



Dec 16, 2015

Kathy Regan
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Re. Proposed Final Amendment to the Remsen-Lake Placid Railroad (RLPRR) Travel Corridor Unit Management Plan

Dear Kathy,

Adirondack Wild is pleased to comment on the proposed amendment's compliance with the Adirondack Park State Land Master Plan (SLMP). We appreciate the significant extent of public outreach, listening and information exchange with Park stakeholders about this proposed amendment and alternative courses of action since 2013. We acknowledge the extensive time, effort and expertise of staff at the APA, DEC and DOT required to analyze the history and current status and condition of the railroad and right-of-way (ROW), as well as the various land use classifications through which the trackage runs, and the management recommendations and alternatives.

We disagree with the Final Draft's conclusion that you have the legal authority to tear up the tracks and create an all-recreational corridor between Lake Placid and Tupper Lake based on current Travel Corridor classification guidelines and other sections of the SLMP. For the reasons described below, deriving from the Adirondack Park State Land Master (SLMP) Plan, Adirondack Wild contends that the only way the state can legally create an all-recreational corridor and ROW between Lake Placid and Tupper Lake is through an amendment to the SLMP.

A weakness of the draft amendment, also sufficient to consider it nonconforming with the SLMP, is its failure to consider additional alternatives and to thoroughly analyze environmental and other impacts on both segments of the RLPRR Transportation Corridor, including cumulative impacts from the proposed significant expansion of snowmobile corridors and snowmobiling.

Unifying Theme of the Master Plan:

Adirondack Wild feels obliged to frequently call APA's attention to the unifying theme of the SLMP (page one), which is that the protection of the natural resources of the Forest Preserve must be paramount. Recreational uses are encouraged but are not permitted to degrade natural resources in all their social, psychological, biological, and physical aspects.

In some ways, the NYS DEC has been observant of this unifying, paramount theme in its study and rejection of Rail with Trail alternatives along Segment 2 that could create recreational impacts on State Land natural resources between Tupper Lake and Lake Placid. The amendment does a particularly good job in analyzing wetland impacts from off-corridor re-routes proposed by the Trails with Rails Action Committee, or TRAC.

In other ways, however, the amendment is not observant of the paramount theme. In particular, the elimination of rail between Tupper Lake and Lake Placid for an all-recreation trail will invite faster snowmobiling and other mechanized sports which could degrade natural resources in their physical, social and psychological aspects, including adjacent to the St. Regis Canoe Area. These impacts are insufficiently described and assessed. The amendment also encourages more snowmobile community connector trails coming off of the Railroad ROW between Beaver River and Tupper Lake, with unknown and unstudied cumulative impacts that could be very detrimental to the wilderness resource and to natural resources.

Travel Corridor Designation:

One of the key questions which this UMP amendment fails to confront and address comprehensively is whether or not removal of the rails between Tupper Lake and Lake Placid and creation of an all-recreation travel corridor conform to the State Land Master Plan. We contend that an all-recreation travel corridor lacking rail transportation infrastructure is not conforming for the following reasons:

- The Travel Corridor definition (SLMP pg.46) states that a travel corridor category includes “the Remsen to Lake Placid **railroad** right-of-way..” The right-of-way is modified by the word railroad in the very definition.
- This ROW descriptor is carried over onto page 47, where the responsibility of the NYS DOT over “the Remsen to Lake Placid **railroad line** is mentioned.
- The designation of travel corridors (SLMP pg. 49) states that the application of the definition results in designation of 120 miles making up “the Remsen to Lake Placid **railroad.**”

In addition, on page 15 the SLMP states that “the classification system takes into account the established facilities on the land...many of these factors are self-evident: the presence of a highway determines the classification of a travel corridor...” From this section, one may conclude that the mere presence of the RLPRR right-of-way without the rails would not make a Travel Corridor self-evident. The presence of railroad trackage would appear to be necessary to meet the Travel Corridor classification.

From all of this evidence, it seems readily apparent that the SLMP authors intended that the Remsen to Lake Placid right-of-way not stand alone but receive definition and designation as a result of the railroad or railroad line. Therefore, removal of the trackage along Segment 2 and creation of an all-recreational facility would appear to require an amendment to the Travel Corridor designation or the creation of a new SLMP designation.

1996 Unit Management Plan:

The multiple authors and agencies involved in the 1996 Remsen to Lake Placid Unit Management Plan thought hard about this problem of SLMP conformance, and they concluded that “the description of the travel corridor classification in the APSLMP refers to the railroad right-of-way in terms of a mass transit situation similar to roads and highways rather than a recreational facility” (1996 UMP, pg. 53).

If the ROW were to be transitioned to a trail for snowmobiling, bicycling or foot traffic, say these 1996 UMP authors, “the travel corridor description should be

amended to more clearly reflect the recreational theme of the management that would be pursued on the Corridor if rail options fail to materialize. As an alternative, another classification should be added to the APSLMP to reflect recreational use of the Remsen-Lake Placid Corridor instead of major transportation use” (1996 UMP, pg. 53).

The APA seems concerned enough about this problem of SLMP conformance of a purely recreational facility to seek an amendment to the SLMP within the current SLMP amendment package recently sent out for public hearing. That apparently minor amendment crosses out the word “railroad” within the Designation of Travel Corridors section on page 49, and replaces it with “right-of-way.” Yet, the other SLMP locations mentioned here where “railroad” modifies “ROW” are not proposed for amendment, so this one amendment proposal seems oddly inconsistent.

Regardless, we find no analysis on page 53 of the amendment (the section pertaining to the State Land Master Plan) why the aforementioned statements about the necessity of amending the SLMP contained in the 1996 UMP do not still apply to Segment 2 between Lake Placid and Tupper Lake.

The amendment admits that “it is not desirable to allow the corridor to revert to the classification of adjacent Forest Preserve units,” an acknowledgement that the RLPRR Travel Corridor is an overlay of the existing State Land classifications (as stated on page 14 of the SLMP). Therefore, removal of the tracks along the St. Regis Canoe Area, for instance, would revert the corridor to Canoe designation and require elimination of motorized uses. While this result may not be desirable from the point of view of some recreational users and state agencies, in the case of Segment 2 it can only be avoided by amending the SLMP Travel Corridor description as recommended in the 1996 UMP.

Insufficient SEQRA Alternatives and Impact Analysis on Segment 2:

The amendment lacks a comprehensive Type 1 SEQRA environmental impact assessment for potential uses, such as snowmobiling, which has the potential to seriously impact both “Forever Wild” conditions on adjacent state lands of Wild Forest, Wilderness and Canoe classifications. Also, the social, aesthetic, public health and safety impacts to local towns and private landowners along the route have not been sufficiently analyzed, interested stakeholders who have, heretofore, not been sufficiently brought to the table to assess impacts of the potential major change from a rail line to a major snowmobile use corridor.

User impacts and health and safety conflicts from the proposed mix of snowmobiling, skiing, and snowshoeing are given inadequate analysis, only that “lanes of travel” will be considered with “soft flagging boundaries,” whatever that may mean.

The UMP/SEQRA EIS should also evaluate impacts of moderate to heavy use of the corridor from Lake Placid to Tupper Lake (as well as other proposed linked trail systems) on local emergency and ambulance squads responding to accidents and search and rescue needs along remote stretches of the corridor.

With respect to alternatives, one that was not explored is the feasibility of a new narrow gauge, electric rail line side by side with a recreational trail, making dual use between Lake Placid and Tupper Lake possible. We ask that this alternative be addressed and assessed.

Alternative Snowmobile Community Connector Trails:

In the amendment’s efforts to bend over backwards to facilitate wider, faster snowmobiling off of the RLPRR corridor between Remsen and Tupper Lake (Segment 1), it contributes unnecessarily to erosion of the integrity and wild character immediately adjoining several key wilderness or primitive area locations, including:

- Page 41, alternative snowmobile corridor B which would formalize and widen an existing snowmobile loop on easements south of Mount Matumbla and through sensitive low-elevation boreal ecosystems adjoining the Raquette-Jordan Primitive Area. Formalizing this route as a community connector would significantly degrade the wilderness character of the area, damage ecosystem values, and exacerbate existing illegal ATV traffic.
- Page 42, formalizing the alternative connector that would invade the edge of the Round Lake Wilderness south of Horseshoe Lake is especially problematic;
- Page 44, alternative route 1 that would run along the southern boundary of the Ha-de-ron-dah Wilderness south of Old Forge, parallel to the tracks, is also especially problematic.

All of these and potentially other problematic off-corridor snowmobile connectors between Remsen and Tupper Lake must be properly addressed through individual Unit Management Plans and through conservation easement Recreational Management Plans. This amendment supports these additional community connector routes without the necessary analysis. The amendment should not be deemed SLMP compliant without a comprehensive analysis of the impacts of these proposed routes on the wilderness resource and on impacted wild, scenic and recreational rivers.

Finally, for a Unit Management Plan amendment that emphasizes winter recreational uses over long, linear corridors spanning so much of the length and breadth of the Adirondack Park the absence of any discussion of climate change and changing snowpack characteristics and durations is notable. The agencies would be strongly advised to include climate change in their SEQRA evaluation of the alternatives in this amendment package.

Thank you for this opportunity to comment.

Sincerely,

David Gibson and Dan Plumley

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Staff Partners

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