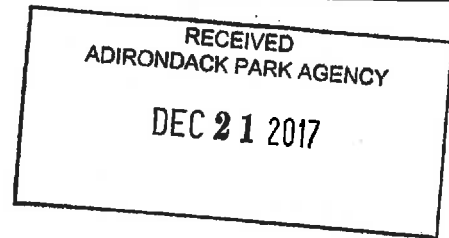




The mission of the ADIRONDACK COUNCIL is to ensure the ecological integrity and wild character of the ADIRONDACK PARK for current and future generations.

December 20, 2017



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Ariel Lynch
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
(Via Electronic Submission)

Re: Project # P2017-2016/ Frontier Town Campground, Equestrian, and Day Use Area Application

Dear Ms. Lynch,

The Adirondack Council offers the same conceptual support for this project that we have since initial plans were disclosed to the public.

Given the scope of the information involved and the limited amount of time for review, Adirondack Council support is conditioned on avoidance of negative site-specific impacts, avoidance of potential off-site cumulative impacts, and avoidance of segmenting the development of a comprehensive forest preserve management plan for the overused and heavily impacted High Peaks complex.

Creating a Southern gateway to an expanded High Peaks Wilderness that include investments that foster more vibrant communities while also protecting the ecological integrity, resilience and wilderness character of the Adirondack Park, has long been a goal of the Adirondack Council. Specifically:

- Investment in these facilities as part of a recreational hub in the Hamlet of North Hudson and east of Northway exit 29 is not only good for the economic health of the communities in this area, but also compliments what should be a Wilderness designation for the most ecologically sensitive new Finch/TNC lands including the Boreas Ponds and a buffer.
- Done properly in combination with other management actions, a hub will provide opportunities for improved visitor education and management as part of updated stewardship and protection of the Forest Preserve including the hugely popular greater High Peaks region and the the Rt. 73 corridor.

This project is clearly a high priority of the Department of Environmental Conservation (DEC) and appears to be on a fast track through the review process, as such we wish to note that the creation of this gateway combined with other



DEFENDING THE EAST'S GREATEST WILDERNESS

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SUSTAINABLE FORESTRY INITIATIVE

state actions currently proposed or under active consideration will impact areas of the Forest Preserve that have yet to be classified. As proposed and presented, the Frontier Town project runs the risk of appearing to prejudge how these new Forest Preserve lands would be accessed and the uses that may be accommodated on them.

As we have for almost every proposed major development project in the recent past, the Adirondack Council has commenced review of the enormous amount of information made available to the public on December 6th. This includes review of the 91-acres site, including "11,450 linear feet of new paved roads, a total of 91 camping sites (13 RV, 33 equestrian, and 45 tent), on-site water supply, on-site wastewater treatment, and stormwater facilities....with year-round operation of a Trailhead Day Use Area that includes parking for 24 vehicles." The Adirondack Council will continue to monitor and evaluate the project as it advances over the coming months. Our expectation is that Adirondack Park Agency (APA) staff are dedicating the necessary resources to the type of review that will result in a well-planned, ecologically conscious, and jurisdictionally compliant project in the end.

As recent discussions on variances have shown, the Agency is charged with meeting its full jurisdictional duty and for ensuring that the long term protection of the Forest Preserve's natural resources are maintained and guarded against unwise or detrimental commercial and recreational uses. We urge the APA to meet its mandate in ensuring that the wetlands, protected streams, and "forever wild" lands nearby and those that will be accessed from this "recreational hub" are not negatively impacted. Moving the review of a project forward at a speed that compromises opportunity for engagement and review is not in the best interest of the agency, communities or the public and increases the potential for errors of fact, process or impact.

In the Adirondacks the State of New York has an opportunity to demonstrate to the country world-class environmental protection in a landscape where people and nature thrive. The communities, the Forest Preserve and the Adirondack Park need and could benefit from a recreational hub in North Hudson just East of Exit 29 of the Northway. Done correctly, this project has the potential to be an important and positive contributor to improved stewardship of the larger complex of effected state and private open space lands. Let's see this important initial phase done right.

Respectfully,



Rocci Aguirre
Conservation Director

cc: Rick Weber, Deputy Director of Regulatory Programs