



May 12, 2020

Richard Weber, Deputy Director for Planning
NYS Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

John Ernst, State Land Committee Chair
NYS Adirondack Park Agency

Re. Remsen to Lake Placid Travel Corridor UMP Amendment

Dear Rick and John,

Adirondack Wild commends NYS DEC and APA for your recent strengthening of the UMP amendment with respect to the impacts of climate change and the responsibilities of both your agencies to consider State Land management recommendations in relation to our society's obligations under the Climate Leadership and Community Protection Act of 2019. Both agencies have done your best in recent days to integrate climate change into this UMP amendment at a reasonably high level of impact assessment. While there could be improvements, as in better anticipation of the impacts of climate change on actual and projected uses along the Corridor, we do appreciate the improvements which aim for consistency with the Adirondack Park State Land Master Plan.

We disagree very strongly with a statement in the agency's May 6 memorandum that **"the Plan does not make any proposals for new development of structures or improvements on State Lands adjoining the RLPTC which would require separate unit management planning and APSLMP conformance determination for the respective adjoining lands."**

Such an APA staff conclusion seems plainly contradicted by the Plan itself where on page 9 it states: "to bolster trail connectivity during times of year when the trains are operating along the RTL Segment, Beaver River can serve as a launching-off point for paddlers and hikers heading to unique wilderness destinations on Forest Preserve lands adjacent to the Corridor. The establishment of a trailhead and trail that link the Corridor to Lake Lila is a priority, to be closely coordinated with the railroad operator and subject to an amendment to the UMP for the William C. Whitney Wilderness Area, and possible review under APA Act Section 814 (emphasis ours).

Later, on page 45 the Plan states: "Facilities provided at Flag Stops would be limited to a small graded area for passengers to safely await the trains arrival and board or alight from the rail car. The establishment of flag stops adjacent to Forest Preserve is a complex issue in which the NYSDEC, NYSDOT, APA and the rail operator must explore to identify specific locations (emphasis ours). Each individual

location would have unique circumstances associated with it. The number, location, design, and procedure for use of such 'flag stops' at trail crossings would be subject to public input, review and discussion among stakeholders" (emphasis ours).

On page 68: "For example, the Corridor runs along the eastern side of the Five Ponds Wilderness Area to places only accessible from trailheads much farther away. Opportunities exist for traditional train station stops or flag stops along this segment, and these opportunities are often in close proximity to the Corridor, such as at Lake Lila and the Boy Scout Camp at Sabattis. In winter, the Corridor will continue to provide access for snowmobiling, as well as expedition camping via cross country-skiing and snowshoeing during the same period allowed for snowmobiles on the RTL Segment."

These are but three examples. Our point, made previously in our April comment letter, is that the Plan plainly encourages and anticipates new improvements and facilities on State Lands adjoining the Corridor which pose "complex issues" and which the Plan admits will require future amendments to other UMPs, including Wilderness UMPs. This Plan amendment fails to conform to the APSLMP and to SEQR because it fails to describe and assess in a generic sense the "complex issues" associated with the Plan's anticipation of new facilities for recreation on Forest Preserve, including Forest Preserve Wilderness, Primitive and Canoe areas, off of the Corridor.

Thank you for considering our additional comments.

Very sincerely,



David Gibson, Managing Partner

Cc: Terry Martino
Agency Members and Designees

Adirondack Wild: Friends of the Forest Preserve
P.O. Box 9247, Niskayuna, New York 12309
www.adirondackwild.org
518-469-4081