



Board of Directors

May 22, 2017

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Steve Guglielmi  
NYS DEC Region 5

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P.O. Box 296  
Ray Brook, NY 12977

**James McMartin Long**  
Secretary

**Re: Adirondack Rail Trail Draft Conceptual Plan**

**David Quinn**  
Treasurer

Dear Mr. Guglielmi,

**Nancy Bernstein**  
**John Caffry**  
**Andy Coney**  
**Dean Cook**  
**Lorraine Duvall**  
**Robert Glennon**  
**Roger Gray**  
**Evelyn Greene**  
**Peter Hornbeck**  
**Dale Jeffers**  
**Mark Lawton**  
**Peter O'Shea**  
**Barbara Rottier**  
**Philip Terrie**

Protect the Adirondacks has reviewed the current draft Adirondack Rail Trail Conceptual Plan dated April 21, 2017. This plan follows approval of the Remsen-Lake Placid Travel Corridor Unit Management Plan that in 2016. Our comments are below.

**Protection and Enforcement Against ATV Trespass:** Public comments recorded by state officials at the various Listening Sessions spoke about the risk of trespass by all terrain vehicles (ATVs) onto neighboring Forest Preserve and private lands from the new multi-use trail. Illegal ATV use on public and private lands remains a serious problem throughout the Adirondack Park.

**Peter Bauer**  
Executive Director

The draft plan provided a great deal of information on the types of bridges that will be used, road crossings, and trail tread materials, among other things, but failed to provide adequate planning for barriers and other protections that will protect this trail system from illegal ATV use, and prevent resultant trespass onto adjoining public and private lands. Indeed some of the entrance or road-crossing scenarios in the draft plan showed wide open entrance points that could be easily accessed by ATVs. The plan must analyze and propose the physical barriers necessary to ensure that ATV trespass does not occur, both on and from the trail.

The public comments listed in the plan also show public concern with staffing by the DEC for enforcement to protect the natural resources of

the Forest Preserve and private lands along the new multi-use trail. This trail will require patrols by Rangers and other state officials. The DEC is already chronically understaffed. This plan needs to provide details about staffing levels by the DEC and/or local communities for enforcement to protect the trail system and neighboring lands, both public and private, and analyze whether or not the necessary resources are available to meet those needs.

**Protection and Enforcement Against Snowmobile Trespass:** Protect the Adirondacks is concerned about snowmobiles leaving the multi-use trail to trespass on neighboring public and private lands. This has been a problem on other parts of the railroad corridor where snowmobile users have trespassed on the Forest Preserve from the rail corridor, such as at Lake Lila in the William C. Whitney Wilderness area. The St. Regis Canoe Area would be particularly vulnerable to this problem. The plan must analyze and propose the physical barriers necessary to ensure that snowmobile trespass does not occur from the trail onto the Forest Preserve, as well as private land.

**Noise Impacts on Residences:** The plan also does not adequately address impacts to private residences. The railroad corridor runs very close to many residences and snowmobiles are far louder than automobiles. Among other considerations, state leaders need to look at curfews on snowmobile use at night, especially where this trail runs through residential areas.

**Wetland Protection and Remediation:** Extensive portions of the Remsen to Lake Placid Railroad were built through wetlands in order to avoid high elevation areas. One shortcoming of the plan is the inadequate analysis of impacts of the existing railroad corridor on aquatic natural resources and how construction of the new multi-use trail would create an opportunity for wetlands restoration. The construction of the multi-use trail creates an opportunity to remediate these wetlands by improving water circulation, as well as the migration of fish, amphibians, and other animals. More information should be provided to ensure that construction of this trail maximizes restoration of waterways through larger culverts or bridges, and other wetlands restoration measures.

**Safety Issues for Dual Snowmobile and Cross-Country Ski Use:** It's quite likely that the multi-use trail will be the largest groomed ski trail in the greater Lake Placid-Saranac Lake area that will be available to the public free of charge. This means that it's likely that it will receive a larger number of skiers than most other snowmobile trails. The plan needs to address joint use and management strategies to ensure public safety, because this new trail system has the potential

to see high numbers of both skiers and snowmobile riders, something that does not usually happen in other parts of the Forest Preserve, where the two types of trail networks are largely separate.

**Tree Cutting on the Forest Preserve and Compliance with Article XIV, Section 1 of the NYS Constitution:** The plan states that the trail corridor will be 15 feet in width between the main trail tread and shoulders. The plan states that there will be no tree cutting along the new multi-use trail corridor. PROTECT remains concerned that tree cutting on the Forest Preserve may occur for ancillary facilities like parking lots and connector trails. Any material cutting of trees would violate Article XIV, Section 1, the forever wild provision of the NYS Constitution. This question must be addressed in the plan. This analysis should take into account trees of all sizes, not just those 3"DBH and larger.

On behalf of the Board of Directors of Protect the Adirondacks, please let me thank you for the opportunity to submit these comments on this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Bauer". The signature is fluid and cursive, with a large initial "P" and "B".

Peter Bauer  
Executive Director