



*Advocate.  
Educate.  
Act.*

**Sustainable Saratoga**  
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April 17, 2014

Mr. Geoff Bornemann, Chair  
Comprehensive Plan Committee  
City of Saratoga Springs  
City Hall – Room 10  
474 Broadway  
Saratoga Springs, NY 12866

**RE: "RECREATIONAL TOURISM DISTRICT" CONCERNS**

Dear Mr. Bornemann:

Sustainable Saratoga is a not-for-profit organization that promotes sustainable practices and the protection of natural resources, through education, advocacy and action, for the benefit of current and future generations in the Saratoga Springs area. Sustainable Saratoga supports smart growth land use principles.

On July 8, 2013, the Saratoga Springs Comprehensive Plan Committee received a request to designate 800 acres of land in the Conservation Development District (greenbelt area) as a "Lake Lonely Special Development Area and Resort Overlay Zone." We had a number of concerns with the request and we met with the applicant several times to review their proposal. On January 15, 2014 we sent the Comprehensive Plan Committee a letter outlining our concerns and **opposition to** the original proposal.

On March 13, 2014 the applicant submitted a revised proposal. Sustainable Saratoga has reviewed that revised proposal and we note the following changes:

1. The size of the project has been reduced from 800 acres to 560 acres and it now encompasses land owned or leased by only one property owner.
2. The size of some of the facilities has been identified. There are now 132 residential units and 150 hotel rooms.
3. The proposed spa & wellness center, conference and event space, and any additional retail/restaurant facilities are all still included, but their sizes (square footage) have NOT been identified.
4. The provision for workforce housing has been deleted.
5. Transit shuttle service between the facility and the downtown has been proposed.

The project developers are seeking to have the current "Conservation Development District" designation in the Comprehensive Plan changed to a "Recreational Tourism District," as well as changing the existing "Rural Residential" zoning designation, in order to permit higher intensive commercial and residential development.

Sustainable Saratoga **still opposes this project and the proposed Comprehensive Plan reclassification** for the following key reasons:

- The proposal removes significant acreage from the low-density “greenbelt” area of the city, eroding the “country” part of the existing “City in the Country” land use designation for the city.
- The proposed development has aspects of a commercial resort that would compete and not be complementary to the downtown area.
- By its exclusive resort concept, the project would not be well-integrated in the core area of the community, but instead would constitute a separate self-contained development that is not beneficial to or sustainable for the rest of the community.
- The proposed transit service does not constitute a substantial connection to the rest of the community and would not necessarily mitigate the impacts of increased road usage.
- Some of the proposed recreational amenities, such as the proposed trail across wetlands to the Owl Pond and Lake Lonely, represent a significant intrusion into sensitive environmental areas.

Sustainable Saratoga believes that **it is far better for the community to locate additional new hotels, spas, restaurants, shops, meeting space and residential housing within the core area of the city,** rather than in the city’s greenbelt.

Sustainable Saratoga’s opposition to the proposal is based upon the following specific factors:

- The concept of a “Special Development Area” (SDA) was presented in the 2001 Comprehensive Plan. It has its origin as an “impact area” in the 1999 Comprehensive Plan. An SDA was essentially an area where the City wanted *infill* mixed use development. All of the current Special Development Areas in the 2001 Comprehensive Plan are in the core area of the community or on the immediate fringe of the core area near existing high-density development. The proposed Recreational Tourism Development Area is detached from the urban core.
- The site of the proposed Development Area is designated in the current 2001 Comprehensive Plan as the “Conservation Development District” (CDD). The Comprehensive Plan states that the uses in the CDD will be limited to residential, recreational and other open space uses. The proposed Recreational Tourism Development Area seeks hotel, spa, conference room space, retail and condominium uses which are incompatible with the CDD concept.
- Some of the key uses in the proposed Recreational Tourism Development Area *can already be accommodated within the existing Rural Residential zoning designation for the area*. The RR zoning already permits golf courses and clubhouses and low-density clustered residential units, etc.
- The introduction of high end hotels and high density golf condominium residences in the outer area of the community should be opposed. Similar residential units already exist in the core area of the City in locations where occupants can shop and eat in close proximity to their units. These types of residential units should remain in the core area of the community.

- The proposed rural landscaping and building design features proposed in the Recreational Tourism Development Area *are already required* in the City's conservation subdivision regulations. There is no need to create a new overlay district simply to obtain these standards.
- While the proposal may include trail construction and a shuttle service, community amenities shouldn't be promoted at the expense of sound overall planning.
- Much of the 560 acres in the proposed Recreational Tourism Development Area is wetlands, floodplains and sensitive environmental areas. Significant land disturbances within and surrounding these areas should be prohibited or discouraged.
- Rezoning a substantial part of the greenbelt would be a precedent for other landowners to have their parcels rezoned for intense development, thereby diminishing the greenbelt and the "City in the Country" over time.

Therefore, Sustainable Saratoga sees no compelling reasons to change the Comprehensive Plan in order to accommodate the Recreational Tourism Development Area proposal.

Sincerely,

Harry Moran  
Chair

cc: Stephanie Ferradino, Applicant's Attorney  
Joanne Yepsen, Mayor  
John Franck, Commissioner of Accounts  
Michele Madigan, Commissioner of Finance  
Chris Mathiesen, Commissioner of Public Safety  
Skip Scirocco, Commissioner of Public Works