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Via Email

September 11, 2025

Ariel Lynch
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

**Re: Sunset Bay RV Park, Inc.
APA Project No. 2024-0270
NYS Route 30 & Paradise Point Road
Town of Mayfield, Fulton County
Tax Parcels 88.-4-18, 88.-4-20, 88.-4-21 & 88.-4-37.12**

Dear Ms. Lynch:

Protect the Adirondacks (PROTECT) appreciates the opportunity to submit comments on the above-referenced application, which proposes the expansion of an existing RV park on approximately 89 acres of land classified as Low Intensity Use by the Adirondack Park Land Use and Development Plan Map (the "Project Site").

PROTECT opposes approval of this application because the application fails to include any analysis of the potential environmental impacts to Great Sacandaga Lake of the proposal to more than double the size of the Sunset Bay RV park and fails to include any science-based analysis of the climate change impacts of the proposed development. In addition, the proposed intensity of development is inconsistent with the Project Site's classification as Low Intensity Use. Consequently, the Adirondack Park Agency (APA) cannot make the statutory findings necessary for project approval.

The Application Includes No Analysis of Potential Environmental or Recreational Impacts

The proposed Project entails expansion of the Sunset Bay RV Resort by adding a 357-unit RV campground adjacent to the existing resort. The Sunset Bay RV Park currently has 283 RV sites. Thus, the proposed

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addition of 357 sites represents a 126% increase in the current development, all of which is located in close proximity to Great Sacandaga Lake.

The expansion also includes construction of three bathhouses (600 SF each); two office/registration buildings (480 SF each); one community building & pool house (2400 SF); two sport courts; and one outdoor amphitheater.

The proposed expansion includes a stormwater runoff collection system and will be connected to a municipal sewer. While these measures will reduce some of the project's impacts, the application fails to meaningfully analyze the impacts to the natural resources in and around Great Sacandaga Lake from the proposed massive influx of seasonal residents. The proposed expansion will add up to 775 people each day to the Project Site during spring, summer and fall and result in 60 additional car and truck trips each day during the week during the one-hour peak traffic period. In addition, the hundreds of additional RV users will have access to Great Sacandaga Lake via the small existing beach at Sunset Bay RV Park, yet no improvements or expansion of the beach facilities to accommodate this massive increase in use is proposed. There is no analysis of impacts to either Great Sacandaga Lake or the surrounding upland areas of this massive increase in recreational use.

The applicant has failed to provide any meaningful analysis of the impacts to Great Sacandaga Lake of the significant increase in recreational use resulting from the proposed expansion. Thus, the APA cannot make the required statutory findings for project approval.

The Proposed Project is Inconsistent With the Low Intensity Use Classification

The APA Act specifies that Low Intensity Use areas are intended to support limited development that protects ecological integrity, while allowing for residential housing and associated services at a low density. Executive Law § 805(3)(e)(2).

This proposed project provides no permanent housing, dramatically exceeds what could be considered "low-intensity" development, and fails to protect the physical and biological resources of Great Sacandaga Lake.

The proposed expansion is therefore inconsistent with the site's land use classification and should be denied on that basis.

The Application Fails to Address Climate Change Impacts

As noted above, the expansion will result in a significant increase in vehicular traffic at the site. However, there is no analysis of greenhouse gas (GHG) emissions from the projected increase in vehicular traffic, a significant omission in light of New York State's climate goals and the requirements of the Climate Leadership and Community Protection Act.

In addition, the applicant proposes to clear-cut 24 acres of forest to make way for the proposed expansion. The applicant acknowledges that the clearing of 24 acres of forest will reduce carbon sequestration, yet provides no quantifiable assessment of the impact this deforestation will have

on carbon sequestration. While the application acknowledges some carbon loss and suggests planting vegetation, no data is presented to support the adequacy or effectiveness of this mitigation.

Conclusion

PROTECT opposes approval of this project in its current form, because it is unreasonably and unnecessarily large, is unsupported by the required environmental impacts analysis, and is inconsistent with the Project Site's classification as Low Intensity Use.

On behalf of the Board of Directors of PROTECT, please accept our gratitude for the opportunity to share our comments on this proposed project.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Amato", with a stylized flourish at the end.

Christopher Amato
Conservation Director and Counsel