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November 11, 2026

Robert Daley
Christi Barber
New York State Department of Environmental Conservation
Division of Lands and Forests
1115 NYS Route 86
P.O. Box 296
Ray Brook, NY 12977-0296

RE: Whiteface Mountain Trail 73b, Gore Mountain Snow Train Surface Conveyor Lift Replacement, and Belleayre Mountain Surface Lift Replacement – Forest Preserve Detailed Project Work Plans

Dear Department of Environmental Conservation (DEC) Officials:

Protect the Adirondacks (PROTECT) has reviewed the final Work Plans for the new trail at the Whiteface Mountain Intensive Use Area, and for the new surface conveyor lifts at the Gore Mountain Intensive Use Area and the Belleayre Mountain Intensive Use Area. All of these Work Plans were noticed in the October 21, 2026 Environmental Notice Bulletin (ENB). We are concerned that these Work Plans were not published as draft documents for public review and comment in accordance with CP-78/Forest Preserve Work Plan Policy (CP-78). The policy establishes a clear public participation process for proposed construction and modification projects on the Forest Preserve. Specifically, Section V.A.3 requires that draft Work Plans be posted on DEC's website and noticed in the ENB for a public comment period of not less than 14 calendar days. Following the conclusion of the public comment period, the final approved Work Plan is to include a record of comments received.

We recognize the effort undertaken by DEC to prepare Forest Preserve Detailed Project Work Plans for the improvements at Whiteface, Gore, and Belleayre Mountains. These plans provide important site-specific information about projects on Forest Preserve lands, including project specifications, anticipated tree cutting and ground disturbance, measures to avoid, minimize, and mitigate impacts to natural resources, and other

considerations. PROTECT values this planning process and the importance of documenting activities on the Forest Preserve and we believe DEC officials do as well.

While Article 14, Section 1 contains amendments authorizing the construction of a specified amount of ski trails and appurtenances at Whiteface, Gore, and Belleayre Mountains, those amendments did not remove the subject lands from the Forest Preserve. Consequently, work conducted on those Forest Preserve lands remains subject to CP-78, a fact acknowledged by DEC's preparation of Forest Preserve Detailed Project Work Plans for these projects. CP-78 establishes the procedures for assessing the impacts of construction activities on the Forest Preserve and ensures that those activities are within the parameters set by Article 14 (including the applicable amendments), the Adirondack Park State Land Master Plan, the applicable adopted Unit Management Plan (UMP), and other considerations.

The public comment provisions of CP-78 serve an important purpose. Work Plans provide the detailed, site-specific analysis necessary for the public to evaluate proposed projects within the framework of Article 14 of the New York State Constitution, the Adirondack Park State Land Master Plan, UMPs, and applicable DEC regulations, policies, and guidelines. Public review and comment provide an opportunity to examine the proposed work, identify potential environmental impacts, raise questions about project design and implementation, and offer recommendations before DEC grants final approval.

DEC published final Work Plans for the Whiteface Mountain Trail 73b and the Gore Mountain Snow Train Surface Conveyor Lift Replacement Work Plans in October 2026. DEC published the Belleayre Mountain Surface Lift Replacement Work Plan as draft in October 2026, but did not accept public comments on it. Drafts of the Work Plans were never published for the minimum 14-day public comment period required by CP-78. DEC's publication of final Work Plans without accepting public comments deprived the public of the opportunity for meaningful review and comment as required by CP-78.

Bypassing the public comment process undermines the transparency and accountability that CP-78 was intended to establish. The Forest Preserve belongs to the people of New York, and the public should have an opportunity to review and comment on proposed modifications to Forest Preserve lands before they are approved and implemented. This is especially important for the Whiteface, Gore and Belleayre projects, which involve tree cutting or changes to existing infrastructure, and other activities that may affect the natural character and resources of Forest Preserve lands.

In reviewing the project details, we note that the Whiteface Mountain project involves cutting 273 trees to create a new open glade ski trail in an area that is currently natural forest at the top of Little Whiteface Mountain. The Gore Mountain and Belleayre Mountain projects involve earth work to remove the existing surface lifts, to excavate and install the new precast foundations for the new lifts, and to level the new surface lift systems. The upgraded and extended replacement Snow Train surface conveyor lift at Gore Mountain will be 400 feet, which is nearly twice the length of the current 220-foot long system. The replacement surface conveyor lift at Belleayre Mountain will be 180 feet, which is nearly twice the length of the current 100-foot long system. These projects do not fall into CP-78's category of an Ordinary Maintenance Work Plan that would not require a public comment period. These projects required a detailed project Work Plan, which were appropriately prepared by DEC. Accordingly, CP-78(V)(A) requires a 14-day public comment period for these Detailed Project Work Plans.

PROTECT respectfully requests that DEC publish the Work Plans as drafts in the ENB and on DEC's website for the minimum 14-calendar-day public comment period as required by CP-78. DEC should then review and consider all public comments received before issuing final approvals, and keep a record of those comments with the final Work Plans, as required by CP-78.

PROTECT appreciates DEC's work to develop, maintain, and follow a formal planning process for projects on the Forest Preserve. However, that process must be implemented consistently and in accordance with the Department's own policies. Public participation is an important safeguard for the protection of the Forest Preserve and helps to ensure that proposed projects receive the scrutiny and consideration they deserve. DEC must ensure that all future Forest Preserve Detailed Project Work Plans subject to CP-78 follow the public notice and comment procedures established by the policy.

On behalf of the Board of Directors of Protect the Adirondacks, thank you for your attention to our concerns regarding the process for finalizing these Work Plans.

Sincerely,



Claudia Braymer
Executive Director

cc: Amanda Lefton, DEC Commissioner
Fiona Watt, DEC Director, Division of Lands and Forests
Peter Frank, DEC Assistant Director, Division of Lands and Forests
Joe Zalewski, DEC Regional Director, Region 5
Molly Breslin, Esq., DEC Office of General Counsel
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