



Board of Directors

April 8, 2024

Charles Clusen
Chair

Peter Frank
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233
Via email at peter.frank@dec.ny.gov

James McMartin Long
Michael Wilson
Vice-Chairs

Barbara Rottier
Secretary

Re: Comments on Proposed Rule Making to Authorize DEC to Post Various Speed Limits on the Adirondack Rail Trail

David Quinn
Treasurer

Dear Mr. Frank:

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Protect the Adirondacks! Inc. (“PROTECT”) is pleased to submit these comments on the Department of Environmental Conservation (“DEC”) proposed rule to authorize DEC to post various speed limits on the Adirondack Rail Trail. We support DEC adopting this rule to allow it to set speed limits that are lower than the statewide speed limit of 55 miles per hour (“mph”) that otherwise applies to snowmobile trails.

Although only in its first year since a portion of the trail construction was completed and opened to the public, the Adirondack Rail Trail is already a busy multiuse trail. It is, and will be, used in all seasons for a variety of different uses by people of differing abilities and ages. Having a speed limit of 55 mph is unreasonable and unsafe for this kind of heavily traveled trail. As such, we agree that DEC needs to have the authority to set lower speed limits throughout the trail, and we applaud DEC for pursuing this rulemaking.

Staff

Peter Bauer
Executive Director

That said, a lower maximum speed limit should be set for the entirety of the trail so that there are no places where travelers can go up to 55 mph. The regulations should set an upper limit of 25 mph, at most, for the Adirondack Rail Trail. The limit of 25 mph is consistent with DEC’s regulations for public motorized use (including snowmobiles and electric powered bicycles or e-bikes) of wildlife management areas set forth in 6 NYCRR § 51.4(c), and with the Office of Parks, Recreation and Historic Preservation regulations set forth in 9 NYCRR § 398.7(b). There are numerous road crossings as well as forested areas where wildlife will cross the trail. In addition, pedestrians may be walking pets on the trail. Having any users, including bicyclists or snowmobilers, traveling above 25 mph is unsafe for the users, vehicles, wildlife, and pets.

Claudia K. Braymer, Esq.
Deputy Director

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Language could be added that sets this limit, and also allows DEC to further lower the maximum speed limit as needed in DEC's discretion. For instance, paragraph (b) of the proposed regulations could be revised to read "No person, by any means, shall travel on any portion of the Adirondack Rail Trail at a speed in excess of 25 mph or at a speed in excess of the posted speed limit, whichever is lower....".

We appreciate that DEC has marked a couple of locations in Saranac Lake and near Lake Clear with speed limits of 15 mph. DEC should also post a speed limit of 15 mph in Lake Placid, in Tupper Lake, and in the stretch of trail between Hoel Pond and Rollins Pond to ensure that all users are able to use and enjoy the Adirondack Rail Trail safely.

In addition, we take this opportunity to request that DEC add regulations for snowmobilers that reflect the standards that apply to snowmobilers pursuant to the Office of Parks, Recreation and Historic Preservation law (*see* PRHPL § 25.05¹). DEC should adopt regulations that are specific to snowmobilers on the Adirondack Rail Trail because of the potential harm that these motor vehicles could have on others using the trail. DEC should require snowmobilers to follow regulations such as:

- (a) No person shall operate a snowmobile between sunset and sunrise;
- (b) Snowmobiles must travel in a single file, shall not ride tandem or abreast of each other except when overtaking another snowmobile, and shall travel on the right side of the trail; and
- (c) No person shall operate a snowmobile within one hundred feet of a person who is not in or upon a snowmobile except at a minimum speed required to maintain forward movement of the snowmobile.

On behalf of the Board of Directors of Protect the Adirondacks, thank you for your consideration of our comments.

Sincerely,



Claudia K. Braymer
Deputy Director

¹ This existing law makes it unlawful to operate a snowmobile within one hundred feet of an ice skater or ice fishing shanty "except at the minimum speed required to maintain forward movement of the snowmobile".