

Appendix X – Public Comments

The New York State Department of Transportation (DOT) and the New York State Department of Environmental Conservation (DEC) held three SEQRA public hearings on September 28, October 3 and October 4 2017 and the public comment period remained open until November 27, 2017. Below is a summary of the comments received both at the hearings and via comment letters and emails, with the DOT/DEC response.

General

Comment 1: First, I want to say how pleased I am to see this document published. I know that DOT has worked on this for years and, now that I see it, I understand why it took so long. The document provides for a language and a process for travel corridor UMPs that is very detailed and impressive. Kudos to DOT for this fine effort. Someday we may shift to regional planning like the Great South Woods effort but in the meantime, we need to find way to have the UMP process work better. This may be a great step forward.

Response: Noted.

Comment 2: Currently on the ballot, the 'Health and Safety Amendment' allows for road related bike paths, and the passage of various types of utilities. How might this impact the draft as written? It is likely to pass so there should be a section describing how it will change what can happen in these corridors.

Response: Noted. Any future possible actions such as the proposed Health and Safety Amendment will be considered as necessary if and when they become passed into law.

Comment 3: Change contractions to full words ie do not vs. Don't.

Response: Noted. No change.

Comment 4: I caught a few typos-Keeseville, not Keesville.

Response: Noted and edits have been made.

Comment 5: On behalf of the (Name Withheld), I would like to thank you for the opportunity to offer the following comments on the Draft Environmental Impact Statement on the Proposed Generic Travel Corridor Unit Management Plan for State Highway Travel Corridors in the Adirondack Park (DEIS). We thank the DOT for putting forth a long awaited, solutions-oriented

framework to guide future travel corridor unit management plans (UMPs). The (Name Withheld)) supports the draft document’s clear, comprehensive and uniform framework, with some recommendations.

Response: Noted.

Comment 6: Travel corridors are an important vehicle for people to enjoy the Adirondack Park’s various landscapes, pristine waterbodies, mountains and unfragmented forests, while still accessing communities and hamlets. However, with access comes significant threats to ecological integrity, habitat connectivity and park-like character. The Park’s proximity to 84 million people places the generic travel corridor UMP in a unique position to positively emphasize ecological integrity, address high traffic and parking densities, and numerous safety concerns in the Park. This is particularly relevant as we see increased use and visitor numbers over recent years along some of the most heavily used Adirondack travel corridors.

Response: We agree and have noted similar information in the document as it relates to public access/use. In addition, we have provided Management Objectives and Actions by topics with these considerations weighed.

Comment 7: The (Name Withheld) recognizes the significant time and resources DOT and other agencies have dedicated to generating this complex document. The DEIS’s integration of community input and professional expertise will help guide the development of safe and appropriate individual travel corridor UMPs in the Park. Additionally, the (Name Withheld) supports the DOT’s strong emphasis on training both DOT staff and local highway crews to improve public health and ecological impact awareness and preparedness about modern management practices.

Response: Noted.

Comment 8: In consideration of the Park’s exposure to threats brought-on by travel corridors and the DOT’s responsibility to achieve and maintain a park-like atmosphere on state lands within the travel corridor that complements the total Adirondack environment (Adirondack Park State Land Master Plan, page 53), the final EIS must emphasize that ecological integrity is a priority of this document (either within the *Executive Summary* or *Vision statement*) more clearly. The final EIS must also emphasize that resource protection is of high importance, that habitat continuity can and should be improved, and the carrying capacity of the natural resources must be assessed and the data generated must be used to inform appropriate management actions.

Response: The document was largely based on the *Adirondack State Land Master Plan* that does not use the specific term, “ecological integrity”. Although the TCUMP has not used the specific term “ecological integrity”, it uses alternative language and terms in the same spirit such as: “sustain the integrity of...”, habitat connectivity, invasive species control, preservation of natural plant communities, etc.—all of which are related to ecological integrity. The document

does include consideration of carrying capacity and related coordination with cooperating agencies.

Comment 9: As a field editor for (Name Withheld), co-founder of (Name Withheld), land steward for (Name Withheld), and permanent resident of New York's Adirondack Park, I thank the New York Department of Transportation and Department of Environmental Conservation and Adirondack Park Agency for the opportunity to comment on the Travel Corridor Unit Management Plan for Adirondack Park. I especially want to thank DOT's road ecology czar Ed Frantz, who has worked tirelessly and wisely for many years to make northern New York's roads more environmentally friendly.

Response: Noted.

Comment 10: The NYS Department Of Transportation (NYSDOT) *Draft Generic Travel Corridor Unit Management Plan for State Highway Travel in the Adirondack Park* is a comprehensive document which presents a carefully researched analysis of highway conditions and management alternatives for State highways in the Adirondack Park. NYSDOT should be commended for producing a document of high quality and comprehensive scope, and for inviting public participation and comment.

Response: Noted.

Comment 11: (Name Withheld) is pleased to be an enthusiastic stakeholder and a long-term participant in the review and comment process for the draft plan. The (Name Withheld) was involved in Adirondack highway management policy as far back as the 1980 Winter Olympics. Since 1994, the (Name Withheld) Hudson-Mohawk Group and the Club's Adirondack Committee have been active participants in the NYSDOT Adopt-A-Highway program, with a project on Route 73 in the Town of Keene, along the Cascade Lakes. The (Name Withheld) was a listed Participating Organization in the development of the 1999 *Route 73 Scenic Corridor Management Plan*. In addition, (Name Withheld) members participate in the NYSDEC/NYSDOT Adirondack Park Invasive Plant Program (APIPP), working to control the spread of non-native plant species in the Park. The (Name Withheld) has more than 1,000 members who live within the Blue Line, and thousands of its 55,000 New York State members visit the Park every year.

Response: Noted.

Comment 12: The Adirondack Park is a national and international treasure. Entering the Park on one of the many scenic byways is unique experience which conveys a sense of wonder and beauty of the natural world. This is a very special resource for which we are all entrusted. Careful management of the State's Scenic Byways and other State highways in the Park is

critical to the preservation of the wild character of the Adirondacks and to the visitor experience of the natural environment.

Response: Noted and agree.

Comment 13: Adirondack Park Agency guidance directs NYSDOT to manage Adirondack roadways to “...*achieve and maintain a park-like atmosphere with the travel corridors that compliments the total Adirondack environment.*” In the many sections of this draft plan NYSDOT identifies critical environmental issues, and management alternatives which will significantly impact the environmental quality of the Park’s future. We appreciate that many of NYSDOT’s proposals, if implemented, will indeed help to “maintain the park-like character” of the travel corridors.

Response: Noted.

Comment 14: Recognizing that this document is a Generic Master Travel Corridor Document, the (Name Withheld) looks forward to participating with DOT and other stakeholders in the development of Travel Corridor Unit Management Plans (TCUMPs) for individual Travel Corridors. Thank you for the opportunity to present these comments.

Response: Noted.

Comment 15: (Name Withheld) applauds the Department of Transportation (DOT) on this thorough compilation of history, general setting, goals, policies, and outlines of management criteria for Travel Corridors in the Adirondack Park. The draft Generic TCUMP is a sound planning step, grounded in the 2009 MOU between the Adirondack Park Agency (APA), the Department of Environmental Conservation (DEC) and DOT, and historically in the good work of the Adirondack Highway Council, as explained in section 1.5.2 of the draft Generic TCUMP.

Response: Noted.

Comment 16: On behalf of (Name Withheld), we congratulate the NYS Dept. of Transportation (DOT) and sister agencies for completing this tremendous task of a generic Travel Corridor UMP for the Adirondack Park. The draft document itself is usefully comprehensive, almost encyclopedic in its scope and its compilation of Park history, laws and policies. Its maps and tables also serve the State and private sectors as a valuable reference of current Adirondack Park data and statistics. Like the proverbial iceberg, there is a tremendous volume of underlying data that, while not included within the draft, supports the document, such as the visual resource assessments completed with the help of students at SUNY ES&F. This underlying data should prove invaluable in future as UMPs are prepared for individual travel corridors, such as State Rte. 3.

Response: Noted.

Comment 17: The illustrations selected to show travel corridor management alternatives add not only visual relief to the document but lend practical understanding of what the alternatives look like, the complex nature of interconnected travel corridors and traveling safety, natural and visual resource issues at stake in the Adirondack Park.

Response: Noted.

Comment 18: The document's emphasis throughout on how travel corridor management decisions of all kinds can enhance the scenic character, natural resources and roadside appearance of the Adirondack Park while meeting fundamental safety standards or, in the alternative, harm or degrade that character is its most important contribution. If the document succeeds in raising and in sustaining institutional awareness within the NYS DOT and sister agencies of how employing the full range of transportation management alternatives can both satisfy agency mission and enhance Park scenic character and environmental sustainability, it will have more than succeeded. It will be seen as a model for the rest of the country.

Response: Noted.

Comment 19: A significant incident and impetus for this document deserves mention and provides context. In 2005, following a complaint about one or more hazard trees falling into the highway, 4000 trees were cut down in a matter of days on Forest Preserve along State Route 3 west of Saranac Lake. The resulting appearance of the Rte. 3 corridor was stark. Just as stark were the lack of substantive interagency deliberation or accounting for Park scenic character, and failure to consider alternative management decisions that could achieve the objective with minimum impact on scenic highway character. Following a complaint and investigation of the tree-cutting by nonprofits like ours and by the State, a consent order was signed by the commissioners of NYS DOT, DEC and APA in 2006. Among the many interagency commitments made in that consent order was the completion of this travel corridor UMP and of individual travel corridor UMPs that would achieve a higher standard for Adirondack highways and avoid repetition of this unfortunate incident. We are very gratified, therefore, to see the outstanding results of so much staff effort on this Travel Corridor UMP.

Response: Noted.

Comment 20: We are also appreciative of the document's recognition of the Adirondack Highway Council of 1975-1985 and the groundbreaking composition and work of the AHC. It's clear from reading the document that the authors consciously recognize that they are building on that strong foundation even today.

Response: Noted.

Comment 21: There is much more we could say about this draft document, but we will stop and again thank the NYS DOT for the opportunity to participate and to comment on this important Travel Corridor UMP. We look forward to a final draft and to continued participation and successful implementation of individual Travel Corridor UMPs in the future that are consistent with this framework and which contribute to the unique character and context of the Adirondack Park.

Response: Noted.

Comment 22: “The individual TCUMPs provide an opportunity to clarify the master document or identify new issues as route specific recommendations develop. The process is iterative; the development of individual documents continues to inform the content of the master corridor plan and vice versa.” (Page 2-19)

Response: Noted.

1.3 LEGAL FRAMEWORK

Comment 23: Page 1-18: Caption under *Table 1.3*

Please note the error in this caption: “Where State Forest and Wildlife Management Areas exist within the Adirondack ParkHowever, since these lands are not Forest Preserve . . .”

Environmental Conservation Law, Title 9.101.6, reads: The "forest preserve" shall include the lands owned or hereafter acquired by the state within the county of Clinton, except the towns of Altona and Dannemora, and the counties of Delaware, Essex, Franklin, Fulton, Hamilton, Herkimer, Lewis, Oneida, Saratoga, Saint Lawrence, Warren, Washington, Greene, Ulster and Sullivan, except:

- a. Lands within the limits of any village or city;
- b. Lands not wild lands and not situated within either the Adirondack Park or the Catskill Park acquired by the state on foreclosure of mortgages made to loan commissioners; and
- c. Lands acquired under the provisions of sections 9-0107 and 9-0501.

The exceptions listed in [c] were not in the law when Article 14 was adopted and defined the forest preserve to be “as now fixed by law”. Therefore, they are unconstitutional. The only valid exceptions to the definition are (a) and (b). Therefore, State Forests and Wildlife Management areas within the Adirondack Park ARE legally Forest Preserve Lands. We urge DOT to correct this caption.

Response: Noted. *Table 1.3* has been updated.

Comment 24: This document is a positive and much needed addition to thoughtful and protective park-wide planning. However, we are concerned that the Volume I and II approach employed in this Generic TCUMP/EIS could undermine meaningful public input. Although the

draft Generic TCUMP contains comprehensive detail about much of the legal framework underpinning this action, missing from the discussion is a clear explanation of 6 NYCRR 617.10, and a discussion of formal comment opportunities when using a Generic EIS and the Volume I and II approach.

Response: Noted. The following text has been added to Section 1.3.6 B:

“To ensure meaningful public participation in the implementation of the Generic TCUMP through individual TCUMPs, the draft Generic TCUMP Volume I and II process for Generic UMPs and individual TCUMPs should follow 6 NYCRR § 617.10[c] which states, “(c) Generic EISs and their findings should set forth specific conditions or criteria under which future actions will be undertaken or approved, including requirements for any subsequent SEQR compliance. This may include thresholds and criteria for supplemental EISs to reflect specific significant impacts, such as site specific impacts, that were not adequately addressed or analyzed in the generic EIS.”

Comment 25: Since DOT intends that the individual TCUMPs will inform and provide new information to the Generic TCUMP, using a Supplemental EIS for the individual TCUMPs will also allow the public an opportunity to have meaningful input on the many actions in the draft Generic TCUMP which have been listed as future or ongoing in the *Section 7: Implementation Schedule*.

Response: Noted. See response to comment #24.

Comment 26: DOT states in the draft Generic TCUMP, “DOT policy is that public involvement is an integral part of the project development process” and that “all travel corridor unit management plans include a public comment period and meaningful public involvement” (e.g., page xi, 6-5). However the use of the Volume I and II process for Generic UMPs and individual UMPs under SEQR introduces uncertainty about the opportunity for *formal* public comment on individual UMPs.

Response: Noted. See response to comment #24.

Comment 27: For example, the Generic UMP Volume I and II process is used for Campgrounds in the Adirondack and Catskill Forest Preserve. In April of this year DEC stated in a Volume II (UMP) for the Piseco Lake Campground that, “DEC's management of the Piseco Lake Campground will conform to the APSLMP. In addition, the actions proposed in this UMP will conform to the conditions and thresholds established for such actions in the Generic Unit Management Plan/Environmental Impact Statement GUMP/EIS and do not require any separate site-specific environmental review (see 6 NYCRR 617.10[d]).”¹

Response: Noted. See response to comment #24.

Comment 28: DOT clearly considers this draft Generic TCUMP document to be a Generic EIS. DOT states on page 2-18, “for the purposes of this Generic EIS, since no specific projects will result, the null alternative is the continuation of current management in the Park without implementing any of the topic-specific Corridor Management Actions or those in *Table 6.1 - List of Actions.*” [emphasis added]

Response: Noted. See response to comment #24.

Comment 29: In this draft Generic TCUMP, DOT refers to the individual TCUMPs as Volume II UMPs because they will be managed under this Volume I Generic TCUMP, “Adirondack Park travel corridor unit management plans are contained in two (2) volumes. Volume I is a generic plan. It contains an overview and describes the environmental setting, goals, policies, and management criteria that are universally applied and characteristic to all Adirondack Park travel corridors. Volume II will be composed of individual travel corridor unit management plans. These plans will include specific management objectives and inventories of physical, biological, and manmade features unique to each travel corridor.” (page ix)

Response: Noted. See response to comment #24.

Comment 30: Many of the actions in the draft Generic TCUMP are not yet fully described, not adequately addressed, and not adequately analyzed. Many of the actions have a very general explanation that an action, e.g. 5.22.1.D, “Develop BMPs for all transportation activities to minimize impact to significant natural communities,” will be accomplished at some point in the future. Consequently, the public will not have an opportunity to comment on the specifics of these BMPs (or many of the other actions in this draft Generic TCUMP) in any meaningful way due to the fact that, if accepted, this Generic TCUMP and subsequent individual TCUMPs will follow 6 NYCRR 617.10[d] which states that no further SEQR compliance is required. This process of decision-making could, unfortunately, exclude the meaningful participation of the public. In this case, “meaningful” means that the public is able to comment on actions in a timely manner that permits legal appeals or challenges to the actions.

Response: Noted. The following text has been added to Section 2.3: “The development of individual TCUMPs will require a supplement to this Generic EIS. Other future management actions described herein may also require separate SEQR review pursuant to 6 NYCRR Section 617.10(d) and/or an opportunity for public comment, where appropriate”

Comment 31: This draft Generic TCUMP must be changed to follow 6 NYCRR 617.10[c] which states, “(c) Generic EISs and their findings should set forth specific conditions or criteria under which future actions will be undertaken or approved, including requirements for any subsequent SEQR compliance. This may include thresholds and criteria for supplemental EISs to reflect specific significant impacts, such as site specific impacts, that were not adequately addressed or analyzed in the generic EIS.”

Response: Noted. See response to comment #24.

2.4.2 Individual TCUMPS

Comment 32: I suggest considering Route 73, the High Peaks Byway, for one of the first TCUMPs. It runs through Keene Valley, Keene and into Lake Placid. It is the access to many high peaks trail heads, rock climbing routes, and other recreational assets. In recent years, increased use of these recreation assets has created numerous parking and traffic issues all along this route. A plan for the entire route including access to State lands is what is needed, and this is exactly the sort of effort proposed in the draft. My sense is that town government and local citizens are ready to positively engage in such a planning effort.

Response: *Section 7 Implementation Schedule* proposes developing a schedule for Individual TCUMPs. This comment will be taken into consideration along with DEC and APA input.

Comment 33: We suggest that each individual TCUMP be compiled as a Supplemental EIS instead of being considered simply part of Volume II of the Generic TCUMP. Using a Supplemental EIS would allow the public the opportunity for timely and meaningful input on the site-specific actions addressed in each individual TCUMP.

Response: Noted. See response to comment #24.

Comment 34: In this case, we strongly urge that (at least) each individual TCUMP be formally reviewed under SEQRA as a Supplemental EIS, and must not be considered as simply part of a second volume of the Generic TCUMP which has already been determined to have no significant environmental impact.³

Response: Noted. See response to comment #24.

3.4.7 DOT Adirondack Park and Forest Preserve Manager

Comment 35: Key Challenges, Consistent Implementation and Staffing, Pg. 3-2: The first two DOT challenges mentioned are: 1. consistently implementing the UMP processes and recommendations, and 2. DOT staff changes and loss of knowledge base. These cannot be overemphasized. Without consistent implementation of the UMP and without retained institutional knowledge of the strategies and alternatives that can best respond to the unique context and needs of the Adirondack Park, the time and resources devoted to this Travel Corridor UMP will have been in vain. In an agency as large and regionalized as DOT, the job of coordinating actions to ensure these challenges are successfully addressed cannot be sustained over any long period of time by one person.

Response: Noted. The Generic TCUMP supports addressing additional actions going forward as necessary.

Comment 36: Not only should DOT make the **Adirondack Park and Forest Preserve Manager** position a permanent staff position, but the agency should augment that position with designated field staff who report to the Manager and help carry out designated Park and Forest Preserve management tasks. We ask that the final UMP add these to the list of needed Corridor Management Actions.

Response: Noted. *Section 7* lists Corridor Management Recommendations to address.

4.3.1.3 Falling Rocks and Slope Problem Areas

Comment 37: My suggestion is to get rid of those huge boulders on the side of Route 73 in Keene near the Ausable River. They're going to come down some day and kill someone. We travel that route when we go to visit my daughter and her family in Harriestown.

Response: There have been rock falls along Route 73 due to its unique character adjacent to many vertical rock faces. DOT Engineering Geologists visit each rockfall site immediately after any fall to evaluate the area. They have visited locations along Route 73 near Saint Huberts and the Cascade Lakes in the Town of Keene for evaluation. If any loose or unsafe rocks are identified by the Geologist, they are removed.

Comment 38: Page 4-8 & 4-9: 4.3.1.3 *Falling Rocks and Slope Problem Areas*

We appreciate the discussion of the need for “balance between safety and visual quality”. However, we urge DOT to eliminate all use of wire basket retaining walls (gabion walls). They are aesthetically unappealing, have a much shorter lifespan than the round-boulder gravity walls they replace, and have no historic context in the Adirondack Park.

Along the Route 73 corridor, we urge DOT to remove the wire basket/gabion walls and rebuild the original round-boulder retaining walls on the uphill slopes, and rebuild and stabilize the laid-up rock walls on the slopes facing the Bouquet River and the Cascade Lakes. These walls contribute to retaining the “park-like character” of the travel corridor (see photo, below). Dating from the 1930s road reconstruction, the round-boulder retaining walls and laid-up walls are of historic and cultural significance to the Adirondack Park.

Response: Noted. Retaining park-like character is a key goal of the Generic TCUMP and will be carried over through subsequent individual TCUMPs. This includes ensuring that engineering decisions such as retaining wall restoration and construction are contextual, informed by aesthetics and historic precedent. Our management actions include the development of a “decision tree” for aesthetic treatments of walls.

Comment 39: Along the Chapel Pond Pass and along the Cascade Lakes we also urge DOT to replace the Jersey Barriers on the west side of the highway with laid up river-cobble barrier walls which replicate the laid-up walls that were originally there.

We commend DOT for maintaining and rebuilding the river-cobble walls along Route 86 in the Wilmington Notch area, and we urge DOT to do the same along the Chapel Pond Pass and Cascade Lakes areas.

We recognize that slope stabilization is a tremendous challenge in areas where the road skirts steep slopes such as the Chapel Pond Pass and Cascade Lakes areas, but we urge DOT to investigate alternatives to dumping rip-rap in front of the original historical cobblestone walls in an effort to stabilize them.

Response: DOT continues to maintain the slope stability along Route 73 as immediate issues are identified. A long-term repair that would include aesthetic improvements is under consideration as alternatives to addressing the challenging slopes are explored. Considering the many needs of our infrastructure, it is more important than ever for us to carefully prioritize the use of each available dollar. Our top priority is keeping bridges and roads safe, with a focus on maintaining the good condition of our most highly traveled corridors. As DOT explores feasible alternatives and associated costs, the repairs to this corridor will be prioritized while weighing the many needs of our infrastructure against the expenditure of limited resources.

Comment 40: These walls are historic structures and worthy of preservation. We urge NYSDOT to apply to the NYS Office Parks, Recreation, and Historic Preservation (NYS OPRHP) to register these walls as Historic Structures, and also apply to the American Society of Engineers to register these walls as Historic Civil Engineering Landmarks. (https://en.wikipedia.org/wiki/List_of_Historic_Civil_Engineering_Landmarks) They are also worthy of NYS historic interpretive signage.

Response: Thank you for your comment. We will take your comment under consideration as we develop the Route 73 Individual TCUMP.

Comment 41: We note that the Vermont highway department works to preserve their round-boulder retaining walls. We also note that National Parks, such as Glacier Park, retain and repair the original stone retaining walls along roads, some of which were built in the 1920s, in similarly precarious locations, to preserve the park-like character of the area; these are registered as Historic Civil Engineering Landmarks. The (Name Withheld) strongly supports the NYSDOT recommended “Corridor Management Action” (Page 4-10) to develop “decision trees” of preferred slope treatments with accompanying “aesthetic guidelines.” We recommend that one of the aesthetic guidelines be the preservation and restoration of historic stone retaining walls in all State travel corridors in the Park.

Dry-stone wall contractors’ directory: <https://thestonetrust.org/find-a-stone-wall-contractor/>.

Response: Noted. The development of a “decision tree” will include this consideration.

4.3.1.5 Traffic Calming

Comment 42: I am most concerned with the great need for safer traffic flow and parking along Route 73 between Exit 30 and Lake Placid. Lately Route 73 has become very dangerous in certain sections due to lack of well planned parking. Some short term and immediate actions before a final solution is created may include flashing lights to warn drivers of hiker parking ahead, a change in speed limit, and more enforcement to slow things down

Response: This level of specificity is beyond the scope of the Generic TCUMP. The Generic TCUMP acknowledged that parking and its location is a topic requiring further investigation in individual TCUMPs. Your specific recommendations will be considered as part of the Route 73 Individual TCUMP process. The DOT Regional office is aware of the increased demand for parking in this area and is working with DEC and local authorities on interim solutions.

Comment 43: Along with installing safe wildlife crossings, the state should impose lower night-time speed limits in areas where animals are trying to cross roads. A disproportionate amount of road-kill happens at night, when many animals are most active and when drivers can see less well. Lower night-time speed limits – if properly enforced – save wildlife and human lives. Lower speeds are especially needed in spring, when on rainy nights many frogs and salamanders are trying to cross roads to get to breeding pools.

Response: We agree many species of wildlife move during low light periods, but the recommendation to change night time speed limits raises regulatory compliance issues, safety considerations, and enforcement challenges. Federal regulations require that speed limits only be established based on an engineering study that uses accepted traffic engineering practices. The current recommended practice is to base speed limits on the 85th percentile speed of free-flowing traffic

Comment 44: The state should also be studying other means of minimizing the tragedy of road-kill. Road ecology is a young but already rich science, with new ideas and technologies emerging every year. NYDOT should play a national leadership role in promoting means of preventing wildlife from getting hit by cars. As noted by the great civil engineer Ted Zoli – designer of the new Crown Point bridge and winner of the design competition for the proposed overpass at Vail Pass in Colorado – if we as a country devoted a modest but respectable amount of money to installing safe wildlife crossings on busy roads nation-wide, we could end the tragedy of road-kill within a generation. I urge New York officials to take the lead in this life-saving venture.

Response: Noted. This is discussed and consistent with the Generic TCUMP Section 5.22.3 *Habitat Connectivity* and its Corridor Management Objectives and Actions.

4.3.1.6 Lighting

Comment 45: *Exterior Lighting*, pg. 4-16: Light pollution is an important environmental issue throughout the State. Dark skies over the Adirondack Park are one of its most unique and significant attributes, benefiting natural resources such as insects and insectivorous birds as well

as human health. All state agencies should be leaders in reducing nighttime glare. We urge NYS DOT to give further emphasis in the UMP to installing shielded fixtures at all DOT facilities in the Park.

Response: Noted. This is discussed and consistent with the Generic TCUMP Section 4.3.1.6 *Lighting* and its Corridor Management Objectives and Actions.

Comment 46: Page 4-14: 4.3.1.6.1 *Lighting*

We appreciate DOT's recognition of the need to balance the safe and effective nighttime highway lighting with the Adirondack Park Agency (APA) recognition that dark sky is a valuable resource.

We note that Adirondack Park does not contain one of the 34 dark-sky parks in the US certified by the International Dark-Sky Association (IDA), but it does have locations which qualify. A study recently published by the National Academy of Sciences concluded that artificial lighting disorients migratory birds. This is of course particularly important in the Adirondack Park which is a summer breeding area for many species of migratory birds.

We applaud DOT's identification of best management practices for highway lighting which will protect the Adirondack Park's valuable dark-sky resource. We also support their work with the Cornell Lab of Ornithology and the Rensselaer Polytechnic Institute Outdoor Lighting Institute to establish standards for highway lighting which are energy efficient, and eliminate light pollution, while maintaining highway safety.

Response: Noted and thank you. Individual TCUMPs will carry forth the corridor management lighting objectives and actions to any facilities under our jurisdiction.

4.3.3 Operations (Maintenance) Program

Comment 47: Page 4-18: 4.3.3 *Operations Maintenance Program*

We support DOT's corridor management actions which will implement a program of "unique maintenance locations," particularly with a view toward controlling stormwater runoff and winter salt and sand migration into Adirondack waterbodies.

We also applaud DOT's proposal to implement a program which will coordinate the timing of maintenance operations to take into consideration factors such as avoidance of disturbance to wildlife migration (eg, turtles and salamanders), and timed mowing to prevent invasive plant seed production and dispersal.

Response: Noted.

4.3.3.2 Winter Maintenance - Snow and Ice Control

Comment 48: Another concern is the high amount of Road Salt the NYSDOT uses on its highways. The salt is seeping into the lakes and streams and is poisoning the waters and aquatic

life. We need to address the issue of Road Salt use and explore as many alternatives as possible to limit salt use. Efforts in the Lake George Region should be a leading example.

Response: DOT continues in its efforts to effectively balance environmental concerns related to road salt applications, as well as maintaining safe and passable state highways during normal and extreme winter conditions. Fostering partnerships with national-level multi-state cooperatives, state agencies, academia, scientific research organizations, and regional environmental working groups have resulted in well-controlled, reduced salt application measures.

Several road salt-use initiatives in cooperation with Clarkson University, Paul Smiths College, and ADKAction have led to reduced salt applications within the Adirondacks. Many of these techniques have been implemented statewide. We have expanded these efforts by working closely with the Lake George Fund to implement additional salt-reduction tactics. These include the use of improved technologies such as Automatic Vehicle Location systems, advanced plow blade designs, alternative anti-icing materials, and pre-storm anti-icing operations. In-house training programs such as DOT's Snow University provide detailed education for managers, supervisors, and plow operators alike focusing in part on the Department's commitment to environmental stewardship.

The DOT is committed to furthering progress of the proposed Management Objectives and Actions (Section 4.3.3.2 *Winter Maintenance- Snow and Ice Control*). This commitment is intended to ensure the department's continued proactive evaluations of operational strategies and the execution of best practices park-wide. The annual report of TCUMP implementation will provide an opportunity for updates on progress.

Comment 49: Safe Roads and Road Salt: DOT has been an integral player in efforts to address increasing salinization of Adirondack waters. However, the increasing threat and impact of salt contamination to surface and ground water is highly concerning, particularly for public health reasons. While the (Name Withheld) recognizes DOT and other Adirondack organization's dedication to this issue, road salt use remains a continuing threat and this generic travel corridor UMP should identify a proactive plan that prioritizes winter maintenance for Adirondack road ways. This UMP should also prioritize the following: a) switch from salt to abrasives, with storm water management and spring cleaning; b) institute driver education and vehicle (e.g. speed) restrictions when and where necessary; and, c) utilize alternative deicing options. Additionally, individual travel corridor UMPs should be encouraged to consider the effects of road salt on stream and ground waters.

Response: Noted. See response to comment #48.

Comment 50: The DOT and other government bodies are to be commended for attempting to reduce salt applications on roads in Adirondack Park, but further reductions are urgently needed. Road-salt is a pollutant, which harms aquatic wildlife, sickens road-side trees, and generally impairs watershed health. Our heavy use of salt on New York roads sometimes seems almost like a collective form of insanity, whereby we ruin our cars and bridges and pollute our waters

just so we can drive a little faster. The state should abandon its dry-roads policy, urge motorists to get snow-tires, and impose lower speed limits when roads are snowy or icy. Subsidizing snow-tire purchases for New York drivers would likely be cheaper in the long run than paying for the damages done by excessive salt use. Salt use should especially be avoided along roads near waterways.

Response: Noted. See response to comment #48.

Comment 51: *Snow and Ice Control*, pg. 4-24: While this discussion is good, it appears insufficient. The negative environmental impacts of heavy use of sodium chloride as principal deicing agent should be more detailed and extensive to include the damage done to concrete, steel, groundwater, surface waters and vegetation. Among the Corridor Management Actions should be more widespread use of brine solutions to reduce salt load, as well as more widespread use of computerized trucks and salt spreading equipment that adjust road salt application for maximum efficiency and effectiveness depending on the temperature of the road surface.

Response: Noted. See response to comment #48.

Comment 52: Page 4-24: 4.3.3.2 *Winter Maintenance – Snow and Ice Control*. We ask that DOT undertake a study to identify viable alternatives to the high winter salt and sand use along Cascade lakes, including re-assessing an alternative as proposed in the *Route 73 Scenic Corridor Management Plan* to construct a tunnel through Pitchoff Mountain to relieve traffic pressure in the Cascade Lakes corridor. We urge DOT to continue to thoroughly investigate winter salt and sand alternatives for all areas in the Park where highways are adjacent to sensitive water bodies, and where winter highway salting has the potential to contaminate well-water resources.

Response: Noted. See response to comment #48. The *Route 73 Scenic Corridor Management Plan* will be taken into consideration as the Route 73 Individual TCUMP is developed.

Comment 53: The Plan seems to address all of the key issues, but in many cases, much more direct and immediate action by DOT should be proposed to minimize certain ongoing environmental impacts. This can be done cost-effectively, while providing a safe, reliable and efficient transportation system.

Section 4.3.3.2 *Winter Maintenance – Snow and Ice Control* is of particular concern to members of the (Name Withheld). Increasingly high levels of salt have been measured in the surface waters of Lake Clear and the surrounding groundwater, resulting in significant environmental, human health and economic impacts. As Lake Clear is a headwater of the Saranac watershed, these impacts are carried downstream.

The source of this salt has been linked to winter maintenance practices on adjoining State Route 30. Salt Summits hosted by the Save Lake George Partnership and research by Daniel L. Kelting of the Adirondack Watershed Institute at Paul Smiths College have provided a wealth of

information and actions to address this issue.

The Plan's proposed actions should be implemented quickly with the goal of immediate reduction in salt use throughout the Park. Lake Clear, as one of the "sensitive locations," qualifies for immediate implementation of updated BMPs to reduce salt inputs through the use of current technology, such as the variable-edge plow and bring, in conjunction with increased training, monitoring and supervision.

Response: Noted. See response to comment #48. The generic TCUMP is an intentionally broad planning document that identifies issues as a starting point to initiate dialogue among involved parties. Some park-wide recommendations can be implemented in the near-term.

Others are more appropriately developed through a Technical Working Group (TWG) and/or in the individual corridor TCUMPs. TWGs are a means to ensure that all considerations are being heard, leading to pragmatic, holistic solutions. Such solutions are initially applied in a limited way to ensure that they function as intended and to identify all secondary impacts. Actions are then adjusted as necessary based on the results of the limited application and can then be more widely implemented.

4.3.4 Highway Work Permit Program

Comment 54: *Highway Work Permits*, pg. 4-28: Utility and other highway contractors of DOT can, without proper training and supervision, quickly cause extensive damage to Park scenery and resources. The Corridor Management Actions in this section should be more specific about what Adirondack-specific conditions should apply to these contractors.

Response: The guidance has not yet been developed but we agree on the need. Our Highway Work Permit process allows for the inclusion of specific conditions. The third Corridor Management Action in this section has been modified to read:

"Guidance will be developed to clarify when and which Adirondack-specific permit conditions (e.g.: related to Invasive species, erosion and sediment control, aesthetic considerations) are to be included in HWPs."

Comment 55: Page 4-27: *4.3.4 Highway Work Permit Program*: We applaud DOT's proposal that "Adirondack-specific permit conditions," such as habitat connectivity, threats to endangered species, impacts on wetlands, the potential for the spread of invasive species, etc, should be conditions included in any DOT-issued Highway Work Permits (HWP).

Response: Noted.

4.3.5 Emergency Response Program

Comment 56: *4.3.5: Emergency Response*: It is too late to train DOT and contractors after the flood crisis has started, as we learned during the last crisis. Training must be required and conducted before the flood is upon us. Learning that was a very expensive lesson last time

Response: Agree. The need for training is broadly applicable across the Generic TCUMP topics and is specifically identified in Section 6, including general training for Emergency Response. Emergency Response, however, is a complex challenge that is dependent on many factors including the scope of the event and the resources available at the time of the event. Individuals and responders are not a given and the approach proposed in the Draft Generic TCUMP is a sound one, based on all these uncertainties.

Comment 57: *Emergency Response*, pg. 4-28: In-stream work following Hurricane Irene (2011) caused extensive damage to stream channels and biota, and will make the next flood event even worse downstream. While the recommended formalizing of emergency procedures to minimize channel changes and maintain habitat and floodplain connectivity is important, more specific Corridor Management Actions could be incorporated that build on lessons-learned from Hurricane Irene, etc. and that would improve inter-agency guidance for the next flood event.

Response: Noted. See response to comment #56. Response to Hurricane Irene, Lee and the 2013 Mohawk Valley Flooding helped inform future proposed Management Actions in this document.

Comment 58: Page 4-28: *4.3.5 Emergency Response Program*: Members who fish in the Adirondacks report that post-flood stream work in many areas produced channelized streams, or shallower streams which resulted in warming waters, and loss of viable fish habitat. We support DOT's proposed guidance that in the future any such work will be conducted in a way that is sustainable to wildlife habitat.

Response: Noted.

4.3.6 Integrated Vegetation Management Program

Comment 59: Part A includes cutting to prevent pavement shading, an issue with ice in the winter. I endorse this practice and it should be expanded to county roads.

Response: Noted.

Comment 60: This includes coordination with utilities which should be better handled with respect to roadside aesthetics, as is proposed.

Response: Noted.

Comment 61: A section needs to be added addressing clearing and maintaining roadside scenic vistas. This relates to section 5.24 *Scenic and Aesthetic Resources*.

Response: Scenic vista vegetation management is mentioned in Section 4.3.6 *Integrated Vegetation Management Program* and is a proposed Corridor Management Action listed.

Comment 62: Also mowing invasive plants BEFORE they go into seed makes a lot of sense

Response: Noted.

Comment 63: Page 4-30: 4.3.6 *Integrated Vegetative Management Program*

The (Name Withheld) continues to be concerned that use of herbicides in highway vegetative control operations has adverse and, in many cases, as yet unknown impacts on the environment and human health. We note that some municipalities, such as Clifton Park, have stopped using herbicides to control roadside weeds, and instead use mechanical operations. We encourage DOT to investigate all alternatives to use of herbicides, including enlisting Adopt-A-Highway volunteers, or prison work-release programs, to assist in mechanical roadside weed control.

Response: DOT understands that there are some concerns about the use of herbicides, which is why the Department is committed to only the most judicious, responsible, appropriately-timed, and limited use of these products.

Mechanical vegetation control is an essential part of our IVM program, but it is extremely labor intensive and is not well-suited to many aspects of vegetation management. Mechanically controlling vegetation around signposts and around and behind guide rail would require dramatically increasing the number of hours that our employees (and/or volunteers, prisoners & Corrections Officers, etc.) spend in the right of way using string trimmers and other equipment. That would increase costs to the Department and, more importantly, increase the risks faced by both our employees and the traveling public.

Herbicides are often the most appropriate treatment when controlling certain invasive species or noxious weeds. Plants such as Wild Parsnip (*Pastinaca sativa*) and Giant Hogweed (*Heracleum mantegazzianum*) can cause significant injuries to workers who are exposed to their sap. Many invasive species, such as Common Reed (*Phragmites australis*) and Japanese Knotweed (*Reynoutria japonica* var. *japonica*) cannot be effectively controlled by mechanical means alone, due to the likelihood of their spreading through fragmentation. Other plant species Knapweeds (*Centaurea spp.*) respond to being cut by growing more aggressively, and require follow-up treatment with herbicides after cutting. It would be imprudent for the Department to remove this tool from our toolbox.

DOT employees who apply herbicides are well-trained, are appropriately licensed, and receive regular continuing education to keep them up to date on the latest methods and product that enable them to select the least impactful strategy to accomplish our vegetation management goals.

Comment 64: Page 4-30: 4.3.6 *Integrated Vegetative Management Program*

In hamlet areas, we ask DOT to carefully evaluate roadside century-trees when making visibility safety determinations. As a participant in the national “Complete Streets” program, DOT recognizes the importance of trees on the visual character of the hamlet areas. Trees along roadsides in hamlet areas can be incorporated with other traffic-calming measures to accomplish “Complete Streets” goals. Large trees in these areas should not be unnecessarily removed.

Response: Noted. DOT currently takes the importance and significance of larger, older trees into consideration when making vegetative management decisions and strives to preserve them whenever safe and feasible.

Comment 65: Page 4-30: 4.3.6 *Integrated Vegetative Management Program*

We are very appreciative that DOT has given significant focus on invasive plant species throughout this draft plan. In this section, we strongly support the DOT statement: “Invasive species are of particular concern in the Park because the extent and integrity of the Park’s natural vegetation is integral to maintaining park-like character.” The proposed use of specially timed mowing to reduce seed production and dispersal of roadside invasive species is an excellent idea. We, again, suggest that DOT consider enlisting Adopt-A-Highway volunteers who, under DOT supervision, could assist with invasive species control efforts.

Response: Noted.

4.4.1 Pavement and Shoulders

Comment 66: I am in favor of wider bike lanes on the shoulders of roads in the Adirondack Park

Response: Noted.

Comment 67: I’m all in favor of wider shoulders for bicyclists along with a network of bike routes

Response: Noted.

Comment 68: Usage of millings to broaden / backup road shoulder should be allowed

Response: Noted.

Comment 69: Page 4-35: 4.4.1 *Pavement and Shoulders*: Current park guidelines of 11-foot travel lanes and 6-foot shoulders help to maintain the “park-like character” of the Adirondacks. Straightening and widening of scenic byways detract from the character of the Park. The existing guidelines should be retained.

Response: Noted.

4.4.2 Drainage System

Comment 70: Page 4-37: 4.4.2 *Drainage Systems*: As addressed in the draft plan, due to historical highway routes, and physical location, in many areas of the Park stormwater runoff and winter salt and sand drain directly into adjacent waterbodies, introducing a range of contaminants, including sediment layering, into aquatic habitats. Given the “drainage assets” inventory referenced in this section, we ask that DOT thoroughly evaluate the drainage areas, identify those which can be diverted away from the adjacent waterbody, and develop a plan for making these drainage changes.

Response: This comment is consistent with the Generic TCUMP and items already included. Section 4.4.2 identifies Management Action (2nd Bullet) Introduce stormwater management practices where they add value (e.g. detention basins, infiltration basins, bioretention basins, stormwater treatment systems...). Section 6 identifies further Management Actions for this topic including: *Build, Refine and Maintain Asset Management Databases* which intends to document locations along individual travel corridors that have opportunities to improve water quality from highway runoff and drainage. Section 7 Implementation Schedule identifies 5.18 Stormwater Management with 3 recommendations that support this comment including: provide update of improvements made as part of annual report.

4.4.4 Bridges

Comment 71: *Bridges and Culverts*, pg. 4-47: While the discussion about functionality and habitat permeability and connectivity is good, the recommended use of Best Management Practices is weak. The recommendation is repeatedly conditioned “where possible.” Use of best practices to simultaneously improve bridge and culvert function in heavy flood events and to improve habitat connectivity should be mandatory in the Park.

Response: We understand that such qualifying text as “where possible” can seem frustrating. However, it reflects the reality that our actions are subject to a broad range of safety, operational, constructability, fiscal, and scheduling influences as well as local, regional, state and federal priorities. The use of qualifying language does not indicate a reduced commitment to striving for improved habitat connectivity. In every bridge and culvert action, identifying opportunities to increase habitat connectivity is part of the process.

Comment 72: Page 4-45: 4.4.4 *Bridges* and Page 4-48: 4.4.5 *Culverts*
We support DOT’s stated intent in these sections when rebuilding bridges and culverts to:

- minimize stream channel changes;
- facilitate the migration or passage of wildlife, fish or other aquatic life;
- maintain wildlife habitat integrity and/or connectivity.

We are particularly supportive of the proposal, when a culvert carrying a stream is to be replaced, that it is replaced with a “box culvert” whose base replicates that natural streambed, and which also has a dry-land passage for non-aquatic wildlife.

For culverts which do not carry streams but only carry stormwater runoff, we recommend, as in Section 4.4.2, above, that DOT inventory these culverts and develop a plan to divert the runoff away from any adjacent waterbody.

Response: Noted.

4.4.5 Culverts

Comment 73: With more motorists the need for larger culverts with critter shelves is essential for wildlife connectivity

Response: Noted.

4.4.6 Fences and Walls

Comment 74: Page 4-52: 4.4.6 *Fences and Walls*

Please see our comments in Section 4.3.1.3, above, regarding stone retaining walls:

- (1) DOT should create an inventory of historic stone retaining walls in travel corridors throughout the Park;
- (2) Stone retaining walls in travel corridors should be considered historic structures and should be registered with NYS Office of Park Recreation and Historic Preservation, as Historic Structures, also registered with the American Society of Engineers, as Historic Civil Engineering Landmarks, and they should have interpretive signage describing their construction and historic context;
- (3) Use of unsightly wire basket gabion retaining structures should be discontinued; the gabion devices currently in place should be removed, and the original rock walls rebuilt and restored;
- (4) Jersey barriers that have replaced laid-up stone walls along highway corridors should be phased out and the laid-up stone walls originally in those locales should be rebuilt and restored, similar to the stone walls in the Route 86 Wilmington Notch corridor. Use of the “Adirondack Drystack aesthetic treatment” (Figure 4.31) as a facing for Jersey barriers should be used only in situations where the original historic stone walls cannot be rebuilt and/or restored.

Response: (1) This will be evaluated and included in Individual TCUMPs. (2) There is a state and federal process to determine which structures qualify as historic. Individual TCUMPs will apply these processes to any walls present. (3) and (4) Noted. Retaining park-like character is a key goal of the Generic TCUMP and will be carried over through subsequent individual TCUMPs. This includes ensuring that engineering decisions such as wall and barrier restoration and construction are contextual, informed by aesthetics and historic precedent. Our management actions include the development of a “decision tree” for aesthetic treatments of walls.

4.4.8 Traffic Control Devices

Comment 75: Page 4-58: 4.4.8 *Traffic Control Devices*: The flashing MPH indicator signs currently in use by DOT at the entrance to hamlets appear to be effective traffic calming devices. We support DOT's continued assessment of traffic calming techniques in all scenic byways in the Park.

Response: Noted.

4.4.10 Bicycle Facilities

Comment 76: I have read the UMP Travel Corridor Plan and I like the idea of trying to incorporate safer cycling access and other recreational use initiatives.

Response: Noted.

Comment 77: *Intermodal Access*: As we work to make the Park more accessible, open and friendly to a greater diversity of world travelers, travel corridors are key. Not everyone has a vehicle. The DEIS should strongly commit to ensuring that travel corridors will be more bike friendly, as just one example of DOT's support of intermodal forms of transportation.

Response: The Generic EIS reflects DOT's broad commitment to increasing multi modal opportunities across the state. The Complete Streets checklist is a tool that has been developed to ensure that multimodal considerations are applied to all Department projects.

4.5.1 Surplus Material and Disposal

Comment 78: Page 4-65: 4.5.1 *Surplus Material Disposal*: While we recognize the benefit of using surplus material disposal in slope flattening at highway edges, we caution that this not lead to (1) unnecessary highway widening, or (2) covering of historic features, such as boulder walls, which will detract from the park-like character of the travel corridor.

Response: Noted and will be part of future considerations such as *Green Book* updates and TWG deliberations.

5.3 Regional and Related Planning Efforts

Comment 79: Page 5-3: 5.3 *Regional and Related Planning*: The comprehensive listing of planning entities, and related laws and regulations provides a useful overview of elements which impinge on Park planning. Please note that the (Name Withheld) participated in the process of setting up the Champlain/Adirondack Biosphere Reserve. As one of the goals of the Reserve is

protection of water quality in the biosphere, we encourage DOT to work cooperatively with the Reserve on water quality issues.

Response: Noted.

5.3.3 Other Organizations and Stakeholder Groups

Comment 80: Page 5-9: *Other Organizations and Stakeholder Groups*: We note that the Sierra Club is omitted from the Appendix J: Working List of Organizations and Stakeholder Groups. The Sierra Club has been involved in Adirondack highway management policy as far back as the 1980 Winter Olympics. Since 1994, the Sierra Club’s Hudson-Mohawk Group and the Club’s Adirondack Committee have been active participants in the NYSDOT Adopt-A-Highway program, with a project on Route 73 in the Town of Keene, along the Cascade Lakes. The Sierra Club was a listed Participating Organization in the development of the 1999 Route 73 Scenic Corridor Management Plan. In addition, Sierra Club members participate in the NYSDEC/NYSDOT Adirondack Park Invasive Plant Program (APIPP), working to control the spread of non-native plant species in the Park. The Sierra Club has more than 1,000 members who live within the Blue Line, and thousands of its 33,000 New York State members visit the Park every year.

Please add the Sierra Club to the list of Stakeholder Groups.

Response: The Sierra Club has been added to Appendix J.

5.4 Access to DEC Managed State Lands/Forest Preserve

Comment 81: Page 5-10: *5.4 Access to DEC-Managed State Lands / Forest Preserve*: We appreciate DOT’s recognition that “not all lands can withstand ever-increasing, unlimited visitor use levels without suffering loss of character.” And we support DOT’s preferred alternative, which will promote synergy between DEC’s UMP and DOT’s individual TCUMP planning process. We recommending adding an additional bullet under “D. Corridor Management Actions” which would be: “Identify and institute effective traffic calming highway design features on either side of popular roadside trailheads.”

Response: Agree. Management Action has been added.

5.6 Community Cohesion and Character

Comment 82: Community Cohesion and Character, pg. 5-13: When major transportation corridors become town and hamlet main streets, significant topics and issues come quickly to the forefront, as this section anticipates. Community surveys, forums and stakeholder involvement are noted as high priority Corridor Management Actions. For example, decision-making that led to removal of the red barn at the intersection of Rtes. 9N and 73, and construction of the scenic

overlook and parking at that location could have benefited from a more robust community discussion.

Response: Noted.

Comment 83: Page 5-13: *5.6 Community Cohesion and Character*: We commend DOT for embracing the national “Complete Streets” and “Livable Communities” programs. We support the DOT position that: “understanding the community relies on a baseline inventory that includes existing transportation, land use, historic resources, architectural character, natural environment and community services.” We encourage DOT to preserve century trees, and to plant native trees, along community main streets that are also State highways. This will contribute to the community character and also assist with traffic calming. (A 2006 study reported that using trees to line roadways reduced average speeds by up to eight miles per hour: <http://www.deeproot.com/blog/blog-entries/trees-are-a-tool-for-safer-streets>)

Response: Noted.

5.8 Secondary and Cumulative Impacts

Comment 84: Page 5-23: *Secondary and Cumulative Impacts*: Again, we support DOT’s continued emphasis throughout this draft plan, and in the “Specific Objectives” listing on page 5-24, on “Maintaining a park-like character.” In this section we also appreciate the objective to “Improve understanding of Park natural areas and systems (Helps ensure preservation of park-like character, eg, waterbody discharge points to improve stormwater management.)” For culverts which carry stormwater runoff, we recommend, as in Section 4.4.2, above, that DOT inventory these culverts and develop a plan to divert the runoff away from any adjacent waterbody.

Response: Noted. This comment is consistent with the Generic TCUMP and items already included. Refer to Section 4.4.2’s Management Action that include (2nd Bullet): “Introduce stormwater management practices where they add value (e.g. detention basins, infiltration basins, bioretention basins, stormwater treatment systems...”. *Section 6* identifies further Management Actions for this topic including: “Build, Refine and Maintain Asset Management Databases...” which intends to document locations along individual travel corridors that have opportunities to improve water quality from highway runoff and drainage. *Section 7- Implementation Schedule* identifies 5.18 *Stormwater Management* with 3 recommendations that support this comment including: provide update of improvements made as part of annual report.

5.10.1 Signage and Branding

Comment 85: *Signs*: Determining relevant sign law and agency jurisdiction in the Park is a complex issue. However, this complexity does not abrogate the state of its duty to enforce the letter and intent of Adirondack Park sign law, appropriate scenic easements along the Northway,

and other corridor and Adirondack sign rules. The Catskill Park's recent signage updates should serve as a model and source of information for this document.

Response: Agree. Refer to the Generic TCUMP Section 4.4.8.1, *Highway Signage* that includes management actions consistent with this comment.

Comment 86: *Highway Signs*, pg. 4-59: Yellow-on-brown highway signage uniquely brands the Adirondack Park, the result of the work of the Adirondack Highway Council (1975-85) and the federal Highway administration waiver which has been sustained over time. Some discussion about an alternative that would create a distinctive Adirondack Park sign similar to the Catskill Park sign now in use should be added for future consideration.

Response: The Catskill Park stakeholders chose to use the Federal Standard for Brown and White signs and in doing so it allowed for the option of a placard to be added to certain signs that created a Catskill" brand". The Adirondack stakeholders chose to stay with the Brown and Yellow signage and based on communications with the Federal Highways Administration (FHWA) adding a placard was not an option with this decision. Any reconsideration would need to be discussed with the FHWA.

5.10.2 Adirondack Park Gateways

Comment 87: *Community Gateways*, pg. 5-30: Consistently high quality and durable interpretive signage off of State Highways remains an important challenge and opportunity to engage visitors and residents with the diversity and character of the Park. As noted, partnerships are crucial in achieving both branding and interpretation of the Park on transportation corridors. Examples of successful interpretation and partnerships could be cited, such as the Hudson River signage at pull-offs on Rte. 28 between North Creek and North River.

Response: Noted.

5.11 Interpretative Signage

Comment 88 Page 5-33 5.11 *Interpretive Signage*: We ask that DOT research and prepare interpretive signage for the historic round-boulder retaining walls and laid-up stone walls along the Route 73 corridor, and along other scenic byways in the Park.

Response: Noted. Refer to the Generic TCUMP Section 3.4.3. A TWG is proposed to consider Interpretive Signage opportunities in the Park and these suggestions will be included in the process.

5.12 Physical Features (Climate, Soils, Hydrology, Geology)

Comment 89: *Physical Features*, pg. 5-35: Climate change is not, as noted here, “an emerging issue in the Park” but a daily and seasonal reality affecting many transportation-related facets of life. The evidence and impacts of climate change discussion should be significantly broadened in this section.

Response: Noted. We recognize climate change effects are a serious matter. It is an emerging issue to be taken into consideration in planning efforts. No further clarification for the purpose and scope of this document is needed.

5.13 Wetland Systems

5.14 Surface Water Resources (Streams and Lakes)

5.15 Ground Water Resources (Aquifers)

5.16 Flood Plains and Floodways

5.17 Coastal Resources/Consistency

Comment 90: We appreciate DOT’s thorough discussion of the impact of highways on wetlands and water bodies, particularly DOT’s recognition of the problems created by stormwater diversion into waterbodies, sedimentation in waterbodies created by highway runoff, the impact of salination from winter snow-melt, and fragmentation of wetlands and waterbodies by the road bed. We support DOT’s Corridor Management Objectives:

- (1) improve aquatic habitat and water quality;
- (2) manage surface water resources in a manner that retains ecological integrity and park-like character;
- (3) avoid impacts on groundwater.

Response: Noted.

Comment 91: *Surface Water and Ground Water Resources*, Pg. 5-40-5-45. This section fails to include an obvious Corridor Management Action that would significantly benefit both surface and groundwater quality: to reduce the use of road salt on Adirondack transportation corridors. It also fails to acknowledge that many rural Adirondack municipalities rely on small aquifers for their water supply, aquifers highly vulnerable to salt pollution and decisions regarding road salt use, management and storage.

Response: Noted. Refer to response to comment #48. Also, see response to comment #70.

5.18 Stormwater Management

Comment 92: Reduction of stormwater and winter salt run-off into waterbodies and ground water. Page 4-18: 4.3.3 *Operations Maintenance Program*

We support DOT’s corridor management actions which will implement a program of “unique maintenance locations,” particularly with a view toward controlling stormwater runoff and winter salt and sand migration into Adirondack waterbodies.

Response: Noted.

Comment 93: *Stormwater Management*, pg. 5-48: While the discussion of water quality impacts of stormwater management decisions is good, the section fails to take note of the many biological issues involved in stormwater management decision-making by DOT. Curbs and catch basins, coupled with hydrodynamic separators to remove suspended solids from stormwater kills millions of amphibians, insects, reptiles and small mammals every year. BMP practices and site design techniques to avoid this mortality should include curb-less road systems that are crowned to shed water into roadside depressions or swales which naturally clean the runoff and allow unimpeded wildlife movements.

Response: Noted. The BMP and site design techniques suggested are the primary approaches by DOT in the Adirondack Park. “Separator type” treatments are less common and are only considered where other treatment options are not feasible (e.g.: in Hamlets). The risk to amphibians, insects, reptiles and small mammals in these areas is less likely.

5.21 Critical Environmental Areas (Including Unique Geological Features)

Comment 94: Ecological Integrity: The extensive context provided in the DEIS regarding the management of Critical Environmental Areas, Wildlife Management and Bird Conservation Areas, and Habitat Connectivity is representative of the Department’s commitment to ecological integrity. However, the final EIS must go beyond representation; it must specifically state that the protection and maintenance of ecological integrity is an intended objective of this framework.

Response: The document was based in large part on the *Adirondack State Land Master Plan* that does not use the specific term, “ecological integrity” and, although the TCUMP has not used the specific term “ecological integrity”, it uses alternative language in the same spirit such as “sustain the integrity of...”, habitat connectivity, invasive species control, preservation of natural plant communities, etc.—all of which are related to ecological integrity. The document already reflects the department’s strong commitment.

5.22.2 Wildlife Management Areas and Bird Conservation Areas

Comment 95: *Wildlife Corridors*: Wildlife corridors are essential to the maintenance of ecological processes because they support species migration and biodiversity. DOT should emphasize within the final document the value of wildlife corridors in the Park and the impactful role the Department plays in their development and management. This issue will only grow in significance as climate change has long reaching impacts that will affect everything from culvert infrastructure due to increased storm velocities to loss of species biodiversity due to habitat fragmentation.

Response: Noted. Section 5.22.3 *Habitat Connectivity* addresses this concern. Our commitment is reiterated in its Management Objectives and Actions.

Comment 96: We at (Name Withheld) are particularly interested in protecting and preserving our Coldwater fisheries. Within the Adirondacks there are a number of Coldwater species, but none more important than the native Brook Trout. DOT has a unique position in helping to reestablish the native Brook Trout which you have identified in your proposed plan. Many states have identified culverts as a major threat to Brook Trout populations.

Response: Noted.

Comment 97: We would urge DOT, whenever possible, to use the Box Culvert Design with baffles to allow native species to migrate and provide connectivity for native populations. It can also provide cold water refuge when temperatures climb during the summer months. But very importantly, the connectivity provides the ability for spawning. We encourage DOT to consider these items whenever any culvert work is being done as a replacement or rehabbing.

Response: Noted. The Generic TCUMP Management Objectives/Actions echo these concerns. Progress on this topic will be documented in the Generic TCUMP Annual Report.

Comment 98: Regarding bridges, we would like to see more parking and access when the opportunity presents itself. Providing access for fishing and other outdoor recreational activities would be beneficial to all New Yorkers.

Response: Noted. DOT partners with DEC to build parking areas along travel corridors in the Park and will continue this practice. Individual TCUMPs will further address these needs and opportunities.

Comment 99: Another concern is for Corridor Management Actions is eliminating, or at least removing the impacts from road salt and other potential contaminants on the waterways and in turn the associated fisheries and wildlife that are dependent on the ecosystem.

Response: Noted. Refer to the response to comment #48.

Comment 100: Lastly, we would ask that the DOT work to minimize the overall impact from thermal shock on the water ways. Rainfall hitting heated summer pavement and running into the adjoining waters which causes a sudden and dramatic increase in the water temperature can cause extensive damage to cold water fisheries and their environment. We appreciate DOT efforts in these endeavors and all the efforts you make on behalf of all New Yorkers.

Response: Noted.

Comment 101: We also applaud DOT’s proposal to implement a program which will coordinate the timing of maintenance operations to take into consideration factors such as avoidance of disturbance to wildlife migration (eg, turtles and salamanders), and timed mowing to prevent invasive plant seed production and dispersal.

Response: Noted.

5.22.3 Habitat Connectivity

Comment 102: The Rewilding Institute and Wildlands Network are continental conservation groups working for wildlife habitat protection and recovery at all scales. Eddy Foundation functions largely as a land trust, helping implement local wildways in several areas, including Split Rock Wildway, linking the Champlain Valley with the Adirondack Mountains. All three of these groups represent many people who care about wildlife and want to see our man-made infrastructure made more permeable to the movement of wildlife, as well as more durable in the face of climate chaos.

Response: Noted. Added to Stakeholder List in *Appendix J*.

Comment 103: 5.23.3 *Culverts*: Defacto culvert design must be to the standard that insures free passage of fish, amphibians and macro invertebrates. Exceptions must need rigorous justification.

Response: Noted. This is consistent with proposed Management actions.

Comment 104: *Wildlife Corridors*: Wildlife corridors are essential to the maintenance of ecological processes because they support species migration and biodiversity. DOT should emphasize within the final document the value of wildlife corridors in the Park and the impactful role the Department plays in their development and management. This issue will only grow in significance as climate change has long reaching impacts that will affect everything from culvert infrastructure due to increased storm velocities to loss of species biodiversity due to habitat fragmentation.

Response: Noted. Section 5.22.3 *Habitat Connectivity* addresses this concern. Our commitment is reiterated in its Management Objectives and Actions.

Comment 105: The unit management plan should identify more specific places along roads where safe wildlife crossings are needed – where underpasses or overpasses would facilitate wildlife movement and increase motorist safety. Among major roads (admittedly, not all state highways) in and around Adirondack Park where safe wildlife crossings are needed are Lakeshore Road between the villages of Westport and Essex, which fragments Split Rock Wildway and causes much wildlife mortality; Route 22, especially between the villages of

Ticonderoga and Keeseville, and most especially in the bottleneck of Split Rock Wildway just north of Wadhams; Routes, 3, 9, 9N, 30, 73, and 86, especially where the roads cross streams or go over ridges; and perhaps most of all, I-87 – arguably, the worst fracture zone in the Park – where it dissects streams, wetlands and ridges.

Response: Noted. Section 5.22.3 *Habitat Connectivity* addresses this concern. Our commitment is reiterated in its Management Objectives and Actions. Specific Travel Corridor recommendations will consider potential opportunities and feasibility. Thank you for the specific details.

Comment 106: Thinking beyond the Blue Line, DOT should continue working with other agencies and conservation groups to identify where wildlife habitat connectivity can be restored beyond as well as within the Park. This would entail holistic planning. It would mean recognizing that Adirondack Park is not, or should not be, an ecological island, but should be kept ecologically connected to surrounding wildlands, including New York’s Tug Hill Plateau and Taconics and Catskill Park, Ontario’s Algonquin Park, and Vermont’s Green Mountains. Indeed, roads just outside the Park need as much attention from road ecologists as do roads inside the Park. On this front, with the aim of allowing wildlife movement to and from the Park, particularly important are safe wildlife crossings on I-81 where links between Adirondack Park and the Thousand Islands – part of the Algonquin to Adirondack (A2A) connection -- remain relatively intact; Route 11 where forested connections extend from the Park toward the St Lawrence River; Route 12 and other roads in the Black River Valley, which imperil connections between Adirondack Park and Tug Hill Plateau; and Route 4 and other roads dissecting the Southern Lake Champlain Valley, crucial nexus between New York’s Adirondack Mountains and Vermont’s Green Mountains. Perhaps a penultimate challenge for New York transportation and conservation officials is to ecologically reunite our state’s two great parks, Adirondack and Catskill, maybe initially along Schoharie Creek.

Response: Noted. DOT has been involved in Tug Hill Plateau/Adirondacks and Green Mountains/Adirondacks connectivity. DOT actively participates in the Northeast Transportation and Wildlife Conference (NETWC), has funded related University Research on several topics, and continues to develop Department guidance for statewide application.

Comment 107: Page 5-59: *Habitat Connectivity*:

We appreciate DOT’s thorough discussion of the importance of understanding wildlife habitat connectivity when undertaking any travel corridor planning and construction. In addition to the various culvert modification and ‘critter crossing’ alternatives discussed, we ask that DOT study the potential for wildlife bridges, which are used extensively in western states. We support DOT’s proposed development of an analysis system for habitat connectivity.

Response: Noted, wildlife bridges may be a future consideration on a limited basis in the Park. Most wildlife bridges built in the US and Canada have been built where Threatened or Endangered Species (e.g. Grizzly Bear (*Ursus arctos*), Florida Panther (*Puma concolor coryi*) or large migration routes (e.g. Elk (*Cervus canadensis*)) warrant their development. In the Park, we

have neither of these conditions. The use of existing bridges with adjacent uplands provide the best-known locations in the Park and are emphasized in the Generic TCUMP, see *Figure 4.26*.

Comment 108: Expansion of the use of best management practices for safe wildlife corridors, fish passages, and highway crossings

Response: Noted and is consistent with proposed Management Actions in Generic TCUMP. See Sections 4.4.4 *Bridges*, 4.4.5 *Culverts*, and 5.22.3 *Habitat Connectivity*.

Comment 109: *Habitat Connectivity*, pg. 5-59: We commend DOT for its participation in the Northeast Transportation and Wildlife Conference and for this UMP discussion of the intersection of transportation corridors and habitat connectivity. Models for integrating habitat connectivity with transportation management should not be limited to Massachusetts but could also include Parks Canada and other models of experimentation in North America that can inform Adirondack Park management. This section typically references the connectivity needs of larger mammals. We recommend that this section also cite the micro-habitat connectivity needs of small mammals, amphibians, reptiles and insects.

Response: Noted, Section 5.22.3 *Habitat Connectivity* does not limit the species considered or tools (e.g. models) needed to evaluate habitat connectivity. The management action has been clarified and now reads:

“Develop an analysis system for habitat connectivity based on existing models such as the one being used by MassDOT.”

Comment 110: Section 5.22.3 *Habitat Connectivity* also concerns the members. Due to the demonstrated impacts of travel corridors on wildlife, ongoing climate change, and associated human safety issues, this Plan should propose a much more active and direct role for DOT to implement a Habitat Connectivity Program to facilitate the safe movement of wildlife across roads, with the added benefit of improved driver safety. The proposed Objectives, Guidance and Alternatives are insufficient, considering the location of these roads linking human communities across extensive Forest Preserve and other forested lands, within an Internationally-recognized Biosphere Reserve.

Response: We believe the proposed Management Objectives and Management Actions address the importance of connectivity in the Park (See Section 4.4.4 *Bridges*, Section 4.4.5 *Culverts*, and Section 5.22.3 *Habitat Connectivity*). These Management Actions take into consideration relative connectivity factors (such as presence of habitat on both sides of a road), importance (such as the abundance of wildlife) and potential value added (such as reduction in crashes). Individual TCUMPs will refine these opportunities (e.g. – see *figure 5.14*, Turtle fencing placed along Route 30 south of Tupper Lake on the Raquette Pond/Simon Pond Causeway).

Comment 111: NY DOT and DEC and APA have taken New York several big steps closer to ecologically-friendly infrastructure with this welcome plan. New York has often lagged behind many other states in providing safe wildlife crossings; but with this document, New York moves into the cohort of states that care and plan for their wild neighbors. Mostly, I want to applaud DOT and DEC and APA for showing increased concern for wildlife habitat connections and wildlife movement, and for minimizing the harmful effects of roads.

Response: Noted.

5.22.4 Native Vegetation

Comment 112: The state is also to be commended for altering mowing patterns to lessen environmental harms, but again, more work here is needed. Wherever possible, the DOT should favor conservation of native plants and minimization of mowing. Flowers along roads are lovely, but may create an attractive nuisance for butterflies and other insects, who may feed at the flowers only to get hit by speeding cars as the insects fly across adjacent roads.

Response: Noted. DOT has a longstanding commitment to integrated vegetation management which includes considerations for altered and reduced mowing. Your comment is consistent with the Management Objectives and Actions in Section 5.22.4, *Native Vegetation*.

Comment 113: We appreciate DOT's emphasis on use of native vegetation, and on re-establishing native plants in the state's right-of-way after construction or maintenance. We appreciate the Corridor Management Action to control invasive species along travel corridors: "Support early detection and rapid response efforts throughout the Park." We recommend that DOT expand Adopt-A-Highway project options to include invasive plant eradication, and enlist Adopt-A-Highway volunteers to work with DOT and the Adirondack Park Invasive Plant Program (APIPP) on invasive plant identification and eradication projects in travel corridors. We also encourage the use of innovative invasive plant control techniques, such as goats and sheep, as is currently used to control the invasive phragmites at the Tivoli Farm in Albany.

Response: Noted, DOT was a primary partner in the establishment of APIPP and continues to partner to foster volunteers with APIPP. We also work closely each year with APIPP on a strategic work plan that includes training, management actions in the travel corridors, and boat inspection development. The use of livestock, as suggested, has been explored but was determined to be infeasible at the time. DOT will continue to be open to and evaluate all innovative methods to control invasive species within the Park.

5.22.5 Invasive Species

Comment 114: *Aquatic Invasive Species Control:* Idaho and Montana are very protective of their renowned lakes and rivers and have very proactive aquatic invasive species control

programs which use highway control stations. We recommend that DOT study these programs, and work with the Governor Cuomo's to develop cooperative agreements with NYDEC and the NY State Police to undertake equally aggressive aquatic invasive species control programs. In Idaho and Montana, state highway truck weigh stations are used for inspections of any vehicle towing a boat. Creating such a program in New York State would very effectively complement the existing inspection stations at boat launches in the Adirondack Park.

Idaho statute 22-1908, "Authority to Conduct Inspections" states:

- (1) ...the director may inspect any....means of conveyance for the purpose of....controlling, collecting samples, or destroying any invasive species.
- (2) The director may establish check stations at points of entry to the state....or other facilities or sites throughout the state necessary to carry out the provisions of this chapter.
- (3) No person shall proceed past or travel through an established inspection station during it's hours of operation while towing, carrying or transporting any conveyance without presenting such conveyance for inspection.

Response: Noted. Thank you for the information. DOT supports boat inspection sites in the Park. DOT has approved use of its lands in some instances, helped with evaluation of locations, assisted with site work, reviewed traffic safety considerations, developed and installed signage. DOT has included a state of the art boat inspection/cleaning facility in the new Adirondacks Welcome Center to be opened in 2018.

Comment 115: Unfortunately, there seems to be a lot of talk but not a lot of action when it comes to controlling invasive species in Adirondack travel corridors. In recent years, I've watched infestations of Purple Loosestrife multiply and expand along state travel corridors in the central Adirondacks. Every August, when it is in bloom, I expect to see that something has been done about it - a quick spray of glyphosate should do it - but am surprised and disappointed to see that previous infestations remain, and new ones have appeared. Meanwhile, these infestations are producing countless tiny seeds that are washing down DOT ditches and into adjacent wetlands.

Response: Noted. NYSDOT works closely with APIPP every year on priority control sites in the Park. The 2017 APIPP annual report includes the following invasive species control activities involving the DOT:

- **New Decontamination Station Announced for Northway!** APIPP and an advisory committee of partners working under the [Adirondack AIS Prevention Program](#) collaborated with NYS DOT to develop and finalize design plans for a premier boat decontamination station to be constructed along the I-87 Northway. The new station will be built as part of a soon to be reconstructed rest area near exit 18 and will service boaters traveling north into the Adirondacks from more highly invaded southern waters. Construction is anticipated to start in the fall of 2018 and be completed by the 2019 boating season. A [predictive analysis](#) conducted by Dr. Richard Shaker of Ryerson University in collaboration with APIPP in 2017 identified the Northway as the primary vector for the introduction and spread of AIS into the Adirondacks making this new station a critical safeguard for the region.

- Funded research (in progress; project active for 8 +/- yrs.) testing biological control agents for common reed grass.
- Funded research testing biological control agents for swallow-wort species.
- Assisted with the survey, early detection and rapid response of invasive plants on the newly reconstructed Blue Mountain access road.
- Included pay items for the disposal of material containing invasive plant species and cleaning of equipment for 100% of capital program projects.
- Provided a visual guide to priority invasive plants and look-alikes to all new temporary construction inspectors during their orientation.
- Participated in the production of two of APIPP's educational videos.
- Offered an invasive plant awareness and [best management practices](#) training to over 40 participants at the Elizabethtown residency.
- Assisted with treatments of target invasive plants along I -87 and route 30.
- Assisted with placement of signage and provided guidance on design specifications for the roadside boat wash stations established under the [Adirondack AIS Prevention Program](#).
- Coordinated with the [Adirondack AIS Prevention Program](#) to incorporate a boat inspection and decontamination station into planned renovations for the I-87 Northbound Glens Falls rest area scheduled for construction in 2018.

Comment 116: Sections 5.22.4 *Native Vegetation* and 5.22.5 *Invasive Species* also concern the members. Due to the widespread occurrence of invasive species in travel corridors, and the high risk of spread of invasive species within and beyond these corridors, this Plan should propose a much more active and direct role for DOT in management and eradication of existing infestations, and prevention of new infestations, and establishment of native species. The proposed Objectives, Guidance, and Alternatives are inadequate considering the known environmental and economic impacts of invasive species.

Response: See response to comment #115.

Comment 117: Purple Loosestrife is regarded as one of the most highly invasive species in NYS, and a single plant can produce 100,000 seeds. Purple Loosestrife (and Phragmites) poses a dire threat to the extensive wetlands of the Adirondacks and it pains me to see these infestations go untreated year after year.

Response: Noted and agree. The Department has payment items for handling soils that are infested with invasive plant species. These payment items are included in all capital contracts within the Park. The payment items – including disposal, excavation, treatment (herbicide or mechanical) - ensure that the Department's actions do not result in the spread of invasive plants.

Comment 118: Attached is a picture taken on August 16, 2017 of Purple Loosestrife growing in a ditch that flows into Big Brook in Long Lake. Treatment of this small infestation would be quick and simple. Also attached is a picture of an infestation that moved from the travel corridor into the adjacent wetlands near Tupper Lake, which will be dramatically more difficult to treat.

Location information is attached to the images. In addition to these images, I've included a graphic from the federal government illustrating the increasing costs of treating invasive species infestations the longer they are left untreated.

Response: Noted, DOT has been actively working to control Purple Loosestrife along Route 30 (from Long Lake to Tupper Lake) for the past 20 years. In 1996, loosestrife infestations along Route 30 instigated a series of meetings that included DOT representatives. These meetings led to the formation of APIPP. By 1998, purple loosestrife populations along Route 30 – near Long Lake - exploded to over 20,000 estimated plants. DOT acted to control the loosestrife population and successfully reduced them by 99% within 3 years. DOT continues to spot treat locations in the corridor with treatments planned in 2018. We will look at these sites mentioned.

Comment 119: The current draft of the TCUMP. provides little assurance that talk will become action. For example on page 7-3 of the “Implementation” section, supposed actions regarding invasive species are “develop work plan”... “Establish annual strategic plan as part of APIPP partnership”... “Develop metrics”... “Continue annual operational discussions between DOT and APIPP concerning invasive species.”

Response: DOT has been and continues to be committed to this topic. The Generic TCUMP includes several Management Objectives and Actions that pertain to invasive species. The plan includes an “...annual report of TCUMP implementation which provides an opportunity for progress updates...” Also, refer to the response to comment #115 regarding the APIPP annual report. DOT is open to suggestions and comments on ways to focus or improve our efforts.

Comment 120: DOT has the authority to apply herbicides in its right-of-way, the equipment and personnel to do it, and doesn't seem shy in the slightest about using herbicides. Why isn't DOT applying herbicides to the Purple Loosestrife (and other high priority invasive species such as Phragmites and Japanese Knotweed)? A small crew can easily spot, identify and treat these infestations in August. There is no good excuse for their continued persistence.

Response: DOT is actively treating invasive species along the rights-of-way in the park. In addition, DOT is working with APIPP to develop the 2018 treatment plans and strategize methods and means to control invasive plant species in the park. A holistic approach is preferred.

Comment 121: It makes sense to work with the Adirondack Park Invasive Plant Program (APIPP) when infestations have moved out of the travel corridors. However, DOT should take responsibility for invasive species infestations within the travel corridors, and not pass the buck on invasive species to APIPP.

Response: Coordinated control of invasive species infestations is both economically and ecologically appropriate. Invasive species infestations on DOT ROW often extend off NYSDOT property and onto private property, utility corridors and properties owned by other state agencies.

To be effective, targeted control measures must include the full extent of the infestation. Without a holistic approach, individual populations on DOT ROW will be re-infested by populations located upstream or upslope and resources expended to control invasive species will be wasted. Therefore, DOT and APIPP cooperate to determine the best course of action for the DOT ROW. In some cases, selective treatments are made by specialized applicators. Specialized applicators are licensed pesticide applicators that fully understand the plants, plant communities and other site factors. DOT, along with other state agencies, instigated the development of APIPP. DOT has contributed to, and will continue to contribute to, invasive species control efforts undertaken by the PRISMS.

Comment 122: Another issue that has come to my attention is that there is no requirement for DOT to use clean fill in road projects. Many sources of fill in the Adirondacks are infested with invasive species. If DOT were to require that fill be free of invasive species, it not only would help prevent the spread of invasive species within travel corridors, but would also likely reduce the use of contaminated fill in other projects.

Response: DOT has been working on this issue and developed guidance and training. The primary strategy to limit invasive plant species infestations is to limit the use of topsoil in the Park. We are currently working with APIPP to develop screening protocol for mine sites that supply material to DOT projects/activities in the Park. It is our intent to have a protocol developed and in place by the end of 2018. DOT will continue discussions with APIPP to coordinate this effort (e.g. working with mine owners on mitigation measures).

Comment 123: The Adirondack Park Invasive Plant Program (APIPP) commends and supports the New York State Department of Transportations' (DOT) advancement of invasive species prevention and management initiatives under the "Generic Travel Corridor Management Plan for State Highway Travel Corridors in the Adirondack Park (TCUMP)"

Response: Noted.

Comment 124: Transportation corridors are the primary vector for the introduction, movement and spread of invasive species throughout the Adirondack Park. As such, DOT plays a critical role in protecting the Adirondacks' diverse ecological and economic resources from invasive species impacts. Invasive species management objectives and action items outlined in the TCUMP, such as instituting a culture of invasive species awareness, developing a framework and strategy for analysis and decision-making, and supporting early detection and rapid response efforts will provide significant benefits in slowing the introduction and spread of invasive species throughout the Adirondack Park. These strategies will also support and strengthen APIPP's current efforts to address invasive species impacts in the region.

Response: Noted.

Comment 125: *Invasive Species:* The Department’s extensive and involved history with invasive species has been crucial in advancing the Park’s response to, education about, and prevention of the spread of harmful invasive species. Transportation corridors pose significant risks to the biodiversity, ecological integrity and health, as vectors for aquatic and terrestrial invasive species. The longevity of collaboration between agencies, organizations and the public to prevent invasive species spread must be safeguarded through well-funded prevention, early detection and rapid response. The EIS must prioritize long-term corridor planning for each individual Travel Corridor UMP that supports funding, prevention, detection and appropriate response.

Response: Noted, Individual TCUMPs will establish a baseline of infestations for measurement of success. Absent any Individual TCUMP will not prevent on-going DOT strategic planning and actions.

D. Corridor Management Actions

- Support early detection and rapid response efforts throughout the Park
 - Establish a baseline map of existing infestations in the Park. The map will be used to measure success in control and/or eradication.

Comment 126: Similarly, the state should help train road crews at town and county levels on the basics of road ecology and on how to avoid unnecessary environmental damage during the course of road maintenance. Again and again, we see road crews inadvertently spreading invasive species, causing stream-bank erosion and sedimentation of streams, and generally multiplying the deleterious effects of roads. State leadership is needed in giving all transportation personnel, from local levels upward, the training they need to make their practices environmentally responsible. Similar training is also needed by utility companies, whose crews likewise cause unwitting harm in their maintenance of power and telephone lines.

Response: Noted. DOT has training plans – created and/or updated annually - that incorporate or address some of the topics mentioned. We also look for opportunities to offer these trainings to Local Highway staff, where feasible. Our Highway Work Permit process affords DOT a measure of control over the activities of utilities.

Comment 127: Reduction of land and aquatic invasive species in travel corridors, and prevention of their spread, particularly into the Park’s waterways.

Response: Noted and concur.

Comment 128: Increased management of invasive species along Adirondack travel corridors is only achievable with certified pesticide applicators, and technical invasive species management equipment, such as backpack and truck-mounted herbicide sprayers, should be provided to the various residencies and maintenance shops throughout the region to meet the control objectives outlined in Section 5.22.5.

Response: Noted and is a part of our annual strategic planning.

Comment 129: In 2016 construction workers unintentionally introduced several species of invasive plants along the Whiteface Veteran’s Memorial Highway by bringing in contaminated fill and top soil during reconstruction. DOT should establish a system for verification and certification of weed- and seed-free material sources for all future construction projects conducted in the Adirondack Park.

Response: Noted. DOT will be providing updated guidance in the *Green Book*. In addition, DOT has incorporated these concerns into our training program and are looking at changing both design and construction practices to avoid these problems. It should be noted that, currently, there is no way to ensure that topsoil, compost or other soil amendments are truly “weed free”. Even were we to have suppliers “self-certify” there is no certain way to hold them accountable should an invasive species infestation occur once the material is placed. We have tightened our specification controls on topsoil, but our first option is to avoid the introduction of topsoil in the Park and the second is to reuse existing soil where disturbance occurs.

Comment 130: DOT’s highway maintenance and construction staff are out on the road nearly every day, giving them a great advantage and added responsibility to report when they have found an invasive species infestation. Additional training and resources for invasive species data collection and reporting should be provided to staff to advance the Adirondacks’ invasive species early detection and rapid response network.

Response: DOT staff contribute to data and coordination of information with APIPP. DOT will continue this approach and look to maintain/expand this opportunity.

Comment 131: The establishment of boat wash and decontamination stations along major road corridors has been effective in preventing the spread of aquatic invasive species (AIS) into the Adirondacks. DOT should continue to support current stations as well as identify potential locations for future stations along major corridors, especially those on the periphery of the park such as I-81 and I-90.

Response: Noted and DOT agrees. Currently (2018), we are working on several sites in the Park with APIPP and local sponsors.

Comment 132: APIPP offers its assistance toward implementation of the TCUMP and these recommendations and looks forward to continuing its partnership with DOT to protect the Adirondack region from the negative impacts of invasive species.

Response: Noted and thank you.

5.25 Historic and Archaeological Resources

Comment 133: Preservation of the historic character of the Park's scenic byways.

Response: Noted.

Comment 134: Elimination of the use of 'wire basket' gabion retaining walls, and preservation and restoration of historic round-boulder and laid up-rock walls in travel corridors.

Response: Noted and will be consideration in guidance development that will be included in the Green Book. This topic will also be evaluated by site in Individual Travel Corridors.

Comment 135: Page 5-82: *5.25 Historic and Archeological Resources*

We very much appreciate DOT's proposal to include Historic Context Studies in each Transportation Corridor Unit Management Plan (TCUMP). The discussion in this section shows great insight and sensitively to the cultural uniqueness of the Adirondack Park. However, recognizing that the TCUMP process is not likely to begin immediately for every Transportation Corridor Unit in the Park, we recommend that DOT immediately commence the Historic Context Studies on Park-wide basis, and incorporate these studies into the TCUMPs as they develop.

The potential for losing historic artifacts as they deteriorate over time is too great a risk. The Historic Context Study is a very important concept and an excellent proposal which should be implemented immediately.

Response: Due to limited resources, we can only address historic context in detail as individual TCUMPs are developed. We have Route 3 and Route 28 complete. We are currently working on Route 73.

5.26.2 Public Access

Comment 136: This section includes a section that explicitly addresses parking needs related to recreation on State lands (hiking, fishing, swimming, boating, hunting and so on). I am very pleased to see this included as it is the big issue on Route 73.

Response: Noted.

Comment 137: **Access to Forest Preserve**, pg. 5-10: DOT cooperation with NYS DEC to address public access, safety and overuse of Forest Preserve off of state highways was evidenced recently at Cascade Mountain trailhead on Rte. 73. Individual Travel Corridor UMPs should anticipate more of this cooperation. The proposed Corridor Management Actions could cite the Cascade Mountain trailhead parking closure as an example of support for public safety and scenic wilderness character.

Response: Noted.

5.26.3 Snowmobile Trail and Infrastructure

Comment 138: 1) All “Park Clubs” should be listed as Shareholders as well as NYSSA.

Response: If agreed upon, DOT will request NYSSA to provide an appropriate list. Once the list has been received and reviewed, DOT staff will include in Attachment J.

Comment 139: 1b) NYSSA needs to engage at lower echelon for specific situations on specific corridor locations

Response: Noted and information by corridor can be provided at any time, even if there is no Individual TCUMP for a corridor. DOT plans to manage this data and work with NYSSA on stakeholder input.

Comment 140: 2) Provide a clear process for shareholder involvement on specific corridors. I have concerns on State Routes 3, 56 and 421:

Response: Noted. A TWG is planned and will include NYSSA and interested club representative(s) on best means to gather and catalog information.

Comment 141: 2a) Rte. 3: Crossing Raquette River in Piercefield and Crossing Windfall Brook near Seveys Corners.

Response: Noted. This is not specific to the Generic TCUMP. DOT will outreach to clarify issue.

Comment 142: 2b) Rt 56: Skirting shoulders along ravine via Culvert crossings just north of Seveys Corners

Response: Noted. This is not specific to the Generic TCUMP. DOT will outreach to clarify issue.

Comment 143: 2c) Rt 421: Substantial Trailer Parking at start of seasonal road

Response: Noted. NYSSA list included in Attachment J.

Comment 144: 3) Has NYSSA or SLCSA ever been involved in one of the “collaborative problem-solving approaches?”

Response: There has not been a formal process to date with NYSSA or SLCSA. The Generic TCUMP was informed on this topic from discussions with NYSSA and various club representatives during the development of the draft plan.

Comment 145: 4) If so, what recommendations in the summary table were topics are earmarked for targeted public?

Response: Unclear what “summary table” the commenter is referring to.

Comment 146: 5) How can we insure Snowmobile Enthusiasts are considered in the convenience and mobility of all users when developing transportation projects that receive state and federal funding? We are asking for well-marked and dedicated road crossings. We seek widened shoulders were required to allow mobility and enhanced safety for all. The ability to skirt bridges and culverts at acceptable slopes and widths is paramount to cross water.

Response: The Department has policies and procedures in place for taking alternate transportation modes into consideration when developing capital projects. In addition, all capital projects are scoped to identify recreational trails within and around a proposed project location. Opportunities to improve communication between the Department and stakeholders will be explored.

Comment 147: 6) All Snowmobile Crossings or Skirting (running parallel in the Right of way or immediate area) should be annotated on the Hard Inventory for record.

Response: Noted and this is planned as part of the Build, Refine and Maintain Asset Management Databases that relate to snowmobiling in the Park (Section 6 and Section 2.4.3.5- defines). A TWG which will include New York State Agencies (NYS Parks, DEC, APA, DOT) staff and Stakeholder representation is planned to be formed to help define additional assets need to be collected relative to what already exists.

Comment 148: 7) All Snowmobile Crossings or Skirting should be considered in maintenance of travel corridor

Response: Noted

Comment 149: 8) Usage of millings to broaden / backup road shoulder should be allowed

Response: Where acceptable under current guidance, site considerations, and appropriate coordination this will be explored

Comment 150: 9) Since NYSSA has very specific opportunities, small local area personnel should be afforded an audience at DOT /APA to review crossings and skirting conditions.

Response: Noted. The TWG will consider and include NYSSA participation.

Comment 151: 10) Develop a data dictionary for Adirondack Park culverts that snowmobiling considerations are identified through outreach and input

Response: Noted, see response to comment #147.

Comment 152: 11) Collaborate with DEC and APA to develop a process that identifies and prioritizes recreational corridor crossing needs

Response: Noted and will be topic included in TWG and (Section 6 and Section 2.4.3.5- defines) Build, Refine and Maintain Asset Management Databases the relate to snowmobiling in the Park

Comment 153: NYSSA is pleased that for many years DOT has worked in partnership with NYSSA on providing snowmobile trail opportunities within the Forest Preserve that were consistent and complementary to DOT's goals and strategies.

Response: Noted

Comment 154: The entire snowmobile community needs to have a cooperative relationship with DOT and an understanding of DOT's concerns when a trail crosses a state highway. Safety must be given priority consideration along with the need to connect communities with the designated snowmobile trails.

Response: Noted and consistent with proposed Management Objectives and Actions

Comment 155: Bridge projects, causeway rebuilding, and even right of way opportunities should be looked at more closely in relationship to the current designated snowmobile trails. Consideration must be given to the possibility of future reroutes caused by private land closures. Consultation with local snowmobile clubs and the towns who maintain the trails in specific areas should facilitate this consideration. Clubs and municipal sponsors should see project specifications prior to final design and bids going out Bridge projects, causeway rebuilding, and even right of way opportunities should be looked at more closely in relationship to the current designated snowmobile trails. Consideration must be given to the possibility of future reroutes

caused by private land closures. Consultation with local snowmobile clubs and the towns who maintain the trails in specific areas should facilitate this consideration. Clubs and municipal sponsors should see project specifications prior to final design and bids going out

Response: The Department has policies and procedures in place for taking alternate transportation modes into consideration when developing capital projects. In addition, all capital projects are scoped to identify recreational trails within and around a proposed project location. Opportunities to improve communication between the Department and stakeholders will be explored.

Comment 156: The NYS snowmobile community asks that the Department of Transportation keep snowmobile use across or on the right of way in mind well in advance of any road project construction. Planning ahead may allow a design for sleds to be easily built to accommodate better snowmobile-vehicle interaction for safe snowmobile use. For instance, when new bridges are designed for heavily travel snowmobile communities, it would be preferable that such use be incorporated into the bridge design to provide snowmobiles and trail maintenance equipment with a safe route over the hazard. Also, large rock removal along the road right of way within utilities projects would help provide a much better trail sub-surface for a potential snowmobile trail along the highway ROW and potentially avoid having to travel into the Forest Preserve proper.

Response: Noted and consistent with proposed Management Objectives and Actions.

Comment 157: Parking lots for snowmobile truck & trailer day-use parking should be evaluated as to whether they could be developed near the current snowmobile trail system, with signage. Plowing of these parking areas would need to be incorporated into the road plow route planning so that vehicles are not parked on the highway. Such actions should be coordinated between DOT, DEC and local trail sponsors.

Response: Noted and will be a consideration in Individual TCUMPs and on a case-by-case basis

Comment 158: Along road ROWs where snowmobile use is most likely or could occur, wide culvert extensions could provide a much safer travel environment with snowmobiles remaining off the actual roadway.

Response: Noted. Will be a consideration in Individual TCUMPs and on a case-by-case basis.

Comment 159: Add New York State Snowmobile Association (NYSSA) to the list of acronyms on page 8-11 in place of NYSCG. In 1995 the New York State Snowmobile Coordinating Group's name was officially changed to the New York State Snowmobile Association.

Response: Noted. Change made.

5.27 Scenic Byways

Comment 160: The resident population and visitor population are getting to around 50 or older. For many of these people, time in their car (windshield time) is the primary way they experience the park. Making the driving experience more attractive to this age group should be a goal. This means, for example, maintaining open vistas, or clearing to re-establish vistas. This means, for example, signs indicating a pull-out area, or a seasonal toilet area, are a half mile ahead, for example.

Response: Noted and consistent with proposed Management Objectives and Actions.

Comment 161: Paper maps are going out of style as cell phone use increases, especially for maps. Consider a program to help each scenic byway make the transition to smart phones, teaching businesses on the route to use it for advertising and visitor guidance of all sorts.

Response: Noted. Scenic Byways organizations are responsible for initiating projects that pertain to their specific byway. This includes the development of paper maps or other innovative means with which to convey routing information. The development of an app for all NYS Scenic Byways is a great idea and is on DOT's "wish list". It is unclear when and if this effort will be funded.

5.32 Utilities

Comment 162: *Underground Utilities:* The Adirondacks are blessed with many tremendous viewsheds, many of which are accessible to millions because they are along travel corridors. These viewsheds could be further enhanced by building on the successful burying of utility lines in some locations (such as just outside Lake Placid and in Keene) and doing the same in more places (in concert with bringing in updated communications and improved culverts and drainage). Underground utilities not only increase visual aesthetics, but also decrease environmental impacts and infrastructure susceptibility to severe weather events

Response: Noted. This will be considered in individual TCUMPs and on a case-by-case basis. To navigate this complex issue, costs, site conditions, regulations and coordination with the utilities, other State agencies, and Federal agencies need to be taken into account. This topic will be a consideration of the TWG.

Comment 163: Though it may go beyond the scope of this document, the state should be encouraging – and eventually *requiring* -- utility companies to bury power and telephone lines along roads, rather than having the lines above ground where they are vulnerable to storm damage and having them cut through otherwise intact forest.

Response: Noted. Such a requirement is beyond the scope of this document. However, with executive management approval may be considered in individual TCUMPs on a case-by-case basis.

Comment 164: Page 5-102: *5.32 Utilities:* We commend DOT for working with utilities to protect the viewshed along travel corridors. We also appreciate the use of travel corridors for utility routes because it avoids the need to cut swaths through forest lands for utility routes.

Response: Noted.

5.4 ACCESS to DEC-MANAGED STATE LANDS / FOREST PRESERVE

Comment 165: *Parking and Forest Preserve Access:* Travel corridors provide the public with access to designated Forest Preserve access points and as such, their management must accommodate and manage for this type and level of use. While we appreciate the DEIS's guidance to encourage dialogue between DEC and DOT to address carrying capacity and public land access, the final draft should specifically speak to how parking capacity and safety will be addressed. Additionally, the final EIS should also note how parking capacity will be addressed if DEC fails to do so in corresponding UMPs.

Response: The Management Objectives and Actions provide a path forward, but specific parking capacity and safety needs are best addressed in the individual TCUMPS, building on carrying capacity information identified in consort with DEC UMPs.

Section 6

Comment 166: *The Law:* Where, by law, roads have been closed, they should be closed. Laws should be honored and enforced. We are a nation and state that follows the law. This principle should be reinforced in the final draft, and the state needs to close the Crane Pond Road.

Response: Noted. Does not apply to the Generic TCUMP.

Comment 167: Although it may go beyond the scope of this plan, the state should be anticipating needs for *ecological austerity* – for ways of saving tax-payer money while also enhancing ecological health and wildlife connectivity. High priorities in this area are closure of unneeded back-country roads that fragment the Forest Preserve. Roads cutting far into Forest Preserve units generally serve few or no year-round residents yet cost thousands of miles a year on average to maintain, plus fragment forest habitat, facilitate invasion by exotic species, bleed sediment into streams, decrease habitat security for sensitive and wide-ranging species, and generally worsen edge effects.

Response: Noted. Does not apply to the Generic TCUMP.

Section 7

Comment 168: Timelines: The DEIS excellently identifies information gaps that need to be filled in order to successfully manage travel corridors across the Park. However, the general lack of timelines included within this generic UMP fails to give the document any accountability measures to address concerns. For example, the DEIS recognizes the need to develop a comprehensive signage law but provides no timeline as to when this should be completed. DOT should consider reviewing management actions and recommendations in order to assign practical and necessary timelines to actions where it is germane.

Response: *Section 7* includes an implementation schedule with relative implementation priorities. Additionally, the Generic TCUMP requires an annual report.

Comment 169: The timeline presented in *Section 7: Implementation Schedule* of this draft Generic TCUMP, shows that the individual TCUMPs are short term actions, while many of the actions described in the Generic TCUMP are defined as intermediate or ongoing. This means that management actions in the individual TCUMPs would likely be approved before many of the actions in the draft Generic TCUMP are complete.

Response: The *Implementation Schedule* does not state that ALL individual TCUMPs are short-term. Two specific ones already underway are to be completed in the near (short) term. Additionally, the development of an overall schedule for individual TCUMPs is a near-term action. Intermediate, ongoing and long-term management actions identified in the Generic TCUMP will be incorporated into and tailored for the individual TCUMPs currently underway.

Attachment E

Comment 170: We ask that DOT add a new category to *Attachment E: Selected Asset Management Inventories and Data Directories*. This category would be entitled “Historic and Cultural Highway Features”, and would include a subsection inventorying historic stone retaining walls

Response: Category added.

Attachment J

Comment 171: *Attachment J:* New York State Council of Trout Unlimited should be added to list of interested NGO's. See our website for necessary info.

Response: Added.

Attachment K

Comment 172: This table is excellent work and the first time I have seen this information compiled in one place. I suggest adding a map to complement the table, showing all these services and the points where they connect with each other.

Response: Noted. A map will be included in the document.

Comment 173: Addition of usage data, and user profiles would add a lot of value. The intersection of public transportation usage and highway traffic data could yield useful insights into gaps in public transport.

Response: Noted, but this is beyond the scope of the Generic TCUMP.

Public Hearing – Open Comments

General

Comment 174: Corridors are integral to entire park to ensure the park is welcoming and inclusive to every body whether you own a car or not; whether you have a bicycle, or coming by bus from the city,... we have to look ahead and plan ahead....

Response: Noted.

Comment 175: Where is PSC in this thing? Do they have a role?

Response: Yes, related to Utilities, see Section 2.1. *Agencies* where we mention other potentially interested agencies/authorities, including PSC, in this effort.

Comment 176: In regards to the document, recommend a brutal no holds bar edit, identify all the redundancies, condense all this nameless superficial language, summarizing all of them their policy items to the max. As best as you can comply with these master regulations. as to what generics are all about and put in this thing succinctly and you will come up with individual travel corridor unit management plans

Response: Noted. The document serves a wide range of issues and audiences and was developed to meet a broad range of interests.

2.4.2 Individual TCUMPS

Comment 177: I hope we complete the generic plan soon so that the first corridor specific plan will be on Route 73 in consideration of access concerns and potential carrying capacity issues to Forest Preserve

Response: Noted, *Section 7* proposes the development of a schedule for Individual TCUMPs as a short term step, Absent any Individual TCUMP the Generic TCUMP informs opportunities and concerns for all travel corridors consistent with this comment.

4.3.3.2 Winter Maintenance - Snow and Ice Control

Comment 178: Keeping roads safe and decreasing use of road salt... lets celebrate the achievement and explore alternatives/opportunities to make further progress.

Response: Noted. See response to comment #48.

Comment 179: We can reduce the amount of salt without sacrificing our level of service like in Colorado

Response: Noted.

4.4.8.1 Highway Signs

Comment 180: Aesthetic issues: we have these brown and yellow signs and Adirondack Park Sign Law, we have easements along the Northway, and we have very specific laws and rules in place. The Generic plan should address how not only businesses, but state and local entities comply to the letter of the law in the park and along the Northway.

Response: Noted. This is consistent with proposed Management Objective and Management Actions in 4.4.8.1 Highway Signs

Comment 181: Along the Northway, The ADK Highway Council under Bill Hennesy (DOT Commissioner) kept those placard things at the exit making (them) ugly, (others) were in favor of generic, food, lodging at exit. Now we not only have placards growing like cancer, we have text stops sponsored by Geico.... and I dearly hope these are not in the Blueline

Response: Noted. Signage considerations will be reviewed through-out the Park.

Comment 182: Keep fighting for the MUTCD directional series getting rid of green and white signs

Response: Noted. We currently comply with the MUTCD and the Adirondack Park supplement.

5.4 Access to DEC Managed State Lands/Forest Preserve

Comment 183: There has been talk about integrating transportation carrying capacity with recreational carrying capacity and with the use and over use of the park, that is fertile area to explore further. This planning effort should include robust examination of transportation carrying capacity and parameters that go with it in order to leverage how we integrate that with recreational carrying capacity for the benefit of the park and people who visit it.

Response: Agree. Management Objectives and Action in Section 5.4 support this.

5.10 Adirondack Park Branding

Comment 184: State highway in ADKP are less aesthetically pleasing than they were a few years ago:

- First was the inevitable pressure put on DOT to put up state signs in light of ADK sign Law of 1924 proven over time for private businesses.
- Second, the loss of the self-oxidizing guide rail is an aesthetic tragedy.
- Third, the Legislation has ironically made ADK highways less scenic due to the numerous signs every two miles telling us this and that trail, etc.
- Fourth adopt a highway sign that are everywhere – sign that were to remind us not to litter but have become litter themselves.

Response: Noted. Refer to the Generic TCUMP Section 4.4.8.1, *Highway Signage* and 5.10 Adirondack Park Branding that includes management actions consistent with this comment.

5.22.3 Habitat Connectivity

Comment 185: Ecological integrity – document refers to ecological integrity with reference to water sources and stormwater run off, but since the AHC work, science and ecology has changed, and our understanding of ecological integrity and roads, the role they play in serving zones.. it is of course stormwater, it is invasive species, but it is more than that, it is habitats, corridors, light, noise, etc. Ecological integrity should be strategic force over the whole document because it ties in with unit management plan and protecting public land. Ecological integrity should be a driver and a strong piece of the overall puzzle.

Response: Noted. We agree that ecological integrity is broad and an important overall consideration in the Generic TCUMP. The document includes Management Objectives and Actions consistent with this comment.