



July 27, 2015

John Schmid, Natural Resources Planner
New York State Department of Environmental Conservation
625 Broadway, 5th Floor
Albany, NY 12233-4254
Email: adirondackpark@dec.ny.gov

RE: **Draft Unit Management Plan for the Remsen to Lake Placid
Railroad Corridor**

Dear Mr. Schmid:

Adirondack Wild: Friends of the Forest Preserve have reviewed the above draft unit management plan for the Remsen to Lake Placid Travel Corridor and submit the following comments for your consideration:

- Adirondack Wild appreciates the work and challenges the NYS-DEC has faced over the past few years in light of the rigorous, sometime caustic public debate over the future of the corridor.
- Adirondack Wild can support in general the preferred alternative put forth by the NYS-DEC suggesting the maintenance and enhancement of the track between Remsen and Tupper Lake for rail service and the removal of track for the development of a multi-use recreational trail between Tupper and Lake Placid.
- We believe and are concerned, however, that there was insufficient research or consideration for possible modern light electric, narrow gauge or even elevated rail - trail options as well as side by side trail options that could incorporate a range of uses.
- Adirondack Wild's principle concern continues to be that the wildlife habitats,

ecosystems, wetlands, rivers, lakes, ponds and wild lands all along the 119-mile transportation corridor gain the optimum conservation protection possible for this linear resource unit. For section 2 that is proposing potentially significant increases in non-motorized and motorized uses, a far deeper look into potential conflicts and impacts to adjacent lands and unique habitat types along the corridor should be assessed within the Final Amendment.

- In particular, Adirondack Wild is concerned about the potential for possible snowmobile and ATV trespass violations from the proposed recreational trail section (Segment 2) between Lake Placid and Tupper Lake that may impact the McKenzie Mountain Wilderness Area, the Saran Lakes Wild Forest and the St. Regis Canoe Area, not to mention private land ownerships which could and likely will at some level be impacted. While the Draft speaks generally to the issues of trespass and enforcement, the Final Amendment should offer far more detail as to who and how, inclusive of DEC forest rangers and ECO's will be monitoring and enforcing against trespass occurrences and impacts. What, for instance, will be the DOT's role in managing, monitoring and enforcing corridor rules and regulations different and more extensively than is being done now in the light of the possible significant increase in usership?
- The Draft Amendment to the UMP discussed some potential impacts to bats and research regarding increased snowmobile activity for deer and moose, but rather cryptically cited only 4 studies. Adirondack Wild would urge for a far more comprehensive summary of more diverse wildlife research analysis on the impacts of snowmobiling corridors on small and large fauna of many varieties, as well as common and endangered bats and also bird populations. Absent such a full EIS assessment, we do not believe the Draft UMP sufficiently meets the criteria for completeness in review under the State Environmental Quality Review Act (SEQRA).
- We question the Draft's minimal discussion of noise impacts on private landowners and their quality of life and believe a deeper analysis of potential impact to private landowner along Segment 2 should be performed including, preferably, a direct outreach questionnaire to landowners. The proposed limit or allowance for snowmobiling up to 35 miles per hour between 7 AM and 10 AM may seem too extensive in its impacts on adjacent landowners sense of place, quiet and solitude, changes in experience and character, etc., etc. Once more, the question of who will actively monitor, undertake enforcement, how often and at what expense and efficacy, all come to mind. What will be the noise impact on the wilderness, canoe area and wild forest experience of non-motorized wild land uses (snowshoers, backcountry and cross country skiers, etc.) during the winter months when snowmobiling may increase substantially? How can those impacts be best mitigated? The draft only speaks generally and far more detail is needed for a proper evaluation.

- The Final Amendment should also better address and evaluate potential impacts and costs to local town and/or county fire and rescue operations with respect to dealing with accident, public health and other emergencies along the corridor.

Thank you for our opportunity to comment.

Sincerely,

/s/ Daniel R. Plumley

Dan Plumley, Partner
Adirondack Wild

/s/ David Gibson

David Gibson, Partner
Adirondack Wild