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**Via Email**

August 11, 2025

Marie Therese Dominguez, Esq.  
Commissioner  
NYS Department of Transportation  
50 Wolf Road  
Albany NY 12232

**RE: Draft New York State Transportation Master Plan 2050**

Dear Commissioner Dominguez:

Protect the Adirondacks (PROTECT) appreciates the opportunity to provide comments on the draft New York State Transportation Master Plan 2050 (Master Plan) prepared by the New York State Department of Transportation (DOT).

**General Comments**

PROTECT supports DOT's stated goals and the general methods (e.g., promote smart growth, reduce emissions and lower pollution, enhance natural habitats) for how the State can achieve its goal of "Environmental Stewardship & Protection". Master Plan at 7, 10.

PROTECT urges DOT to consider establishing a single DOT region for the 6-million acre Adirondack Park. The Master Plan appears to be reorganizing the DOT Regions to align with New York's ten Regional Economic Development Councils (designated in 2011). Master Plan at 35. However, the Adirondack Park is a discrete geographic region with unique legal, transportation and environmental restrictions and attributes that should be managed by a single DOT regional office.

In the description of the North Country's Key Transportation Infrastructure, the Major Bicycle Routes/Trails should include the 34-mile Adirondack Rail Trail from Lake Placid to Tupper Lake. In addition, the ferries that cross Lake Champlain (year-round and seasonally) should be included.

**Protect the Adirondacks**

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In the description of the Capital Region’s Key Transportation Infrastructure, the Major Bicycle Routes/Trails should include the potential, approximately 80+-mile multiuse/bicycle trail known as the Hudson River Bike Trail (or Upper Hudson Rail) trail from Saratoga Springs to Tahawus (traversing Saratoga, Warren and Essex Counties).<sup>1</sup>

### **Comments on Strategies for Achieving Environmental Goals**

**Climate change planning** (Master Plan at 79): We support DOT’s efforts at right-sizing culverts to protect roads and waterways. We urge DOT to revise stormwater management calculations to reflect the higher intensity of rainfall events due to climate change, and to encourage the use of bottomless culverts to minimize disturbance of the natural streambed and water flow. We also suggest that DOT consider re-routing and/or closing roads that are located in areas that are at risk of climate change-induced flooding and washouts. Additionally, DOT should ensure that its actions protect existing wetlands that serve as a natural buffer from water fluctuation and flooding.

**Smart Growth** (Master Plan at 82): We support “strengthening the integration of transportation and land use planning”. The Master Plan should recognize the State’s Open Space Conservation Plan and the goals of the State to protect and conserve habitat (e.g., the 30 by 30 Act enacted in 2022).

**Reduce emissions** (Master Plan at 82-83): We support zero-emissions vehicles and efforts to increase electric vehicle and electric vehicle infrastructure. The Master Plan should also demonstrate support for electric trains, planes and ferries and increasing infrastructure for these types of carbon-free transportation. The Long Island Rail Road should be fully converted to electric so that no portion of the line is operating on diesel fuel.

**Support for bicycling and pedestrian enhancements** (Master Plan at 83-84): The State should connect the Adirondacks/North Country to the Capital Region and the rest of the state by developing the Upper Hudson Rail Trail in Saratoga/Warren/Essex Counties and connecting it to the Empire State Trail.

**Invasive species** (Master Plan at 84): We support the use of native vegetation for plantings on roadways and for screenings facilities. DOT should identify methods and strategies that it uses for managing, limiting the spread, and removing invasive species.

**Landscape connectivity and biodiversity** (Master Plan at 84): We support DOT’s effort to improve “wildlife and aquatic connectivity through the use of standardized environmentally friendly design features (like wildlife crossings)”. Each year, more than one million wildlife-vehicle collisions occur in the United States, resulting in hundreds of human fatalities, thousands of injuries, and over \$8 billion in economic losses. Wildlife crossings—such as overpasses, underpasses, and fencing—are proven, science-based solutions that significantly reduce collisions while maintaining ecological corridors for wildlife movement and migration.

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<sup>1</sup> See <https://www.protectadks.org/build-the-hudson-river-bike-trail> and <http://www.upperhudson.org>.

With increasing habitat fragmentation and the effects of climate change altering wildlife behavior and movement patterns, having in place infrastructure for wildlife connectivity (e.g., wildlife crossing) is more important than ever.

PROTECT urges DOT to make mandatory the use of best practices for incorporating crossings infrastructure and designs. DOT should also proactively identify areas of wildlife/vehicle collisions in the State and prioritize implementing solutions that will protect lives, property, and our state's natural resources.

**Protect and restore wetlands** (Master Plan at 85): We support DOT's plan to "protect and restore wetlands". As stated above, DOT should place greater emphasis on the protection of existing wetlands that serve as a natural buffer from water fluctuation and flooding.

**Reforest** (Master Plan at 85): We support reforesting highway rights of way and adding trees to support carbon sequestration.

**Road Salt** (Master Plan at 85): We support DOT's plan to "seek alternatives to salt for de-icing roadways". DOT should explicitly reference the joint Department of Environmental Conservation/DOT Adirondack Road Salt Reduction Task Force Assessment and Recommendations report published in 2023<sup>2</sup>, and make mandatory the use of the best management practices and strategies that are outlined in the report.

## **Conclusion**

As discussed above, PROTECT supports many of the initiatives included in the draft Master Plan and encourages DOT to improve on the areas noted in this letter. On behalf of the Board of Directors of PROTECT, please accept our gratitude for the opportunity to share our comments on the draft Master Plan.

Sincerely,



Claudia Braymer  
Executive Director

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<sup>2</sup> See <https://dec.ny.gov/sites/default/files/2024-09/adirondackroadsaltreport.pdf>.