

# **GROWTH INDUCING ASPECTS and CUMULATIVE IMPACTS**

**Chapter Twenty**

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### Comment Growth-1

#### *Growth-Inducing Aspects*

*The DEIS contains contradictory assertions that call into question its conclusion that the Proposed Project is not likely to induce additional commercial and/or retail development. The Applicant begins by asserting that the Proposed Project will increase demand for goods and services and that “it is possible” that additional stores or personal services may open, but then claims that the increase in income will instead stabilize the market rather than enable its growth. None of these assertions are supported with any kind of factual data. In addition, the DEIS briefly lists a number of potential development projects that may be undertaken nearby, including “vacant lots in Terravest Corporate Park, “ upgrades to existing buildings,” and the former Putnam Seabury site, but provides no evaluation of whether or not these projects may be induced by the Proposed Project. (Riverkeeper (11/12/13)*

#### Response:

The project includes a 100+/- room hotel and 143,000 +/- SF of retail and restaurant space. Since construction of the Highlands, there has been no direct or indirect growth related to the existence of the shopping center including this property which was proposed to be retail space at the same time as the Highlands. Based on this, there appears to be no direct or indirect connection between the Crossroads proposal and any corporate development which may happen in Terravest Corporate Park or on other properties in the area. The Putnam Seabury site has no current approvals. It is vacant land, with limited access and no utility service available. The last approvals at the site were for residential use and not a direct or indirect growth from the proposed project.

### Comment Growth-2

*Further, the DEIS falls far short of the requisite level of detail necessary to evaluate the growth-inducing aspects of the Proposed Project and the significant environmental impacts likely to result. For example, the DEIS concludes that there is a sufficient unemployed population in the area to absorb the additional jobs created by the Proposed Project, presumably as evidence that the project will not induce population growth, but fails to support that conclusion. Instead, the applicant merely lists the unemployment rate in the area, but does not provide information regarding how many of those*

*individuals are able to work and have the skills to match the employment opportunities that will be created. (Riverkeeper (11/12/13)*

**Response:**

This project will require similar skills and number of employees to those shopping plazas already in the area and will provide another source of employment for the area.

Census data suggest people in Putnam County travel approximately 30 minutes to work. In 2010 about 6.9% of the working age population in the area was unemployed. The project retail development consultant expects most jobs to be filled by people currently residing in the market area, a 30± minute drive.

The proposed project is now smaller in size than the existing Highlands or Lakeview shopping centers and will offer another employment option for local residents.

**Comment Growth-3**

*Cumulative Impacts*

*The DEIS does not appear to contain any sort of analysis of cumulative impacts. Despite the title of Chapter Twenty, Growth Inducing Aspects and Cumulative Impacts, that section of the DEIS does not contain a discussion of cumulative impacts. The Applicant notes that the project area is “identified in the Town Comprehensive Plans as a node for economic activity, but—other than briefly mentioning and dismissing the Putnam Seabury site. Vacant lots in Terravest Corporate park and, unnamed potential building upgrades—does not attempt to identify potential projects in that same area. Given that any development projects in the area are likely to increase impervious surfaces and thereby the risk of transporting pollutants into surface and drinking water resources via increased stormwater runoff, it is critical that the DEIS identify other planned and/or approved projects in the area and evaluate likely cumulative impacts. (Riverkeeper (11/12/13)*

**Response:**

The proposal is independent from other sites in the area and will stand on its own economic merits. Every project within the NYC Watershed is evaluated by NYCDEP and NYSDEC on its own merits for compliance with the applicable stormwater quality regulations. Vacant lots in Terravest Park are zoned for corporate use, having no connection to retail use. A number of lots in Terravest Corporate Park are already approved for construction, independently of this site.

#### **Comment Growth-4**

*What is the potential effect on other RC Zoned properties if the zone change is granted?  
(Catherine P. Croft (11/12/2013), (Steven Mattson 11/8/2013)*

**Response:**

As noted in the DEIS, it is highly unlikely that other RC properties could meet the Special Permit criteria proposed by the zoning amendment. Large Retail Establishments are not currently permitted uses in the RC zone. Moreover, under the current zoning of the subject property as RC, it is the only such zoned property with immediate access to an interstate interchange and across from an already developed office/industrial park. Notably, the recently adopted Town of Southeast Comprehensive Plan states with respect to Rural Commercial Districts, “Additional uses that could be considered are craft workshops, agricultural tourism based businesses and performing arts or other arts based uses”(page5-6). While these uses are more suited to the three other areas zoned RC, they are ill-suited for the subject property when contrasted with the uses permitted in the HC-1 zone, which is Highway Commercial (emphasis added). Accordingly, there is little or no impact from the zoning text changes on other property zoned RC.