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Mayor Meg Kelly
Commissioner of Finance, Michele Madigan
Commissioner of Accounts, John Franck
Commissioner of Public Safety, Robin Dalton
Commissioner of Public Works, Skip Scirocco
Admin of Parks, Open Lands, Historic Preservation & Sustainability, Tina Carton

Dear Mayor, Commissioners, and Admin Carton,

RE: COMMENTS ON THE SARATOGA SPRINGS' NATURAL RESOURCES INVENTORY

Sustainable Saratoga is pleased that the City has released a draft of the Natural Resources Inventory (NRI). The completion of this NRI is a recommendation of the City's 2015 Comprehensive Plan, and we had urged the City to pursue full funding for an NRI in order to update the City's 2002 Open Space Resource Plan and to provide background data for regulatory decisions in the Unified Development Ordinance (UDO). We commend the members of the Open Space Advisory Committee, Tina Carton – Administrator of Parks, Open Lands, Historic Preservation and Sustainability for the City, and the NRI consultants for their work in developing an overview of the City's natural resources and explaining their importance and value.

The NRI will provide important assessments regarding the City's remaining naturally occurring resources, such as forests and other ecological communities, open space, lakes, streams, wetlands, and springs. The NRI's descriptions of current conditions of natural resources will provide information for making decisions to promote climate resilience, to protect our wetlands and other important water resources, and to reduce the risk of ecological damage and fragmentation of the City's Greenbelt and other natural areas. As the population of Saratoga Springs continues to grow, these functions become increasingly critical and increasingly under threat of being diminished.

Overall, it is important to develop best practices summaries for all topics within the document. More than strictly just an inventory, the NRI should include detailed information on best practices and recommendations for conservation, stewardship, and management for each of the resources inventoried. In addition, in the development of the NRI, the UDO, and the upcoming Open Space Plan, the consultant selection process is critically important and can materially affect the quality of the City's product. We urge the City to review its consultant selection process and criteria, and ensure that sufficient funds are allocated for these important projects.



Our specific comments follow:

The connection between the NRI recommendations and the draft UDO should be stated. The draft NRI contains management strategies and regulatory recommendations for the protection of our community's natural resources. It is not clear how those recommendations will be used to guide the City's new Unified Development Ordinance. Key recommendations of the NRI should be incorporated into the UDO, and we urge the City Council to direct the UDO consultants to synthesize relevant NRI recommendations into the UDO.

The recommendations for climate change mitigation planning need to be expanded. The NRI gives examples of some climate action plans from other communities. We believe that completing a Climate Resilience and Action Plan for the City is an essential next step, and this recommendation should be clearly stated in the NRI. Specific recommendations for Saratoga Springs could include increasing the urban forest canopy, continuing to promote sustainable practices and compact development in the urban core while discouraging inappropriate development in the Greenbelt, promoting "complete streets" measures and alternatives to automobile use, and promoting alternative energy generation and use, as well as increased energy efficiency in building design and layout. New York State law now mandates net zero emissions statewide by 2050. The need to move ahead with mitigation plans has never been more urgent.

The water resource protection section should articulate protections for water resources and watersheds. The best practices for protection of ground water resources (page 61), water quality and drinking water (pages 94-95), and mineral springs should discuss the value of establishing greater watershed rules and regulations that would regulate land uses, land disturbances and land treatments both within and beyond the City boundaries. In addition, the report should reflect the City's commitment to close clean water regulatory gaps resulting from Federal Clean Water Act changes and lack of state regulation or outdated information regarding some classes of streams and wetlands. As reported last week in *The New York Times* [<https://www.nytimes.com/interactive/2020/06/29/climate/hidden-flood-risk-maps.html>], a First Street Foundation study indicated that the flood risk for Saratoga Springs is increasing, and estimated that over 1400 properties within the City will be at risk within 30 years. The time is now to protect our natural resources, and especially our wetland and forest resources, which will serve to slow water movement across the landscape and mitigate some of that increased flood risk. (Also, this finding is consistent with NYSEDA's ClimAID report.)

The Land Cover/Ecological Communities section needs best practices recommendations. We view this as one of the most important chapters in the report; as such, it requires best practices recommendations. The importance of biodiversity should be more fully described in this section, with emphasis on ecosystem services, and on the relationships between various diversity metrics (i.e., diversity is not solely about species richness) and ecosystem functions and services. This section would also benefit from a deeper discussion of the implications of changes in species diversity. As suggested in the draft, we agree that the City should undertake a more detailed mapping of its ecological communities. However, there were no recommended



mitigation measures or regulatory actions that should be taken to protect our biodiversity, important habitats, and wildlife corridors. This is a significant omission in the report. We recommend that the City expand and give more weight to this section.

The importance and status of the urban and community forest is well-documented in this report, and Sustainable Saratoga supports the strong recommendations for its preservation and expansion. We support the development and adoption of urban forestry best practices intended to implement the City's Urban and Community Forest Master Plan. The draft NRI makes a strong case for the City to increase protections and expand the urban forest by incorporating strong, enforceable provisions in the UDO and additions to the City Code.

Increasing the canopy of large-growing trees is especially important in the urban core. Key benefits include reducing stormwater runoff to mitigate impervious surfaces, reducing energy use by shading buildings, and making the area more attractive to business customers. However, conditions for tree growth are limiting. The NRI should specifically mention the value of incorporating increased building setbacks in the UDO to accommodate wider tree lawns – areas of open soil needed to allow large trees to grow to maturity.

The Greenbelt and Open Space Conservation section needs additional analysis and protections. This section should address threats to the conservation elements of the Greenbelt and set out recommendations to better preserve the Greenbelt's open space resources. The NRI states on page 231: "Saratoga Springs is now required to update our zoning laws to be in accordance with the comprehensive plan. This is a regulatory method and opportunity to ensure that the Country Overlay Area and the Conservation Development District be translated into a mechanism to conserve rural character, open space, and constrained lands during Greenbelt development." Accordingly, the NRI needs to articulate and expand the action plans included in the 2015 Comprehensive Plan that relate to the Greenbelt and open space, so that those plans may be included in the UDO. Further, given both the length of the document and the importance of these resources, we believe it is worth repeating any recommendations that are found in earlier sections related to specific resources found in the Greenbelt.

The NRI has the potential to be an important asset to the community and to assist in land use planning and policy. A fuller statement of conclusions, best practices, and up-to-date data would bolster the utility of the NRI as an essential support document to the City.

Thank you for giving us the opportunity to make these comments.

Sincerely,



Wendy Mahaney

Executive Director, Sustainable Saratoga

