. into a mixed use city center” was among the least popular options, and yet that is what the state and city chose. This created a public outcry which persists till today.

This section fails to account for the fact that if the correct procedures were followed as per the DRI rules, why significant public opposition emerged once the City inked the deal with Prime LLC. Since then, multiple petitions signed by nearly 2,000 individuals emerged opposing the project. Protests were held in front of City Hall. Opponents to the DLMUD began to speak out at City Council Meetings. Various groups emerged including Strong Towns Plattsburgh, Save Durkee, Concerned Citizens of Plattsburgh. The majority of downtown business owners signed a petition opposing the DLMUD. These groups coalesced into a not-for-profit Plattsburgh Citizens Coalition LLC, whose goal was to fundraise to mount a legal challenge against the City. An online petition opposing the imposition of a paid parking regime garnered significant support. In short, the DGEIS makes it sound like everything about this project was proceeding in a natural, unproblematic way, failing to reflect significant local opposition to the DLMUD.



The proposed DLMUD elicited a level of public outcry never witnessed in the history of the city of Plattsburgh. Residents felt that the state and city had not listened to their expressed wishes for the DRI.

**1.1.5 Statement of Project Purpose and Need (Page 8)**

The statement speaks of the DLMUD as part of plan to “advance downtown revitalization through transformative housing, economic development...”

Transformative housing: This is a term usually reserved for low-income or mixed income housing. The City has failed to account for where it is going to find 115 high income households in a city whose population is declining, where the majority of residents are low-income, and where high-income job growth is small to non-existent. Perhaps there may be high-income in the wider Town of Plattsburgh, but the City and its associated commissioned studies has optimistically assumed that these individuals, employed in the town, will want to rent an expensive apartment in a de-vitalized downtown.

Another stated goal is to “attract and retain residents, visitors and businesses”. How does building a large, bland, corporate looking apartment/retail complex make downtown Plattsburgh more attractive or interesting to residents, visitors and tourists? Does the City really feel that young families will want to travel to downtown Plattsburgh to view a corporate-looking apartment complex?

“The overall DRI project is expected to bring in 500 temporary jobs, 100 permanent jobs, about \$11 million in downtown revenue...” According to the Clinton County DRI PILOT agreement the main part of the DRI project, the DLMUD, will create 4 permanent jobs. But under construction jobs, which I assume



are temporary, there are NONE listed. Zero. The figure of \$11 million in downtown revenue may partially be made up of people eating in downtown restaurants and drinking in bars, but as for shopping, the 114 high-income residents of the DLMUD will have precious few shopping options in the downtown core, unless they like thrift shops and second hand stores. And they will have cars and buy their groceries uptown (not in the city) and will shop online. So it is hard to see where the \$11 million figure comes from. And this statement fails to account for the significant tax burden that the PILOT agreement will impose on residents and taxpayers of the City.

The DRI will “result in a considerable increase in tax revenue, putting the City in a more fiscally sound position”. Once again, this is a problematic statement. According to Plattsburgh City School Board Director Jay LeBrun, the PILOT agreement, far from providing enhanced tax revenues, will be a significant burden to the taxpayers of the City. (His letter is included in the PILOT documents.)

“The City’s public and private partnership with Prime to develop the DLMUD will spur economic development on the underutilized property...” The DLMUD will build an apartment complex for units that few downtown residents will be able to afford, and create retail space that most likely fail to attract tenants. (See comments below). I fail to see how that will “dynamize” the downtown economy. Similar claims were made for the Gateway building in 2007, and not only did it struggle to find tenants, its main retail space, 14 Durkee Street, on the corner, only found a tenant in 2019 (The Glen Falls National Bank, displaced from its Margaret Street location.) The Gateway complex failed to revitalize the downtown economy or change the feel and attractiveness of the downtown.



The Gateway Building failed to revitalize Plattsburgh downtown. A Lake Placid based restaurant opened at the corner location called Nicolas. It closed within six months and the space remained empty until 2019, when the Glens Falls National Bank rented the space.

Why does the DLMUD call for adding more retail space at a time when bricks-and-mortar establishments are closing nationwide? The Prime LLC plan involves the addition of significant amount of retail space on the ground level. Why is this advisable when our count reveals at least 32 empty storefronts in the city of Plattsburgh, and more in the Town. People are calling it the “RETAIL APOCALYPSE”, and every effort must be made to fill the empty storefronts of the City before building new ones. Ironically, many of these empty storefronts are adjacent to the Durkee Street Parking Lot.



Plenty of empty retail/commercial space in the city of Plattsburgh, including many storefronts proximate to the Durkee Street Parking Lot. Why build more?

## **2.2 Description of Proposed Property**

### **2.2.1 Durkee Lot Mixed Use Development**

As per the initial DRI plan, “approximately 1 acre of new on-site open space” was to be created for public use.

The report states that “a 2,400 SF publicly-accessible civic space with an open-air pavilion” will be one of the features of the DLMUD. The fact is that the publicly-owned Durkee Street Property will be given away to a private developer. What used to be the public space of the Plattsburgh Farmers and Crafters

Market will now be a privately owned space. The City effectively loses control of it, and there is no guarantee that Prime LLC will not, in future, dispose of this property as it sees fit or profitable. In this manner the text of the GEIS gives the false impression that the DLMUD has provided a significant amount of public “civic” space. It has not. Why, as an alternative, does the City not keep the half of the Durkee Street Parking lot that will constitute the public parking, and retain the 2.400 SQ FT space occupied by the PFCM for public usage, preserved as such for generations to come? There is an international movement to preserve public urban open spaces, and the DLMUD fails to do that. (See the Open Spaces Society at [www.oss.org.uk](http://www.oss.org.uk) and the Open Space Institute at [www.openspaceinstitute.org](http://www.openspaceinstitute.org) )



The Durkee Street Parking Lot is the largest open space in downtown Plattsburgh. Open spaces are now viewed as necessary for viable cities.

(Page 25) the notion that “the addition of 30 students is not anticipated to result a significant impact on facilities” According to Jay LeBrun, the Director of the Plattsburgh City School District, the cost per student is 25K per year. At that cost, 30 new students would cost the School Board \$750,000 per annum. But according to the Clinton County IDA, Prime LLC will only be paying \$75,000 in taxes per year for the first 20 years. This will result in a significant tax burden on the taxpayers of the city. The PILOT agreement flies in the face of this documents’ claim that the DLMUD will result in a significant growth of the City’s tax base.

Very substantial concerns are being raised by the Clinton County IDA's PILOT agreement for Prime LLC. This is in keeping with a recently published (December 16, 2019) New York State Senate investigation of Public Authorities which finds substantial cause for concern for how these largely unaccountable organizations impose financial burdens on their local taxpayers. (Report from the New York State Senate Committee on Investigations and Government Operations. *Final Investigative Report: Public Authorities in New York State*, Chair, Senator James Skoufis, December 16, 2019).

The PILOT agreement currently being sought calls for an 83% reduction in taxes for Prime LLC over a 20 year period. This means that while it should be paying approximately \$18 million in taxes over that period, it will be paying only \$2.7 million. Local taxpayers will have to make up the difference. The PILOT agreement negotiated by the Clinton County IDA should itself be considered an "adverse impact" on the Plattsburgh community.

Furthermore, the text suggests that "The positive economic impacts of the project are significant, the total economic impacts of the proposed projects construction equate to 56 jobs, nearly \$2.2 million in earnings..." Will the project be employing local/regional contractors and construction workers? If so, why does the PILOT agreement list ZERO construction jobs created for the county?

### **2.2.3 Durkee Street Reconfiguration and Streetscape Improvements (DRSI) (Page 28)**

The report states that as far as Durkee Street reconfiguration goes, a one-way street is viable. The report states "The existing loading zone" is to be moved to a "to be determined location". Based on this, it concludes that if Durkee is made into a one-way street it will "not result in significant adverse impacts to traffic conditions". This is an inadequate description of the issues involved on Durkee Street. Durkee Street, aside from having many businesses of its own, serves as a delivery site for many of the restaurants on Margaret Street, considered "restaurant row". At any given time in the day, there can be 18-wheel trucks double-parked on Durkee, as well as FedEx and UPS delivery trucks stopped in the southbound lane with emergency lights flashing. With a two-way street, cars stuck behind these double parked delivery trucks can venture into the opposite lane, but as a one way street, traffic will come to a standstill. As a northbound one-way street, Durkee will divert southbound traffic emerging along state route 9 onto upper Bridge Street, which itself often has large delivery trucks parked on it servicing Alekas, Pizza Bono, The Green Room and Our House Bistro. So the loss of double lanes will add to the congestion of this intersection. Add to that the egress coming into and out of the Prime parking courtyard, and the diagonal parking planned, plus the double parked trucks, pedestrian crosswalks, and you have a recipe for an unworkable street. This is far from the pedestrian, cyclist and roller-friendly scenario envisaged by the Smart Streets movement's goal of delivering safer, more welcoming urban spaces.



Typical scenario on Durkee Street. In the distance, you see a double parked delivery truck blocking one lane of Durkee Street. What will happen when there is only one lane? Traffic will come to a standstill.

In short, people who live and work in the Durkee Street area seem to have a better impression of how the street functions than the fancy metrics presented in the DGEIS. The plan as envisaged has not sufficiently studied the real-world use of Durkee Street as a delivery lane nor has it suggested ways to remediate the abovementioned problems. Instead of retaining or adding to street space devoted to cars, and freeing up urban areas for mixed use or car-free spaces, this plan reduces the street space at the same time adding the potential vehicular traffic of 115 households into that reduced space where trucks will be parked to make their necessary deliveries. This simply makes no sense. Into that reduced one-lane space you will have cars entering and exiting the Prime courtyard parking space, cars backing out of diagonal parking spaces, trucks and vans stopped, blocking the one-lane street. This is a recipe for a chaotic, congested, non-functioning, pedestrian-unfriendly street. Thus it is hard to envisage how the report can conclude that “the reconfiguration of Durkee Street to a one-way street...would not result in significant adverse impacts to traffic conditions”.



This is a typical scenario on Durkee street. Three trucks parked in the same area at the same time. How will this work with one lane, an entry/exit way, diagonal parking and pedestrian crossings?

### **2.2.8 Plattsburgh Farmers' and Crafters' Market (PFCM) Relocation to Building 4 at 26 Green Street**

“The City has proposed a relocation of the PFCM to City-owned property in Plattsburgh’s Harborside Area near downtown.” This is perhaps the most controversial aspect of the entire Plattsburgh DRI. We find ourselves in front of a major change to the downtown commercial landscape which was never envisaged by the public consultations of the DRI. Building 4 at 26 Green Street is not in the downtown business district. It is located in a remote part of town that few people every visit, and is 100 feet from the municipal sewage treatment plant. Many residents and visitors have expressed opposition to this move, saying they simply will not shop for food at location so proximate to open pools of evaporating human waste.

They say that “foot traffic is the life blood of all retail”, and in its present location, the PFCM being in the Durkee lot, attracts foot traffic from local residents, and visitors who may be patronizing a downtown restaurant, doing shopping at the North Country Coop, and then stopping at the PFCM. In other words, there is a kind of food synergy in the downtown area. By removing the PFCM from the downtown area, you break this food synergy which is key to placemaking. In short, you do not enhance placemaking by dispersing popular visitor attractions, but by concentrating them. Across the border, the City of Longueil,

about an hour from Plattsburgh, learned this the hard way. They moved their downtown Farmers Market to a new state-of-the-art facility out by the airport. And now their Farmers Market is failing due to the lack of foot traffic.

Linda Spencer recently wrote this in a comment on the Save Durkee Facebook group page: “I was just wondering if anyone has gotten a hold of a copy of the General Environmental Impact Statement? The reason why I am asking is because I was wondering if it contained any information about having the Plattsburgh Farmers' and Crafters Market in such close proximity to the wastewater treatment facility. In the meeting a woman got up and said that it didn't smell that bad. The fact that it smells at all is reason for me and many others not to go to the Plattsburgh Farmers' and Crafters Market. But what is so troublesome to me is the fact that the settling tanks (clarifiers) are right there. What type(s) of bacteria are airborne? Escherichia coli? Staphylococcus? That is why I am asking the question about having the Plattsburgh Farmers' and Crafters Market in such close proximity to the wastewater treatment facility and if there has ever been any air samples taken? Is that part of the General Environmental Impact Statement? I am aware that such things as temperature, wind velocity and specific humidity etc. is going to influence the spread and the ability of the microorganisms to survive in the air. In the same meeting there was mention of odor abatement and the use of screens. How is this odor abatement going to work? Is it going to work by mechanical means? Chemical means? How? The use of screens is to make it more aesthetically pleasing but it is not going to prevent airborne particles from being released into the air. I really wish Plattsburgh Farmers' and Crafter Market would stay right where it is and Prime LLC would go far away and stay there.”

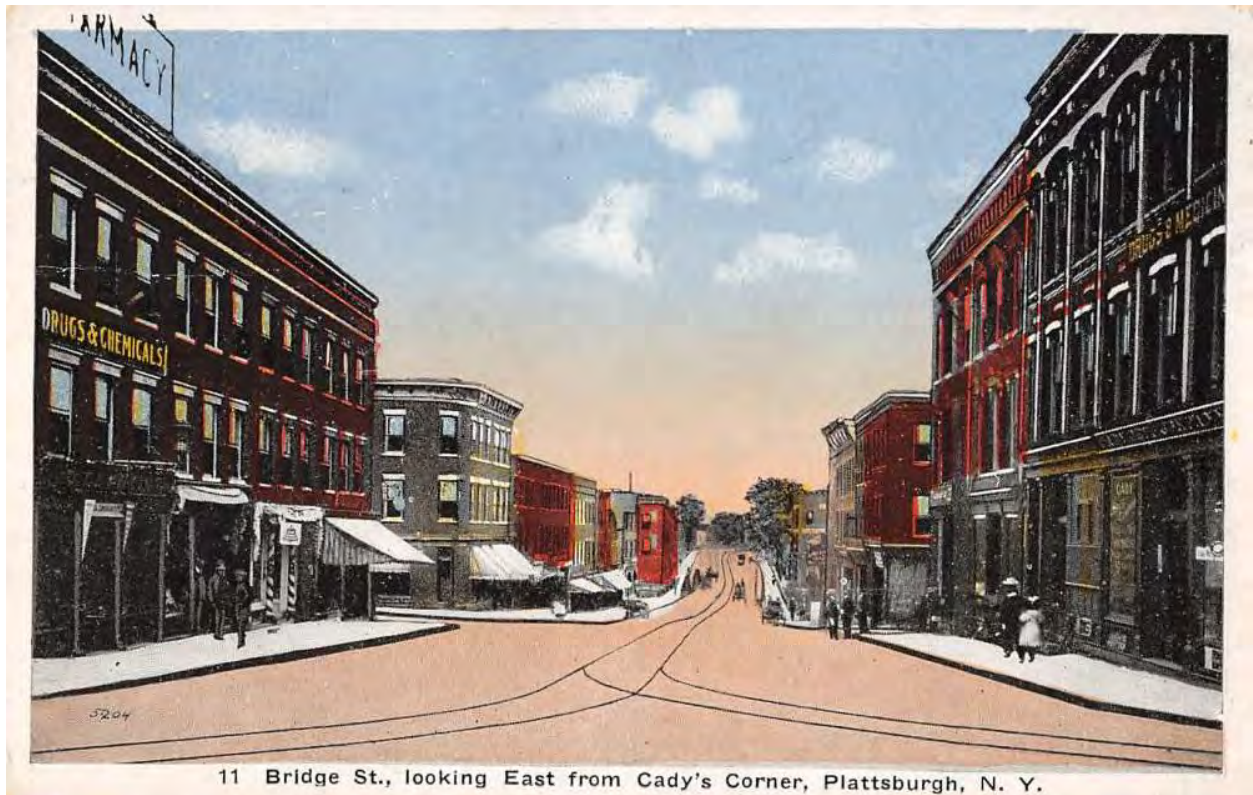
The report states that “The City is seeking up to \$250,000 for the proposed relocation of the PFCM from the DRI's Downtown Grant Program (DGP).” I would like to suggest that this idea is throwing good money after bad, since if individuals like Linda Spencer who are fearful of shopping for food there just don't visit, the PFCM will fail no matter what they do to cosmetically enhance Building 4.

It is my view that the City should have conducted a consumer survey to see if shoppers could get over the psychological barrier of shopping for food next to the Poop Plant. The Mayor has gone on record stating that he will clean up the smell, that there will be no microscopic human waste in the air, but so far we have not seen any credible plans to accomplish this goal.

### **3.1.1.2 Zoning (page 76)**

There is some confusing language here about the PUD on Durkee Street. The text talks about City Code Chapter 300, Subdivision of Land, and states that it is “not required to strictly adhere to the bulk and dimensional requirements stipulated in Schedule II of Chapter 360, Zoning, or to 360-18, which restricts the number of buildings and dwelling units on each lot. Instead, bulk and dimensional requirements may be varied to provide an alternative...in order to preserve the natural and scenic quality of open lands”. Currently, the Durkee Street lot constitutes the largest open space in the downtown area. It provides views of scenic streets with historic buildings eligible for listing on the National Register of Historic Places. It also has a small patch of green space, where once a gas station stood. This “little green space” is of public value, and if anything, should be enhanced or enlarged, not eliminated.

And as for bulk and dimensional variance, my estimation is that the 115-unit structure being proposed by Prime LLC is at least ten times the size of surrounding structures. As is, the mega-complex stands to overpower the downtown area and significantly change its appearance and atmosphere. The average building height and the height of the buildings which were originally on the east side of Durkee Street is three stories, not five.



11 Bridge St., looking East from Cady's Corner, Plattsburgh, N. Y.

This linen postcard from the interwar years shows the original buildings on the corner of Durkee and Bridge. They are three stories high.

And how does building what amounts to a massive gated community on the downtown's only open space "preserve the natural and scenic quality of open lands"?





As this aerial photo shows, the proposed development of the Durkee Street Lot is completely disproportionate to the surrounding cityscape. Its scale is overwhelming.

The report suggests that the Planning Board is authorized to waive requirements stipulated in 360-21 (D), hoping that this is indeed what will happen. But in my view, the building of a massive, overpowering gated community in the most historic part of our downtown does not allow for the “maintenance of open lands” nor does it “ensure the preservation of the natural and scenic qualities of such open lands.” (77)

### **3.1.2. Potential Impacts**

#### **3.1.1.11 Land use and Community Character**

Prime proposes to build a 200,000 SF U-shaped apartment building with 13,400 SF of commercial space.

The overwhelming size of this project means it will overpower the downtown area. The initial DRI plan called for 45 residential units and approximately 47,000 feet of retail and/or commercial space.” At 115 residential units, and 200,000 SQ FT, this five-story behemoth is more than three times the size of the originally proposed building. Its size and scale, despite cosmetic elements designed to disguise its outsized proportions, will change the feel and authentic atmosphere of this historic district.

Prime's cookie-cutter apartments are bland and add nothing to the character of the historic downtown business area. The updated plans show a five story-building trying hard to look like a three-story building. This building contributes nothing pleasing to the streetscape of our city. If you look at the Hotel Prime built in Saratoga Springs, you will see that it is essentially the same template as the one being used here in Plattsburgh. There is nothing about this design, aside from the postmodern cornices used on the front of the building, which relates to the quaint and pleasingly chaotic architectural feel of the Durkee Street neighborhood.



The design of the Prime LLC project for Plattsburgh is similar to what Prime built in Saratoga Springs. Nothing unique to our town here.

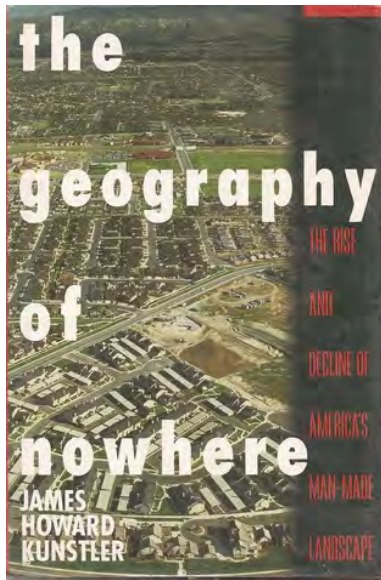
The most recent plans show Prime LLC has even abandoned the postmodern cornices in favor of what appear to be shelves held up by diagonal sticks. In terms of design, such cheap attempts at mimicry are unworthy of our downtown area. At the very least, Prime LLC should be required to produce some finishes that are actual cornices. My impression is that Prime LLC has changed the cornices for sticks because it will save costs, allowing them to make the maximum number of housing units at minimal expense. Now that Prime has changed the cornices into shelves held up by diagonally placed sticks, the complex looks rather like a luxury chicken coop. Plattsburgh deserves better.



This design, which is part of Prime LLC's potential offerings, seems to fit more seamlessly into the current streetscape of downtown Plattsburgh. The GEIS should note that other options for the site in terms of size, scale, and design, could be considered.

I see nothing in the mock-up of the proposed building that shows “frieze and cornice detailing with contrasting metal detailing to mark fenestration and other fine details.” (86) I see no fine details...Just sticks.

This plan fails to create an attractive, visitor-worthy destination in Plattsburgh's downtown core. Can you imagine a young family from Montreal saying, “Gee, we need to travel down to Plattsburgh and see that new, corporate-looking apartment building in their downtown”? The original plan stated as a goal the need to “Elevate global recognition of the region as one of the special places on the planet to visit, live, work and study.” How does building an apartment complex achieve this stated goal?



James Howard Kunstler has argued that large, corporate-looking apartment complexes like the one being proposed by Prime LLC are leading to blandness in American cities, with them all looking the same. He calls this “the geography of nowhere”. Kunstler would not recommend giving a large section of our downtown over to a large, bland apartment building.

### **Arnie Pavone Memorial Parking Plaza (APMPP)**

When I originally expressed my opposition to the Durkee Street redevelopment plan, officials at City Hall told me, “Parking Lots are ugly. The Durkee Lot is ugly. Wouldn’t you like to see a nice building there?” Well, by the same logic, if “parking lots are ugly”, now the cars that once parked in the Durkee Lot will be parking on a new lot on Margaret Street. So the “ugliness” will be shifted from Durkee Street to Margaret Street, to our main commercial artery. So why is it OK to have ugliness on Margaret Street, but not OK to have it on Durkee Street? To some degree, the ugliness shell game cannot be won. Ours is a car-centered community, and the bulk of downtown jobs are in services to the County, and employees and visitors need places to park. One way or another the parking spaces need to go somewhere, and this plan will distribute them throughout the downtown area, making it less people and pedestrian friendly, which goes directly against the stated goals of the DRI application.



The GEIS should note that the now-available site of the Glens Falls National Bank could be used for something other than a parking lot. Developing a multi-use apartment complex or hotel on this site would restore the original streetscape, and unify the Margaret Street corridor.

### **Westelcom Park Improvements (WPI)**

Here too I see a poorly conceptualized plan. Currently, the Westelcom pocket park connects the main street (Margaret Street) to the all-important Durkee Street Parking Lot. It is my feeling that many of the public amenities that were initially planned for the Durkee Street property have been shifted onto and concentrated into this small sloping space between two buildings. The new plan calls for a multi-tiered park which will include sculpture areas, a water feature, a plaza, bicycle infrastructure, and pedestrian walking areas..." (91) There will be a water fountain below street level.

My problem with this is that I think it fails to do what the original Durkee Street reconfiguration was intended to do, which was to create much needed public gathering space.

As stated earlier, according to the initial DRI plan, the Durkee Street site was to contain "approximately 1 acre of new on-site open space" for public use.

The City's own documents (posted on its website) note the crying need for downtown open space to host large events:

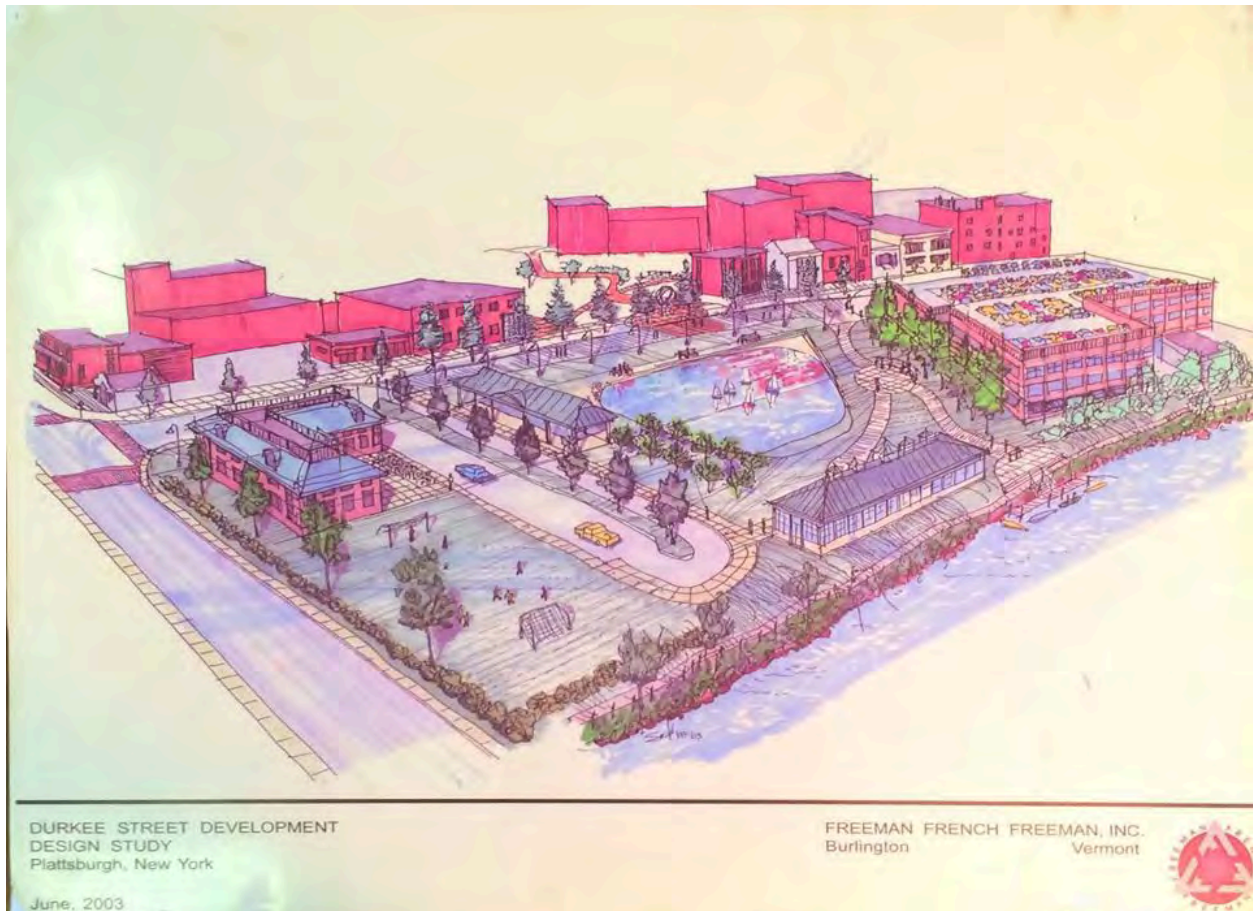
“The demand for space, for activities, races, marches, and concerts has exceeded its availability. Downtown needs space to accommodate more than the current ceiling of about 2,000 people. We need space to allow the activities that currently must be cramped into a small park or cause street closures. Our market study shows that we need... more mixed income housing. Creation of the City Center is necessary first to meet current demand to allow future demand...(and the needs of) a sizeable existing population and would make this an easy-reach, primary downtown area for both residents and visitors alike.” City Hall’s own study showed a need for a larger gathering space in the downtown area capable of hosting more than 2,000 people. And the Westelcom Park, crowded as it is with features, fails to accomplish that need for open gathering space. (See *North Country Regional Economic Development Council, Downtown Revitalization Initiative DRI Instructions*)

My sense is that we will be putting a fountain in below the street level in an area which fails to function as a gathering place, because it is too small to be a gathering place. The elimination of the Durkee Street Lot, in combination with the creation of the overly cramped and fussy Westelcom parkette, both fail to accomplish the goals for a revitalized gathering space for the Plattsburgh’s downtown.



The Durkee Street Parking Lot constitutes the city's only large open space, which hosts many events. The GEIS does not address how this open space will be replaced once the Prime LLC development is built.

What we needed was the open space for public gatherings combined with the attractive features being suggested for the Westelcom parkette. This kind of thing was once envisaged in a 2003 revitalization plan designed by Freeman French Freeman, Inc.



This visualization of the Durkee Street Parking Lot transformed into a city center shows many elements which would be likely to receive public support, note the retention of the PFCM.

### 3.5 Parking

#### 3.5.1. Existing Conditions

Others will comment on the parking replacement scenario which simply doesn't add up.

Nowhere in the DGEIS does the report mention the adverse impact of the loss of winter parking on the Durkee Street lot as an adverse impact on downtown residents whose apartments lack off-street parking. This is a serious flaw in the DGEIS report.



Plattsburgh has a winter parking regime set up that uses the Durkee Street Lot for winter emergency parking. The loss of this space will incur potential hardship on the residents of the downtown area who lack off-street parking. The GEIS does not address this question.

On page 156 we see some more pie-in-the-sky thinking that will essentially kill our downtown area. Notable is the revival of the idea of making people pay to park. Bricks-and-mortar retail establishments and malls are all dying due to the increased prevalence of online shopping, where you don't have to pay to park. The inauguration of a paid parking regime, a pet project of certain members of the PPAC, is a non-starter for our dying downtown.

Recommendation number 6 is to "Develop a plan to utilize the Harbor parking lots during the DLMUD construction." What is the city recommending? The use of shuttle buses to transport downtown workers and patrons to their chosen downtown destinations? This unworkable plan shows that the DLMUD has the potential of killing our downtown even before the Prime LLC project opens its doors to residents.

What this suggests to me is that the City is so desperate to give away the Durkee Street Parking lot to a Wall-street traded corporation that they are willing to do so at any cost, and no matter what hardships they impose on the current businesses, residents, workers and visitors of Plattsburgh.

The imposition of a paid parking regime has been a "secret" or secretly imposed idea on the community. Once the city inked the deal with Prime LLC, it became clear that the Special Assessment District, which



had been created to pay for the upkeep of the parking lots, would have to be dissolved. The City decided that to maintain parking lots going forward a paid parking regime would be necessary. The Plattsburgh Parking Advisory Committee spent months designing a complex parking plan, which reconfigured the entire downtown area into a giant paid parking lot, in order to accommodate Prime LLC. A paid parking regime has already been tried in the postwar years, but had to be eliminated in the 1980s as the downtown found itself unable to compete with the uptown malls. Making customers pay to park will send business up to the town, where parking is always free and plentiful, or send business onto Amazon, where parking is never an issue. This idea is and will remain a non-starter for the foreseeable future.

Why were the changes to the City/County parking lot not included in this Environmental Impact Statement? These changes were carried out to compensate for lost parking caused by the DLMUD, so why was the environmental impact not evaluated? The creation of an expanded parking lot with five entry/exit ways into the street is unconventional at best, and needed to be evaluated in this study.

### **3.7 Historic and Cultural Resources**

#### **3.7.1 Existing Conditions**

Durkee Street contains two buildings which have the potential to be listed on the National Register of Historic Places. Both Durkee Street west and the corner of Bridge and City Hall place constitute some of the most historically valuable intact 19<sup>th</sup> century commercial architecture that the city has to offer. Both of these areas offer pleasingly quaint and chaotic sightlines which contribute considerably to Plattsburgh's historic character. If you are interested in historic preservation and placemaking, you should be mindful that any attempt to insert a massive contemporary structure into this human-scaled cityscape poses the distinct possibility of marring its historic character and its architectural identity.



The west side of Durkee Street offers two buildings which are eligible for listing on the National Register of Historic Places. The pleasingly chaotic assemblage of disparate shapes, sizes and colors makes this one of the most appealing vistas in our downtown. It would damage the overall feel of the street to put a large bland monolith in front of this view.

As previously noted, Durkee Street contains two buildings which are eligible for listing on the National Register of Historic Places. It is also adjacent or proximate to three districts which are on the list of the National Register of Historic Places: Court Street, Brinkerhoff Street, and The Point District.

My wider critique of the entire Plattsburgh DRI as currently being envisioned in the DGEIS is that it does not take into account that the entire downtown business district constitutes a largely intact collection of 19<sup>th</sup> century commercial buildings, and is itself a National Register eligible historic district (see October 17, 2019 letter of the NYOPRHP cited on page 183). Given the sensitivity of the entire area which surrounds the Durkee Street Parking Lot, it very well may be that the Prime LLC project considerably alters its status as an intact historic district. More importantly, should construction be allowed to proceed in this area, it should be all the more congruent with the historic nature of this district. And nothing in the PrimeLLC plan aside from color choice indicates a pleasing conformity with the chaotic, quaint jumble of buildings that surrounds it and makes this area so attractive.

It is not OK to simply state, as is the case on page 184, that “the proposed project will not adversely impact the adjacent DPHD or other listed or eligible for listing resources”.

The atmosphere and “feel” of a district is only as genuine as the past and present efforts to build the urban environment in such a way as to preserve, restore or embellish its historic character. You would not build a three story Victorian commercial building in Rome’s *Centro Storica*, just as you would not build a southwestern Territorial adobe building in Boston, nor would you erect modernist skyscraper in Old Montreal (actually that happened but it was considered a monumental blunder).

Should building proceed on the Durkee Lot a smaller building on the scale originally envisaged in the Plattsburgh DRI (45 units) and one whose design was better integrated into the surrounding historic district would be a better choice.

According to Jane Jacobs, arguably the most influential urban theorist of the 20<sup>th</sup> century, people are attracted to city streetscapes that are human in scale, pleasingly chaotic, and offering a wide number of choices and “eyes on the street”. Large, bland, bunker-type buildings like the one envisaged by Prime LLC do not offer these features, and do not attract people to them. They repel people. Witness the Gateway complex, which struggled to attract tenants and today remains a desolate part our downtown.

Cities like Santa Fe New Mexico remain some of the most attractive urban spaces in America by having rigorous planning laws that restrict residents’ choices of building styles and materials. One of the problems I see in Plattsburgh is the lack of general standards as to what is the “spirit of Plattsburgh” and what styles and materials should be encouraged.

The City of Galena, Illinois has really no distinction, other than the fact that they have retained and enhanced their 19<sup>th</sup> century commercial buildings such as they are now considered one of the best small cities in America. (They also offer free three hour downtown parking.)

The *Clinton County Destination Master Plan* stipulates that “We will maintain the unique character of our region while increasing economic opportunities and quality of life for those who live here through the development of carefully planned tourism.” What is carefully planned about building a giant apartment complex? How does it help to “maintain the unique character of our region”? I see no enhancement of the unique character of our region in a building which essentially is based on a template that Prime uses throughout the state. I also don’t see how it will attract visitors and tourists.

This plan, in general, fails to coordinate the cultural and historical assets that Plattsburgh does have. While they may not all be in the Special Assessment District, how does this plan co-ordinate the Kent DeLord House, the Macdonough Monument and City Hall, the County Court House, the Strand Theater, the Monopole, Margaret Street, the Coop, the Farmers and Crafters Market, the harborfront, the Saranac River and Terry Gordon Bike trails that lead to the historic U.S. Oval, the Clinton County Historical Museum and Transportation Museum? Plunking a giant apartment complex does nothing to enhance the connectivity of these places. In fact, I see no “vitalizing” effect here. To quote former Mayor Jim Canlon, who was responsible for bringing the DRI funds here in the first place, “Providing spaces for people to live without giving them a reason to be there is not really an effective way of developing things”.

Plattsburgh, rather than retaining, preserving and enhancing its unique built environment, seeks to modernize it by building a giant, discordant, unappealing bunker-like gated community on its main public space.

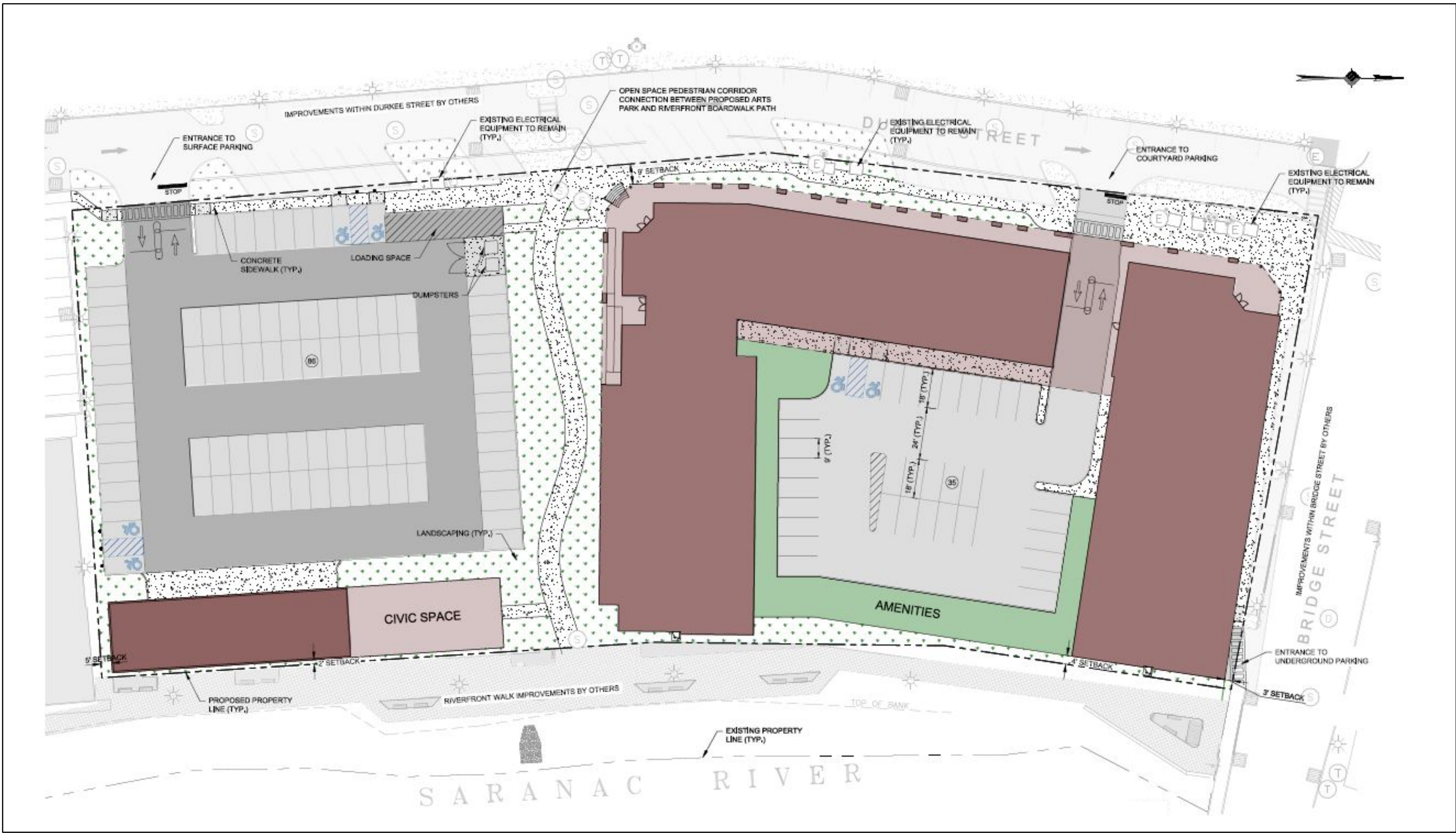
How can that not adversely impact the Downtown Plattsburgh Historic District? It's going to "stick out like a sore thumb". The overwhelming size of this project means it will overpower the historic downtown area, and that in itself is an "adverse impact". The initial DRI plan called for 45 residential units and approximately 47,000 feet of retail and/or commercial space." At 115 residential units, and 200,000 SQ FT this five-story behemoth is more than three times the size of the originally proposed building. Its size, despite cosmetic elements designed to disguise its scale, will change the feel and authentic atmosphere of this historic district.

Plattsburgh has had a bad record of pie-in-the-sky developments like the Westelcom Suites, Gateway Building and most recently, the Broad Street Commons, a giant, bunker-like building which failed and had to be bailed out by the City. It is my sincere hope that we will not let this happen again in this case.



Much of the Westelcom Suites, steps away from the proposed DLMUD, remains empty. Another failed pipe dream for downtown revitalization was the attempt to build this mall like space which never filled.

*Appendix C:*  
*Revised and New Figures*



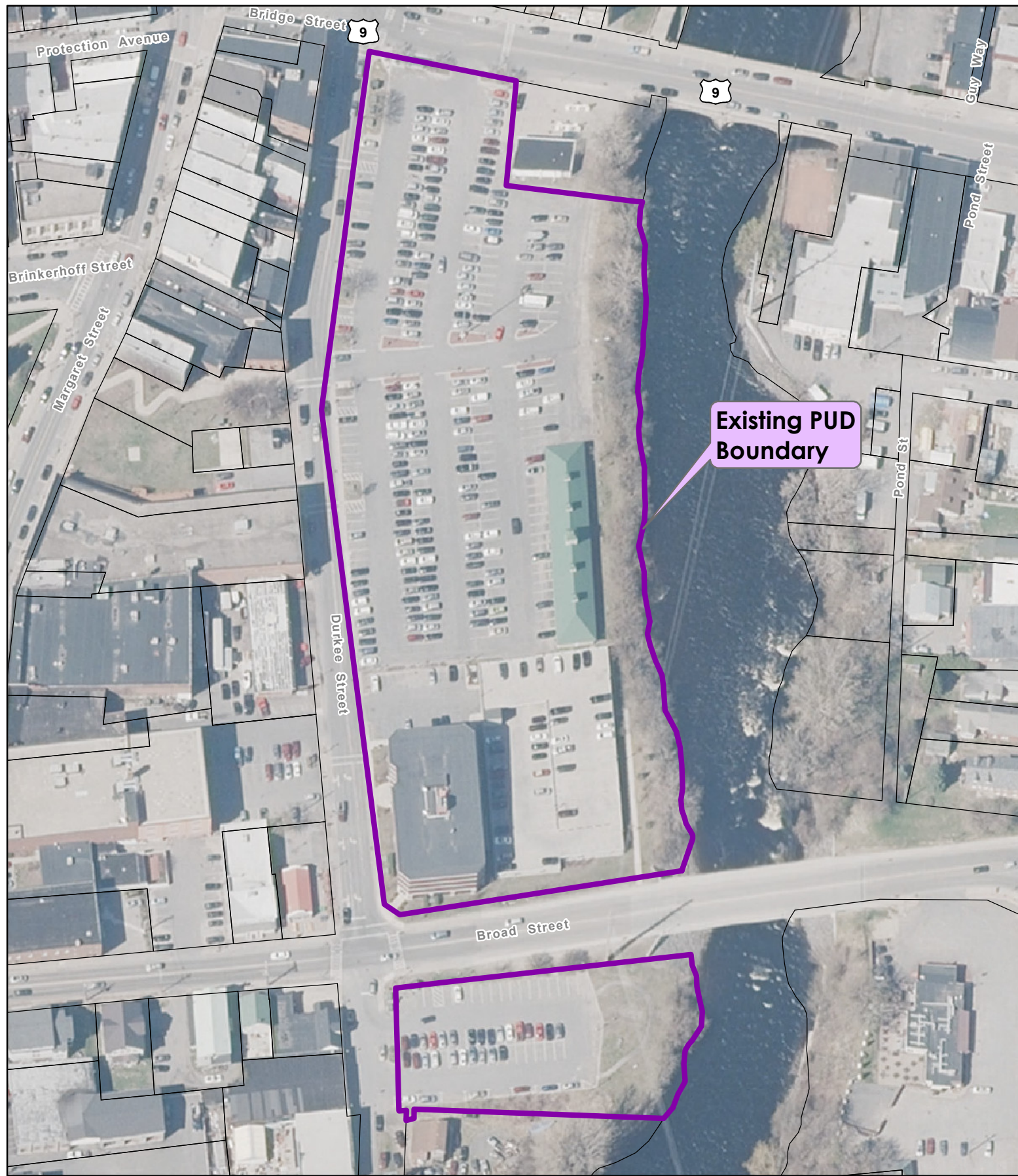


Figure 3 - PUD Boundary - Existing and Proposed

HATCH LEGEND	
	PROPOSED PAVEMENT
	PROPOSED CONCRETE WALK/PAD
	PROPOSED BUILDING COVERAGE
	PROPOSED OPEN SPACE
	PROPOSED ACCESSORY STRUCTURE
	PROPOSED GRAVEL

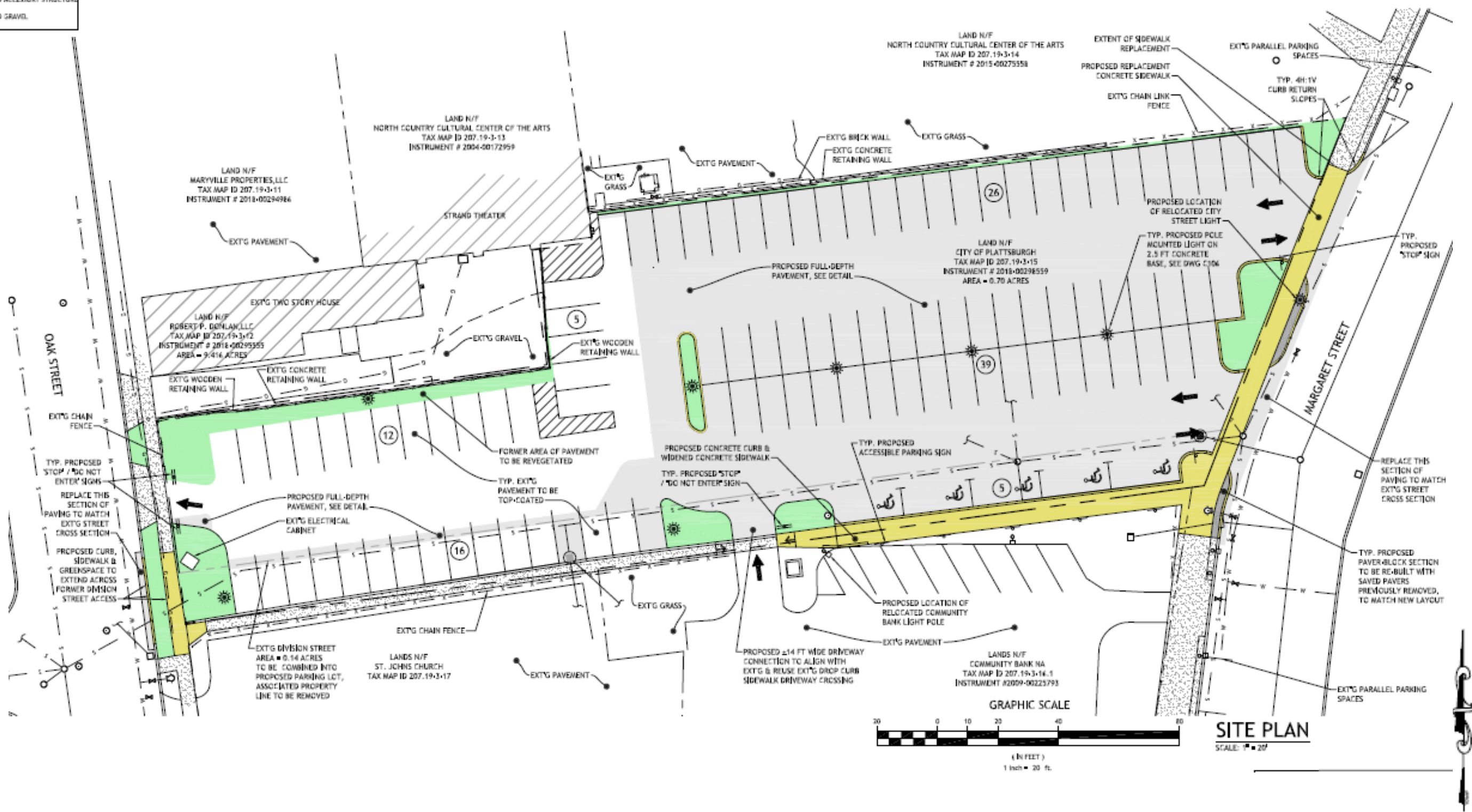






Figure 7: Westelcom Park Improvements - Conceptual Site Plan

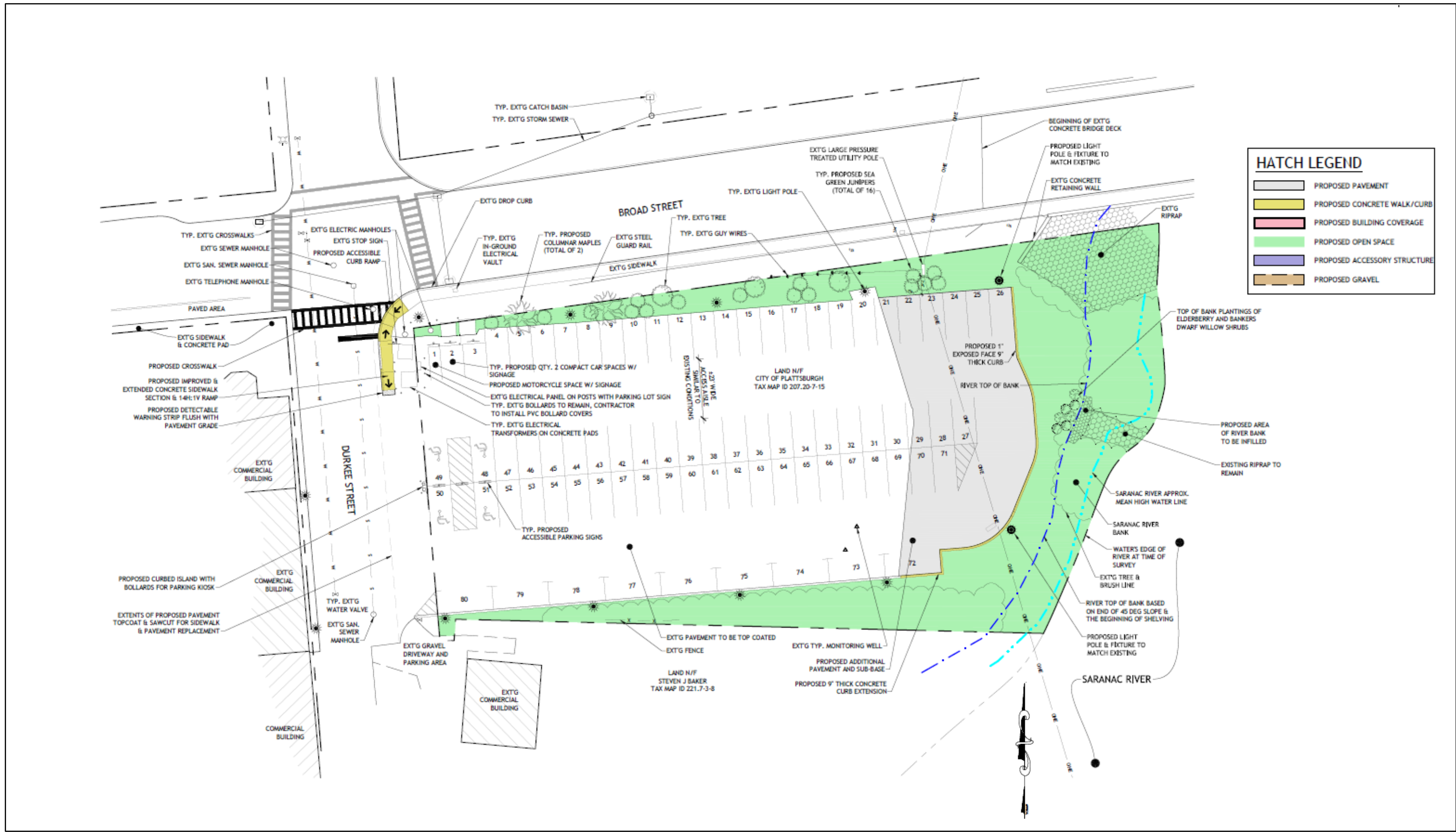


Figure 8: Broad Street Parking Lot - Conceptual Site Plan | Downtown Area Improvement Projects



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Plattsburgh Mixed Use  
Development

View from Bridge St. & Durkee St.

The City of Plattsburgh  
Plattsburgh, NY  
1/24/2020

1



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Plattsburgh Mixed Use  
Development  
View from Durkee St.

The City of Plattsburgh  
Plattsburgh, NY  
1/24/2020

2



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**Plattsburgh Mixed Use  
Development  
View from Bridge St.**

The City of Plattsburgh  
Plattsburgh, NY  
1/24/2020



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Plattsburgh Mixed Use  
Development  
View from Bridge St. 2

The City of Plattsburgh  
Plattsburgh, NY  
1/24/2020



**McFarland Johnson**  
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 SUITE 402  
 SARATOGA SPRINGS, NEW YORK 12866  
 P: 518-580-9380 F: 518-580-9383  
 mjinc.com

PROJECT MILESTONE  
**SITE PLAN SUBMISSION**

NO.	DATE	DESCRIPTION

CLIENT: **PRIME PLATTSBURGH, LLC**

**CITY OF PLATTSBURGH, NEW YORK**

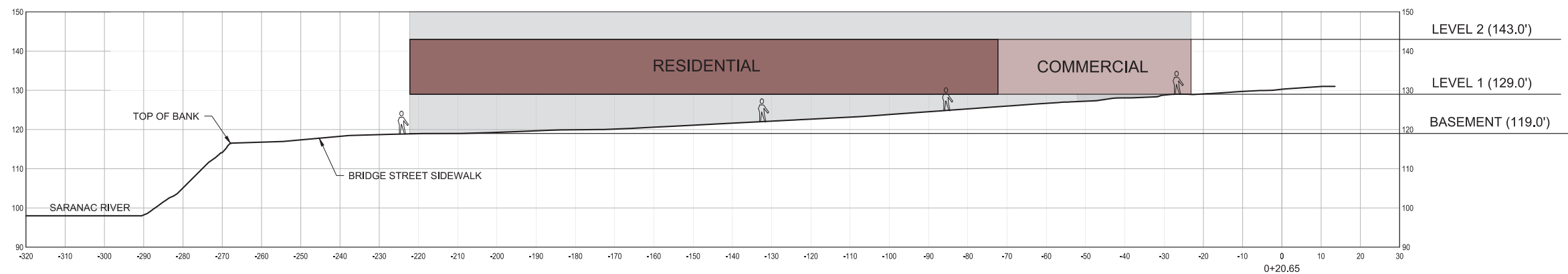
PROJECT: **DURKEE STREET MIXED USE DEVELOPMENT**

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DESIGNED	NSO
CHECKED	TCB
SCALE	1"=15'
DATE	JANUARY 2020
PROJECT	18491.00

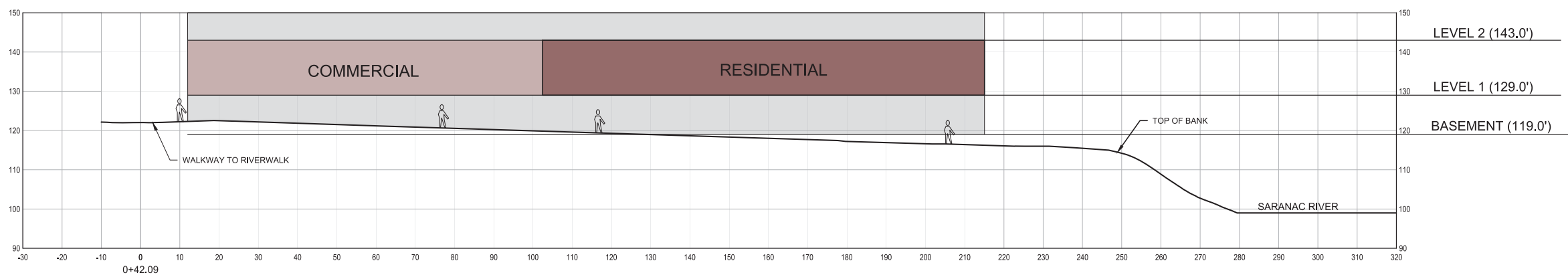
IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS THEY ARE ACTING UNDER THE DIRECT DIRECTION OF A LICENSED PROFESSIONAL ENGINEER, ARCHITECT, LANDSCAPE ARCHITECT, OR LAND SURVEYOR, TO ALTER AN ITEM IN ANY WAY. IF AN ITEM BEARING THE STAMP OF A LICENSED PROFESSIONAL IS ALTERED, THE ALTERING ENGINEER, ARCHITECT, LANDSCAPE ARCHITECT, OR LAND SURVEYOR SHALL STAMP THE DOCUMENT AND INCLUDE THE NOTATION "ALTERED BY" FOLLOWED BY THEIR SIGNATURE, THE DATE OF SUCH ALTERATION, AND A SPECIFIC DESCRIPTION OF THE ALTERATION.

DRAWING TITLE  
**SECTION VIEWS**

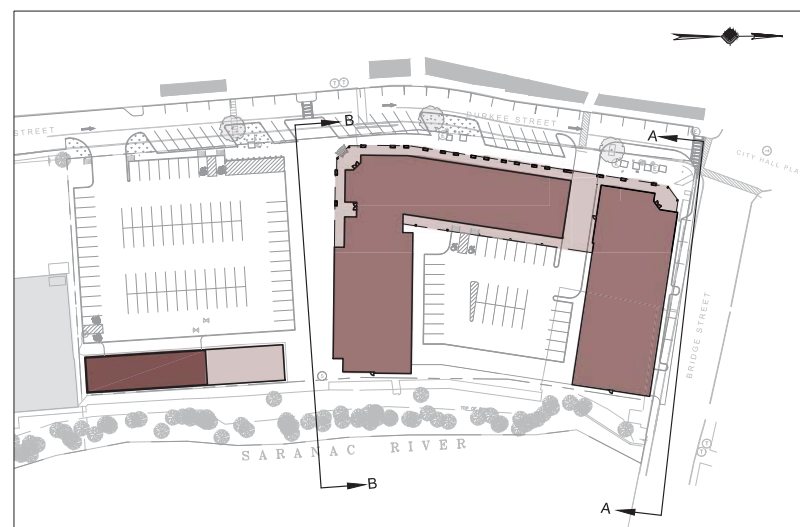
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 01 OF 01



SECTION VIEW A - A



SECTION VIEW B - B



KEY MAP



*Appendix D:*  
*Correspondence*





**Parks, Recreation,  
and Historic Preservation**

**ANDREW M. CUOMO**  
Governor

**ERIK KULLESEID**  
Commissioner

December 23, 2019

Mr. Ethan Vinson, Project Coordinator  
City of Plattsburgh  
41 City Hall Place  
Plattsburgh, NY 12901

Re: NYSHCR  
City of Plattsburgh Downtown Area Improvement Projects  
Plattsburgh, Clinton County, NY  
19PR05584

Dear Mr. Vinson:

Thank you for requesting the comments of the New York State Historic Preservation Office (SHPO). We have reviewed the provided documentation in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO and relate only to Historic/Cultural resources. They do not include other environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the National Environmental Policy Act and/or the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8).

Based upon our review the reports prepared by Curtin Archaeological Consulting, Inc (Curtin & Dymond, June 2019) and Hudson valley Cultural Resource Consultants (Selig, October 2019) and the response to our request for additional information/clarifications about the project, it is the opinion of the New York SHPO that this undertaking will result in No Adverse Effect to historic properties, including archaeological and/or historic resources. This recommendation pertains only to the Area of Potential Effects (APE) examined during the above-referenced investigation. It is not applicable to any other portion of the project property. Should the project design be changed SHPO recommends further consultation with this office.

If you have any questions, I can be reached at 518-268-2218 or via e-mail at [Josalyn.Ferguson@parks.ny.gov](mailto:Josalyn.Ferguson@parks.ny.gov).

Sincerely,

Josalyn Ferguson, Ph.D.  
Scientist Archaeology

*via e-mail only*

c.c. Beth Selig, HVCRC  
c.c. Charles Vandrei & Region 5, DEC  
c.c. Patricia O'Reilly, NYSHCR

c.c. Caren LoBrutto, Chazen Companies  
c.c. Malana Tamer, City of Plattsburgh

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**Division for Historic Preservation**

P.O. Box 189, Waterford, New York 12188-0189 • (518) 237-8643 • [parks.ny.gov](http://parks.ny.gov)



DISCOVER

Plattsburgh

## MUNICIPAL LIGHTING DEPARTMENT

(A Municipally Owned and Operated Power System)

# Plattsburgh, New York

William J. Treacy, P.E.  
Manager

217 Sharron Ave.  
Plattsburgh, NY 12901  
P: (518)-563-2200  
F: (518)-563-2748  
[www.cityofplattsburgh-ny.gov](http://www.cityofplattsburgh-ny.gov)

January 27, 2020

McFarland-Johnson, Inc.  
60 Railroad Place, Suite 402  
Saratoga Springs, NY 12866

Attn: Mr. Turner Bradford

Re: Prime Plattsburgh, LLC - Durkee Street Mixed-Use Development  
Durkee Street, City of Plattsburgh (Tax ID 207.20-7-15)

Dear Mr. Bradford:

We have reviewed the material provided in regard to the above referenced project. Based upon this information the City of Plattsburgh has sufficient capacity within its electrical supply and distribution system to service the project.

Sincerely,

William Treacy, PE  
Municipal Lighting Department Manager  
City of Plattsburgh

cc: Deb Osterhoudt – Prime Plattsburgh, LLC



January 27, 2019

McFarland-Johnson, Inc.  
60 Railroad Place, Suite 402  
Saratoga Springs, NY 12866

Attn: Mr. Turner Bradford

Re: Prime Plattsburgh, LLC - Durkee Street Mixed-Use Development  
Durkee Street, City of Plattsburgh (Tax ID 207.20-7-15)

Dear Mr. Bradford:

We have reviewed the material provided in regard to the above referenced project. Based on existing infrastructure and anticipated demand and output, the City's water supply and wastewater collection/treatment systems should be sufficient to handle the design flows as represented in your letter.

Sincerely,

Arsene Brodi  
Department of Public Works  
City of Plattsburgh

cc: Deb Osterhoudt – Prime Plattsburgh, LLC

*Appendix E:*  
*Governmental Immunity Test*



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City of Plattsburgh  
41 City Hall Place  
Plattsburgh, NY 12901  
Phone: 518-563-7707

[BuildingInspector@cityofplattsburgh-ny.gov](mailto:BuildingInspector@cityofplattsburgh-ny.gov)

September 25, 2019

Clinton County Planning Department  
Attn: Rodney Brown  
135 Margaret Street  
Suite 124  
Plattsburgh, NY 12901

Re: Reconfiguration of Clinton County Government Center Parking Lot

Dear Mr. Brown,

Please be advised that I am the Building Inspector for the City of Plattsburgh. Clinton County ("County") owns the Government Center property located at 137 Margaret Street in the City of Plattsburgh, which is identified as tax map parcel no. 207.19-2-9. The Common Council of the City of Plattsburgh ("City") has authorized the execution of a cooperative parking agreement ("Agreement") with Clinton County to accomplish a reconfiguration of the County's Government Center Parking Lot ("Parking Lot") and to provide a structure for management of the newly configured lot once construction is complete.

The Agreement obligates the City to pay for a portion of the construction costs associated with the Parking Lot reconfiguration, obligates the County to make a specified number of parking spaces of various sizes in the newly configured Parking Lot available for public use, and details how the Parking Lot is to be administered by both City and County officials subsequent to completion of construction activities. The majority of construction activities will take place on County property. However, a small portion of the construction activity will take place on City property along the Parking Lot's southern perimeter adjacent Court Street. This reconfiguration of the Parking Lot, which will also involve City-owned property, may be exempt from the City's zoning and related codes where the public interest is not served by subjecting the project to local land use controls.



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Upon review of the Parking Lot project, and in light of past history and level of review for prior County public works projects located within the City, and per the inquiry regarding the requisite local permitting, I want to confirm that under the analysis set forth by the Court of Appeals in City of Rochester v. County of Monroe, 72 NY2d 338 (1988)—which establishes a balancing test for governmental immunity from local zoning provisions—this Parking Lot reconfiguration would be exempt from local planning/zoning board review and other land use regulations. As you may be aware, the Rochester case requires a nine-point balancing test. Turning to each factor, I offer the following:

1. The nature and scope of the instrumentality seeking immunity. Here both the City and County have established a viable partnership to accomplish the reconfiguration of the Parking Lot. The property subject to construction activity is already utilized as a parking area and its reconfiguration to allow for additional parking capacity would enhance the utility and efficiency of the space without impacting the surrounding areas. The increased availability of public parking will serve the public's interest, as well as the interests of the City and County.
2. The encroaching government's legislative grant of authority. The County has an interest in providing parking capacity adequate to the needs of its employees and visitors. The City, a municipal corporation, is located within the County. Both County and City owned property are involved in the Parking Lot reconfiguration.
3. The kind of function or land use involved. As noted above, the Parking Lot already serves as a parking area for County employees and visitors. Its reconfiguration to allow for additional capacity and increased public utilization of the space is compatible with both uses and functions. Existing City streets and sidewalks bound the Parking Lot.
4. The effect local land use regulation would have upon the enterprise concerned. Local land use regulation would largely support the reconfiguration of the Parking Lot. It is an appropriate and necessary accessory use for a public building. The Parking Lot services a large, municipal complex containing various State and County offices and as such, is a unique public building. The City has language in its zoning code governing curb cuts which limits them in width to 60% of the total lot frontage, limits their



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aggregate width to 70 feet on any one street frontage, and limits the maximum width of any single drive to 30 feet. While proposed curb cuts along Court Street do not strictly comply with the City zoning code, their inclusion would not present a substantial change from the existing traffic or pedestrian patterns. As noted, this Parking Lot services a unique public building and the additional curb cut, per an engineered design, would improve vehicular access while retaining pedestrian access and safety. Further, it is compatible with the comprehensive plan of the City and would not create a deleterious impact on neighboring parcels. The planned removal of a portion of the current on-street parking capacity on Court Street – necessitated by the creation of additional curb cuts – will increase visibility and/or walkability for pedestrians and motorists when entering and leaving the reconfigured Parking Lot.

5. Alternative locations for the facility in less restrictive zoning areas. There are no viable alternative locations for this Parking Lot. Its proximity to both the County's governmental offices and the City's downtown core make it ideal for the creation of additional parking capacity.
6. The impact on legitimate local interests. The reconfigured Parking Lot would not create any substantial impacts as compared to the current lot. The more efficient utilization of space within the Parking Lot and the increased availability of parking capacity to the public should, if anything, bolster downtown visitation to the benefit of local businesses.
7. Alternative methods of providing the proposed improvement. The Parking Lot's size and proximity to the County's governmental offices and the City's downtown core and its existing use as a parking area make the site a unique candidate to accomplish these improvements. While there are other parking lots owned by the County within downtown Plattsburgh, none possess the size or the opportunities for reconfiguration that would allow for a comparable addition in parking capacity.
8. The extent of the public interest to be served by the improvements. The reconfigured Parking Lot and the terms of the Agreement would increase the parking capacity available to the public in the City's downtown and generate additional revenue for the City of Plattsburgh by permitting the City to enforce agreed upon regulations



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within the Parking Lot and retain all revenue collected via parking violations. The public interest would be fully served by these improvements.

9. Intergovernmental participation in the project development and an opportunity to be heard. The City and County have worked together for several months to craft an Agreement that would be beneficial to both parties. This cooperative effort has been discussed at several meetings of both the City's Common Council and the County's Legislature at which the public has had an opportunity to be heard on the matter.

Accordingly, based upon my analysis of these factors, it is my determination that the reconfiguration of the County Parking Lot would not require local planning or zoning board review as it is exempt from our local zoning provisions.

If you have any questions please do not hesitate to contact me.

Sincerely,

Joseph McMahon

Building Inspector

City of Plattsburgh



*Appendix F:*  
*Parking Related Information*

## MEMORANDUM

To: Mayor Read & Members of the Common Council  
From: Matthew Miller, Director of Community Development  
Date: August 15, 2019  
Re: PPAC Recommendations to Common Council

During its meeting on August 13, 2019, the Plattsburgh Parking Advisory Committee approved several recommendations to be sent to the Common Council for their further deliberation. They are as follows:

### **Recommendation for Immediate Consideration:**

1. Standardization of all on-street parking time limits within the downtown Special Assessment District footprint to 2 hours. This would eliminate all 10 minute, 30 minute, and 1 hour time limits within this zone. This action should be reviewed and approved by City Planner prior to formal approval by Council.
2. Except for the first recommendation regarding standardization of on-street parking time limits, the PPAC recommends no other changes be made to the on-street parking management system at this time.
3. Continuation of current City policy regarding outdoor seating “parklets” on City streets during the summer season.

### **Recommendations for Consideration Pending Completion of GEIS/Traffic Study:**

1. Authorize an agreement with IPS Group, Inc. to provide hardware and software services for a new, managed, downtown parking system that employs kiosks should the Council determine to implement such a system.
2. A single type of parking permit should be offered for sale on either a monthly or annual basis. Annual permits should be offered for sale at a modest discount to the cost of 12 monthly permits. The parking permits should be designed to work in the following off-street lots:
  - Arnie Pavone Memorial Parking Plaza
  - Broad Street Lot
  - Court Street Lot
  - City Hall Place Lot
  - Public parking on the Prime Companies development (once available for use)

The permit should allow individuals to park between 8:00 a.m. and 5:00 p.m., Monday through Friday in the off-street lots listed above. The costs of these permits shall be discussed by the PPAC and a

recommendation sent to the Common Council once all costs of the new downtown parking system are known.

3. A system that employs both permits and kiosks should be implemented in the following off-street lots:

- Arnie Pavone Memorial Parking Plaza
- Broad Street Lot
- Court Street Lot
- City Hall Place Lot
- Public Parking in the Prime Companies development (once available for use)

A system that employs kiosks only should be implemented in the following off-street lots:

- Public Parking in Clinton County Government Center lot

Permits should be made available for frequent, long-term parkers. Kiosks should be made available for those individuals parking for shorter periods. Rates charges by the kiosks should be modest and parkers should be given the option of purchasing time on both an hourly and a daily basis. These rates should be charged only between the hours of 8:00 a.m. and 5:00 p.m., Monday through Friday. This would coincide with the recommended parking permit structure. The distribution of kiosks in the off-street lot should be as follows:

- Arnie Pavone Memorial Parking Plaza: 3 kiosks
- Broad Street lot: 1 kiosk
- Court Street Parking lot: 2 kiosks
- City Hall Place Parking Lot: 1 Kiosk
- Public Parking in Prime Companies development: 2 kiosks

4. Assuming the implementation of a new, managed, downtown parking system that employs parking permits and kiosks in off-street lots, the PPAC recommends that the downtown Special Assessment District be either reduced or eliminated.

#### **Recommendations for Consideration Pending Physical Development of Durkee Street parking lot:**

1. Implementation of new snow ban parking system that utilizes four off-street lots (Arnie Pavone Memorial Parking Plaza, City Hall Place lot, Broad Street lot, and Court Street lot) and the existing snow ban street light system to plow roughly 125 spaces (~50%) the first night following a snow event and roughly 125 spaces (~50%) the second night following a snow event. The specific order of lot plowing to be determined by DPW based on prevailing conditions during and after each snow event with public notice provided by the existing light system.

A system that employs kiosks only should be implemented in the following off-street lots:



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41 City Hall Place  
Plattsburgh, NY 12901  
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## MEMORANDUM

From: Matthew Miller, Director of Community Development  
To: Common Council of the City of Plattsburgh  
Subject: Downtown Special Assessment District – Parking Utilization  
Date: January 24, 2020

Several comments received in response to the City of Plattsburgh’s Downtown Area Improvement Projects Draft Generic Environmental Impact Statement (DGEIS) expressed concern with the amount of public parking that will be made available by the City to compensate for the proposed development of the Durkee Street Municipal Parking Lot (DSMPL). The City maintains, as is stated in the Final Generic Environmental Impact Statement (FGEIS), that an adequate amount of new, publicly available parking capacity will be provided. Rather than debate the merits of these assertions, the most effective way to respond to these comments is to:

1. Presume the assertions made in the DGEIS comments to be true and, based on that presumption, calculate the number of new parking spaces being created in the downtown area.
2. Analyze the existing public parking supply and observed demand within the City’s Downtown Parking Special Assessment District (“SAD”) defined as the area bordered by Cornelia Street to the north, Oak Street to the west, and by the Saranac River to both the east and south.
3. Determine whether the claimed shortfall in parking supply (as asserted in the DGEIS comments) can be adequately absorbed by the SAD.

### **Assertions Made in DGEIS Comments**

Included below in Table 1 is the City’s accounting of the downtown parking supply within the SAD before and after completion of the GEIS projects (See Table 3 of the FGEIS).



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**Table 1: Publicly Accessible Parking Supply Changes**

	<b>Existing Public Supply</b>	<b>Future Public Supply</b>	<b>Change in Public Supply</b>
DSMPL (existing) /DLMUD (future)	289	50	-239
BSMPL	59	80	+21
APMPP	0	103	+103
Westelcom Park	4	0	-4
Clinton County Lot	0	69	+69
Court Street Lot	44	44	0
City Hall Place Lot	17	17	0
<b><i>Off-Street Totals</i></b>	<b><i>413</i></b>	<b><i>363</i></b>	<b><i>-50</i></b>
Durkee Street (Broad St. to Bridge St.)	15	53	+38
Bridge Street (Adjacent to DSMPL)	0	6	+6
Court Street (north side from Margaret St. to Oak St.)	28	19	-9
Margaret Street (west side from Brinkerhoff St. to Division St.)	9	4	-5
<b><i>On-Street Totals (All Streets within SAD)</i></b>	<b><i>407</i></b>	<b><i>437</i></b>	<b><i>+30</i></b>
<b><i>Total On- and Off- Street Spaces</i></b>	<b><i><u>820</u></i></b>	<b><i><u>800</u></i></b>	<b><i><u>-20</u></i></b>

The Clinton County Planning Board (“CCPB”) stated that the number of proposed public spaces attributable to the Clinton County Main Lot Expansion included in Table 39 of the DGEIS should be 44 rather than 66 (Table 3 of the FGEIS lists of a figure of 69 spaces based on new information provided by Clinton County). The CCPB and other commenters asserted that the number of proposed public spaces attributable to the Durkee Lot Mixed Use Development (“DLMUD”) in Table 1 should be reduced by 50. Assuming these assertions are accurate would create a total deficit of spaces that would need to be absorbed by the SAD.

Presuming these assertions are accurate, the resulting changes to the accounting of the public parking supply are detailed in Table 2 below.



**Table 2: Publicly Accessible Parking Supply Changes (utilizing assertions made in DGEIS comments)**

	Existing Public Supply	Future Public Supply	Change in Public Supply
DSMPL (existing) /DLMUD (future)	289	0	-289
BSMPL	59	80	+21
APMPP	0	103	+103
Westelcom Park	4	0	-4
Clinton County Lot	0	44	+44
Court Street Lot	44	44	0
City Hall Place Lot	17	17	0
<b>Off-Street Totals</b>	<b>413</b>	<b>288</b>	<b>-125</b>
Durkee Street (Broad St. to Bridge St.)	15	53	+38
Bridge Street (Adjacent to DSMPL)	0	6	+6
Court Street (north side from Margaret St. to Oak St.)	28	19	-9
Margaret Street (west side from Brinkerhoff St. to Division St.)	9	4	-5
<b>On-Street Totals (All Streets within SAD)</b>	<b>407</b>	<b>437</b>	<b>+30</b>
<b>Total On- and Off- Street Spaces</b>	<b><u>820</u></b>	<b><u>725</u></b>	<b><u>-95</u></b>

### Parking Supply and Observed Demand within the SAD

The DLMUD will contain enough on-site parking to meet its own parking demands. The current capacity of the DSMPL will be replaced in multiple locations within the SAD. If we are to utilize the assertions made in the DGEIS comments, the City would need to demonstrate that a minimum of 95 vacant spaces would exist within the SAD at periods of peak parking demand that could be occupied without exceeding an 85% utilization rate within the SAD as a whole.

#### **Current Public Parking Supply within SAD**

- Current On-Street – 407 spaces
- Current Off-Street – 413 spaces (289 within the DSMPL)
- Total Supply – 820 spaces



### SAD Parking Utilization and Excess Supply

An 85% utilization rate is a typical industry standard for optimal parking utilization and indicates that, while most parking spaces are filled at any given time, at least one available space can be found on any given block. In this report, the City has used this 85% utilization rate to determine whether the SAD could handle the asserted deficit of 95 parking spaces.

To determine the existing parking demand within the SAD, the City’s Community Development Office conducted 89 separate off-street parking lot counts of the City-owned lots within the SAD and 32 separate on-street parking counts of the entire SAD. Of these, 43 off-street counts and 29 on-street counts were conducted during the work week over the course of 6 months at various times of the day. The remaining counts were conducted on weekends and the utilization rates observed during these weekend counts were considerably less than those observed during the week. Those weekend counts have not been included in this analysis. A summary of the observed results of the 72 parking counts conducted during the work week is shown in Table 3 below which shows the average number of available parking spaces at different times of the day. Table 3 also shows that, at the peak period of average utilization from 1:00 – 2:00 p.m., 278 parking spaces within the SAD remain vacant.

Table 3: Observed, Vacant Public Parking Spaces within SAD on Weekdays			
Time	On-Street Vacant	Off-Street Vacant	Total Vacant Spaces
8:00 - 9:00 am	278	194	472
10:00 - 11:00 am	213	112	325
12:00 - 1:00 pm	199	112	311
1:00 - 2:00 pm	179	99	278
2:00 - 3:00 pm	212	99	311
3:00 - 4:00 pm	191	120	311
4:00 - 5:00 pm	243	173	416

### Can the SAD Absorb the Asserted Deficit?

As stated earlier in this report, the total number of current public parking spaces within the SAD is 820. As shown above in Table 3, the City’s current parking system contains 278 spaces that



remain vacant during the peak period of average utilization resulting in an SAD-wide utilization rate of 66.1%  $[(820-278)/820]$ .

As shown above in Table 2 the total parking supply within the SAD would be reduced by 95 spaces if the assertions made in the DGEIS comments are utilized for this analysis. That would leave a total public parking supply of 725 spaces within the SAD after completion of the proposed GEIS projects. The number of vacant spaces observed during the peak utilization period would also be reduced by 95 spaces leaving 183 vacant spaces (278-95). **This would result in an SAD-wide utilization rate of 74.8%  $[(725-183)/725]$ . This is well below the 85% peak utilization threshold and thus the SAD could absorb a loss of 95 spaces without causing a significant adverse impact on downtown parking availability.** These results are summarized below in Table 4.

Table 4: Current and Proposed SAD Parking Utilization Rates		
	Current SAD	Proposed SAD (utilizing assertions made in DGEIS comments)
<b>Total Public Spaces</b>	820	725
<b>Vacant Public Spaces</b>	278	183
<b>Utilization Rate</b>	66.1%	74.8%

If we are to apply the assertions made in the DGEIS comments, a utilization rate of 85% in the proposed SAD shown in Table 4 above would indicate that 617 spaces were occupied and 108 were vacant during periods of peak utilization. As Table 4 shows, that proposed SAD could be expected to include 183 vacant spaces, this means that 75 additional spaces would need to be occupied before a utilization threshold of 85% would be crossed at peak utilization during the day (183-108). Those 75 spaces represent significant additional economic growth that could be absorbed by the SAD before the City would need to start planning for additional parking capacity. To reiterate, these figures reflect the future parking supply if the assertions made in the DGEIS comments were accurate.

## **Conclusions**

The data collected by the City's Community Development Office through over 121 separate parking counts shows that the existing excess parking supply within the SAD can absorb the parking deficit asserted in the DGEIS comments and still accommodate future downtown growth





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without crossing the 85% utilization threshold that would compel the City to implement further additions to the SAD's parking supply that are not included in the DGEIS.

The City's ultimate responsibility is to its taxpayers and the parking improvement projects proposed within the DGEIS provide sufficient replacement parking capacity to meet the observed needs of City residents, business owners, employees, and visitors and still accommodate future downtown growth. To overbuild parking capacity before facts and data show that it is necessary would be a disservice to the City's taxpayers. If future downtown development warrants the provision of additional parking supply, the City will certainly implement it and, in the interim, will continue to explore options for additional capacity should the need for it arise. However, at this time, the City feels it is neither prudent nor in the City's long-term best interest to overbuild parking capacity within the SAD.

*Appendix G:*  
*Community Engagement Summary*

<b>DRI / Parking Community Engagement Summary</b>	
<b>Activity</b>	<b>Dates</b>
Governor Andrew M. Cuomo launched the Downtown Revitalization Initiative	4/7/2016
The City of Plattsburgh submitted it's DRI Application to the North Country REDC	5/27/2016
City of Plattsburgh chosen as DRI Round 1 Awardee	7/6/2016
LPC Meeting 1 (50 members of the Public)	9/15/2016
Focus Group - Local Stakeholders Plan	9/19/2016
Focus Group - SUNY Engagement Plan	9/28/2016
Community Workshop 1 (50 members of the public)	10/10/2016
Urban Century Movie Night @ SUNY Plattsburgh (35 members of the public)	10/14/2016
LPC Meeting 2 (20 members of the Public)	10/24/2016
LPC Meeting 3 (20 members of the Public)	12/9/2016
Focus Group - Youth Focus Groups	12/9/2016
Community Workshop 2 (40 members of the public)	12/10/2016
LPC Conference Call 1	1/4/2017
Urban Century Movie Night @ The Strand Theater (50+ members of the public)	1/4/2017
LPC Conference Call 2	1/5/2017
Community Workshop 3 (25 members of the public)	1/9/2017
Community Workshop 4 (70 members of the public)	1/9/2017
LPC Conference Call 3	2/1/2017
LPC Meeting 5 (50 members of the Public)	2/11/2017
Community Workshop 4 (70 members of the public)	2/11/2017
Community Survey - General Community Survey (144 responses)	-
Community Survey - SUNY Plattsburgh Survey (90 responses)	-
Community Survey - Families Survey (25 responses)	-
Community Survey - Middle School Survey (22 responses)	-
City of Plattsburgh submitted it's Strategic Investment Plan to the State for Approval	Mar-17
Lieutenant Governor Kathy Hochul annouced the 10 DRI Priority Projects that would receive funding	5/25/2017
City of Plattsburgh and Various State agencies begin work on the 10 DRI Priority Projects	Jun-17
RFP for "Parking Study City of Plattsburgh" was issued	6/12/2017
RFP for "Parking Study City of Plattsburgh" was closed	7/12/2017
Common Council - Awarded Carl Walker, Inc. to conduct the Plattsburgh Parking Study	8/3/2017
Carl Walker, Inc - First Site Visit	Week of Sept. 18th 2017
Stakeholder Meeting - Lake City Local Development Corporation Board	9/20/2017
Stakeholder Meeting - City of Plattsburgh Departments	9/21/2017

Stakeholder Meeting - Downtown Stakeholders	9/21/2017
Public Open House	9/20/2017
Online Survey ( Over 500 Respondents)	9/18/2017 - 10/15/2017
Carl Walker, Inc - Second Site Visit	Week of Oct. 23rd, 2017
Public Open House	10/25/2017
City of Plattsburgh Common Council Update	10/26/2017
Carl Walker, Inc - Third Site Visit	Week of Dec. 20th, 2017
Public Open House	12/20/2017
City of Plattsburgh Common Council Update	12/21/2017
Common Council - Votes to Approve February 2018 Parking Study	3/1/2018
Carl Walker, Inc -Fourth Site Visit	Week of April 18th, 2018
Public Meeting Presentation of Recommendations and Discussion	4/18/2018
Common Council - CD Office Presents Rough Draft Plan	9/5/2018
Common Council - Non-Binding Resolution to Explore and Implement Various Sections of the February 2018 Parking Study	10/18/2018
CD Office - Mailed and Online Survey for Streetscape and Riverfront Access Project (960 Responses)	10/26/2018 - 11/12/2018
Common Council - CD Office presents Past and Future Plans for Community Engagement involving Parking and General DR	11/1/2018
CD Office - Hand-delivered Letters for Business Roundtables	11/7/2018
CD Office - Hosted Business Roundtable #1	11/13/2018
CD Office - Hosted Business Roundtable #2	11/14/2018
CD Office - Hosted Business Roundtable #3	11/16/2018
CD Office - Hosted Business Roundtable #4	11/19/2018
CD Office - Hosted Business Roundtable #5	11/20/2018
CD Office - Hosted Business Roundtable #6	11/20/2018
Common Council - Established the Plattsburgh Parking Advisory Committee (PPAC)	11/29/2018
Common Council - Appoints members to the PPAC	December 2018 - January 2019
CD Office - Streetscape and Riverfront Access Public Meeting #1	12/5/2018
CD Office - Hosted DRI Public Update Meeting	12/18/2018
CD Office - Hosted DRI Public Update Meeting	12/19/2018
Common Council - Reinforcement of Current Parking Time Limit Signage Begins	1/3/2019
CD Office - Prime Companies Presentation	1/8/2019
Common Council - Approves Prime Companies Proposal	1/10/2019
PPAC - First Plattsburgh Parking Advisory Committee Meeting	1/15/2019
PPAC - Second Plattsburgh Parking Advisory Committee Meeting	2/19/2019
Common Council - Approved a Trial Period for Single Use Parking permits for the Downtown Core	2/21/2019
PPAC - Third Plattsburgh Parking Advisory Committee Meeting	3/12/2019
PPAC - Fourth Plattsburgh Parking Advisory Committee Meeting	4/9/2019
Common Council - CD Office Presents Most Recent Parking Plan and Update of the Durkee Development	5/2/2019

CD Office - Streetscape and Riverfront Access Public Meeting #2	5/13/2019
PPAC - Fifth Plattsburgh Parking Advisory Committee Meeting	5/14/2019
Common Council - Durkee Street Preliminary Site Plan Presentation #1	5/23/2019
CD Office - Online Survey for Marketing, Signage & Branding Project	5/29/2019 - 6/12/2019
PPAC - Sixth Plattsburgh Parking Advisory Committee Meeting	6/11/2019
Common Council - Durkee Street Preliminary Site Plan Presentation #2	6/13/2019
Zoning Board - Priem Companies Site Plan Conceptual Review	6/17/2019
Planning Board - Prime Companies Site Plan Conceptual Review	6/24/2019
PPAC - Seventh Plattsburgh Parking Advisory Committee Meeting	7/9/2019
Common Council - CD Office presents update on Harborside, Parking, DRI & CFA	8/1/2019
Clinton County IDA - Prime Plattsburgh, LLC Public Hearing	8/5/2019
PPAC - Eighth Plattsburgh Parking Advisory Committee Meeting	8/13/2019
CD Office - DRI Open House @ Farmer's Market	8/21/2019
Common Council - Draft Generic Environmental Impact Statement Scoping Session	8/22/2019
Planning Board - Prime Companies Site Plan & PUD Review (Informational Only)	8/26/2019
CD Office - Marketing Signage & Branding Public Meeting at the Ted K. Center	9/5/2019
CD Office - Marketing Signage & Branding Informational Table at the Farmer's Market	9/14/2019
CD Office - Marketing Signage & Branding Focus Group at SUNY Plattsburgh	9/19/2019
Common Council - Accepts DGEIS Opening Public Comment Period on Document	11/21/2019
Common Council - DGEIS Public Hearing	12/9/2019
PPAC - Ninth Plattsburgh Parking Advisory Committee Meeting	12/10/2019
Planning Board - Prime Companies Sketch Plan Approval	12/23/2019
Dark Blue = DRI Process	
Blue = Carl Walker, Inc	
Yellow = Common Council	
Orange = PPAC	
Green = Community Development Office	
Purple = Planning / Zoning Boards	
Red = Clinton County IDA	

*Appendix H*  
*Clinton County's SEQRA review –*  
*Government Center Parking Lot*

**Consent Form for Establishment of Clinton County as the Lead Agency for the following project:**

**Clinton County Government Center Parking Lot Rehabilitation**

The City of Plattsburgh has been identified as an Involved Party under the New York State Environmental Quality Review Act (SEQR) 6 NYCRR Part 617 for the above stated project proposed to be undertaken by Clinton County. For purposes of a Coordinated Review of this project, Clinton County is declaring its intent to assume the role of Lead Agency under SEQR. Please mark the appropriate box below to indicate the position of the City of Plattsburgh relative to the request by Clinton County to the lead agency for this project, and sign below.

YES, the City of Plattsburgh hereby consents to the establishment of Clinton County as the Lead Agency for purposes of SEQR Review of the above referenced project.

NO, the City of Plattsburgh does not consent to the establishment of Clinton County as the Lead Agency for purposes of SEQR Review of the above referenced project.

  
\_\_\_\_\_  
Signature

Mayor  
\_\_\_\_\_  
Title

Colin L. Read  
\_\_\_\_\_  
Name (please print)

8/2/19  
\_\_\_\_\_  
Date

Please return this consent form as soon as possible, but no later than thirty (30) calendar days from the date of the attached letter (August 26, 2019) to following address:  
[Rodney.Brown@clintoncountyny.gov](mailto:Rodney.Brown@clintoncountyny.gov) or ATTN: Rodney Brown, Deputy Administrator, Clinton County Legislative Office, 137 Margaret Street – Suite 208, Plattsburgh, NY 12901.

**Legend**

→ Arrows\_andMarkings

**Category**

- At Grade Sidewalk
- Sidewalk
- Striping

**Category**

- City
- CityHC
- Customer
- Employee
- Handcpd
- Reserved
- DriveLanes

**COURT STREET PROPOSED PARKING CHANGES:**

**PROPOSED:**  
 213 TOTAL: EMPLOYEE: 129, CUSTOMER 60, HANDICAPPED 11, RESERVED: 13  
**CURRENT:**  
 158 TOTAL: EMPLOYEE: 99, CUSTOMER 39, HANDICAPPED 9, RESERVED: 11  
**NET GAIN: 55**

**Key Points:**  
 Two Way traffic on Court Street essential to plan (one way parking lanes / traffic on Gov. Center Lots.  
 Sidewalks at least 5 feet wide (ADA), kept on north side and most of south side.  
 Sidewalk kept without changes on south side of Court between Oak and Marion, but would need to add curbs to extend around parking spaces.

Fire Hydrant could be kept in place on Gov Center by moving parking field north.

Light poles would require moving / removal on south end of lot especially.

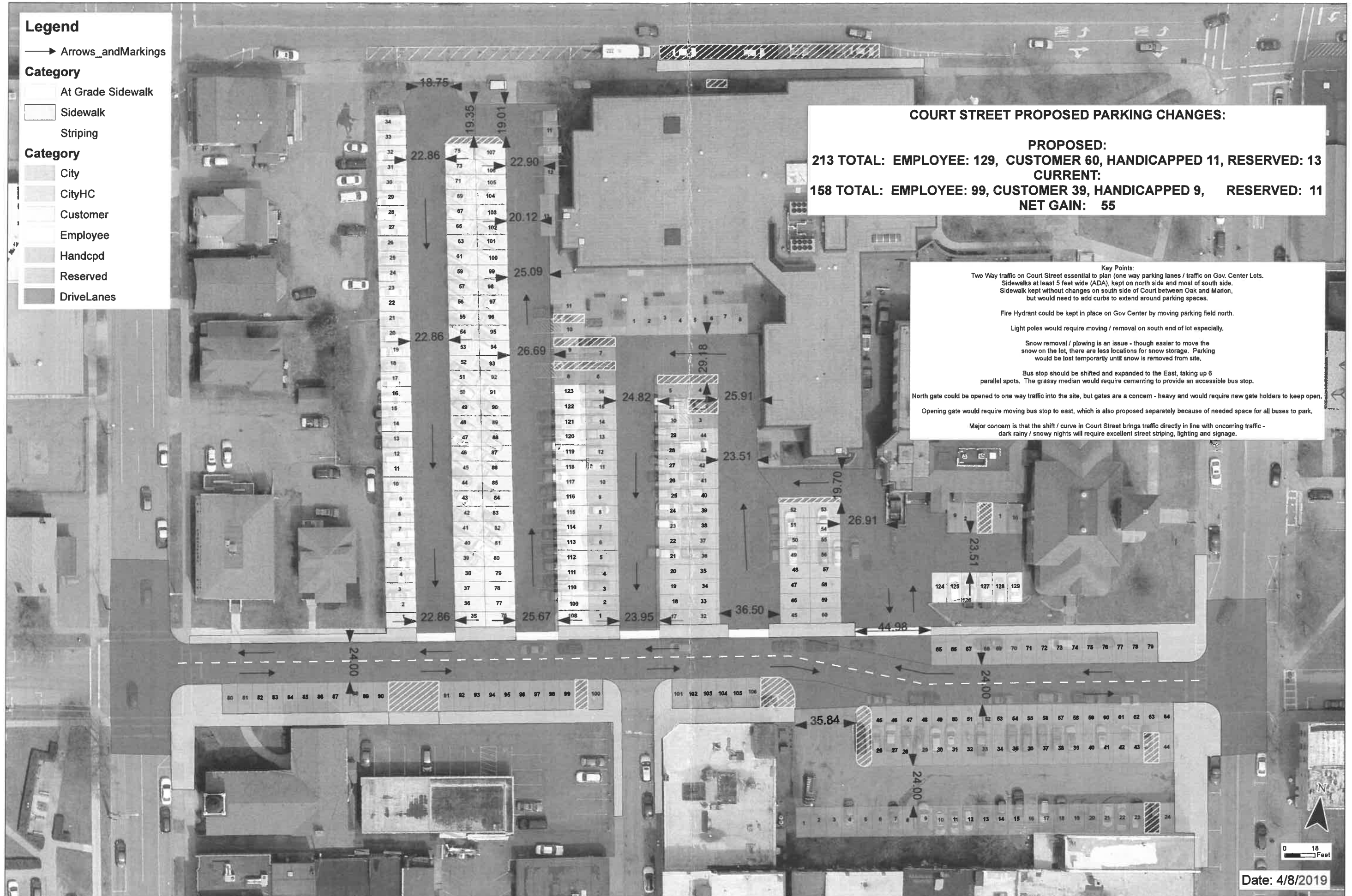
Snow removal / plowing is an issue - though easier to move the snow on the lot, there are less locations for snow storage. Parking would be lost temporarily until snow is removed from site.

Bus stop should be shifted and expanded to the East, taking up 6 parallel spots. The grassy median would require cementing to provide an accessible bus stop.

North gate could be opened to one way traffic into the site, but gates are a concern - heavy and would require new gate holders to keep open.

Opening gate would require moving bus stop to east, which is also proposed separately because of needed space for all buses to park.

Major concern is that the shift / curve in Court Street brings traffic directly in line with oncoming traffic - dark rainy / snowy nights will require excellent street striping, lighting and signage.





RESOLUTION #598 - 08/14/19

DESIGNATING THE PROPOSED GOVERNMENT CENTER PARKING LOT  
IMPROVEMENT PROJECT AS A NON-SIGNIFICANT ACTION FOR THE PURPOSE  
OF THE ISSUANCE OF A NEGATIVE DECLARATION UNDER THE STATE  
ENVIRONMENTAL QUALITY REVIEW ACT (SEQRA) - LEGISLATURE

BY: Mr. Conroy

WHEREAS, Clinton County proposes to undertake and fund a project to improve the Government Center parking lot, which will involve reconstructing the lot through removal of some of the existing traffic islands and concrete walkways, resurfacing the asphalt, increasing the number of entrances/exits from three to five, and redesigning the parking space configuration that will result in the increase of the number of parking spaces by approximately fifty-five spaces; and

WHEREAS, under the State Environmental Quality Review Act (SEQRA), the project has been determined to be an "Unlisted Action," and a Short Environmental Assessment Form has been prepared for the proposed action; and

WHEREAS, the City of Plattsburgh has been determined to be an "Involved Party" as a result of its agreement to provide a portion of the funding to complete the project, and the City of Plattsburgh has agreed to the County's request to allow the County to be the Lead Agency for preparing the SEQRA documents for the proposed project; and

WHEREAS, an environmental assessment of the proposed project has led to a determination that the project will not result in a significant adverse impact on the environment; now, therefore,

BE IT RESOLVED, upon recommendation of the Economic Development and County Operations Committee, at its meeting of Wednesday, August 14, 2019, the Clinton County Legislature hereby concludes that the project will not have a significant environmental impact and authorizes the Legislative staff to sign all documents related to this negative declaration, in accordance with the requirements of the State Environmental Quality Review Act ("SEQRA"); and

BE IT FURTHER RESOLVED, County staff is hereby authorized to file and publish all documents related to this negative declaration.

SECONDED BY: Mr. Dame  
ADOPTED

"Yes" 10  
"No" 0  
Absent 0

RESOLUTION #598 - 08/14/19

STATE OF NEW YORK)  
COUNTY OF CLINTON) SS:  
LEGISLATIVE CHAMBERS)

I HEREBY CERTIFY, that the foregoing is a true copy of a resolution acted upon by the  
County Legislature in Regular Session on August 14, 2019.

A quorum being present, and a majority voting therefor.

  
Michael E. Zurlo  
Clerk of the Legislature

(SEAL)

# Short Environmental Assessment Form

## Part 1 - Project Information

### Instructions for Completing

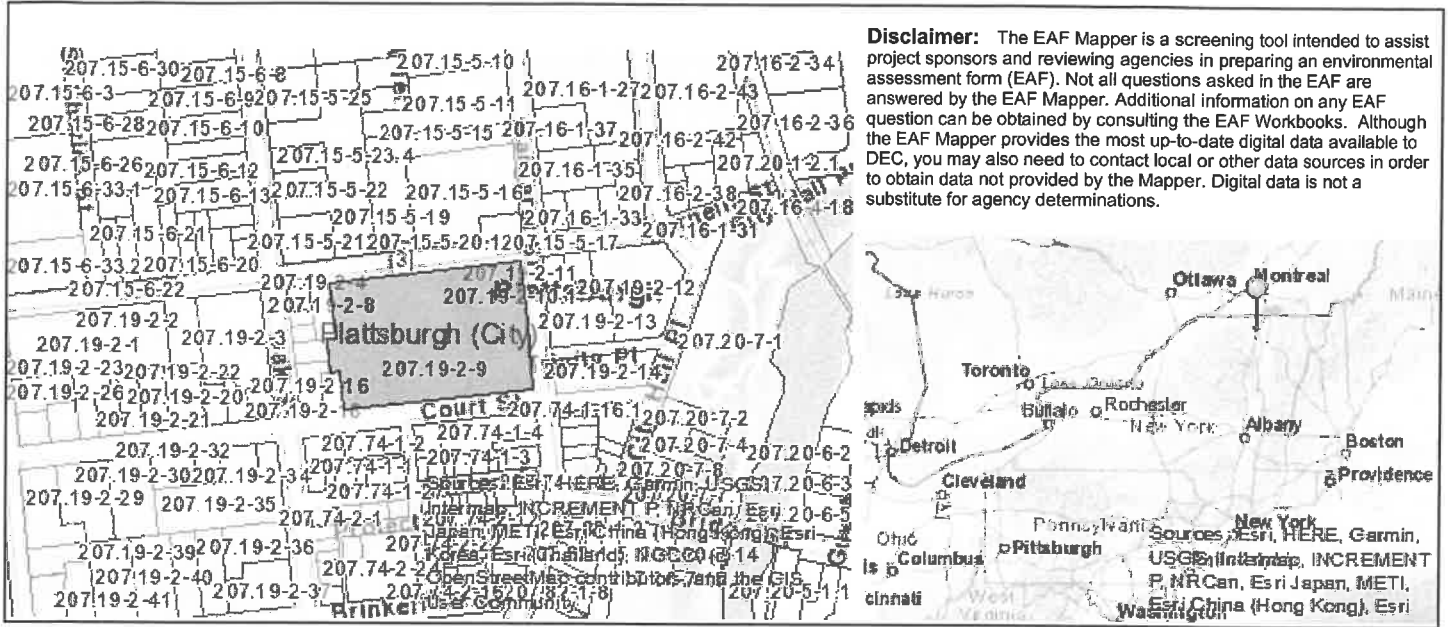
**Part 1 – Project Information.** The applicant or project sponsor is responsible for the completion of Part 1. Responses become part of the application for approval or funding, are subject to public review, and may be subject to further verification. Complete Part 1 based on information currently available. If additional research or investigation would be needed to fully respond to any item, please answer as thoroughly as possible based on current information.

Complete all items in Part 1. You may also provide any additional information which you believe will be needed by or useful to the lead agency; attach additional pages as necessary to supplement any item.

<b>Part 1 – Project and Sponsor Information</b>			
Name of Action or Project: Clinton County Government Center Parking Lot Rehabilitation			
Project Location (describe, and attach a location map): 137 Margaret Street, Plattsburgh, NY 12901 (Map attached)			
Brief Description of Proposed Action: Reconfigure, repave and re-stripe existing parking lot located at the Clinton County Government Center complex in order to maximize the number of parking spaces, improve circulation and facilitate parking lot routine maintenance activities.			
Name of Applicant or Sponsor: County of Clinton		Telephone: 518-565-4600 E-Mail: Legislature@clintoncountygov.com	
Address: Legislative Office, 137 Margaret Street - Suite 208			
City/PO: Plattsburgh		State: NY	Zip Code: 12901
1. Does the proposed action only involve the legislative adoption of a plan, local law, ordinance, administrative rule, or regulation? If Yes, attach a narrative description of the intent of the proposed action and the environmental resources that may be affected in the municipality and proceed to Part 2. If no, continue to question 2.			NO <input type="checkbox"/>
			YES <input type="checkbox"/>
2. Does the proposed action require a permit, approval or funding from any other government Agency? If Yes, list agency(s) name and permit or approval: City of Plattsburgh. Approval to utilize a small portion of City-owned land.			NO <input type="checkbox"/>
			YES <input checked="" type="checkbox"/>
3. a. Total acreage of the site of the proposed action?		1.58 acres	
b. Total acreage to be physically disturbed?		1.58 acres	
c. Total acreage (project site and any contiguous properties) owned or controlled by the applicant or project sponsor?		3.7 acres	
4. Check all land uses that occur on, are adjoining or near the proposed action:			
5. <input checked="" type="checkbox"/> Urban <input type="checkbox"/> Rural (non-agriculture) <input type="checkbox"/> Industrial <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Residential (suburban)			
<input type="checkbox"/> Forest <input type="checkbox"/> Agriculture <input type="checkbox"/> Aquatic <input checked="" type="checkbox"/> Other(Specify): Religious, government, medical			
<input checked="" type="checkbox"/> Parkland			

5. Is the proposed action,	NO	YES	N/A
a. A permitted use under the zoning regulations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Consistent with the adopted comprehensive plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Is the proposed action consistent with the predominant character of the existing built or natural landscape?	NO	YES	
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
7. Is the site of the proposed action located in, or does it adjoin, a state listed Critical Environmental Area?	NO	YES	
If Yes, identify: _____	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8. a. Will the proposed action result in a substantial increase in traffic above present levels?	NO	YES	
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b. Are public transportation services available at or near the site of the proposed action?		<input checked="" type="checkbox"/>	
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
c. Are any pedestrian accommodations or bicycle routes available on or near the site of the proposed action?		<input checked="" type="checkbox"/>	
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
9. Does the proposed action meet or exceed the state energy code requirements?	NO	YES	
If the proposed action will exceed requirements, describe design features and technologies: _____ _____	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10. Will the proposed action connect to an existing public/private water supply?	NO	YES	
If No, describe method for providing potable water: _____ The proposed action is rehabilitation of a parking lot and does not require connection to a water supply. _____	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11. Will the proposed action connect to existing wastewater utilities?	NO	YES	
If No, describe method for providing wastewater treatment: _____ The proposed action is rehabilitation of a parking lot and will not require wastewater treatment. _____	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12. a. Does the project site contain, or is it substantially contiguous to, a building, archaeological site, or district which is listed on the National or State Register of Historic Places, or that has been determined by the Commissioner of the NYS Office of Parks, Recreation and Historic Preservation to be eligible for listing on the State Register of Historic Places?	NO	YES	
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
b. Is the project site, or any portion of it, located in or adjacent to an area designated as sensitive for archaeological sites on the NY State Historic Preservation Office (SHPO) archaeological site inventory?		<input checked="" type="checkbox"/>	
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
13. a. Does any portion of the site of the proposed action, or lands adjoining the proposed action, contain wetlands or other waterbodies regulated by a federal, state or local agency?	NO	YES	
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b. Would the proposed action physically alter, or encroach into, any existing wetland or waterbody?		<input type="checkbox"/>	
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
If Yes, identify the wetland or waterbody and extent of alterations in square feet or acres: _____ _____ _____			

14. Identify the typical habitat types that occur on, or are likely to be found on the project site. Check all that apply:		
<input type="checkbox"/> Shoreline <input type="checkbox"/> Forest <input type="checkbox"/> Agricultural/grasslands <input type="checkbox"/> Early mid-successional <input type="checkbox"/> Wetland <input checked="" type="checkbox"/> Urban <input type="checkbox"/> Suburban		
15. Does the site of the proposed action contain any species of animal, or associated habitats, listed by the State or Federal government as threatened or endangered?	NO	YES
	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16. Is the project site located in the 100-year flood plan?	NO	YES
	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17. Will the proposed action create storm water discharge, either from point or non-point sources? If Yes,	NO	YES
	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a. Will storm water discharges flow to adjacent properties?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Will storm water discharges be directed to established conveyance systems (runoff and storm drains)? If Yes, briefly describe:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The site is already a parking lot, and will continue to be used as a parking lot, and storm water is already directed to storm drains conveyed to the City of Plattsburgh system.		
18. Does the proposed action include construction or other activities that would result in the impoundment of water or other liquids (e.g., retention pond, waste lagoon, dam)? If Yes, explain the purpose and size of the impoundment:	NO	YES
	<input checked="" type="checkbox"/>	<input type="checkbox"/>
19. Has the site of the proposed action or an adjoining property been the location of an active or closed solid waste management facility? If Yes, describe:	NO	YES
	<input checked="" type="checkbox"/>	<input type="checkbox"/>
20. Has the site of the proposed action or an adjoining property been the subject of remediation (ongoing or completed) for hazardous waste? If Yes, describe:	NO	YES
	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sites within 2,000 feet include 510007, V00637, C510022 and E510020. The entire existing site is already disturbed, and no subsurface excavation is proposed.		
<b>I CERTIFY THAT THE INFORMATION PROVIDED ABOVE IS TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE</b>		
Applicant/sponsor/name: <u>Rodney L. Brown</u> Date: <u>7/24/19</u>		
Signature: <u><i>Rodney L. Brown</i></u> Title: <u>Deputy Administrator</u>		



Part 1 / Question 7 [Critical Environmental Area]	No
Part 1 / Question 12a [National or State Register of Historic Places or State Eligible Sites]	Yes
Part 1 / Question 12b [Archeological Sites]	Yes
Part 1 / Question 13a [Wetlands or Other Regulated Waterbodies]	No
Part 1 / Question 15 [Threatened or Endangered Animal]	No
Part 1 / Question 16 [100 Year Flood Plain]	No
Part 1 / Question 20 [Remediation Site]	Yes

Project:

Date:

***Short Environmental Assessment Form  
Part 2 - Impact Assessment***

**Part 2 is to be completed by the Lead Agency.**

Answer all of the following questions in Part 2 using the information contained in Part 1 and other materials submitted by the project sponsor or otherwise available to the reviewer. When answering the questions the reviewer should be guided by the concept “Have my responses been reasonable considering the scale and context of the proposed action?”

	No, or small impact may occur	Moderate to large impact may occur
1. Will the proposed action create a material conflict with an adopted land use plan or zoning regulations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Will the proposed action result in a change in the use or intensity of use of land?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Will the proposed action impair the character or quality of the existing community?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Will the proposed action have an impact on the environmental characteristics that caused the establishment of a Critical Environmental Area (CEA)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Will the proposed action result in an adverse change in the existing level of traffic or affect existing infrastructure for mass transit, biking or walkway?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Will the proposed action cause an increase in the use of energy and it fails to incorporate reasonably available energy conservation or renewable energy opportunities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Will the proposed action impact existing:		
a. public / private water supplies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. public / private wastewater treatment utilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Will the proposed action impair the character or quality of important historic, archaeological, architectural or aesthetic resources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9. Will the proposed action result in an adverse change to natural resources (e.g., wetlands, waterbodies, groundwater, air quality, flora and fauna)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. Will the proposed action result in an increase in the potential for erosion, flooding or drainage problems?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11. Will the proposed action create a hazard to environmental resources or human health?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Project: \_\_\_\_\_

Date: \_\_\_\_\_

### **Short Environmental Assessment Form Part 3 Determination of Significance**

For every question in Part 2 that was answered “moderate to large impact may occur”, or if there is a need to explain why a particular element of the proposed action may or will not result in a significant adverse environmental impact, please complete Part 3. Part 3 should, in sufficient detail, identify the impact, including any measures or design elements that have been included by the project sponsor to avoid or reduce impacts. Part 3 should also explain how the lead agency determined that the impact may or will not be significant. Each potential impact should be assessed considering its setting, probability of occurring, duration, irreversibility, geographic scope and magnitude. Also consider the potential for short-term, long-term and cumulative impacts.

The existing site is a parking lot, and the proposed action would result in the improvement and a slight expansion of the lot on the site by reducing internal walkways and parking islands and replacing with parking. The proposed action will also increase the number of entrances/exits to Court Street from three to five. The reduction of internal walkways is minor and sufficient walkways will still exist on the site to allow pedestrians to safely move from their cars to the government center buildings. The increase of entrances and exits to Court Street will involve two additional curb cuts across the sidewalk on the north side of Court Street, but the impact to pedestrians utilizing the sidewalk is expected to be minimal as the City has agreed to remove the parallel parking spots adjacent to this sidewalk, greatly improving the ability of drivers entering exiting the parking lots to see and avoid pedestrians. In addition, all three of the existing entrances/exits to the parking lot are two-way, thereby requiring pedestrians utilizing the sidewalk to look in both directions as they cross those entrances/exits. The addition of the two additional entrances/exits to the parking lot will allow the County to establish four of the five entrances/exits as one way only, making it easier for the pedestrians utilizing the sidewalk to look only one direction when crossing those entrances/exits.

Overall, the project will increase the total number of parking spaces by 55 spaces, from 158 to 213 (principally by re-striping the lot and converting angled parking to perpendicular parking). The project will also improve on-site circulation by improving access to and from Court Street.

The impact of the project is not expected to be significant. The site has been used as a parking lot for decades and will continue to be used as a parking lot. The circulation of vehicles on the site will be improved, the total number of parking spaces will be increased to address an anticipation of a shortage of parking, and the impact to pedestrians on the periphery of the property is expected to be minor, and perhaps even improved.

- Check this box if you have determined, based on the information and analysis above, and any supporting documentation, that the proposed action may result in one or more potentially large or significant adverse impacts and an environmental impact statement is required.
- Check this box if you have determined, based on the information and analysis above, and any supporting documentation, that the proposed action will not result in any significant adverse environmental impacts.

County of Clinton

\_\_\_\_\_  
Name of Lead Agency  
Rodney L. Brown

8/15/19

\_\_\_\_\_  
Date  
Deputy Administrator

\_\_\_\_\_  
Print or Type Name of Responsible Officer in Lead Agency

\_\_\_\_\_  
Title of Responsible Officer

*Rodney L. Brown*  
Signature of Responsible Officer in Lead Agency

\_\_\_\_\_  
Signature of Preparer (if different from Responsible Officer)

**PRINT FORM**