



# **ALCO Redevelopment Final Generic Environmental Impact Statement**

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**Location of Action:**

Former ALCO Site  
Broadway  
Schenectady, New York

**Lead Agency:**

Schenectady Metroplex Development Authority  
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## **I. Introduction**

The following is the Final Generic Environmental Impact Statement (FGEIS) prepared for the Alco Redevelopment. Pursuant to the State Environmental Quality Review Act (SEQRA), the purpose of the FGEIS is to respond to substantive comments received on the Draft Generic Environmental Impact Statement (DGEIS).

The DGEIS for the Alco Redevelopment was determined acceptable for public comment by the Schenectady Metroplex Development Authority (the Authority), acting as Lead Agency, on February 10, 2010. A public hearing was held on March 1 and the public comment period ended on March 12, 2010.

Pursuant to the requirements of SEQRA, the FGEIS includes the DGEIS by reference, substantive comments received during the public hearing and comment period and responses to substantive comments. The last step in the SEQRA process is the adoption of a SEQRA Findings Statement by the lead agency.

The purpose of the GEIS is to look at the likely future actions that may occur on the site as allowed by the existing City of Schenectady Zoning and in conformance with the City adopted Comprehensive Plan for this area. The City of Schenectady Planning Commission will be reviewing the individual site plans for any development of the Alco site. The purpose of the GEIS and SEQRA Statement of Findings is to look at overall cumulative impacts that may be associated with development thresholds and to specify, where possible, mitigation measures that will accompany these development thresholds.

### **A. Summary of Written Comments**

Section II of the FGEIS provides a summary of substantive comments raised during the public hearing and comment period. Comments addressed herein include those received in writing from agencies and the general public, as well as those comments made by the speakers at the public hearing. Copies of written correspondence and minutes for the public hearing are included in Appendix 1 and 2, respectively.

Nine organizations and/or individual provided substantive comments at the two public hearings and eleven letters were received from agencies and the general public. Comment letters were received from:

- NYS Dept of Transportation
- Department of the Army Corps of Engineers
- Schenectady Heritage Foundation
- Schenectady County League of Women Voters
- STS Steele

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- T. Hodgkins
  - Schenectady County Environmental Advisory Council
  - SGS Rowing Association
  - ALCO Historical and Technical Society
  - Capital District Transportation Authority

## **B. Summary of Public Hearing**

Five individuals spoke at the public hearing, with one submitting written comments. A list of speakers and submitted comments are included in Appendix 2. The comments from the public hearing are consistent with the written comments that are summarized in Section D. below.

Ruth Bonn of the Schenectady Environmental Advisory Council provided comments that were the same as those outlined in her letter of March 1 (refer to Appendix 1) Similarly, Jim Stori of STS Steele made comments that were consistent with his letter of February 2 (refer to Appendix 1).

Dick Steinbrenner of the Alco Historical Society made comments that were consistent with the Society's March 12 letter (refer to Appendix 1).

## **C. Revisions and Clarifications**

In response to comments received on the DGEIS, a revised economic impact analysis has been prepared and is included in Appendix 5. The revised and updated report confirms the significant positive economic impact of the project. Its key findings are as follows:

- Once all three phases of construction are completed, the overall project construction budget of \$152 million is predicted to generate \$219 million of economic output within Schenectady County. This includes construction-related payrolls of \$41 million creating almost 1,000 one-year full time equivalent (FTE) jobs, with an average annual wage of approximately \$42,000.
- Once all construction is complete, ongoing operations of the project is predicted to generate almost \$800 million of economic output within Schenectady County *annually*. This includes \$132 million in payrolls, approximately 2,800 permanent FTE (full time equivalent) jobs. With this, the site will house 82 permanent FTE permanent retail jobs and 43 hotel jobs.

The significant positive economic impact will be realized by transforming a blighted, underutilized area of the City which in its current configuration prevents the use and enjoyment of the waterfront. Moreover, the Alco site is a deteriorating "brownfield" which will benefit from

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remediation and reuse. A key component of the redevelopment of the area will be NYSDEC approved remediation plans that will allow the reuse of the area. This is a strategy that has been successfully implemented at nearby former Alco areas that have been remediated and rebuilt and are now contributing to the tax base of the City and the County and Community's revitalization.

Although the long term focus of the redevelopment of this area is a mixed commercial and residential area, the Alco site currently contains some industrial operations including STS Steel. With the change in City zoning several years ago STS's operation is a pre-existing non-conforming use. STS Steel currently owns a building and has indicated that it may purchase additional property at the Alco Site pursuant to an existing option agreement.

STS Steel, as a property owner in the Alco site, will need to address existing environmental conditions, such as a contaminated groundwater and soils, and will need to enhance landscaping and other aesthetic features of the STS Steel operation. This will be necessary as well for the other remaining industrial owners/users of the Alco site. Future uses in the area have been designated as retail commercial due to its location immediately adjacent to Erie Boulevard, a major connector road between the City of Schenectady and the Town of Glenville.

Also of note, the unused buildings on the property are in very deteriorated condition. They have asbestos and other forms of contamination as well as structural instability. To mitigate the deteriorated conditions of all buildings not currently in use, as well as those that may cease to be used in the future,, the City has entered into a Letter of Understanding with the New York State Office of Parks, Recreation and Historic Preservation and that New York State Economic Development Corporation to undertake the photomontage of the Alco buildings to document them for the future. A donation is also being made to the Schenectady Museum to assist the Museum in its curation of objects and historical documents concerning the Alco facilities in the City of Schenectady.

It will be necessary, as part of the brownfield remediation of the property, to demolish structures and remove contaminants in order to reclaim this blighted property. Preserving what remains in situ will not achieve the goals of the City. One substantial impediment to the use of the property for historic purposes related to the construction of trains at the site is the complete absence of any rail lines on the property. It is hoped that existing operations in the Alco site, especially non-conforming industrial uses, will cooperate with the both the aesthetic and remediation goals of the redevelopment of the property.

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## **II. Response to Comments**

The following are comments received during the public comment period for the FGEIS. For each substantive comment, a response is provided. Where a comment has already been addressed there is a reference to the previous response.

### **A. NYS Department of Transportation**

The following comments are from a letter date March 12, 2010 from the NYS Department of Transportation. A copy of the letter is provided in Appendix 1.

#### **A1. Comment**

*Page 11-3 of the DGEIS incorrectly refers to the Erie Boulevard corridor project as including the section of Erie Boulevard from State Street to Union Street under PIN 1756.17. This should be corrected to read that the Erie Boulevard Corridor project extends from I-890 to Liberty Street, and is being progressed under PIN 1757.16 (CDTC TIP S177). The Erie Boulevard/Jay Street/Nott Street/Front Street project is properly referenced as PIN 1758.00, but should also be identified as CDTC TIP @188.*

*The DGEIS states, "Because of these ongoing or pending projects, additional improvements at these locations are not recommended." The developers of the ALCO Project should be prepared to implement needed mitigation features/improvements to accommodate the site development either in the absence of a highway project(s), or beyond the programmed improvements anticipated.*

*We highly recommend that the ALCO Site Redevelopment Project (ALCO Project) be closely coordinated with any highway related projects ongoing, pending or otherwise contemplated. This is not meant to suggest that public funds be used to mitigate the Alco Project related impacts. Conversely, the intent is to ensure that highway improvements adequately consider anticipated land uses and appropriately serve the intended purpose.*

#### **Response:**

The development program outlined in the DGEIS will be coordinated with any highway related projects. The goal is to encourage the reuse of the property which already has excellent access onto Erie Boulevard and to other City infrastructure such as water and sewer. The site is currently almost entirely developed. While specific development proposals will require site plan approvals from the City of Schenectady and site plan review is typically coordinated with NYS Department of Transportation, it is the goal of the City and Metroplex that this blighted area be reused. As NYSDOT previously noted in connection with the redevelopment of the Proctor's block portion of the City, it does not make sense to require the same type of highway mitigation of urban redevelopment that is required of suburban and ex-urban projects. Good planning requires concentrated

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re use of City properties to prevent further development of Greenfield areas and the sprawl associated with such development.

**A2. Comment:**

*The capacity analysis shows that some of the development, including a drop in level of service between the proposed and existing conditions, has not been fully mitigated. The Department considers a drop in level of service to be a significant impact and wants to see a more rigorous mitigation analysis.*

**Response:**

The mitigation analysis provide in the DGEIS was based on the design work completed for the Erie Blvd Corridor Project. The recommended mitigation measures were taken directly from that project.

As stated above, the project is intended to be a new urbanism mixed use sustainable development within the City's downtown district. Metroplex will continue to work with the City, NSDOT and CDTC to ensure the project is compatible with the adjoining road network as development moves forward.

**A3. Comment:**

*Erie Boulevard at Site Access: There is an existing 40 foot access point approximately 900 feet north of the Erie Boulevard/Nott Street intersection and a 20 foot access point at the northern end of the site near the Freeman's Bridge. The remaining right-of-way is without access and the DGEIS correctly states that FHWA approvals may need to be evaluated in addition to the needed NYSDOT approvals. The applicant needs to determine if federal funds were utilized to purchase property with the 'without access' limitations. If federal funds were used, then FHWA action, in addition to NYSDOT approval, will be required.*

*While pushing the access further north (to the midpoint, or aligning the access with the reestablishing of the Maxon Road intersection at the railroad underpass), may be valid from an urban and multimodal transportation context, this proposed mitigation needs a more detailed analysis before a determination of the transportation tradeoffs can be made. It is therefore incumbent upon the applicant to adhere to federal and Departmental policies (as applicable) on this topic. For Departmental Guidance, reference should be made to Appendix 8 of NYSDOT's Project Development Manual.*

**Response:**

At this time, Metroplex expects the existing site access at Front Street will continue to be the primary entrance into the site. The need and location of future access will be driven

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by specific site plans for redevelopment as always Metroplex will work with the City, NYSDOT and if needed FHWA to develop an acceptable approach to site access, if any changes in site access are necessary.

**A4. Comment:**

*The Capital District Transportation Authority should be consulted to evaluate opportunities for enhancing transit service/ridership.*

**Response:**

The Capital District Transportation Authority provided comments on the DGEIS. Please refer to Section II.J.

**A5. Comment:**

*The Town of Glenville should be provided an opportunity to review this proposal.*

**Response:**

The Town of Glenville had the opportunity to review and comment upon the DGEIS during the public comment period.

**A6. Comment:**

*A Drainage Report for the proposed project evaluating the pre and post development flows into the state highway system will need to be provided for our review and approval. The drainage report is a professional engineering document and must be stamped and signed by a New York state Licensed Professional Engineer.*

**Response:**

As is appropriate the GEIS identified several ways in which future projects will need to comply with drainage and storm water management requirements. Engineering level detailed plans will be required by the City as the MS4 program will be evaluated as a part of the site plan package for any proposed development. Remediation and redevelopment of the site will serve to benefit site drainage and compliance with applicable storm water management requirements will be a substantial environmental benefit over existing conditions.

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**B. Department of the Army Corps of Engineer**

The following comments are from a letter dated March 15, 2010 from the Corps of Engineer. A copy of the letter is included in Appendix 1.

**B1. Comment:**

*To remain out of Department of the Army jurisdiction completely, we recommend that the applicant limit the project to those areas upland of any waters or wetlands of the United States. Not only is this environmentally sound, but it could potentially save the applicant considerable time and expense while attempting to obtain necessary federal, state, or local permits.*

*It is possible that a project may qualify for a nationwide general permit, in accordance with 33 CFR 330 and the Issuance of Nationwide Permits in the Federal Register dated March 12, 2007 (72 FR 11092). An activity is authorized under a nationwide general permit only if that activity and the permittee satisfy all of the nationwide permit's terms and conditions. Unless a nationwide general permit contains a condition requiring the applicant to notify the Corps prior to undertaking the proposed activity, a written authorization is not necessary. Activities that do not qualify for authorization under a nationwide general permit may still be authorized by an individual or regional general permit.*

*To apply for a Department of the Army permit, the applicant should submit a completed Joint Application for Permit form, a work description and project drawings identifying all proposed activities shown in reference to the limits of waters of the United in the project area, and specify the total proposed impacts to waters of the U.S. proposed to be lost or substantially modified, in acres, square feet, linear feet, or as appropriate.*

**Response:**

The comment is noted. If and when disturbance of the bed or bank of the Mohawk River is considered, the work will be coordinated with the Corps of Engineers and the NYSDEC. No such disturbance is currently proposed in the GEIS. It is possible in the future that a dock or other similar amenity may be proposed for this area since it would be an appropriate location for such a waterfront use and consistent with both the City Zoning and Comprehensive Plan. Such a use is likely several years in the future and would require a level of engineering detail that is beyond the scope of this GEIS.

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## **C. Schenectady Heritage Foundation**

The following letter is from a letter dated March 8, 2010 from the Schenectady Heritage Foundation. A copy of the letter is included in Appendix 1.

### **C1. Comment:**

*The Foundation supports the redevelopment of the former American Locomotive Company site, important to both local and national transportation and industrial history and eligible for listing on the National Register of Historic Places.*

#### **Response:**

Metroplex agrees that the remediation, reuse and redevelopment of the site is important to the City. The Letter of Resolution provides mitigation that will ensure that the important history of the Site is properly documented. It should be noted that there are many areas around the country where railroad history has been preserved in situ. These areas were the beneficiaries of substantial federal and State resources as well as Foundations with substantial private funding available to them. It is unfortunate that such resources were not made available to preserve the Alco site when it was capable of being preserved. The site currently has no such resources and no longer any railroad tracks. The buildings are structurally unsound and the area is contaminated; as such, a remediation program will need to include the removal of the deteriorated, dilapidated structures.

### **C2. Comment:**

*The Foundation believes that every attempt should be made to incorporate some of the ALCO's historic buildings and industrial artifacts into its redevelopment. Modern energy-efficient methods will be used in the ALCO project, but the ultimate "green" approach is to reuse existing structures. While some may label ALCO as "blighted", others see more possibilities. Demolition of potentially valuable historic buildings should not occur until a bona fide redevelopment plan and financing are in place. Although NYS OPRHP commented that a "photographic" record will "mitigate" the demolition of ALCO, the Foundation considers this a poor substitute for the preservation of real structures, especially without further research. Communities that have dealt with similar circumstances and environmental contamination should be consulted and visited creative design approaches considered, and costs of retaining some historic buildings should be analyzed.*

#### **Response:**

The City of Schenectady, Empire State Development Corporation and the NYS Office of Parks, Recreation and Historic Preservation have evaluated site conditions and, as a result, negotiated a draft Letter of Resolution (refer to Appendix 3). The LOR stipulates

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that a photographic record be completed for the buildings. A copy of the preliminary photographic documentation is included in Appendix 4.

The LOR further stipulates that a payment of \$5,000 will be provided to the Schenectady Museum to help offset costs associated with an exhibit on the ALCO site. The significant structural deterioration, the lack of resources for preservation of buildings and their adaptive reuse, as well as the level of contamination on the site, prevents the type of development envisioned by the Foundation.

**C3. Comment:**

*Because ALCO is an iconic symbol of America's industrial might, people deserve an opportunity to see it. Therefore, the Foundation supports opening this historic site for controlled public inspection as soon as possible.*

**Response:**

Public access to the site, exposing the public to unsafe conditions and contamination, is not possible. The majority of the site is contaminated and the buildings not currently being used (as well as some just nominally in use) are in poor condition. Combined, this creates a public safety issue that prevents a public tour of the site. Many of the buildings, structures and debris on the site are a public nuisance. The site is secure and will remain secured until it is redeveloped. One of the most important goals of the project is the clean-up of the site and the construction of a public pathway along the waterfront. Until remediation programs are implemented, in accordance with NYS DEC oversight, public access is not warranted.

**C4. Comment:**

*The redevelopment of ALCO is too important to settle for mediocrity. A nationwide competitive process should be used to select a design team capable of combining historic preservation with excellent urban design. Columbus, Indiana has achieved impressive results with a n innovative strategy (<http://www.columbus.in.us/listings/index.cfm?catId=336>). Consulting with such communities would bring fresh ideas to our process. Attempts to duplicate nearby historic neighborhoods should be avoided, as per standards set forth by the Secretary of the Interior ([http://www.nps.gov/history/local-law/arch\\_stnds\\_8\\_2htm](http://www.nps.gov/history/local-law/arch_stnds_8_2htm)).*

**Response:**

The City, County, and Metroplex have high hopes for the redevelopment of the Alco site and have established standards for the redevelopment through City Zoning, the City Comprehensive Plan and in this GEIS. The redevelopment of the other Alco sites has been to a very high standard under the direction of the City and Metroplex and there is no

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reason to believe that the redevelopment of this blighted site will be any different. Furthermore, the public should actively participate in the City of Schenectady (e.g. Site Plan Approval or Special Permit) approval process to further encourage a high level of design.

**D. Schenectady County League of Women Voters**

The following comments are from a letter dated March 12, 2010 from the Schenectady County League of Women Voters. A copy of the letter is included in Appendix 1.

**D1. Comment:**

*The League of Women Voters of Schenectady County supports efforts to redevelop the former ALCO site. It will give a boost to the revitalization of the City and benefit the County as well. By providing an inviting urban, waterfront, mixed use living environment unique in the region, the City and County will be seen as an exciting place to relocate. It will provide a vibrant living environment which will attract new residents, especially young professionals and empty nesters.*

**Response:**

Metroplex agrees that redevelopment of this site in an appropriate fashion is critical to the future good health of the community. Other Cities have successfully redeveloped blighted former industrial areas and returned them to the tax rolls as vibrant, attractive and inviting waterfront mixed use areas.

**D2. Comment:**

*The League urges that affordable housing be part of the housing mix in this development. Rather than making it a high-end ghetto, a percentage of the housing should be kept within economic reach of the people who might teach the neighborhood children, or work in the shops, offices, or other commercial enterprises that are planned as part of the mix.*

**Response:**

Within the City, Habitat for Humanity, Better Neighborhoods, Inc. and Community Land Trust all work in the City of Schenectady to provide affordable housing. Further the City, as an element of the recently adopted Schenectady 2020 Comprehensive Plan, is working on increasing the amount of affordable housing. Schenectady Metroplex envisions the ALCO site as an opportunity to maximize job creation and tax benefits. To that end, affordable housing is not anticipated to be part of the future mixed use redevelopment plan for this brown-field area.

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**D3. Comment:**

*The League notes that positive environmental aspects of the proposed development. Remediation of the brownfield will allow the land to be used for development, thus saving greenfields elsewhere and reducing sprawl. It will pose fewer risks to the environment and to public health. The compact, walkable, mixed use design proposed for the development will reduce automobile dependence and help reduce energy consumption and carbon emissions. (Every little bit helps.) Using existing infrastructure by utilizing existing roads, sewers, and water lines will save resources.*

**Response:**

Metroplex agrees with this observation and agrees that these are the goals of the redevelopment effort.

**D4. Comment:**

*Cleanup will also reduce the threat of contamination of ground water and storm water runoff. Since the site is adjacent to the Mohawk River and above the Great Flats Aquifer, two of the County's greatest natural resources, this is a significant benefit. The League underscores the need for strict adherence to all regulations governing discharges to the Mohawk River and activities within the Aquifer zone III during cleanup so as not to contaminate surface or ground water. In addition, to minimize the impact of redevelopment on water quality, we support the use of low impact development methods such as rain gardens, buffer strips, permeable pavers and roof gardens for storm water management to the fullest extent possible.*

**Response:**

As a Brownfield site, redevelopment will require review and comment by NYSDEC to ensure that both surface and groundwater resources are not impacted. As discussed in the DGEIS, LID techniques would be explored during detail design of future development, but their use will be contingent on contamination issues. Infiltration through contaminated underlying soils is often discouraged. All uses of the site, existing and future are required to comply with new stringent storm water management and drainage requirements. These requirements are local, State and federal.

**D5. Comment:**

*We strongly support use of this project to showcase green building design as suggested in the DGEIS. The opportunity to use innovative materials and design techniques that simultaneously promote cost efficiency should be pursued. The City is already moving toward becoming a leader in innovative green design with the building of the first LEED certified affordable housing. Green technology is an area in which the Schenectady*

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*County Community College will specialize. Showcasing innovative green design in the ALCO project could put Schenectady on the map as a leader in this area.*

**Response:**

Both the City and Metroplex have encouraged developers to incorporate green design in all elements of their projects. Green technology represents the future and the goal is to have the redevelopment of the Site be environmentally friendly. The implementation of remedial programs at the ALCO area, and its productive reuse, will represent a substantial and long lasting improvement over the existing condition of the Alco site.

**E. STS Steel**

The following letter is from a letter dated February 2, 2010, from STS Steel. A copy of the letter is included in Appendix 1.

**E1. Comment:**

*The DGEIS does not address how the proposed use of the property will be impacted by the continued industrial use of the property by its longest occupant, STS Steel. Neither does it address how the proposed use of the property will potentially impact the continued operation of STS Steel.*

**Response:**

The Potential Land Use Plan (Figure 1-3) of the DGEIS represents a broad concept for the future redevelopment of the site. The industrial uses currently operating at the Alco site are existing non-conforming uses which are not consistent with the City Comprehensive Plan or the zoning code which is based upon the Plan. It is hoped that STS Steel will work with the City and Metroplex, and where appropriate, the NYS DEC, to bring its site conditions, maintenance and landscaping up to the standards that will be met by the developers of the site. The industrial operations currently operating out of the Alco site must not contribute to a continuation of the “blighted appearance” of the property. The goal is to establish a vibrant mixed use project.

**E2. Comment:**

*The DGEIS assumes retail use of STS Steel's property at the North end of STS Steel's buildings 304 and 330. STS Steel has leased this property since 1989 with an option to purchase which we intend to exercise. The continued use of this property is essential to the continued operation of STS Steel. Our use of this property for ingress and egress to our buildings (304 and 330) and to Erie Boulevard is critical for shipment and storage of large lock gates, bridges, and other structural components manufactured by STS Steel. Building 330 was constructed by us in 2001 specifically to perform lasting and painting of lock gates and other large components. Blasting and painting is an integral part of the*

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*product which cannot be performed in Building 304. Discovering that this property is designated for retail use is rather startling to us.*

**Response:**

The Potential Land Use Plan that shows the area north of Building 304 as retail uses is a long term vision for the site. Retail is generally located along highly visible corridors such as Erie Boulevard. This use assumes environmental remediation will occur in this vicinity. STS Steel will need to undertake remediation as well as aesthetic improvements to its buildings and grounds to be consistent with the goal of the City's Comprehensive Plan and this GEIS.

**E3. Comment:**

*The DGEIS does not address the impact to potential future property users of an existing right of way which entitles STS Steel to industrial use of designated property within the park for movement of large trucks, forklifts, and other industrial equipment. Ingress and egress around Building 304 is essential to the continued operation of STS Steel. Movement of trucks through the park will presumably impact the other occupants of the park.*

**Response:**

Refer to the response to Comment E1 above. One existing user and its use of the property should not impair the future functioning of the mixed use project. The common access ways will need to be consistent with the goals of the GEIS and the City's Comprehensive Plan and Zoning.

**E4. Comment:**

*We are currently using a large portion of Building 332 for bridge fabrication and material storage. The plan shows this area as commercial leading us to assume that Building 332 is scheduled for demolition. We have been led to believe over the past year that we would be able to purchase Building 332 and share with Metroplex renovation costs to make the building more appealing from Erie Boulevard. We need this building. This is a unique building and is irreplaceable. It represents an era of construction that no longer exists. Duplicating such a structure is not economically feasible. Building 332 and 304 are unique, they enable us to meet the niche we have worked hard to develop over the last 20 years since moving to Schenectady.*

**Response:**

Building's currently in use are not scheduled for demolition. It is the goal to have unused areas redeveloped in accordance with the City's Zoning and Comprehensive Plan.

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Existing uses will have to meet GEIS standards for environmental remediation and aesthetic improvements.

**E5. Comment:**

*If the plan is to take STS Steel's property it should be stated in the DGEIS with appropriate compensation budgeted. If the plan is not to infringe on STS Steel's ability to continue functioning on the property the impact of our operation should be fully disclosed. It bears repeating that STS has unique fabrication capabilities that are tied to the unique features of these historic buildings. STS Steel is a key supplier of lock gates for the NYS Thruway Authority and is the only fabricator in New York State with American Institute of Steel Construction (AISC) quality certification for Complex Bridges with Fracture Critical and Complex Coatings endorsements. Our products are not small. We fabricate, store outside and move lock gates in the park that are 26 feet wide 52 feet long and weigh up to 55 tons, bridge girders up to 150 feet long and other large fabrications. Our operation does not seem compatible with the planned residential component of the property.*

**Response:**

Metroplex and the City have set forth a vision for the Alco site that includes a residential component. This is a key element to the type of mixed use brownfield re-development that will revitalize this portion of the City of Schenectady. Over time the level of industrial use of the Alco site has shrunk.

The City, and the redeveloped areas adjacent to the ALCO facility, needs to have this blighted area redeveloped and remediated. While STS Steel's operation may continue as a pre-existing non-conforming use, no user of the overall Alco site can be expected to be the determining factor in the redevelopment and remediation of the remainder of the site.

It will be necessary for the City, Metroplex and the remaining industrial users to work together to ensure that the redevelopment efforts are not adversely affected. It is worth noting the City Zoning Law and the City Comprehensive Plan are documents that Metroplex and all future developers must comply with in the redevelopment of the site. The scale and nature of development and its thresholds set forth in the GEIS are completely consistent with the zoning and comprehensive plan. Before adopting these documents the City held numerous public informational meetings and hearings.

**E6. Comment:**

*Does the planned use of the property anticipate the continued industrial use by STS Steel of the property currently owned or leased by STS Steel including the easement contained in STS Steel's deed for building 304 that provides specific use of roadways in the park?*

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**Response:**

See Response E5, above.

**E7. Comment:**

*Will you revise the plan to show the property currently leased by STS Steel North of parcel 304 containing our building 300 as industrial and not retail? Will you state in the DGEIS that the plan calls for STS Steel's continued use of that property.*

**Response:**

As stated above, the FGEIS notes that STS Steel operates at the Alco site and owns property within the overall site. The redevelopment of any unused property will be undertaken in accordance with the thresholds established in this GEIS to return a blighted and contaminated area of the City into the waterfront mixed use area envisioned by the City.

**E8. Comment:**

*Ray Gillen said in his opening statement that the March 1 public hearing that this is a draft open to revision. When will the revised plan be available to the public?*

**Response:**

The Final GEIS has been made available for public review

**F. T. Hodgkins**

The following comments are from an e-mail dated March 12, 2010 from T. Hodgkins. A copy of the e-mail is included in Appendix 1.

**F1. Comment:**

*Property values will decline, and vacancy rates will rise in other areas of the city due to the development of excessive housing stock.*

**Response:**

The type and timing of land uses will be in direct response to market conditions. Also, the type of housing proposed to be provided in the Alco site will be different than that provided in other areas of the City.

**F2. Comment:**

*This project will not be a "local and regional destination"; it will be another set of cheaply constructed, poorly designed, overpriced, soulless vacant boxes.*

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**Response:**

Neither this GEIS nor the City's Zoning and Comprehensive plan support this statement. To the contrary a blighted area of the City will be remediated and redeveloped with modern facilities that will meet the needs of people living in the City and the region generally. All development sponsored by Metroplex in the City has been attractive and in character with the City's best architecture. Private development efforts in the City should be commended from the facades improved on State Street to the new Golub office building on another former Alco site. The redevelopment of the former Ramada Inn on Nott Street is also on former ALCO property.

**F3. Comment:**

*This project will not be "improving the storm water quality flowing into the Mohawk River", because more wastewater will be produced with development and thereby increasing the number of times a year, as well as volume of sewage overflowing into the Mohawk River.*

**Response:**

Redevelopment will require remediating and stabilization of the site. At this time the contaminant conditions on the site are unmanaged; remediation will significantly improve environmental conditions. In the long term, this should improve the water quality of stormwater generated by the site. Additionally the City has an approved and well operated wastewater treatment facility that has the capacity to serve the redevelopment of the site.

**F4. Comment:**

*Development does not have "a beneficial impact on the environment"; certain features of the proposal might have positive impacts, but the aggregate damage to the environment done by new development far exceeds these paltry measures.*

**Response:**

Urban renewal and reuse of existing brownfield sites is a key component of good planning for any City, but especially for the City of Schenectady. Absent such reinvestment in the City, the City's infrastructure may become a tax burden on those businesses and residents that remain in the City. Redevelopment of this site will have clear economic benefits (see the updated and revised report in Appendix ). The remediation of the site through the brownfield program is a substantial environmental benefit over existing conditions and is fully consistent with protecting public health and the environment.

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**F5. Comment:**

*Why does the DGEIS not discuss the nuclear reactor or the nuclear fuel on the ALCO site?*

**Response:**

The DGEIS clearly identifies the long-standing training facility operated by RPI, a premier educational facility in the Capital District. The purpose of the facility is to act as a laboratory or training facility for RPI's nuclear engineering students. It does not represent an incompatible use as the size of the facility is extremely small and not useful for any purpose other than training.

**F6. Comment:**

*Where is the amphitheatre, aquarium, art museum, ghats, gazebo, galleries and atrium?*

**Response:**

These uses are not and never have been considered for the project.

**F8. Comment:**

*Where is the public space, cultural space, community space and sacred space?*

**Response:**

In accordance with City Zoning and the City's Comprehensive Plan, the redevelopment will include a pathway for pedestrians and bicyclists that will open up this important and beautiful segment of the waterfront along the Mohawk River by extending the Hudson River Mohawk Bike Path from its current terminus on Maxon Road to Stockade District. For the first time in centuries the public will have safe access to enjoy the waterfront.

**G. Schenectady County Environmental Advisory Council**

The following comments are taken from a letter dated March 1, 2010, from the Schenectady County Environmental Advisory Council. A copy of the letter is included in Appendix 1.

**G1. Comment:**

*The Schenectady County Environmental Advisory Council strongly supports the redevelopment of the former ALCO site. Redevelopment of this site will have a positive effect on the area and will be a great asset to the city. What currently appears to be a wasteland at one of the gateways to the city will be transformed into an attractive, vibrant mixed use development.*

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*Land which is currently unused and unusable will be remediated and turned into a cleaner site posing fewer risks to the environment and public health. Redevelopment of the area will capitalize on the investment already made in infrastructure by utilizing, to the extent possible, existing roads, sewers and water lines.*

*Mixed use development, with offices, residential and retail space and the retention of the existing light industry on the site, will allow people to walk-to work, to shops, to services rather than pushing people into their cars as typical development does. Reducing automobile dependence has numerous benefits. It is better for the environment because gasoline consumption is reduced, resulting in lowered contributions of greenhouse gases to global climate change. It is better for public health both because people are walking, getting more exercise and reducing obesity, and because air quality is improved. The need for roadways is also reduced, preserving green space and reducing storm water runoff which is better for the health of our waterways.*

**Response:**

The City and Metroplex appreciate the SCEAC's support for the redevelopment of the site.

**G2. Comment:**

*Recreational possibilities will be increased. A neglected and inaccessible section of the Mohawk River will be opened up to be enjoyed by the public. Bicycling and walking pathways will be networked and expanded along the riverfront. Greenspace should be preserved. SCEAC supports the development of public commons areas on the site as well as parkland along the waterfront.*

*The county will also benefit. The county will benefit economically from having a vibrant and attractive city at its center, which will draw young professional workers to the area. Compact development in the city helps preserve the rural landscapes, small town character and open space and quality of life of the county, keeping it an attractive place to live and raise a family. Waterfront development on both sides of the river is planned to make the county a destination site for Erie Canal boaters, bicycle tour groups and out of town visitors and well as area residents.*

**Response:**

The City and Metroplex agree that redevelopment will realize these important planning and economic development goals.

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**G3. Comment:**

*Given that the extent and nature of contamination of the site is currently not well understood, SCEAC is concerned that the eventual cleanup of the area be performed in accordance with all relevant state and federal requirements. Potential residents and others working within the area need to be assured that any residual levels of contamination are below concentrations that would pose a risk to human health or the environment.*

*SCEAC is concerned that during the clean up and redevelopment process that hazardous materials (contaminated soil, building materials, etc.) are dealt with properly during clean up and development. It is important to prevent the potential release of contaminants to the environment during these processes and to minimize contamination of potentially reusable building materials during the demolition of buildings. Protection of workers at the site and nearby residences is of paramount importance.*

**Response:**

Remediation of the site will be reviewed by the NYSDEC as the site is taken through the Brownfield program. The site will be remediated in accordance with applicable regulations. Absent this dynamic redevelopment of the site, no funds would be available for its clean up and reuse. The Brownfield program has been successfully used in the City for the redevelopment of other Alco sites. Metroplex is confident that the GEIS will encourage the redevelopment of the site in accordance with modern and up to date rules and regulations implemented by local, State and federal governmental agencies. All existing users of the Site will also need to remediate property to address past contamination issues.

**G4. Comment:**

*We emphasize the need to take proper precautions not to contaminate surface water and ground water since the site is adjacent to the Mohawk River and above the Great Flats Aquifer, two of the county's greatest natural resources. All regulations governing discharges to the Mohawk River and activities within the Aquifer zone III must be strictly adhered to.*

**Response:**

All future development, as opposed to the existing blighted and abandoned facilities on the site, will follow all applicable governmental regulations. At the time the site was used by Alco, as well as other past users of the site, environmental laws and regulations were either non-existent or in their infancy. Absent the brownfield redevelopment of the property, the existing contaminant conditions would be unmanaged and unabated.

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As such, the redevelopment of the property is fully consistent with environmental protection interests. Encouraging modern urban redevelopment that complies with the City's vision for the site by adopting a GEIS and taking other steps to make the site more "shovel ready" fulfills the purpose for which Metroplex was created.

**G5. Comment:**

*We also suggest that prior to demolition of the buildings deconstruction could take place. Valuable or historic components of the building would be removed prior to demolition of the buildings and could be sold through places like Habitat for Humanity's ReStore to be reused in other buildings, or they might be useful for museum displays depicting local history.*

**Response:**

The potential for the reuse of such components is envisioned and encouraged in the Letter of Resolution.

**G6. Comment:**

*We note the suggestion in the DGEIS that this redevelopment presents an opportunity to showcase green building design by using innovative materials and design techniques that simultaneously promote cost efficiency and urge that that direction be taken.*

*We encourage the use of low impact development methods for storm water management to the fullest extent possible. Rain gardens, buffer strips, permeable pavers and roof gardens are some techniques mentioned in the DGEIS.*

**Response:**

The GEIS will encourage these efforts. LID measures will be informed by the nature of the contamination on the site. Infiltration through contaminated soils is generally discouraged.

**H. SGS Rowing Association**

The following comments are from a letter dated March 20, 2010 from the SGS Rowing Association. A copy of the letter is in Appendix 1.

**H1. Comment:**

*SGS is hoping to develop a community boathouse, which would allow SGS to grow and offer the sport of rowing to other schools in the area, and could provide a home for the recently formed and already successful SCCG crew program. Many of the parents of SGS rowers have expressed an interest in learning and participating in the sport of rowing, and a community boathouse would be able to serve the adult community as well.*

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*There is very little undeveloped river front left in Schenectady. Public access to the Mohawk River is limited to walking and viewing parks such as River Side Park and Collins Park in Scotia. The ALCO site offers public access to the River. As part of the redevelopment of this site the inclusion of a community boathouse would be boon to the community.*

**Response:**

At this time, there are no plans to include a boat house on the site. However, if funding becomes available, this use could be considered in the future.

**H2. Comment:**

*The ALCO site has a very steep riprap reinforced shore line and lies above the flood plain making it an ideal location for a boathouse in the City of Schenectady. The barge canal channel is very close to the shore along most of the ALCO shoreline. The area immediately upstream (west of) building 320 is a feasible location for a boathouse. The barge channel is far enough from the shore that the Army Corps of Engineers guidelines indicates a dock would be permitted. The shore is steep and would require a graded cut in the bank to allow access to the water. The cut would have to be reinforced with riprap to stabilize the bank.*

*The only other area in the ALCO site where a dock could be located is in the small cover immediately downstream (east) of the RPI reactor. However the dock must be sufficiently upstream from the piers of Freemans Bridge to be safe for inexperienced crews landing shells. A shell swept by the current against a bridge pier puts the crew in peril of a dunking.*

**Response:**

Such uses are compatible with the City's zoning and would be considered if proposed, adequately funded and all appropriate federal, State and local permits are obtained.

**I. ALCO Historical and Technical Society**

The following comments are taken from a letter dated March 12, 2010 from the ALCO Historical and Technical Society. A copy of the letter is included in Appendix 1.

**II. Comment:**

*In accordance with your call for written comment at the public review of the GEIS and the Redevelopment Plan on March 1, 2010, we are pleased to submit our proposal for the creation of an ALCO Heritage Museum at the south end of the subject property. This*

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*top-level proposal has a sound basis of analysis and study, which we would be able to discuss with you at your convenience. We believe that the buildings and surrounding property that we propose for the ALCO Heritage Museum would provide a fitting Keynote to the redevelopment of this property in which Schenectady could take great pride and from which would derive significant revenue.*

**Response:**

The site does not have any existing rail access, which would be significant detriment to the development of a heritage museum with a rail theme. Furthermore, Metroplex considers the site a great opportunity for job creation and new tax revenue for the City. A not-for-profit museum would not be consistent with this goal.

**J. CDTA**

The following comments are from a letter dated March 26, 2010 from the Capital District Transportation Authority. A copy of the letter is included in Appendix 1.

**J1. Comment:**

*As development occurs, Metroplex should continue to consult CDTA to evaluate the possibility of providing transit services closer to the site, such as along Erie Boulevard. It will be critical for any future development within the site to include internal pedestrian network that extends to key external pedestrian infrastructure.*

**Response:**

Metroplex will continue to consult with CDTA as the project moves forward. CDTA should participate in the City of Schenectady approval process (e.g. Site Plan approval) since the City will examine pedestrian friendly features in proposed future site development.

**J2. Comment:**

*Site developers should incorporate bicycle infrastructure, such as racks, lockers, and showers to encourage people to bicycle for more than recreational purposes.*

**Response:**

The GEIS supports the development of such infrastructure as part of each development component.

**J3. Comment:**

*CDTA recommend including market rate parking within the study area to encourage walking, biking, and transit use and to improve air quality and reduce contaminated*

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*surface runoff. CDTA also supports the DGEIS' recommendation of shared parking within the site.*

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**Response:**

Comment is noted.

**J4. Comment:**

*Section 2.1.1 of the correctly states CDTA's current fixed route services provision near the site. However CDTA is currently restructuring the route system in Schenectady County, with a planned implementation date of 5/2010. Preliminary plans would put the closet transit routes along Van Vranken Avenue, as well as along Seward Place between Nott Street and Union Street. This could change in the future if the city incorporates the ability to make a left hand turn for Erie Boulevard southbound onto State Street eastbound, an action the City Engineer has told us currently undergoing an engineering evaluation as part of the federally funded Erie Boulevard Re4ocnstrauition project. We will keep Metroplex advised of the final route configuration after we have processed the input form the public outreach process. In addition, while it is true that CDTA provide curb-to-curb service on an advance registration basis, it should be noted that this service is a paratransit service offering transportation alternatives only to people who at certain times cannot use or have substantial limits using, the CDTA fixe-route bus system because of a disability or impairment as defined by the Americans with disabilities Act. Called START, it is available only within ¾ mile of a fixed transit route only during the days and hours of the route's operation.*

**Response:**

Comment is noted. The GEIS recognizes that ongoing coordination with entities such as CDTA will be necessary and critical to ensure the success of the redevelopment efforts.