



November 27, 2017

Ed Frantz, Adirondack Park and Forest Preserve Manager
New York State Department of Transportation
Environmental Services Bureau
50 Wolf Road
Albany, NY 12232.

**Re. Draft Generic Transportation Corridor Unit Management Plan
For State Highway Travel Corridors in the Adirondack Park (TCUMP)**

Dear Mr. Frantz,

Introductory Comments: On behalf of Adirondack Wild: Friends of the Forest Preserve, we congratulate the NYS Dept. of Transportation (DOT) and sister agencies for completing this tremendous task of a generic Travel Corridor UMP for the Adirondack Park.

The draft document itself is usefully comprehensive, almost encyclopedic in its scope and its compilation of Park history, laws and policies. Its maps and tables also serve the State and private sectors as a valuable reference of current Adirondack Park data and statistics. Like the proverbial iceberg, there is a tremendous volume of underlying data that while not included within the draft supports the document, such as the visual resource assessments completed with the help of students at SUNY ES&F. This underlying data should prove invaluable in future as UMPs are prepared for individual travel corridors, such as State Rte. 3.

Finally, the illustrations selected to show travel corridor management alternatives add not only visual relief to the document but lend practical understanding of what the alternatives look like, the complex nature of interconnected travel corridors and traveling safety, natural and visual resource issues at stake in the Adirondack Park.

The document's emphasis throughout on how travel corridor management decisions of all kinds can enhance the scenic character, natural resources and roadside appearance of the Adirondack Park while meeting fundamental safety standards or, in the alternative, harm or degrade that character is its most important contribution. If the document succeeds in raising and in sustaining institutional awareness within the NYS DOT and sister agencies of how employing the full range of transportation management alternatives can both satisfy agency mission and enhance Park scenic character and environmental sustainability, it will have more than succeeded. It will be seen as a model for the rest of the country.

A significant incident and impetus for this document deserves mention and provides context. In 2005, following a complaint about one or more hazard trees falling into the highway, 4000 trees were cut down in a matter of days on Forest Preserve along State Route 3 west of Saranac Lake. The resulting appearance of the Rte. 3 corridor was stark. Just as stark were the lack of substantive interagency deliberation or accounting for Park scenic character, and failure to consider alternative management decisions that could achieve the objective with minimum impact on scenic highway character. Following a complaint and investigation of the tree-cutting by nonprofits like ours and by the State, a consent order was signed by the commissioners of NYS DOT, DEC and APA in 2006. Among the many interagency commitments made in that consent order was the completion of this travel corridor UMP and of individual travel corridor UMPs that would achieve a higher standard for Adirondack highways and avoid repetition of this unfortunate incident. We are very gratified, therefore, to see the outstanding results of so much staff effort on this Travel Corridor UMP.

We are also appreciative of the document's recognition of the Adirondack Highway Council of 1975-1985 and the groundbreaking composition and work of the AHC. It's clear from reading the document that the authors consciously recognize that they are building on that strong foundation even today.

Our specific comments and suggestions follow.

- **Key Challenges, Consistent Implementation and Staffing**, Pg. 3-2: The first two DOT challenges mentioned are: 1. consistently implementing the UMP processes and recommendations, and 2. DOT staff changes and loss of knowledge base. These cannot be overemphasized. Without consistent implementation of the UMP and without retained institutional knowledge of the strategies and alternatives that can best respond to the unique context and needs of the Adirondack Park, the time and resources devoted to this Travel Corridor UMP will have been in vain. In an agency as large and regionalized as DOT, the job of coordinating actions to ensure these challenges are successfully addressed cannot be sustained over any long period of time by one person. Not only should DOT make the **Adirondack Park and Forest Preserve Manager** position a permanent staff position, but the agency should augment that position with designated field staff who report to the Manager and help carry out designated Park and Forest Preserve management tasks. We ask that the final UMP add these to the list of needed Corridor Management Actions.
- **Exterior Lighting**, pg. 4-16: Light pollution is an important environmental issue throughout the State. Dark skies over the Adirondack Park are one of its most unique and significant attributes, benefiting natural resources such as insects and insectivorous birds as well as human health. All state agencies should be leaders in reducing nighttime glare. We urge NYS DOT to give further emphasis in the UMP to installing shielded fixtures at all DOT facilities in the Park.
- **Snow and Ice Control**, pg. 4-24: While this discussion is good, it appears insufficient. The negative environmental impacts of heavy use of sodium chloride as principal deicing agent should be more detailed and extensive to include the damage done to concrete,

steel, groundwater, surface waters and vegetation. Among the Corridor Management Actions should be more widespread use of brine solutions to reduce salt load, as well as more widespread use of computerized trucks and salt spreading equipment that adjust road salt application for maximum efficiency and effectiveness depending on the temperature of the road surface.

- **Highway Work Permits**, pg. 4-28: Utility and other highway contractors of DOT can, without proper training and supervision, quickly cause extensive damage to Park scenery and resources. The Corridor Management Actions in this section should be more specific about what Adirondack-specific conditions should apply to these contractors.
- **Emergency Response**, pg. 4-28: In-stream work following Hurricane Irene (2011) caused extensive damage to stream channels and biota, and will make the next flood event even worse downstream. While the recommended formalizing of emergency procedures to minimize channel changes and maintain habitat and floodplain connectivity is important, more specific Corridor Management Actions could be incorporated that build on lessons-learned from Hurricane Irene, etc. and that would improve inter-agency guidance for the next flood event.
- **Bridges and Culverts**, pg. 4-47: While the discussion about functionality and habitat permeability and connectivity is good, the recommended use of Best Management Practices is weak. The recommendation is repeatedly conditioned “where possible.” Use of best practices to simultaneously improve bridge and culvert function in heavy flood events and to improve habitat connectivity should be mandatory in the Park.
- **Highway Signs**, pg. 4-59: Yellow-on-brown highway signage uniquely brands the Adirondack Park, the result of the work of the Adirondack Highway Council (1975-85) and the federal Highway administration waiver which has been sustained over time. Some discussion about an alternative that would create a distinctive Adirondack Park sign similar to the Catskill Park sign now in use should be added for future consideration.
- **Access to Forest Preserve**, pg. 5-10: DOT cooperation with NYS DEC to address public access, safety and overuse of Forest Preserve off of state highways was evidenced recently at Cascade Mountain trailhead on Rte. 73. Individual Travel Corridor UMPs should anticipate more of this cooperation. The proposed Corridor Management Actions could cite the Cascade Mountain trailhead parking closure as an example of support for public safety and scenic wilderness character.
- **Community Cohesion and Character**, pg. 5-13: When major transportation corridors become town and hamlet main streets, significant topics and issues come quickly to the forefront, as this section anticipates. Community surveys, forums and stakeholder involvement are noted as high priority Corridor Management Actions. For example, decision-making that led to removal of the red barn at the intersection of Rtes. 9N and 73, and construction of the scenic overlook and parking at that location could have benefited from a more robust community discussion.

- **Community Gateways**, pg. 5-30: Consistently high quality and durable interpretive signage off of State Highways remains an important challenge and opportunity to engage visitors and residents with the diversity and character of the Park. As noted, partnerships are crucial in achieving both branding and interpretation of the Park on transportation corridors. Examples of successful interpretation and partnerships could be cited, such as the Hudson River signage at pull-offs on Rte. 28 between North Creek and North River.
- **Physical Features**, pg. 5-35: Climate change is not, as noted here, “an emerging issue in the Park” but a daily and seasonal reality affecting many transportation-related facets of life. The evidence and impacts of climate change discussion should be significantly broadened in this section.
- **Surface Water and Ground Water Resources**, Pg. 5-40-5-45. This section fails to include an obvious Corridor Management Action that would significantly benefit both surface and groundwater quality: to reduce the use of road salt on Adirondack transportation corridors. It also fails to acknowledge that many rural Adirondack municipalities rely on small aquifers for their water supply, aquifers highly vulnerable to salt pollution and decisions regarding road salt use, management and storage.
- **Stormwater Management**, pg. 5-48: While the discussion of water quality impacts of stormwater management decisions is good, the section fails to take note of the many biological issues involved in stormwater management decision-making by DOT. Curbs and catch basins, coupled with hydrodynamic separators to remove suspended solids from stormwater kills millions of amphibians, insects, reptiles and small mammals every year. BMP practices and site design techniques to avoid this mortality should include curb-less road systems that are crowned to shed water into roadside depressions or swales which naturally clean the runoff and allow unimpeded wildlife movements.
- **Habitat Connectivity**, pg. 5-59: We commend DOT for its participation in the Northeast Transportation and Wildlife Conference and for this UMP discussion of the intersection of transportation corridors and habitat connectivity. Models for integrating habitat connectivity with transportation management should not be limited to Massachusetts but could also include Parks Canada and other models of experimentation in North America that can inform Adirondack Park management. This section typically references the connectivity needs of larger mammals. We recommend that this section also cite the micro-habitat connectivity needs of small mammals, amphibians, reptiles and insects.

There is much more we could say about this draft document, but we will stop and again thank the NYS DOT for the opportunity to participate and to comment on this important Travel Corridor UMP. We look forward to a final draft and to continued participation and successful implementation of individual Travel Corridor UMPs in the future that are consistent with this framework and which contribute to the unique character and context of the Adirondack Park.

Sincerely,

Dave Gibson and Dan Plumley

David Gibson & Dan Plumley, Staff Partners

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Cc: Cathy Calhoun, Acting Commissioner, NYS DOT

Basil Seggos, Commissioner, NYS DEC

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