

APPENDIX 14
RESPONSES TO COMMENTS

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I. PROJECT DESCRIPTION AND NEED

No specific comments were received regarding this section.

II. SOCIOECONOMIC AND PHYSICAL ENVIRONMENTAL SETTING AND IMPACT ANALYSIS

A. DEMOGRAPHY

II.A.1 Population Growth:

The growth in population within the Study Area was based on the evaluation of the Cumulative Growth Development Scenario. In formulating this scenario, a number of steps were taken which are detailed in Section II, B, Land Use and Zoning, pages II-9 to II-20. The reader is also referred to the Land Use & Zoning portion of this Appendix.

A projected increase in population for the Study Area was determined by multiplying the number of housing units anticipated by an average household size of 2.56 persons per unit. The average household size is based on data supplied by the Capital District Regional Planning Commission (CDRPC). It should be noted that this scenario is only one of many potential growth scenarios which could occur as a result of development pressure during the 15-year planning period. If a demand for 1,584 housing units does not materialize, then the population for the Study area will not increase at the projected rate.

Population forecasts for this portion of the Town are higher than projections developed by the CDRPC. There are several reasons for this. First, the Town and Village Planning Boards are currently entertaining applications for 840 housing units in the Study Area alone. These projects alone could increase the Study Area population by over 2,150 people. Second, the

existence of over 2,500 acres of undeveloped land within an area that is heavily developed and centrally located within the Capital District Region has and will continue to experience significant pressure for growth. Nevertheless, changing economic conditions or more stringent controls on development could impact the level of growth that occurs in the Study Area during the 15-year planning period. Third, the target growth land use scenario evaluated in the CDTC studies for the Wolf Road and Albany County Airport Area Traffic Assessment Studies indicated that up to 1,734 new housing units could be expected by the year 2005. These study areas encompass an area somewhat smaller than the Airport Study Area as defined in the FGEIS. The portions of the Study Area not included in the CDTC studies can generally be described as the lands north of Route 7 and west of Vly Road within the Town of Colonie.

II.A.2. Miscellaneous Comments:

The comment is noted.

B. LAND USE & ZONING

II.B.1. Development Scenario:

The level of development evaluated in this document is not intended to be a development goal or objective. As stated on page II-9 of the FGEIS, the Cumulative Growth Scenario represents potential future conditions if no action is taken by local municipalities and involved agencies to control development in the Study Area beyond those land use controls which currently exist. The purpose of any EIS is to identify both impacts and mitigation measures associated with a given action. In instances when specific impacts and mitigation measures cannot be identified due to project uncertainties or a potential change in

the project, usually the impacts associated with the worst case situation should be evaluated. This analysis was conducted through the evaluation of impacts associated with the High Growth Future Development Scenario included in the FGEIS.

This type of analysis ensures that the proper magnitude of impacts are evaluated. If a lower level of development is evaluated and future conditions result in more aggressive growth, then a supplemental GEIS would be required for the Study Area. Through the evaluation of the Cumulative Growth Scenario, improvements necessary to support anticipated development can be planned, designed, and constructed in the most efficient and cost effective manner.

If growth occurs at a slower rate than anticipated, fewer public improvements will be necessary. Capital Improvement Plans normally phase improvements over a 3 to 5 year period. Annual monitoring of growth and adjustments to the Capital Improvement Plans will be necessary to ensure that the level of improvements and applicable mitigation fees are appropriate to support that development which actually occurs during the 15-year planning period.

The methodology used to develop the Cumulative Growth Scenario utilized a four-step process. This process included: a review of various development proposals under active consideration by the Town and Village Planning Boards, the inclusion of data from the 1988 Traffic Assessment for the Albany County Airport Area and Transportation System Plan for the Wolf Road/Airport Area prepared by the CDTC, the assignment of speculative development identified in the CDTC studies listed above to specific sites in the Study Area, and input from landowners of 5 acres or more within the Study Area. The methodology used to develop this scenario is also described in Section II,B, Land Use and Zoning, pages II-9 through II-20. The agricultural lands targeted to remain in production through the year 2005 were also based on contact with owners of these lands and assumptions made by CDTC (Section II,B, Land Use and Zoning, page II-10).

In regard to more specific questions about the projected square footage of commercial space and the number of housing units, the following clarification is offered. The combination of the Transportation System Plan for the Wolf Road/Airport Area and Traffic Assessment for the Albany County Airport Area prepared by the CDTC evaluated a "Target Growth Future" of approximately 6.1 million square feet of commercial development and 1,734 housing units. These studies did not include any projections for development in areas north of Route 7 between Vly Road and New Karner Road. Table II-B-2 of this FGEIS identifies 64 residential and commercial projects which were before the Village and Town Planning Boards at the time the GEIS process was initiated. This included 840 residential units and 2.8 million square feet of commercial space.

Consideration should also be given to the fact that the Study Area currently contains over 2,500 acres of undeveloped land and over 800 acres of active agricultural land. As a result, population growth in this portion of the Town may out-pace the growth rate for the Town as a whole.

As a result of the projected 1,583 housing units to be built by the year 2005, an additional 4,052 people (2.56 people/residential unit (CDRPC)) would reside in the Study Area. This estimate, combined with the population forecasted in the Boght Road - Columbia Street GEIS and growth in the remaining portions of the Town, would result in a Town-wide population of 99,677 in the year 2005.

The prediction of 23,000 new jobs for the Study Area is based on the construction of 7.4 million square feet of commercial space projected in the FGEIS. The guidelines used to estimate new jobs were based on those developed by the CDTC in the Proposed Transportation System Plan for the Wolf Road

/Airport Area to project future employment levels. Again, development may not occur by the year 2005 at the level projected in the FGEIS, however, if it does it is reasonable to assume that 23,000 new jobs would be created.

Finally, the FGEIS will allow the Town and Village of Colonie and Albany County to determine if the level of development, the associated physical and socio-economic impacts, and the mitigation measures are desirable or achievable. Existing Town and Village of Colonie zoning laws, as well as the regulations and guidelines of involved agencies, would permit this level of development to occur. As a result, involved agencies may wish to review existing regulations to determine if changes are necessary to control growth.

II.B.2. Enplanements:

The projected enplanements included in the DGEIS were based on the "Preferred Forecast" in the 1987 Upper Hudson Region Air Services Study prepared by Cress & Associates, Inc. for the CDRPC. Since that time, the CDRPC has reviewed and updated these projections (Upper Hudson Regional Aviation System Plan, Study of Service Demand CDRPC, June 1990) and determined that a more likely scenario is the "Low Range", defined in the 1987 study. As a result, enplanements may be expected to increase by 1.2 million, rather than 1.5 million annually as indicated in the DGEIS. As stated in the Executive Summary of the Upper Hudson Regional Aviation System Plan dated 1990, "Although total enplanements at the Airport are showing signs of slowing, that does not necessarily jeopardize the overall improvement program." The improvement program referred to is developed in the Draft Albany Airport Layout Plan and Land Use Study prepared in 1990 (Appendix 12). The CDRPC study further recommends that enplanements and economic trends should be monitored frequently to ensure that capital improvements at the Airport are phased in efficiently.

One recommendation of the FGEIS states that development trends in the Study Area must be monitored on a regular basis to ensure that public improvements keep pace with actual development. As stated in the FGEIS, a CIP must be developed to outline the phasing of necessary improvements. If necessary, the CIP can be modified based on changing conditions.

II.B.3. Shaker Run Apartments:

At the time the DGEIS was prepared, the Shaker Run Apartments proposal included 192 dwelling units. It is noted that the project size has been reduced to 184 apartments; however, a change of 8 units within the context of a study of this magnitude will have a negligible effect on the projected impacts or mitigation measures described in the FGEIS. It is further noted that the project has not yet been granted any approvals and the scale of the project is likely to be further refined in the months ahead.

II.B.4. Cumulative Growth Scenario and LUMAC:

Open space and Agricultural Lands identified in the Land Use Management Program Technical Report prepared by LUMAC and the Future Land Use Map included in the FGEIS were compared. The Future Land Use Map designates a larger area of open space within the Study Area than does the LUMAC Land Use Plan. Although under the Cumulative Growth Scenario more open space has been mapped, this does not represent an endorsement of any level of development (See Response II.B.1). However, this level of development could occur in the Study Area based on existing zoning and land use regulations currently in place.

II.B.5. Agricultural Lands:

Contact with area farmers was the largest factor contributing to the prediction that certain agricultural lands would remain in

active use through the year 2005. Projections developed by CDTC for their 1988 traffic studies covering the Study Area were also considered. General economic conditions as well as the specific financial situation of each land owner may alter this prediction. The FGEIS recognizes the problem of dwindling farmland and outlines mitigation measures on pages II-18 and II-19.

II.B.6. Stewart Airport Impact:

The development of Stewart Airport is in its infancy and the facility has only just begun to provide limited passenger service via regularly scheduled commercial airline flights. The future impact on operations at Albany Airport is not presently known. Nevertheless, Stewart Airport is being promoted as an option to passengers who reside in the lower Hudson Valley Region and would normally travel to New York City based airports for commercial air service. As a result, the impact of expanded operations at Stewart Airport is not likely to have a significant impact on Albany Airport passenger enplanements.

II.B.7. Miscellaneous Comments:

The comment is noted.

II.B.8. Completion of SEQR Process and Initiation of Capital Improvement Plan:

The purpose of the Airport Area FGEIS is to address questions and comments which were raised during the public review period for the Airport Area DGEIS. If the FGEIS is accepted as complete by the lead agency, a Findings Statement will be prepared. It is normally the responsibility of each involved agency to prepare their own independent findings. However, due to the cooperation between the Town of Colonie, Village of Colonie, and Albany County in

preparation of the GEIS, the preparation of a joint Findings Statement should also be considered. The Findings Statement will then serve as the framework for the preparation of a Capital Improvement Plan (CIP).

Prior to the preparation of the CIP a detailed intermunicipal agreement between the Town of Colonie, Village of Colonie, and Albany County should be developed to clearly delineate the responsibilities and obligations of each municipality. This is described in pages II-259 and II-260 of the FGEIS. Primarily, the intermunicipal agreement should address issues related to the collection of fees and the coordination of improvements for transportation, recreation, and water supply facilities.

The CIP is an important part of the overall planning process related to the Airport Area. The Findings Statement will aid in the identification of specific improvements that will be required as development progresses and should be used as a basis to formulate the CIP. The CIP process will identify and prioritize necessary infrastructure improvements, normally in 5-year increments. Once the CIP is adopted by the municipalities and implementation of specific projects are initiated, the CIP schedule should be reviewed and updated annually. This will ensure the proper timing of improvements especially if development proceeds at a different pace than that which was evaluated in the GEIS.

The primary goal of this GEIS process is to facilitate the development of a CIP that coordinates necessary improvements in an efficient, cost-effective manner. Municipal improvements will be phased in such a manner so that they can keep pace with development. As stated in the FGEIS, the Development Mitigation Cost system will be used to finance necessary improvements related to the Cumulative Growth Scenario. Existing deficiencies will not be financed through this system.

II.B.9. LUMAC Recommendations:

A goal of this FGEIS is to identify potential environmental impacts and mitigation measures associated with the Cumulative Growth Scenario. Any recommendations made in the LUMAC Technical Report which would tend to mitigate the impacts associated with this development have also been identified in the FGEIS. The decision to implement these mitigation measures rests with the lead agency and other involved agencies.

II.B.10. Growth Controls:

The SEQR process allows applicants, agencies, and the public to identify impacts and mitigation measures of a particular action or set of actions. The numerous mitigation measures outlined in this document include, for example, growth controls such as rezoning within certain portions of the Study Area (FGEIS pages III-22 through III-37).

Once the FGEIS is accepted as complete, each involved agency is responsible for the preparation of a Findings Statement (SEQR Part 617.9). The Findings Statement in part, must incorporate those mitigation measures that are identified as practicable in the SEQR process. Once the Findings Statement is complete, the criteria outlined in it will be part of any approval process such as site plan and/or subdivision approval. If the Findings Statement identifies growth control measures or other regulatory changes, each agency will be responsible to implement these land use controls.

The SEQR process is not the final resolution of the issues addressed in the DGEIS, FGEIS and Findings Statement documents. The SEQR process

does, however, identify the steps that must be taken in order to mitigate to the extent practicable the impacts associated with the Cumulative Growth Scenario. The reader is referred to response 1 in this section for more information.

II.B.11. "Real" Target Growth:

The Cumulative Growth Scenario evaluated in the FGEIS is based on various assumptions described in Section II, B, Land Use and Zoning. Impacts and the suggested mitigation measures will vary if development occurs at a slower or more rapid pace. Capital Improvement Programs, land use controls, and community and agency land use goals will have to be reviewed on a regular basis to ensure that necessary improvements are keeping pace with actual development and that land use controls continue to be effective in meeting Town, Village, and County goals.

II.B.12 Course and Pace of Development:

The Cumulative Growth Scenario is an attempt to identify impacts associated with a fairly aggressive level of development (see response II.B.1., of this appendix). This level of development may or may not occur within the 15-year planning period. If the Town, Village, or County determines that the impacts associated with this level of development are unacceptable for socio-economic and/or environmental reasons, they must initiate steps to ensure that a lower level of development occurs. Some methods, as suggested in Section II, B of the FGEIS include rezoning certain parcels of land, creating greenbelts, implementing overlay districts, and limiting development in environmentally sensitive areas. A variety of other land use controls are described in Section III of the FGEIS.

II.B.13. Optimum Level of Growth:

The cost of providing adequate levels of service on Study Area roadways in order to keep pace with development is one of the primary factors in determining what level of development is acceptable. However, as part of this SEQR process a number of other factors must also be considered including impacts to the physical environment, land use, infrastructure, and community services. The Town, Village, and County must use this information to determine if this level of development is acceptable (see response II.B.1. above). If the lead agency or another involved agency determines that growth control measures are appropriate, it may be necessary to reevaluate impacts and mitigation measures as required. The list of recommendations provided by the Colonie Coalition of Homeowner Associations includes a variety of methods for controlling growth within the Study Area.

II.B.14. Airport Development:

The April 1990 draft Albany County Airport Updated Layout Plan and Land Use Study (ALP) has been included in the FGEIS as Appendix 12. The FGEIS evaluates, on a generic level, the impacts associated with the proposed improvements identified in the ALP and identifies appropriate mitigation measures. The FGEIS does not, however, evaluate the site specific environmental impacts or the mitigation measures that may be required for full implementation of the ALP. Therefore, at such times when the phased improvements of the ALP are implemented, compliance with the National Environmental Policy Act (NEPA) will be required as may additional environmental review under the State Environmental Quality Review Act (SEQR). These additional environmental reviews will analyze site specific impacts and mitigation measures associated with the proposed ALP improvements.

II.B.15. Development Levels:

The FGEIS reflects a level of development which could occur in the Study Area during the 15-year planning period if current zoning and other land use controls are maintained. It is one step in the process of determining what level and type of growth is acceptable from an environmental and socioeconomic viewpoint. Once this has been determined, it will be necessary for local municipalities to reevaluate existing land use controls, and guidelines and make appropriate changes. The costs associated with providing necessary infrastructure improvements to support a certain level of development are an important factor which government agencies use to determine the level and type of growth acceptable for the Study Area.

II.B.16. Use of Overlay Map System

Each section of the FGEIS presents various exhibits including existing land use, soils, vegetative communities, problem flooding areas etc. as necessary. These will be one of the tools utilized by the Town and Village of Colonie and Albany County in making future land use decisions within the Study Area.

II.B.17. Projects Included in the GEIS Process:

The Town of Colonie, as lead agency, adopted a Positive Declaration for the Airport Area on October 24, 1989. Any individual projects proposed within the Study Area boundaries that had not received a Positive or Negative Declaration in accordance with SEQR Part 617.6 prior to this date are subject to the findings to be adopted by the lead agency and other involved agencies.

C. GEOLOGY, TOPOGRAPHY, SOILS:

II.C.1. Miscellaneous Comments:

The comment is noted.

D. VEGETATION, WILDLIFE AND AQUATIC ECOLOGY:

II.D.1. Greenbelts:

The Greenbelts as shown on Exhibit II-D-5 represent a conceptual plan for linking open space. Pages II-51 through II-53 of the FGEIS outline a number of mechanisms to establish greenbelts. If the involved agencies choose to pursue the idea of greenbelts, a more detailed plan could be developed and specific land areas could be identified. At that time, a determination would have to be made as to how these greenbelts would be established.

II.D.2. Hydric Soils:

The Town of Colonie recently developed a policy regarding lands that could be considered jurisdictional wetlands by the Army Corps of Engineers under Section 404 of the Clean Waters Act. As development plans are pursued, individual applicants are responsible for contacting and securing the necessary approvals from the U.S. Army Corps of Engineers and accommodating those wetlands into a project's design prior to submitting concept development plans to the Town of Colonie Planning Board.

II.D.3. Management of Airport Lands for Habitat:

Airport lands could potentially be managed for short grass species and habitat. The County will have to evaluate this option in regard to economic and safety considerations. Any action taken by the Airport in this matter would have to meet FAA safety requirements.

ILD.4. Field Investigations:

Data utilized for these investigations was obtained from various sources including the NYSDEC Wildlife Resources Center and Albany County Planning Department as well as various publications as listed in the Reference Section of the FGEIS. Field visits were conducted at various locations throughout the Study Area to verify information collected above. The results of these field visits and data collection efforts are shown in Exhibits II-D-1, II-D-2, II-D-3, II-D-4, and II-D-5.

ILD.5. Miscellaneous Comments:

The comment is noted.

E. GROUNDWATER

ILE.1. Protection of Resources:

Section II,E, Groundwater and II,F, Hydrology, Drainage, and Water Quality identify mitigation measures that, if implemented, would protect groundwater resources. The lead agency notes the comments of NYSDEC Region IV office regarding protection of groundwater resources. Section II,E has been revised to address these comments. Appendix 15 has been added to the FGEIS to incorporate a copy of the draft Schenectady Intermunicipal Watershed Rules and Regulations provided to the lead agency by the NYSDEC Region IV office.

ILE.2. Miscellaneous Comments:

The comment is noted.

F. HYDROLOGY, DRAINAGE AND WATER QUALITY

II.F.1. Stream Protection:

The Town of Colonie has a Watercourse Protection Law which protects certain streams from encroaching development. The FGEIS acknowledges the existence of these regulations and recommends that they continue to be enforced.

II.F.2. Shaker Creek in the Village of Colonie:

At the time the DGEIS was prepared, the proposed Shaker Run Apartments had not received any final approvals. As a result, it was recommended that the portion of Shaker Creek within the Village be protected in accordance with the same guidelines outlined in the Town Watercourse Area Management Ordinance. The agreement reached between the NYSDEC, Village of Colonie and the applicant should achieve in the same goal, the protection of Shaker Creek.

II.F.3. Stormwater Management:

The FGEIS identifies stormwater management practices that, if implemented, will protect surface and groundwater resources. It is believed that the most successful program of protection will result from the use of standardized stormwater management practices. It is recognized that a majority of the Shaker Creek watershed in the Village is developed; however, there is potential for some additional development or redevelopment in the Village which may impact a portion of the Shaker Creek watershed. Therefore, standardized stormwater management practices are recommended for this area of the Village.

II.F.4. Miscellaneous Comments:

The comment is noted.

II.F.5. Stormwater Runoff Controls:

Due to the frequent flooding problems in the Shaker Creek watershed, several modifications to the Town's current stormwater regulations were suggested. These recommendations included limiting the 50-year post-development discharge to the 50-year pre-development level (page II-95); however, this recommendation is based on conditions in the Shaker Creek watershed and is limited to that watershed.

In addition, the current Town policy ensures that peak mitigation will be provided for the 25-year event (page II-87). Standard engineering practices require that detention structures be designed for safe passage of the 100-year storm.

G. UTILITIES

II.G.1. Availability of Electric and Gas:

The reader is referred to page II-104 and Appendix 1 of the FGEIS. The information regarding capacity and potential improvements to Niagara Mohawk Power Corporation (NMPC) facilities was provided by NMPC based on the potential impacts identified under the Cumulative Development Scenario.

II.G.2. Improvements to the Existing Sanitary Sewer System:

The location and sizing of the sanitary sewer collection system was determined by the Town of Colonie Pure Waters Department during the formation of this improvement area. Contact with the Pure Waters Department (pages II-114 and II-116) indicated that the sewer system is capable of handling the

additional wastewater flows that would result from the Cumulative Growth Scenario. Also, as stated on page II-116, connections to the sanitary system are the financial responsibility of each developer and subject to the approval of the Town of Colonie Pure Waters Department.

II.G.3. Miscellaneous Comments:

The comment is noted.

H. TRANSPORTATION

II.H.1. Methodology Used to Determine Required Improvements:

The process of identifying existing deficiencies as well as future roadway improvements in the Study Area involved a series of steps which follow standard engineering practices and are accepted by the NYSDOT. In regard to existing deficiencies, please refer to Section II,H, Transportation, pages II-125 through II-128. Based on an analysis of existing highway capacities and levels of service for Study Area roadways, a number of existing deficiencies were identified as outlined on Table II-H-2. These deficiencies had been previously identified by the CDTC and this agency estimated the cost of these improvements between \$8,420,000 and \$11,780,000. These costs have not been included in the Development Mitigation Costs outlined in Table II-O-5.

Table II-H-2, which outlines existing deficiencies in the Study Area, does not include a new Northway Exit 3 or north-south arterial, although under the Cumulative Growth Scenario these improvements will be necessary by the year 2005. The improvements to various intersections at Route 7, Albany Shaker Road and Watervliet Shaker Road, which were identified in Table II-H-2, were not included in Table II-O-5, Development Mitigation Costs.

The steps used to determine future transportation needs are identified on pages II-129 through II-136 of the FGEIS. The methods used to identify transportation needs are consistent with accepted engineering practice and NYSDOT procedures. The recommended improvement package will provide motorists with efficient travel routes throughout the Study Area. The locations and extent of these improvements are based partially on existing and future traffic distribution patterns. It is unlikely that large numbers of motorists will consciously choose less efficient or indirect routes when traveling between two destinations.

The determination that the five percent of future traffic growth in the Study Area is based on background growth rates developed by the CDTC. Background growth rates vary based on the level of development being considered in a specific location. In the Cumulative Growth Scenario, the level of development is concentrated and nearly 21,000 new pm peak hour trips will be generated.

II.H.2. Albany Shaker Road Traffic Projections:

The Anderson PUD was considered during the transportation analysis for Albany Shaker Road. This project includes a proposed access road to be located between Sand Creek and Albany Shaker Roads. The distribution analysis was based, in part, on the construction of Exit 3 and the new arterial between Wolf Road and Route 7. The distribution analysis indicated that the increase in traffic on this section of Albany Shaker Road is somewhat less than traffic increases on other major roadways in the Study Area.

II.H.3. Office and Retail Development:

Trip generation rates for each potential project were based on Institute of Transportation Engineers (ITE) guidelines. These guidelines distinguish between a large number of land use types including retail, office, manufacturing, warehouse, and residential uses. Table II-O-5 which estimates

Development Mitigation Costs for the Study Area, illustrates the delineation of transportation costs into five categories including: airport, residential, office, retail, and industrial uses. These costs were based on the increase in expected traffic for each land use type listed above.

II.H.4. NYS Route 7 Widening:

The recommendation that Route 7 be widened to include 3 through lanes in each direction between I-87 and the Schenectady County Line is based on traffic projections which would result if development occurred as anticipated under the Cumulative Growth Scenario. It is not meant to imply that there are not difficulties associated with the implementation of this improvement, especially in terms of economic impacts and ROW needs. If this transportation improvement is unacceptable to the lead agency or other involved agencies, they must take steps to ensure that acceptable levels of service can be maintained on this roadway. This could be accomplished through measures to control growth or by evaluating alternative roadway improvements.

The NYSDOT has indicated that they will begin a major reconstruction of Route 7 between the Northway (I-87) and the Schenectady County line in 1991. This project will provide two through lanes in each direction and a continuous left-turn median on Route 7 between Wade Road and St. David's Lane. They have indicated that, during the 15-year planning period, they do not plan to further widen Route 7 to accommodate six lanes of traffic. Should this be the case, other actions should be considered to reduce traffic congestion on this roadway.

Continuous concrete barriers could be placed between eastbound and westbound lanes to limit left turns only to key intersections such as Albany Shaker Road. A series of service roads could be constructed parallel to and

behind existing properties with frontage on Route 7 to separate local traffic (those vehicles making multiple stops) from through traffic. Neither of these improvements is likely to be completely successful in mitigating traffic impacts anticipated for Route 7 under the Cumulative Growth Development Scenario. Nevertheless, the lead agency and the involved agencies should consider these options as well as others identified in this FGEIS when evaluating necessary highway improvements within the Route 7 corridor.

II.H.5. Existing Roadway Deficiencies:

The focus of the DGEIS was to identify the impact which future development would have on the roadways within the Study Area through the year 2005. Existing roadway deficiencies in the Study Area cannot be attributed to development which has yet to occur. As a result, the capital costs of improvements identified to correct existing roadway deficiencies cannot be assessed to future development. Nevertheless, it is essential that the list of existing transportation deficiencies be addressed prior to the consideration of the transportation improvements identified as part of the Cumulative Growth Scenario. This will ensure that the complete package of improvements is successful in meeting the goal of providing orderly and efficient traffic movement within the Study Area. The Town and Village of Colonie and Albany County will have to consider various funding mechanisms to pay for construction of these short-term roadway improvements.

The use of Transportation Development Districts (TDDs) as discussed in the CDTC Draft Procedures for Public/Private Highway Financing In The Capital District may be one mechanism which could help fund these improvements. TDDs are also discussed on pages II-263 through II-264 of the FGEIS as a means of financing future improvements. Although the implementation of these existing deficiencies is an important issue, it is not within the scope of this FGEIS.

II.H.6. Transportation Systems Management (TSM) Strategies:

A 25 percent reduction in traffic (FGEIS page II-134) through the implementation of TSM strategies is an optimistic goal. Based on the level of growth evaluated in the FGEIS, however, this goal must be reached to maintain acceptable levels of service on Study Area roadways through the end of the 15-year planning period. All recommended improvements were based on the assumption that this reduction in traffic would be accomplished. Another option to consider is an even more extensive level of highway improvements, a choice that will be more costly and require more ROW acquisition than what is currently proposed in the FGEIS.

The traffic impacts and improvements associated with the Cumulative Growth Scenario are significant. The function of the FGEIS is to identify impacts and potential mitigation measures associated with this level of growth. The lead agency and involved agencies must determine, based on the information provided in the FGEIS, if this level of growth and the associated impacts and mitigation measures are acceptable and feasible to accomplish. If the Town and Village of Colonie and Albany County do not feel that a 25 percent reduction in traffic can be accomplished through TSM strategies, other options must be considered. These could include: a more extensive improvements package, accepting a decreased level of service on area roadways, or the consideration of various growth controls which will reduce traffic generation.

II.H.7. I-87 Interchange:

The recommendation of new I-87 interchanges is one option to mitigate traffic impacts resulting from development in the Study Area. These suggested improvements which are shown on Exhibit II-H-4 and II-H-5 are conceptual and more detailed engineering and planning will be required. Technical issues

regarding design and spacing of an interchange would have to be addressed in a detailed transportation study. The alignments as shown in the FGEIS generally follow those included in the CDTC reports: Traffic Assessment for the Albany County Airport Area and Proposed Transportation System Plan for the Wolf Road/Airport Area.

II.H.8. Widening of I-87 Mainline:

The comment is noted. The DGEIS stated that a greater planning effort would be required to completely address all the future transportation needs along the I-87 mainline from Albany to Saratoga Springs. This effort is beyond what can be accomplished within this GEIS process.

II.H.9. Phased Implementation:

The FGEIS recommends that a single agency coordinate the necessary transportation improvements planned for the Study Area. For this agency to work effectively a CIP, as described in response II.B.1. of this appendix, must be developed. CIPs normally cover a 3-5 year period and are reviewed annually. This will give the agency responsible for coordinating the highway improvements, as well as other involved agencies such as the NYSDOT, the ability to ensure that improvements are implemented in a coordinated manner and are able to keep pace with future development in the Study Area.

II.H.10. Miscellaneous Comments:

The comment is noted.

II.H.11. Traffic Projections:

The traffic analysis in the FGEIS includes existing as well as future conditions. Table II-H-3 summarizes existing as well as future traffic

volumes for the pm peak hour. Traffic volumes for the year 2005 include not only traffic generated as a result of the Cumulative Growth Scenario but, existing background traffic and background traffic growth.

II.H.12. Target Growth Scenario:

As stated in the Notes to Readers page found in the front of the Executive Summary of the FGEIS, the name "Target Growth" scenario has been changed to the "Cumulative Growth Scenario."

II.H.13. Further Traffic Analysis:

It was acknowledged during the preparation of the DGEIS that there are an unlimited number of development possibilities that could be evaluated. The Cumulative Growth Scenario, which represents a fairly aggressive level of development, was chosen to gain an understanding of the magnitude of impacts associated with this level of development.

Upon the completion of the FGEIS, the lead agency as well as each involved agency will be required to prepare a Findings Statement. Following this, CIPs must be prepared to identify the level and timing of the necessary improvements. The pace of development will impact the level of necessary improvements. In addition, any plans to construct roadway improvements will require further engineering studies and detailed design plans. It is these studies and plans that will determine the exact location and magnitude of any necessary improvements.

The purpose of the FGEIS is to identify the impacts and mitigation measures which may occur based on the analysis of various levels of

development in the Study Area. A package of transportation improvements is proposed in the FGEIS to mitigate transportation impacts of development anticipated under the Cumulative Growth Scenario.

II.H.14. Impacts to the Residential Community:

Many of the improvements outlined in the FGEIS include road widenings which may require additional ROW. These widenings, while having the positive impact of improving traffic movement, may have some negative impacts to homeowners along these roads. Homeowners will be faced with the possibility more traffic related noise, the taking of portions of yards for ROW, and more difficult access to and from their residences.

II.H.15. Application of TSM Strategies:

Some type of regional approach to TSM strategies will be necessary to operate an effective and successful program. The Town and Village of Colonie and Albany County will need to determine how and when these strategies will be applied.

II.H.16. Proposed I-87, Exit 3:

The proposed I-87 Exit 3 would divert traffic from Wolf Road to I-87, thereby reducing traffic volumes that are currently using the most heavily traveled section of Wolf Road. This improvement was also recommended in the 1988 CDTC study, Traffic Assessment for the Albany County Airport Area, as being necessary to allow surrounding roadways to operate at acceptable levels of service. The FGEIS does not recommend additional through lanes on Wade Road; however, various intersections in the Study Area will need to be widened to provide exclusive turning lanes.

Having all truck traffic exit I-87 at Exit 5 and closing the western ramp would have to be studied in greater detail to determine if this citizen's suggestion is a viable solution. Requiring all trucks to exit I-87 at Exit 5 would require improvements to the roadway system to accommodate heavier vehicles. Removing truck traffic at Exit 5 may not decrease traffic volumes sufficiently to mitigate the need for I-87 Exit 3.

The proposed I-87 Exit 3 will result in both economic and environmental impacts. Nevertheless, these impacts must be weighed against the resulting impacts on Study Area roadways if the improvements are not constructed and levels of service are allowed to further decline.

II.H.17. Proposed North-South Arterial:

The methods used to develop the Cumulative Growth Scenario are described in the FGEIS pages II-9 through II-20 and in Response II.B.1. As stated on page II-135, the proposed north-south arterial is necessary to provide adequate levels of service on Albany Shaker Road and other area roadways. Page II-136 indicates that the arterial will significantly improve operating conditions along Albany Shaker Road and at the I-87 Exit 4 interchange as well as provide a better link from I-87 to the Airport.

Option 2 roadway improvements, which include a tunnel under the north-south Airport runway, was recommended to reduce significant impacts to the Watervliet Shaker Historic District that would result from the implementation of Option 1 roadway improvements. Without the full interchange at Exit 3 of I-87 coupled with the north-south arterial (as shown in either Option 1 or Option 2), there would not be enough capacity at Albany Shaker Road to accommodate all of the projected traffic demand.

A level of service D is an acceptable level of service based on NYSDOT standards. In some cases the improvements necessary to obtain levels of service A through C would be impracticable based on physical constraints or economics. If the arterial was not constructed, Albany Shaker Road would have to be widened to 4 lanes in each direction to accommodate the projected future traffic volumes.

II.H.18. Northway Exit 6:

Page II-139 of the FGEIS recognized that even with the improvements at Wade Road and NYS Route 7, the link between Wade Road and the I-87 Exit 6 interchange and the interchange itself will continue to operate at level of service F during peak hour conditions. The interchange overpass is already 7 lanes wide; therefore, future improvements of any significance at this overpass are not feasible. To accommodate the traffic projected under the Cumulative Growth Scenario, a multi-level grade separated interchange would likely be required. This would eliminate much of the existing commercial development in this area. For this reason, efforts were concentrated to improve the Exit 4 and Exit 5 interchanges of I-87. A higher percentage of traffic accesses the Study Area at these two interchanges than at Exit 6. Transportation improvements identified in Option 1 and Option 2 would divert some traffic from Exit 6 to Exit 4 or 5 of I-87. However, improvements of any significance to the Exit 6 interchange of I-87 area may not be feasible.

II.H.19. Route 7 Bypass:

The route from Sicker Avenue to Kelly Road, Old Niskayuna Road and Exit 5 of I-87 would primarily serve as a local bypass for Route 7 rather than a service road. The intent of service roads is to provide direct access to establishments and developments immediately adjacent to the mainline while limiting

interruptions of traffic flow. The connection of these two-lane roads would not significantly alter the traffic volumes along Route 7. The circuitous routing would also make it less attractive to potential users.

II.H.20. Short-term Improvements:

The list of short-term improvements in Table II-H-2 represents mitigation measures necessary to correct existing traffic deficiencies. The implementation of these improvements will result in more efficient traffic movement in the Study Area, but will not address any future deficiencies resulting from the Cumulative Growth Scenario.

The proposed widening of Watervliet Shaker Road in the vicinity of Ann Lee Pond will have an impact on the character of the area including potential impacts to the Watervliet Shaker Historic District and the Ann Lee Pond Nature and Historic Preserve. This would have to be taken into consideration during the detailed design of this improvement.

II.H.21. Airport Access Road:

Closing of the Airport Access Road to through traffic is based on a conceptual plan for terminal expansion prepared by an architect for Albany County.

II.H.22. Transportation Options:

Both transportation options outlined in Section II,H of the FGEIS will have environmental impacts including impacts to agricultural lands. It will be the responsibility of the lead agency and other involved agencies to determine what level of improvements are acceptable from an environmental and economic standpoint and the steps necessary to ensure that the appropriate level of improvements are implemented.

II.H.23. Route 7 Widening:

The NYSDOT has indicated that there are not any plans to widen Route 7 to six lanes; however, the traffic which would result from the Cumulative Growth Scenario would require this improvement for an acceptable level of service to be maintained at the end of the 15-year planning period. There would be practical difficulties associated with widening Route 7, including extensive acquisition of businesses and residences. Although Route 5 currently carries a higher volume of traffic than Route 7, the location and scale of future developments proposed for Route 7 as outlined in the FGEIS indicates that Route 7 will carry a higher volume than Route 5 at the end of the 15-year planning period.

II.H.24. Magnitude of Impacts:

The FGEIS makes no assumptions that the environmental and fiscal impacts associated with the Cumulative Growth Scenario can be completely mitigated. Even if every mitigation measure is successfully implemented, the economic costs will still be substantial. One purpose of the GEIS process was to evaluate impacts and mitigation measures associated with the Cumulative Growth Scenario. During the preparation of the Findings Statement(s) each involved agency must identify what mitigation measures are appropriate and will be required. If some mitigation measures are deemed impractical due to economics or other constraints, then these agencies will have to take steps to ensure that a reduced level of growth occurs within the Study Area.

II.H.25. Impacts on Route 9:

The construction of the Watervliet Shaker Road tunnel under the north-south Airport runway may have an impact on traffic patterns beyond the limits of the Study Area. As indicated on page II-155 of the FGEIS, the traffic

analyses have not attempted to address the more regional needs that may develop along the mainline of I-87 due to the increased traffic demand that is expected from development within the Study Area. This is beyond the scope of this GEIS. The traffic analyses have, however, attempted to address the transportation improvements which are necessary to adequately support development in the Study Area based on the Cumulative Growth Scenario.

II.H.26. Existing TSM Programs:

The TSM programs described in the DGEIS are limited to three major programs which are the most successful and easiest to implement. This included ride sharing programs, variable work hour programs and, transit programs. One or more elements of each of these TSM programs is currently being implemented in the Capital District. It is recognized that very aggressive TSM Programs will be required to achieve a 25 percent reduction in the additional Peak Hour traffic demand in the Study Area.

II.H.27. Cost of TSM Programs:

The cost of implementing TSM Programs will vary depending on which TSM Programs are implemented and the degree to which local authorities will be able to transfer the cost of implementing these programs to the private developer. The FGEIS indicates that 77 percent of all new traffic generated under the Cumulative Growth Scenario is related to office development and, therefore, an opportunity exists to require developers to incorporate mandatory TSM Programs as part of the project review process (see page II-167). The degree to which this effort is successful will depend to some extent on the individual Findings of the lead agency and other involved agencies.

Based on information provided by the CDTC, a number of communities across the country have instituted TSM Programs which require employer participation and/or provide direct staff support to alleviate traffic problems. If a serious attempt is made to establish TSM programs which include substantial financial incentives along with commuting alternatives which compete with the private automobile, travelers will leave their vehicle for other means of commuting to and from work. If these factors are confronted by a TSM program, trip reductions in the range of 20 to 40 percent are possible.

Major ridesharing programs which do not offer financial incentives to travelers historically have resulted in trip reductions of 8 to 16 percent. Major ridesharing programs which do offer financial incentives to travelers have historically resulted in trip reductions in the range of 20 to 40 percent. These financial incentives vary with the types of programs offered; however, incentives offered in TSM programs around the country range between \$20 to \$40 per month for each trip saved. In addition, the CDTC has indicated that the cost to institute and maintain a TSM program might range between \$200,000 to \$300,000 annually for staffing and office space. Additional funding to market a program effectively could cost up to an additional \$300,000 annually, based on the experience of the City of San Diego in establishing their TSM program in 1990.

Undoubtedly, financial incentives would be required to achieve a 25 percent reduction in the additional Peak Hour traffic demand in the Study Area as stated in the FGEIS. This represents a reduction of approximately 5,200 trips at the end of the 15-year planning period. Financial incentives, as outlined above, would cost approximately \$1,250,000 to \$2,500,000 annually. Add the estimated expenditures for staffing, office space, and marketing and these costs could climb to \$1,750,000 to \$3,100,000 per year.

Some of these expenditures would be borne by the employers who could be required to provide some or all of the financial incentives offered to employees. In turn, some of the incentives could be partially funded through employee charges such as parking permit fees for those who did not participate in a ride sharing program. Nevertheless, the cost of implementing a TSM program for the Study Area should be carefully considered to assure that the program is properly administered and promoted. In this manner, the program will meet its goal of reducing traffic congestion in the Study Area.

II.H.28. Arterial Management:

Arterial management is an important aspect of managing any roadway system. During the site plan review process each municipality should evaluate new roadways and access points as well as roadway improvements to identify the potential for shared driveways, thus reducing curb cuts. This would be particularly applicable to larger sites being developed for mixed use. Page II-138 describes the concept of limiting access in order to maintain the effectiveness of an arterial as it relates to Route 7. This concept could be applied to other major roadways in the Study Area.

II.H.29. Organization of Highway Improvements:

Transportation improvements identified in Section II,H of the FGEIS, were presented as two separate improvement options, one of which attempted to offer an alternative which would avoid the environmental and historical impacts associated with the Watervliet Shaker Historic District and Ann Lee Pond. The proposed improvement options were organized according to the major roadways which traverse the Study Area.

II.H.30. Acceptable Standards:

The traffic improvements identified in the FGEIS are necessary to maintain acceptable levels of service based on current NYSDOT standards. They are not intended to replicate traffic conditions of 10 or 15 years ago.

II.H.31 TSM Jurisdiction and Implementation:

The FGEIS identified TSM measures as a means to reduce traffic volumes especially during the peak hours. Although this analysis was limited to the Study Area, a successful TSM program needs to be implemented on a regional level. The smallest unit to be considered for TSM programs would probably be at the Town level. Municipalities within Albany County should work with the Capital District Transportation Authority, and the CDTC to identify appropriate TSM strategies. Large employers should be targeted for their participation in a TSM program. See also response II-H-27.

II.H.32 Sidewalks on Sand Creed Road:

Sidewalks adjacent to Sand Creek Road as well as along other Study Area roadways could be considered to provide safe pedestrian walkways between destinations. Although sidewalks could be constructed at any time, the most cost effective method would be to include provisions for sidewalks during any roadway reconstruction. Finally, Section ILL - Recreation, recommends the

development of a network of bike trails/pedestrian walkways between existing and future residential and commercial parcels to provide residents and employees with opportunities for passive recreation activities and pedestrian access between locations.

I. AIR QUALITY

III.1. Air Analysis:

The Level I air analysis is meant to be a screening technique to allow the Town and Village of Colonie, and Albany County to identify areas of potential carbon monoxide impacts resulting from increased vehicle traffic. The FGEIS recommends on page II-172 that further analysis of six intersections should be conducted to determine if EPA threshold standards are exceeded.

III.2. Health Impacts:

Increases in carbon monoxide levels may result in health impacts to all segments of the population. This is the reason 11 intersections were evaluated for carbon monoxide levels and a recommendation made that Level 2 and, if necessary, Level 3 air quality analysis be conducted. If the roadway improvements recommended to alleviate traffic impacts are implemented, more detailed environmental analysis will be necessary to evaluate site specific impacts. This will include impacts on air quality.

III.3

The comment is noted.

J. NOISE

II.J.1. Projected Expansion of Hangar Facilities:

The Updated Airport Layout Plan and Land Use Study included in Appendix 12 of this FGEIS considers future development at Albany County Airport. Based on this plan, it is likely that future aircraft maintenance activity will be located in the northeast and northwest quadrant of the Airport. As discussed on page II-185, the construction of a noise abatement facility is one method which the Airport and the airlines may consider in future plans for expansion to avoid noise impacts related to engine run ups.

II.J.2. Landscaping Techniques to Limit Noise:

The 1981 ANCLUC study indicated the use of earthen berms or landscaping to reduce aircraft engine noise would only be marginally effective in limiting noise to the Ann Lee Home because of its close proximity to the Airport. The effectiveness of such treatment diminishes rapidly when the distance between an aircraft and noise receptor (e.g. residence) increases. Therefore, such treatment is not likely to have a significant impact in reducing noise from engine run ups for outlying residential areas.

The relocation of hangar facilities will not have a significant impact in reducing noise from engine run ups for outlying areas. The Airport is located on nearly level terrain and, based on the complaints received at the Airport Director's office, residential areas up to one mile away are adversely affected by nighttime run ups. Within a one mile radius, residential areas surround the airport. Moving hangar facilities would have a negligible impact on

aircraft engine noise resulting in perhaps a slight decrease in noise levels for some persons at the expense of slightly increased noise levels for other residential areas.

II.J.3. Noise Duration:

The point at which noise generated by engine run ups at the Airport becomes obnoxious is partly a function of the limits of the individual who is subjected to the noise. Commuter airline representatives have indicated that engine run ups can last for up to 10 minutes if engine malfunctions are difficult to locate or correct. If this occurs, then a run up of the same engine may occur on multiple occasions in one night. Although the noise levels recorded for turbo-prop aircraft are significantly lower than a jet power aircraft, multiple engine run ups of turbo-prop aircraft for 10 minute intervals may be more disturbing to some people than the departure of one jet aircraft from the Airport.

II.J.4. Noise Levels of Turbo-Prop Aircraft:

The noise generated by different types of turbo-prop aircraft does vary to some degree. The noise levels for the turbo-prop aircraft which are typically operated by the commuter airlines out of Albany County Airport are as follows:

<u>Aircraft</u>	<u>Noise Level (dB)</u>
Beechcraft 1900	79
Saab 340	90
DeHavilland Dash 7	92
Short SD-3	93
Short SD-6	90
ATR-42	97
Merlin SW-4	Not Available
Dornier 82	72

These noise levels were obtained from FAA Advisory Circular 36-1E dated June 30, 1988 which includes noise characteristics for U.S. certificated and foreign aircraft at takeoff. It should be noted that the Beechcraft 1900, one of the quieter aircraft of the group, is the most commonly used aircraft at Albany Airport.

IIJ.5. New Technology Aircraft:

Future aircraft engine designs will undoubtedly be more fuel efficient and quieter than existing aircraft. However, any technology advances for turbo-prop aircraft will not have a significant impact on nighttime run ups. A new technology propeller driven aircraft, would not have an immediate effect on nighttime run ups due to the remaining "old technology" aircraft still in service. The steps which could be taken to provide incentives for carriers to utilize quieter turbo-prop aircraft would be the same as those discussed in section II, J regarding jet aircraft (see page II-190).

IIJ.6. Atmospheric Effects on Noise:

Temperature, wind velocity and direction, precipitation, and humidity can all effect sound levels or intensity. High humidity and precipitation can reduce the level or intensity of sound. Wind also tends to diffuse sound. People can hear sounds farther downwind than upwind from a source. Any impact which the weather may have on sound levels is a factor which cannot be controlled; however, it may be a factor in why some nighttime engine run ups affect certain geographic areas more than others.

IIJ.7. Expanding "Quiet Hours" Curfew:

Expanding the prohibition of nighttime run ups from 12 pm - 6 am to 11 pm - 7 am would reduce the hours in which the commuter airlines could

legally conduct maintenance activities which require the operation and testing of aircraft engines. This could result in more violations of the "quiet hours" curfew by the airlines. Based on conversations with representatives of Trans World Express, Business Express and American Eagle-Command Airways, commuter airline flight schedules could also be adversely affected due to the cancellation of some flights. They also indicated that maintenance operations could be shifted to other airports.

II.J.8. Use of the 1981 ANCLUC Study:

The ANCLUC Study of 1981 constructed future noise contours based on projected levels of increased air traffic and changes in the overall aircraft mix operating at the Airport. According to the FAA officials in Albany, the flight tracks, runway usage, and distribution of flights between day and night at the Airport have not changed significantly over the last 9 years. Therefore, assumptions made in the ANCLUC Study regarding these factors remain valid.

The 1981 ANCLUC Study utilized an aircraft noise prediction model to evaluate the average noise energy exposure level around the Airport. This procedure, known as the Integrated Noise Model (INM) used the following principal data elements to calculate noise contours: flight tracks, flight profiles, aircraft characteristics and, frequencies of operations by various aircraft types. The noise prediction model took into account the increased impact of late hour operations on surrounding areas. Operations which occurred during late hours (10 PM to 7 AM) were assigned a 10:1 penalty, that is, one late night flight was equivalent to 10 day hour flights. Therefore, the time of day in which flights occurred played a major role in the calculation of ANCLUC noise contours.

The ANCLUC Study developed projections of the types of aircraft and number of annual operations which were anticipated to operate in Albany in the years 1985 and 1995. Through interpolation of these projections in the FGEIS, these aircraft characteristics were compared with actual flight operations for the years 1988 and 1989 (see FGEIS, Table II-J-1). These 1988 projections based on the ANCLUC Study for total annual aircraft operations at Albany are 3 percent higher than the actual 1988 total. In addition, the ANCLUC Study projected that 92 air carrier jet aircraft operations would occur on a daily basis in 1989 versus an actual total of 94 such operations. Finally, the ANCLUC Study projected that there would be 129 percent more annual general aviation jet aircraft operations in 1989 that actually occurred at Albany County Airport during that year. Based on the analysis of the projected versus actual total operations and type of aircraft at Albany County Airport, the noise contours projected in the ANCLUC study for 1995 can be considered a reasonable estimate of the noise which will be generated at the Albany County Airport in the future.

Fixed-wing military aircraft operations were included in the calculation of noise contours. However, there was no provision in the INM noise prediction model to incorporate helicopter operations into the noise energy summation calculations. Military helicopter operations are not expected to increase in the future according to discussions with the New York Army National Guard.

Aircraft currently operating at the Airport have the same noise characteristics or are quieter than the aircraft which operated there in 1981. However, the FGEIS recognized the need for ongoing noise monitoring and recommended that such a program be established so that the noise levels of increased air traffic operations can be tracked and noise exposure areas can be updated.

The DGEIS stated that, generally, noise levels will increase around the airport. This statement was based on the evaluation of the noise contours for 1995 which were generated in the 1981 ANCLUC Study. This statement was also supported by current projections which indicate that future aircraft operations are anticipated to increase.

II.J.9. Noise Exposure Guidelines:

The Federal Aviation Administration has published a set of land use guidelines for noise exposure zones in the vicinity of airports. These guidelines suggest the highest noise zone for which a particular land use is recommended. These recommendations are included in the FGEIS in Table II-J-4 and are based on the day-night average sound level (Ldn) as shown on the noise contour maps included in the FGEIS (see Exhibits II-J-1 and II-J-2). The U.S. Department of Housing and Urban Development has also developed acceptability guidelines for site exposure to aircraft noise which are used for screening mortgage guarantees and other HUD assistance. The guidelines suggest that average day-night sound levels of 55-65 Ldn are "normally acceptable" for residential uses.

The reference to "incompatible land use" in the DGEIS refers to the land use planning standards from the FAA and HUD. These represent general guidelines for siting future development in noise sensitive areas, as well as for developing goals for remedial actions to reduce noise impacts on existing uses such as soundproofing of existing structures. Incompatible land uses around the Airport were first identified in the 1981 ANCLUC Study.

II.J.10. Miscellaneous Comments:

The comment is noted.

II.J.11. Noise Projections for Traffic:

Due to the concerns of a number of homeowners and organizations, the primary focus of the evaluation of noise in the Study Area centered around Airport generated noise. Any new development will result in increased noise levels in various parts of the Study Area from increased traffic as well as noise associated with various business operations and residential areas. It is anticipated that noise levels would be similar to those portions of the Study Area which are intensely developed, such as Wolf Road.

It is not possible to determine accurately the number of incidents of sleep interference than can be expected to occur on an annual basis for residents within the Study Area as a result of aircraft noise. However, the Albany Airport Director's Office has provided data which indicate that 22 noise complaints were received at that office during the period from May 31, 1989 to October 26, 1990. While some impact may result from sleep interference resulting from aircraft noise, attempting to quantify this impact with any degree of accuracy is not feasible and is beyond the purpose and scope of the FGEIS.

K. HISTORICAL AND ARCHAEOLOGICAL

II.K.1. Widening of Albany Shaker Road and Watervliet Shaker Road:

It is acknowledged that widening of Albany Shaker Road and Watervliet Shaker Road will impact the Shaker Historic District. The alternative presented in the October 17, 1990 correspondence from the Shaker Heritage Society could be considered during the detailed design phase for the planned improvements in this area. In addition landscaping and pedestrian access would also have to be evaluated as part of any road improvement project in this area.

II.K.2. Contact with Shaker Heritage Society

The Shaker Heritage Society was contacted for their input with regard to development impacts related to the DGEIS. On November 29, 1989 an employee of Clough, Harbour & Associates conducted a lengthy phone conversation with Ms. Phoebe Bender, a representative of the Shaker Heritage Society, to discuss potential impacts associated with future development within the Watervliet Shaker Historic District. On that same day, Clough, Harbour & Associates also contacted Ms. Jean Olton, Town Historian and Ms. Mary Burke, Town Engineering & Planning Services Department Senior Planner, to discuss issues related to the Historic District. On December 13, 1989, Ms. Diane Conroy-LaCivita, Executive Director of the Shaker Heritage Society, submitted correspondence to Ms. Mary Burke commenting on development in the Airport Area as it related to the preparation of this GEIS. Finally, on January 3, 1990 Clough, Harbour & Associates sent a letter to Ms. Phoebe Bender, c/o the Shaker Heritage Society, thanking her for her input with regard to her November 29, 1989 phone conversation. A copy of that letter is included in Appendix 4 of the FGEIS.

II.K.3. Historic Survey:

The Town could choose to conduct a survey of all structures within the Study Area that are more than 50 years old. Another option is to require developers to complete the Structure/Building Inventory Forms and forward these to the NYS Office of Parks, Recreation and Historic Preservation for review prior to receiving final approvals for a project.

II.K.4. Miscellaneous Comments:

The comment is noted.

L. RECREATION

III.1. Pocket Park Locations:

The pocket park locations shown on Exhibit II-L-1 in the FGEIS are merely conceptual as to locations. Prior to finalizing the specific locations additional environmental reviews under SEQRA may be required. With respect to the particular location of a pocket park within the County owned Ann Lee Pond Nature and Historic Preserve, further analysis will be required to determine the appropriateness and specific location. The parks were generally located by officials of the Town of Colonie Parks and Recreation Department in areas expected to have a need for this type of recreational facility at the end of the 15-year planning period.

In the case of the pocket park shown near Sunset Boulevard, it is intended to serve the area between Albany Shaker and Sand Creek Roads and, therefore, could potentially be located anywhere in that portion of the Study Area. If, due to future development, it becomes necessary to create a pocket park in that area, the Village's concerns regarding access and maintenance would be part of the process of identifying a specific location for the park.

M. MUNICIPAL SERVICES

III.1. Solid Waste Estimates:

As stated in section II, M, Municipal Services page II-222, the estimates for solid waste generation were based on generation rates from Environmental Engineering and Sanitation by Joseph A. Salvatore, P.E. In addition

contact was made with the Town's Director of Environmental Services to determine the impacts of this level of development on the life of the current landfill. This information is discussed on pages II-235 through II-237 of the FGEIS. In regard to the Comprehensive Solid Waste Management Plan being prepared by the Town, new development will be subject to any policies or programs implemented by the Town.

II.M.2. Contact With Fire Companies:

All of the fire companies whose districts included portions of the Study Area were contacted, both by phone and in writing, to discuss potential impacts on services as a result of the development scenarios discussed in the DGEIS. Copies of correspondence to the fire companies is included in Appendices 2 and 4 of the FGEIS.

N. VISUAL RESOURCES

II.N.1. Scenic View Criteria:

Many of the scenic views or key viewsheds identified in the DGEIS were delineated in the 1977 Town of Colonie Environmental Inventory Scenic and Historic Area mapping. The methodology employed to identify other key viewsheds was adapted from a guide prepared by the United States Department of Transportation Federal Highway Administration, Visual Impact Assessment of Highway Projects, March, 1981; evaluative techniques were based upon those found in Jones and Jones, Aesthetics and Visual Resource Management for Highways, October, 1977.

Upon acceptance of an FGEIS, the Town of Colonie Planning Board, as lead agency under SEQR, must develop a Statement of Findings which will recognize the environmental impacts associated with future development in the Study Area. The Planning Board will also incorporate into their decision-making process those mitigation measures identified as practicable in the SEQR process. Some or

all of the mitigation measures identified to protect the visual and aesthetic resources in the Study Area may be incorporated into the Findings Statement developed by the Planning Board.

O. ECONOMICS

II.O.1. Tax Revenues:

Sales tax revenues are accounted for in the fiscal impact model included in Appendix 5 of the FGEIS. The analysis of fiscal impacts contained in the FGEIS is based on the reference entitled, Fiscal Impact Analysis A Guidebook, published by the Capital District Regional Planning Commission.

Payroll taxes are collected by the State of New York. An increase in payroll taxes due to development in the Study Area would increase State revenues; however, there is no direct link or formula between payroll tax receipts collected by the State and disbursements to Albany County or local governments. General revenue sharing between the State and local governments is subject to the annual approval of the New York State Budget by the Governor and the State Legislature.

II.O.2. Office & Retail Developments:

For the purposes of this FGEIS, nonresidential uses were divided into the general categories of office, retail, warehouse, industrial, and manufacturing. Mitigation fees were developed based on the type or level of usage anticipated for each general category. Trip generation rates as outlined in the Institute of Transportation Engineers Report, Trip Generation, 1987 were used to determine the amount of traffic that would be generated from various types of development. Procedures used to determine traffic projections in the Study Area

are described in pages II-129 through II-131 of the FGEIS. The development mitigation costs (Table II-0-5) were then calculated for each nonresidential use category.

II.O.3. Costs to Developers and Businesses:

The economics section of the FGEIS evaluates the cost to the municipalities and the associated school districts for maintaining services at existing levels. A number of capital costs that would be necessary to serve anticipated development in the Study Area were identified. Table II-O-4 in the FGEIS identified the total costs associated with new development under the Cumulative Growth Scenario. Mitigation costs have been calculated for some of the identified capital expenditures which were required to accommodate proposed development. Furthermore, the FGEIS recommends that these costs be charged to those individuals who wish to develop land within the Study Area. It is likely that these costs will then be passed on to those who will live or conduct business in the Study Area through increased home prices and rental fees for commercial space. While local governments must plan for the future needs and demands of a community, a developer's decision to construct a new home or commercial structure within a given area is optional and is based upon existing market conditions. Given the size of the Study Area in relation to the Capital District real estate market, the initiation of mitigation costs in the Study Area should not have a significant economic effect on businesses in the region.

II.O.4. Assessment of Mitigation Costs and Existing Deficiencies:

As stated in sections II, G and II, F of the FGEIS, the cost of correcting existing deficiencies was not included in the Development

Mitigation Costs shown on Table II-O-5. In regards to transportation improvements, Table II-H-2 lists all the improvements necessary to improve existing transportation deficiencies.

II.O.5. Credit for On-Site Improvements:

Certain credits may be extended to developers to offset proposed mitigation costs. This may include certain on-site improvements if they will offset the need for a portion of the public improvements included in the Capital Improvement Plan. An example might be the donation of land to the Town of Colonie from a developer for the construction of a pocket park identified in the Town Capital Improvement Plan for the Study Area.

II.O.6. Assessment of Costs and Revenues:

The reader is referred to Appendix 5 of the fiscal impact analysis which identifies municipal revenues associated with this project including tax revenues which may be anticipated. This fiscal impact model also evaluates the cost of maintaining services at existing levels. The FGEIS also identifies necessary capital improvements associated with the Cumulative Growth Scenario and the costs required to implement these improvements. This information is detailed in the appropriate sections of the FGEIS and is also summarized in Tables II-0-2 through II-0-5.

II.O.7. Fiscal Impact Analysis:

The capabilities of the fiscal impact model utilized in this FGEIS are described on page II-249 and II-251. The formulas used on the worksheets included in Appendix 5 of the FGEIS can be found in the CDRPC publication, Fiscal Impact Analysis. A Guidebook. General methodology is described on page II-250 through II-253. Table II-0-2 of the FGEIS indicates that the

Cumulative Growth Scenario would result in budget surpluses for the Town and Village of approximately \$1.1 million and \$25,000 (1989 dollars) respectively. Based on 1989 tax rates, this would indicate that there would be no impact to tax rates for the Town and Village to maintain services if all other forms of revenues remain equal. Table II-0-3 also lists the surpluses or deficits related to the school district operations. In recent years, State aid to school districts and municipalities has been reduced. Unfortunately, future reductions or increases in State aid to municipalities and school districts cannot be anticipated with any accuracy and; therefore, current State aid levels are assumed to remain constant.

As stated on page II-250 of the FGEIS the fiscal impact model does not include the cost of the capital improvements necessary to support development as projected under the Cumulative Growth Scenario. The capital improvements are identified in each section of the FGEIS as appropriate. These costs are summarized on Table II-0-4. The method used to finance these improvements will have a direct impact on the tax rates. The establishment of a Mitigation Cost system; however, will shift the burden of funding the majority of the capital improvement costs from the municipalities to new development.

II.O.8. Residential Mitigation Costs:

Trip generation rates are calculated for each project included in Table II-B-3 based on the application of a known trip rate as reported in the fourth edition (1987) of the Institute of Transportation Engineers' (ITE) report, Trip Generation, or as modified by CDTC to reflect local characteristics of land uses. CDTC has collected information on local trip rates for the Capital District and, where appropriate, this data has been utilized in place of national trip rates developed by the ITE. When specific types of residential dwelling units were identified for projects listed in Table II-B-3 (eg., single family home vs. apartment), the appropriate trip generation rate was applied to calculate the total

number of new trips. However, some projects were speculative in nature and a specific residential dwelling unit type could not be identified. In those cases, the trip generation rate for a single family home was used to calculate total new trips. Furthermore, it is necessary to summarize the total number of new PM Peak Hour trips by land use type to present the data in a simplified format. These land use types include: 1) residential, 2) office, 3) retail, 4) warehouse/industrial/manufacturing, and 5) Airport Enplanements.

Once the traffic impacts and mitigation measures (ie., roadway improvements) were identified, the total improvement costs were calculated for Option 1 and Option 2 roadway improvement packages. Transportation mitigation costs are calculated for each of the five land use types named above and are presented in the FGEIS in a format to allow direct comparizon with other mitigation costs . These included mitigation costs for water system, recreation, and GEIS preparation expenditures. The units of measure in which these fees are presented includes: cost per dwelling unit for residential land uses and cost per square foot of building space for office, retail, and warehouse/industrial/manufacturing land uses. Transportation mitigation costs for airport enplanements are indicated as a lump sum since the Airport represents a land use limited to one location in the Study Area.

The Transportation mitigation costs in Table II-O-5 represents the weighted average Mitigation Cost for each land use type for Option 1 and Option 2 roadway improvements. A more detailed breakdown of these costs by the various types of residential units is not provided as it is beyond the scope of this GEIS. However, the Town and Village of Colonie may consider modification of the transportation mitigation costs based on the number of new trips which are

generated by individual projects in the Study Area. Costs could then be assessed based on a cost per new vehicle trip. For the two transportation improvement options, the cost per trip in the Study Area is calculated as follows:

Option 1

- A. Total Transportation Costs Attributable to New Development: \$91,405,200
- B. Total New Trips Generated by New Development: 20,908 trips
- C. Total Cost Per New Trip (A ÷ B): **\$4,372/trip**

Option 2

- A. Total Transportation Costs Attributable to New Development: \$119,018,850
- B. Total New Trips Generated by New Development: 20,908 trips
- C. Total Cost Per New Trip (A ÷ B): **\$5,692/trip**

II.O.9. Transportation - Background Growth:

The transportation mitigation costs developed for the Cumulative Growth Scenario accounted for background or pass-through traffic in the Study Area. Based on a review of the traffic projections at key check points in the Study Area, 95 percent of the projected traffic increase on Study Area roadways is attributable to new development proposed within the Study Area under the Cumulative Growth Scenario. The remaining 5 percent of the projected traffic growth is attributable to development outside the Study Area and a general increase in car ownership in the region. Existing traffic operational deficiencies within the Study Area are identified in Table II-H-2 of the FGEIS. The approximate construction cost (1990 dollars) to complete roadway improvements to correct these deficiencies are estimated at \$8.4 to \$11.8 million. These improvements are not included in the calculation of mitigation costs.

II.O.10. Airport Mitigation Costs:

The focus of the FGEIS is approximately 8,500 acres of land surrounding the Airport and referred to as the Airport Area for the purposes of this study. Any Development mitigation costs collected will be used for capital improvements to support future development in this area. mitigation costs have been calculated in Table II-O-5 of the FGEIS and it includes costs which are to be levied against the Airport as a result of additional enplanements which are anticipated within the 15-year planning period. This will insure that the Airport pays for its fair share of the Study Area capital improvements.

II.O.11. Miscellaneous Comments:

The comment is noted.

II.O.12. Costs Associated with Projected Development:

The figures in Table II-O-4 are divided into two categories: capital costs and other costs. The costs were tabulated to demonstrate the total impact of development associated with the Cumulative Development Scenario in the year 2005. It is not necessary to capitalize any annual costs in the table for two reasons. First, annual costs borne by the municipalities will be offset by additional revenues collected as identified in Table II-O-2. Second, any annual costs incurred by the fire or school districts in the Study Area cannot legally be collected by the Town, Village or County and, therefore, are not included in the calculations of estimated mitigation costs (see Table II-O-5).

II.O.13. Golf Course Mitigation Costs:

The Recreation mitigation costs, which includes the costs of improvements to the golf course, were calculated based on the population

increase in the Study Area as compared to the entire Town (page II-223). The same methodology was used to calculate mitigation costs in the Boght Road - Columbia Street GEIS. The Town is currently collecting money under this system. In addition, the Town of Colonie has established a fee system for the golf course in which non-resident users pay a higher fee than resident users.

II.O.14. Water System Mitigation Costs:

The mitigation costs developed in the FGEIS are based on the capital costs of constructing the necessary improvements related to the Cumulative Growth Scenario. Upon the completion of the Findings Statement and the SEQR process, a CIP must be prepared by the Town, Village and County.

During the preparation of the CIP, projects will be prioritized and the phasing of improvements will be determined. Once the timing and costs of each development project are known, the issue of credits to individuals who have paid mitigation costs can be addressed. These credits will be calculated to prevent customers from paying mitigation costs for water improvements which do not take into account the user fees which they will pay in the future to support the system.

II.O.15. Methods of Funding Capital Improvements:

In light of decreased state and federal aid for capital improvement projects, municipalities are left with the responsibility to fund capital improvements necessary to support new development. One method of doing this is through the Mitigation Cost system outlined in the FGEIS. Other options also discussed in the Section II, O, of the FGEIS include impact fees, developer negotiations, Transportation Development Districts and excise taxes. Another option not discussed is the raising of property taxes. If identified capital

improvements are not made and necessary infrastructure and public services are unavailable, the pace of development in a community will be impeded. Some method of financing these capital improvements is essential for the fiscal health of the community.

ILO.16. Maintenance of Improvements:

The maintenance of any improvements proposed in the FGEIS to support new development will be the responsibility of the municipality or state agency who owns the improvement. For example, the maintenance of a new water line in the Study Area will be the responsibility of the Latham Water District, while the maintenance of improvements to NYS Route 7 will be the responsibility of the NYSDOT. Funding to maintain the improvements may be raised through user fees, special assessments, or property taxes, as appropriate. The cost of maintaining proposed infrastructure during the 15-year planning period cannot be determined at this time. The timing and sequence of the improvements will be determined as part of the CIP process. Once these factors are known, the cost of maintaining the improvements may be determined.

ILO.17. Hotel and Motel Mitigation Fees:

Transportation mitigation costs estimated for hotel and motel projects in the Study area are calculated on a per room basis in the same manner which transportation costs for a housing development would be calculated. Each motel or hotel room in such a commercial project would be counted as one unit and the Transportation Mitigation Cost for that unit would be equal to one residential dwelling unit. This method is used because this type of commercial use has similar trip generation rates as residential uses. Hotel and motel mitigation costs for water improvements are calculated on a per square foot basis of total

building space. Recreation mitigation costs only apply to new residential dwellings. GEIS preparation mitigation costs are determined based on the size of the parcel to be developed.

IIO.18. Excise Taxes:

As stated on page II-264 of the FGEIS, New York State allows the imposition of an excise or privilege tax by a local government on the business of new construction. According to the New York State Department of Taxation And Finance, various forms of excise taxes are authorized in New York State and include, for example, mortgage recording taxes, real estate transfer taxes, and motor fuel taxes. Article 29 of the New York State Tax Law cites the taxes which may be enacted by local governments in New York State. The implementation of this type of fee system would probably require the approval of the New York State Legislature.

III. ALTERNATIVES

A. INTRODUCTION:

There were no comments regarding this section.

B. ANALYSIS OF ALTERNATIVES:

IIIB.1. Additional Development Scenarios:

The DGEIS evaluated the environmental and socio-economic impacts of two alternative land use scenarios. As is stated in Section II, B of this FGEIS, the two scenarios represent only two of any possible number of future development schemes which may occur at the end of the 15-year planning period. The two scenarios; therefore, are used as a basis to identify potential impacts in the Study Area and to suggest possible mitigation measures to minimize those impacts.

Should the lead agency, and ultimately the Town and Village of Colonie and Albany County, find the impacts associated with both development scenarios to be unacceptable in terms of the required infrastructure improvements or loss of open space and natural amenities, their Statement of Findings should reflect the reasons which support this determination.

III.B.2. Mandatory Clustering and In-Fill Development:

The concept of mandatory clustering and in-fill development in sections of the Study Area which are substantially built up (e.g. Wolf Road) is not feasible unless affordable and convenient mass transportation is provided substantially beyond what currently exists in the Capital District. Such a concept, while noble and well intended, would require a complete shift in public policy which transcends the legislative abilities of the municipalities which have initiated this study. While the experience of urban cities demonstrates that more people can be accommodated in less space, the continued growth in the number of automobiles on our highways and the rapid development of land in suburban towns suggests that the automobile is still the preferred mode of transportation which must be addressed for any development plan in the Study Area.

III.B.3. Loss of Resource Amenities:

The impacts associated with the two development scenarios and the public infrastructure improvements to accommodate development were identified in the DGEIS. Those resource amenities not affected by proposed development in each scenario are not slated for additional "necessary" public infrastructure improvements during the 15-year planning period. In addition, mitigation measures to protect these resources were discussed throughout various sections of the DGEIS.

III.B.4. North-South Arterial Options:

Based on the evaluation of traffic impacts under the Cumulative Development Scenario, various roadway improvements are required to maintain traffic flow at an acceptable level of service. One of the required improvements is a new north-south arterial which will provide additional north-south access through the heart of the Study Area and will serve traffic from Wolf Road and anticipated development to the west of the airport. It will also provide a better link between the airport and I-87. This improvement was also identified by the Capital District Transportation Committee as a long term need for the Airport Area. Two north-south arterial options were identified in the DGEIS to mitigate potential roadway impacts of the roadway on the Watervliet Shaker Historic District and the NYSDEC regulated freshwater wetlands adjacent to Ann Lee Pond. The proposed alignment of the north-south arterial as shown in both options is only preliminary. More detailed engineering investigations will be required for any proposed alignment to fully consider site specific environmental and economic issues related to this roadway improvement.

III.B.5. Future Development of the Airport:

The future development of Albany County Airport was evaluated in the DGEIS based on the Updated Airport Layout Plan and Land Use Study which was commenced in 1988. A copy of the most recent draft of this plan is included as Appendix 12 of the FGEIS. County officials have approved this plan and final approval from the Federal Aviation Administration is pending. This report outlines a three-phase plan to implement necessary improvements at the Airport over a 20-year period. A number of other proposals to own and/or manage the airport have been proposed since the GEIS process began. Nevertheless, the Updated Airport Layout Plan and Land Use Study remains to be the official document which guides future development of the airport at this time.

III.B.6. Miscellaneous Comments:

The comment is noted.

III.B.7. Full Build-out Scenario:

If it was assumed that all vacant lands within the Study Area would be developed, impacts associated with a full build-out scenario would be greater than the impact described under the High Growth Future Development Scenario described in Section III, B, of the FGEIS. As stated on page III-17, " The extreme impacts resulting from the High Growth Future Development Scenario traffic analysis were presented to officials of the Town and Village of Colonie and Albany County. It was determined that this development scenario was not realistic from an environmental or socio-economic standpoint. Therefore this alternative for the Study Area was dismissed".

III.B.8. High Growth Future Development Scenario:

The High Growth Future Development Scenario included projects currently in the Town and Village review process as well as speculative development. The methodology used to develop this scenario is detailed on pages III-3 through III-8 of the FGEIS.

III.B.9. No Action Alternative:

The no action alternative would result in a number of impacts affecting the ability of the municipalities to provide adequate levels of services within the Study Area, especially in the area of transportation. Transportation improvements would only be identified and completed on a project by

project basis. There would be no overall plan (CIP) to coordinate and implement these improvements. As a result, when roadway improvements did occur, most would be to correct deficiencies rather than anticipated future needs.

IV. CUMULATIVE AND GROWTH INDUCING IMPACTS:

No specific comments were received regarding this section.

V. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES:

No specific comments were received regarding this section.

VI. UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS:

VI.1. Transportation Impacts:

The Route 7 link between Wade Road and the I-87 Exit 6 interchange will operate at a level of service F during the peak hours even with the identified improvements in place. This situation could be mitigated through the implementation of improvements identified on pages II-155 through II-157 of the FGEIS.

VII. FUTURE SEQOR ACTIONS:

VII.1. Future Specific Actions:

The comment is noted.