



**WHITEFACE**

# **2021 UMP Amendment**

**Proposed Final**



**Olympic Regional  
Development Authority**

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## Executive Summary

The NY Olympic Regional Development Authority (ORDA) proposes to amend the 2004 Unit Management Plan (UMP) for the Whiteface Mountain Ski Center Intensive Use Area (Whiteface) to include certain new connector trails between existing ski trails and to widen other existing ski trails. Also included in the new management actions for this 2021 UMP Amendment (UMPA) are the installation of a new lift between the Bear Den Lodge area and the area of the Legacy Lodge that was constructed near the former Midstation Lodge<sup>1</sup>, and an expansion of the existing NYSEF Building near the Base Lodge. Development of hiking and mountain biking recreational trails to be independent and serviced by lifts is also proposed in this UMPA. See **Figure ES-1**, 2021 Master Plan, on the following page. More detailed descriptions of the 2021 proposed new management actions are in Section 2 of this UMPA.

The purpose and need for this UMPA, including the new management actions, is the on-going improvement and modernization of facilities at Whiteface that will add to public accessibility, increase user safety, and enhance recreational experiences while simultaneously complying with [Article XIV of the New York State Constitution and](#) the Adirondack Park State Land Master Plan ~~and Article XIV of the NYS Constitution.~~

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<sup>1</sup> Legacy Lodge has replaced the former Midstation Lodge and the general area of the mountain around the current lodge and the former lodge is now referred to “Legacy”.

Proposed new downhill trails and proposed trail widening include the following:

Management Action	Trail/Lift ID	Name / Description	Trail Length (LF)	Average Width (LF)
<b>New Downhill Trails</b>				
	95	Yellow Dot	260	23
	94	High Country Road	560	99
	93	Trail Under Bear Den to Legacy Lift	500	115
	<b>Total</b>		<b>1,320</b>	

<b>Widen Existing Trails</b>				
	59A	Wildway	n/a	30
	61	2200 Road	n/a	60
	20	Upper Thruway	n/a	68
	18	Upper Parkway	n/a	66
	21	Lower Thruway	n/a	85
	24	Burton's	n/a	55
	28	Danny's Bridge	n/a	43
	68	Brookside	n/a	60

In addition to these new trails and new trails widening as 2021 management actions, the previously approved trails 88 and 89 to be located off of the recently replaced Bunny Hutch Lift in the Bear Den area (C) are no longer proposed. The combined length of these trails is 1,700 feet (0.32 mile)

The addition of 1,320 feet (0.25 mile) of new trails and the abandonment of 1,700 feet (0.32 miles) of previously approved trails will result in a total of 22.32 miles of downhill ski trails at Whiteface, which is 2.65 miles below the NYS Constitutional limit of 25 miles. Additionally, the amount of trails greater than 120 feet wide and less than 200 feet wide will now be 2.33 miles (was 1.75 miles) which is well below the five (5) mile limit for such wider trails that was established in the 1987 amendment to Article XIV.

The new lift (Lift D) will be a detachable quad with a midstation terminal, approximately 4,300 feet long overall, between the Bear Den area and the Legacy Lodge area. Construction of the Legacy Lodge at a new location facilitated the proposal of this action that has been contemplated by ORDA for some time. Bear Den is now the location for beginner skier and snowboarder activities on the mountain. A lift connection from the beginner terrain in the Bear Den area to the intermediate trails out of the Legacy area provides a logical and safer learn to ski and snowboard progression by providing access to the proper terrain for lower level abilities. ORDA considered alternative configurations for this lift, including a straight lift without a midstation terminal at the turn. Such an alternative would not provide a lower elevation drop off point for learning skiers and snowboarders, and the straight line lift would have to pass up and over a 300 feet vertical ridge that exists between Bear Den and Legacy where lift riders would leave the protection of the tree line and be exposed to the elements of the barren rock ledge.

One other lift-related actions for this UMPA include that the previously approved extension of the Bear Lift (B) to the area around Calamity Lane and Legacy Lodge, including a new lift midstation, is no longer proposed. [The proposal to replace and extend the Freeway Lift \(I\) ,which was approved in 2018, is no longer proposed. To accommodate the instillation of the Bear Den Lift, the The Mixing Bowl lift \(A\) is being removed.](#)

New 2021 Management Actions have been added to an updated Status of Management Actions master table that is in **Exhibit 1** of this UMPA. The following actions have occurred since the approval of the 2018 UMPA and the master table in **Exhibit 1** has been updated to include those changes in status for:

- Creation of Slide View Glade
- Widening of Easy Street Trail
- Widening of Broadway Trail
- Replacement of Midstation Lodge with Legacy Lodge
- Widening (installing snowmaking lines) of Danny's Bridge Trail
- Widening (installing snowmaking lines) of Brookside Trail
- Widening of Otter Trail
- Creation of Coyote Trail
- Installation of Coyote Cruiser and Cub Carpet Surface Lifts at Bear Den
- Replacement and extension of Bunny Hutch (C) lift.

As part of this UMPA, ORDA has performed an environmental assessment of the proposed new management actions. This assessment resulted in the identification of the following potentially significant impacts. See Section 3 and **Exhibit 9** of this UMPA for additional detail.

- Potential impacts to land from steep slope soil erosion during construction,
- Potential impacts to water from sedimentation of eroded soils,
- Potential impacts to land from construction in areas with shallow depth to bedrock, and
- Potential impacts to Bicknell's thrush and its habitat.

The same potential impacts were identified in the 2018 UMPA ~~which that~~ contained extensive, detailed measures proposed to avoid or mitigate these potential impacts. This 2021 UMPA proposes the ~~These~~ same avoidance/mitigation measures. ~~are proposed in this 2021 UMPA.~~

Because this UMPA was prepared less than 3 years since the approval of the 2018 UMPA, the Inventory of Existing Resources, Facilities, Systems and Use in Section II of the 2018 UMPA and the Management and Policy guiding the operation of Whiteface in Section III of the 2018 UMPA ~~remain essentially the same and~~ are not repeated in this 2021 UMPA. All new management actions in this UMPA, including removal of the Mixing Bowl lift and installation of EV chargers, have been added to the table in Exhibit 1, Whiteface UMP Management Action Status., the following: EMMA TO INSERT CHANGES.

Section 4 of this UMPA contains descriptions of additional permits or approvals that may be required following approval of this ~~needed after the acceptance of the~~ UMPA and prior to construction.

~~Twelve (12)~~ Eleven (11) Exhibits at the end of this UMPA provide additional supporting information for various topics including trail mileage, natural resources mapping, tree counts, , stormwater management, visibility, and the NY State Environmental Quality Review Act (SEQRA) assessment of the 2021 new management actions.

# Whiteface Mountain 2021 UMP Amendment

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## List of Abbreviations

ACOE	US Army Corps of Engineers
ADA	Americans with Disabilities Act
APA	NYS Adirondack Park Agency
APSLMP	Adirondack Park State Land Master Plan
CEA	Critical Environmental Area
DBH	Diameter at Breast Height
DEC	NYS Department of Environmental Conservation
FIS	Federation Internationale de ski (International Ski Federation)
NYSEF	New York Ski Education Foundation

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<sup>2</sup> Changes made to the Public Draft when preparing the Proposed Final UMPA



OPRHP	NYS Office of Parks Recreation and Historic Preservation
ORDA	NY Olympic Regional Development Authority
SEQRA	NY State Environmental Quality Review Act
SPDES	State Pollution Discharge Elimination System
SWPPP	Stormwater Pollution Prevention Plan
UMP	Unit Management Plan
UMPA	Unit Management Plan Amendment

## Section 1 Introduction

The NY Olympic Regional Development Authority (ORDA) is amending the 2004 Unit Management Plan (UMP) for the Whiteface Mountain Intensive Use Area (Whiteface) located in the Town of Wilmington, Essex County, New York. See **Figure 1** in **Exhibit 3**, Site Location Map. Previous Whiteface Mountain UMP documents, including the 2018 Amendment, are incorporated by reference into this 2021 UMP Amendment (UMPA).

This 2021 UMPA for Whiteface has been prepared in accordance with the Adirondack Park State Land Master Plan (APSLMP) and adds several new management actions. Most of the new management actions are widening of existing downhill ski trails and construction of short new connector trails. A new ski lift is also proposed. Language in the APSLMP that pertains specifically to Whiteface Mountain states “Existing downhill ski centers at Gore and Whiteface should be modernized to the extent physical and biological resources allow. Cross-country skiing on improved cross-country ski trails may be developed at these downhill ski centers.”

Section 816 of the Adirondack Park Agency Act directs the New York State Department of Environmental Conservation (DEC) to develop, in consultation with the New York State Adirondack Park Agency (APA), UMPs for each unit of land under its jurisdiction classified in the APSLMP. ORDA, pursuant to its enabling law and agreement with the NYSDEC for the management of Whiteface, has prepared this UMPA in cooperation with DEC and in consultation with APA.

The primary objective of this UMPA is to continue the maintenance and operation of Whiteface at a constant level over the ensuing five-year management period in such a way that will contribute to stabilizing Olympic Region employment, economics, public recreation, and governmental administration. Additional objectives include improving facilities that will add to intermediate and beginner terrain on the mountain, increasing user safety, and enhancing recreational experiences. Many of the improvements listed in this UMP Amendment are safety-related and pertain directly to present needs of the mountain in terms of customer expectations and the safety of all levels of skiers. Primarily, the proposed improvements are designed to facilitate access to appropriate terrain for beginner and intermediate skiers and snowboarders, which makes it safer and more enjoyable for all.

Because this UMPA was prepared less than 5 years since the approval of the 2018 UMPA, the Inventory of Existing Resources, Facilities, Systems and Use in Section II of the 2018 UMPA and the Management and Policy guiding the operation of Whiteface in Section III of the 2018 UMPA remain essentially the same. The following management actions have been implemented at Whiteface since the approval of the 2018 UMPA and their status has been updated in Management Actions Status Master Table in **Exhibit 1** of this UMPA:

- Creation of Slide View Glade
- Widening of Easy Street Trail
- Widening of Broadway Trail
- Replacement of Midstation Lodge with Legacy Lodge

- Widening (installing snowmaking lines) of Danny's Bridge Trail
- Widening (installing snowmaking lines) of Brookside Trail
- Widening of Otter Trail
- Creation of Coyote Trail
- Installation of Coyote Cruiser and Cub Carpet Surface Lifts at Bear Den
- Replacement of Bunny Hutch Lift (Lift C)

## Section 2 Proposed Management Actions

### A. List and Map of 2021 Management Actions

The following management actions, listed from highest to lowest priorities, are the subject of this 2021 UMPA:

- Widen Upper Thruway Trail
- Widen Upper Parkway Trail
- Widen Lower Thruway Trail
- Widen Burton's Trail
- Add New Lift Connecting Bear Den to Legacy including a new skiable trail beneath the lift
- Install electric vehicle (EV) chargers in parking lot in front of NYSEF building
- Install a 2-toilet prefabricated restroom facility near the timing building to replace existing pit privies
- New Yellow Dot Trail
- Widen Wildway Trail
- New High Country Road Trail
- Widen 2200 Road Trail
- Widen Danny's Bridge Trail
- Widen Brookside Trail
- Construct new [mountain biking trails within the Whiteface Mountain Intensive Use Area to foster interconnections between existing mountain biking trails at Whiteface with the existing trails within the Wilmington Wild Forest and the Flume Trail System.](#) ~~lift-serviced hiking trails within the WFM intensive use area including a route to the summit of Whiteface Mountain from the summit of Little Whiteface Mountain.~~
- Construct [re-rerouted hiking trails within the Whiteface Mountain Intensive Use Area to mitigate environmental degradation and increase overall safety of existing poorly designed trails. The proposed trail system will foster interconnections between the IUA and Wilmington Wild Forest.](#) ~~new lift-serviced mountain biking trails (easy, harder, hardest) within the intensive use area as well as connecting to existing trails in the adjoining Wilmington Wild Forest.~~
- Construct NYSEF Building Expansion

See **Figures 2, 2A, 3 and 4 in Exhibit 3** that show the locations and extents of these actions.

Also, as part of this 2021 UMPA, the status of trails 88 and 89 are being changed from previously approved in 2018 to no longer proposed in 2021. Together, these two trails total 0.32 mile, and this amount is incorporated into the current ski trail mileage calculations in **Exhibit 2** and summarized in section 2.F below. There will be a slight net decrease in trail mileage at Whiteface as a result of the 2021 management actions. The extension of Bear (B) Lift to the area around Legacy Lodge approved in the 2017 UMPA is no longer proposed. Replacement and extension of the Freeway Lift (I) is no longer proposed. The Mixing Bowl lift

(A) is being removed.

B. Descriptions of Individual Management Actions

Items 1-4 below are part of a common plan to satisfy the ski racers' needs and allowing for separation of racing from recreational activities.

1. Widen Upper Thruway Trail (20) – Widening Upper Thruway supports the overall development of the venue for training and racing at an international level. This will include the removal of a small tree island at the intersection of Upper Parkway as well as widening approximately 1,336 feet of trail an average widening width of 68 feet on the skiers left side throughout. It will create more width to install safety measures required to host large international events and improve the overall layout and safety for all athletes of all abilities.

2. Widen Upper Parkway Trail (18) – Widening of Upper Parkway is part of a plan that will allow Whiteface to have 2 FIS homologated race trails. This will support official training on a homologated trail while there is an event in progress on the other. The training on a homologated trail is now a requirement for some of the larger events in the ski racing world. Homologated trails also support additional safety precautions for the racers. The proposed widening will be on skiers left, approximately 761 feet long and with an average widening width of 66 feet and will result in Upper Parkway and upper Thruway becoming contiguous side-by-side trails. These side-by-side trails are allowable as long as the two trails are counted individually when calculating miles of ski trails. See **Exhibit 43A** for details.

3. Widen Lower Thruway Trail (21) – Widening of Lower Thruway is also part of the plan that will allow Whiteface to have 2 FIS homologated race trails. The proposed additional clearing will be on skiers left between Calamity Lane and Burton's, and on skiers right below Burton's and in the area of the intersection with the Lower Valley Trail. The length of widening on Lower Thruway is 1,464 feet with an average widening width of 85 feet.

4. Widen Burton's Trail (24) – This is also a part of the process for homologating a downhill trail off the summit of Whiteface Mountain to the existing finish area for the general race trails on Drapers Drop. The current downhill is homologated to the Legacy area, and with the new Legacy Lodge being constructed in the finish, the trail will need to be rerouted. The proposed widening is on skiers right on the upper portion of the trail below Calamity Lane and on skiers left near the intersection with Lower Thruway. Length and average width of widening are 733 feet and 55 feet, respectively.

5. Add New Lift Connecting Bear Den to Legacy (including a new skiable trail 93 beneath the lower end of the lift ) (Lift D) – a new detachable quad with a midstation terminal, approximately 4,300 feet long overall, is proposed between the Bear Den area and the Legacy Lodge area. Construction of Legacy Lodge at its new location facilitated the proposal of this action that has been contemplated by ORDA for some time. Bear Den is now the location for beginner activities on the mountain. A lift connection from the beginner terrain in the Bear

Den area to the intermediate trails out of the Legacy area provides a logical, safer learn to ski and snowboard progression by providing access to the proper terrain for lower level abilities. The lift line corridor clearing will be 50 feet wide where the lift passes through currently wooded areas. The total length of the lift is just over 4,300 feet, and the new tree clearing needed to construct the lift will be a total of 500 feet long in multiple locations, with an average additional clearing width of 50 feet. ORDA considered alternative configurations for this lift, including a straight lift without a midstation terminal at the turn. See **Figure 5 in Exhibit 3** showing a plan view of the alternatives and **Figure 5A in Exhibit 3** showing elevation profiles of the proposed lift and the alternative considered. Such an alternative would not provide a low elevation drop off point for learning skiers and snowboarders, and the straight line lift would have to pass up and over a 300 feet vertical ridge that exists between Bear Den and Legacy where lift riders would leave the protection of the tree line and be exposed to the elements of the barren rock ledge. There would also be significantly more tree clearing and soil disturbance with this alternative.

6. New Yellow Dot Trail (95) – construction of the new Yellow Dot Trail will allow easier access to Lower Skyward off the gondola. Currently, Lower Skyward is only accessible by skiing Upper Skyward. Lower Skyward is underutilized and is often an easier route for intermediate skiers as compared to the Victoria trail. The new Yellow Dot trail will be approximately 260 feet long with an average width of 23 feet wide on relatively flat ground.

7. Widen Wildway Trail (59A) – widening Wildway will allow for access to Mountain Run from Upper Wilderness. This will allow skiers to access Mountain Run without skiing around the midstation on the Little Whiteface lift or through the existing narrow area at the bottom of the approach. Widening will involve 145 feet of existing trail with an average widening width of 30 feet.

8. New High Country Road Trail (94) – this action involves recutting the old High Country Road Trail and extending it down to Lower Empire. Reestablishing this connection will allow access from the top of Freeway and the midstation area of the Little Whiteface Lift to the Summit lift. It will also provide a non-expert “escape” route from the top of Freeway. This new management action involves approximately 560 feet of trail and an average width of 99 feet.

9. Widen 2200 Road Trail (61) – portions of the 2200 Road Trail totaling approximately 390 feet in length (between 2 sections) will be widened an average of 60 feet. Like the High Country Road Trail, widening the 2200 Road will allow access from Freeway and the midstation area on the Little Whiteface lift to the Summit Lift and also provide for the better “escape route” that avoids expert terrain.

10. Widen Danny’s Bridge/Brookside Trails (28 & 68) – This area is often used as a terrain park. The proposed widening will occur on skiers left with 500 feet of Danny’s Bridge widened to by an average 43 feet to 120 feet, the upper 220 feet of Brookside widened to 160 feet and the lower 720 feet of Brookside widened to 120 feet. This will allow for more terrain park area and

more options for terrain park users. The widening will also allow for safer passage around the jumps in the terrain park for non-users.

~~11. Construct new lift-serviced mountain biking trails connecting existing WFM facilities with a trail along the West Branch AuSable River and eventually connecting with the Flume Parking Lot off NYS Route 86 (in Wilmington Wild Forest). A total of 19.48 miles of single-track mountain bike trails between 36 and 72 inches wide are proposed including 6.25 miles of easiest (green) trails, 10.53 miles of more difficult (blue) trails and 2.7 miles of most difficult (black) trails. Mountain biking activities will be based out of the Bear Den area. A map of the proposed mountain biking trails is **Figure 3 in Exhibit 3**. **Exhibit 5** contains the Masterplan Report for the proposed hiking and mountain bike trails and **Exhibit 5A** contains a Phasing and Implementation Plan, and **Exhibit 5B** contains the construction best management practices and details for the proposed trails. All proposed single-track trails work will follow the 2018 NYS DEC Management Guidelines for Siting, Construction and Maintenance of Single-track Bicycle Trails on Forest Preserve Lands in the Adirondack and Catskill Parks where applicable. ([https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/bikeguidance.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/bikeguidance.pdf)) All stream crossings will also follow DEC Best practices ([https://www.dec.ny.gov/docs/permits\\_ej\\_operations\\_pdf/streamcrossbroch.pdf](https://www.dec.ny.gov/docs/permits_ej_operations_pdf/streamcrossbroch.pdf)).~~

~~12. Construct hiking trails at WFM including a route to the summit of Whiteface Mountain from the summit of Little Whiteface Mountain and an extension to existing trail from the summit of Bear Den Mountain to create a trail loop. A total of 4.4 miles of hiking trails will be established within the intensive use area. A map of the proposed hiking trails is **Figure 4 in Exhibit 3**. **Exhibit 5** contains the Masterplan Report for the proposed hiking and mountain bike trails and **Exhibit 5A** contains a Phasing and Implementation Plan, and **Exhibit 5B** contains the construction best management practices and details for the proposed trails.~~

11. Construct new mountain biking trails within the Whiteface Mountain Intensive Use Area to foster interconnections between existing mountain biking trails at Whiteface, with existing trail within the Wilmington Wild Forest and the Flume Trail System. This program will be supported and serviced by mountain infrastructure in the Bear Den area of Whiteface, out of which mountain biking activities will be based. Approximately half of the proposed trails will be located on existing cleared trails in the Whiteface Mountain Intensive Use Area. The proposed system includes approximately 19 miles of single-track mountain biking trails with approximately 6 miles of easiest (green) trails, 10 miles of more difficult (blue) trails, and 3 miles of most difficult (black) trails. A map of the proposed mountain biking trails is **Figure 3 in Exhibit 3**. The proposed trail system was informed by the Master Plan Report for Hiking and Mountain Biking at Whiteface Mountain which can be found here: <https://www.dec.ny.gov/lands/90459.html>. All trails identified in the guidance document and tabulated below are subject to the DEC Work Plan Process.

<b>Mountain Biking Trails (Improve Existing and Proposed New Trails)</b>		
<u>Trail ID</u>	<u>Trail Name</u>	
<u>Easiest</u>		<u>+/- 6 miles</u>
<u>a</u>	<u>Green Flow</u>	
<u>b</u>	<u>Green Jump</u>	
<u>c</u>	<u>Top of Falcon Flyer to Bear Den Base</u>	
<u>d</u>	<u>Base Lodge to Valvehouse</u>	
<u>e</u>	<u>Northeast Beginner Loop</u>	
<u>f</u>	<u>Magic Bus Road</u>	
<u>g</u>	<u>Pedal Access Above Legacy</u>	
<u>Intermediate</u>		<u>+/- 10 miles</u>
<u>h</u>	<u>Upper Blue Flow</u>	
<u>i</u>	<u>Lower Blue Flow</u>	
<u>j</u>	<u>Blue Jump</u>	
<u>k</u>	<u>Northwest Shore</u>	
<u>l</u>	<u>Northern Single Track Trails</u>	
<u>m</u>	<u>Seek and Destroy</u>	
<u>n</u>	<u>New Blue Technical</u>	
<u>o</u>	<u>New Inconceivable</u>	
<u>p</u>	<u>Southwest Shore</u>	
<u>q</u>	<u>River Loop</u>	
<u>Advanced</u>		<u>+/- 3 miles</u>
<u>r</u>	<u>Slickrock</u>	
<u>s</u>	<u>To Slickrock</u>	
<u>t</u>	<u>Center Advanced</u>	
<u>u</u>	<u>Freedom</u>	
<u>v</u>	<u>Evil Empire</u>	

No trail construction will occur until DEC has finalized the comprehensive review of applicable trail construction policies. All proposed trail work will be reviewed in accordance with that policy, and final siting and design must be approved through the updated Work Plan process. Where applicable, all proposed trails will also comply with the 2018 NYS DEC Management Guidelines for Siting, Construction and Maintenance of Singletrack Bicycle Trails on Forest Preserve Lands in the Adirondack and Catskill Parks ([https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/bikeguidance.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/bikeguidance.pdf)) All stream crossings will also follow DEC Best practices ([https://www.dec.ny.gov/docs/permits\\_ej\\_operations\\_pdf/streamcrossbroch.pdf](https://www.dec.ny.gov/docs/permits_ej_operations_pdf/streamcrossbroch.pdf)).

12. Construct re-routed hiking trails within the Whiteface Mountain Intensive Use Area to mitigate environmental degradation and increase overall safety of existing poorly designed



trails. The proposed trail system will foster interconnections between the IUA and Wilmington Wild Forest. Approximately half (5 miles) of the proposed trail system will make use of existing hiking trail areas and approximately four (4) miles of new hiking trail will be established in the Whiteface Mountain IUA. Improvements will be made to existing trail areas deemed hazardous or unsustainable, and new trails favor moderate terrain over that of the steeper existing trails. Existing trails where rehabilitation is not proposed will be closed. A map of the proposed hiking trails is **Figure 4 in Exhibit 3**. The proposed hiking trail re-routes were informed by the Master Plan Report for Hiking and Mountain Biking at Whiteface Mountain which can be found here: <https://www.dec.ny.gov/lands/90459.html>. All trails identified in the guidance document and tabulated below are subject to the DEC Work Plan Process.

<b>Improve Existing Hiking Trails</b>		<b>+/- 5 miles</b>
<u>Trail ID</u>	<u>Trail Name</u>	
A	<a href="#">Top of Gondola to Base Lodge</a>	
B	<a href="#">Bear Mountain Extension</a>	
C	<a href="#">Little Whiteface Summit Path</a>	
D	<a href="#">Valve House Road to Bear Den</a>	
E	<a href="#">Champlain Valley Trail</a>	
F	<a href="#">Slide-Out</a>	
<b>Proposed New Hiking Trails</b>		<b>+/- 4 miles</b>
<u>Trail ID</u>	<u>Trail Name</u>	
G	<a href="#">West Branch Nature Trail Extension</a>	
H	<a href="#">Little Whiteface Mountain Ridge Trail</a>	
I	<a href="#">Top of Summit Quad to Summit</a>	
J	<a href="#">New Bear Den Mountain Trail</a>	
K	<a href="#">Paron's Run to the Bottom of the Slides</a>	
L	<a href="#">West Branch Ausable River Accessible Trail</a>	
M	<a href="#">Accessible Trail to Eastern Drainage</a>	

[No trail construction will occur until DEC has finalized the comprehensive review of applicable trail construction policies. All proposed trail work will be reviewed in accordance with that policy, and final siting and design must be approved through the updated Work Plan process.](#)

13. Expand NYSEF Building – NYSEF is proposing to construct a 25-foot by 70-foot, two floor addition to the north side of their existing building in the base lodge area.

14. Install Electric Vehicle (EV) Chargers – [ORDA has installed three \(3\) dual port charging units in the open parking area adjacent to the Bear Den Mountain Trailhead and desires to install additional EV Chargers in the River Lot. Project specifics shall be outlined through the Wild, Scenic and Recreational Rivers Act permit required by DEC. ORDA supports EV usage and wants to encourage those with electric vehicles to come to Whiteface Mountain. ORDA will install](#)

~~three (3) dual port charging units in the open parking area adjacent to NYSEF snow sports school building and near the recently renovated base lodge in order to encourage those with electric vehicles to come to Whiteface Mountain.~~

15. Install Prefabricated Freestanding Restroom – an approximately 10 feet by 20 feet precast concrete restroom building will be installed adjacent to the Timing Building and replace the existing outhouse building. The building will house two toilet rooms served by non-potable snowmaking water and a proposed onsite wastewater treatment system. The exterior of the building will employ stained concrete form liner patterns to simulate a stone and/or clap board siding.

C. Projected Use

The actions proposed in this UMPA are intended to better distribute skiers on the mountain and not necessarily to significantly increase the levels of use at Whiteface.

See section IV.B of the 2018 UMPA for a discussion of attendance numbers and projected future use.

D. Actions Approved in Previous UMPs which are Part of [this UMP e Foregoing 5-year Plan Amendment](#)

The status of all pre-2018 UMPA management actions remain the same as they were in the 2018 UMPA. Per section 1 above, some of the new management actions in the 2018 UMPA have been completed and other actions approved in the 2018 UMPA are no longer proposed. **Table 1**, Status of Management Actions, in **Exhibit 1** has been updated to reflect changes in the status of previously approved actions and to include the new 2021 management actions.

E. Prioritization and Schedule of Management Actions

The following is a listing of new 2021 management actions by priority.

Top Priority

- Widen Upper Thruway Trail
- Widen Upper Parkway Trail
- Widen Lower Thruway Trail
- Widen Burton's Trail
- New Lift Between Bear Den and Legacy Areas with Skiable Trail Underneath
- Install EV Chargers

Moderate Priority

- New Yellow Dot Trail
- Widen Wildway Trail
- New High Country Road Trail
- Widen 2200 Road

- Replace Outhouse Building with Toilet Building

Lower Priority

- Widen Danny’s Bridge and Brookside Trails
- New Mountain Biking Trails
- New Hiking Trails
- NYSEF Building Expansion

The anticipated schedule for implementing these management actions is as follows

Management Action	Anticipated Implementation	
	2022	2023
New Yellow Dot	X	
New High Country Road		X
Widen Wildway		X
Widen 2200 Road		X
Widen Upper Thruway	X	
Widen Upper Parkway	X	
Widen Lower Thruway		X
Widen Burtons		X
Widen Danny's Bridge	X	X
Widen Brookside	X	X
Bear Den to Legacy Lift	X	X
Hiking Trails	X	X
Biking Trails	X	X
Expand NYSEF (2025)		

Any trail construction related to Hiking and Mountain Biking trails will not take place until the DEC restriction on trail construction is lifted.

F. Ski Trail Mileage With 2021 Management Actions

Below is an updated version of the 2018 UMPA Trail and Glade Mileage Summary table that includes the 2021 UMPA trail adjustments / new management actions, previously approved trails no longer proposed, and mileage of the existing glades.

There are no changes to the calculated glade mileage between the 2018 UMPA and the 2021 UMPA. The “Slide View Glade” that was created subsequent to the approval of the 2018 UMPA (see 2021 Draft UMPA Section 1-1) is in the same location as previously approved trail 12a. Since the length of trail 12a is already included in the table under “Approved Trail” mileage, it is not included in the glade mileage entry in the table below. If it was also included in the glade mileage table entry, this would result in a calculation redundancy (double counting) in the

mileage calculations. As shown in the table, even if the mileage of glades is included, total mileage is still below the 25-mile Constitutional limit established for Whiteface Mountain. See **Exhibit 2**, Updated Trail Mileage Calculations, for details.

### 2021 Trail and Glade Mileage Summary

<b><i>Summary of Totals</i></b>	<b><i>(In Miles)</i></b>
Total Existing Trails	19.95
Total Approved/Not Constructed Trails	2.79
<b><i>Total Existing and Approved Trails</i></b>	<b><i>22.74</i></b>
Total Proposed Trails	0.25
Total Previously Approved, No Longer Proposed Trails	-0.32
<b><i>Total Existing/Approved and Proposed Trails</i></b>	<b><i>22.67</i></b>
Constitutional Trail Mileage Limit	25.00
<b><i>Total Allowable Trail Mileage Remaining</i></b>	<b><i>2.33</i></b>
Total Existing/Approved and Proposed Trails	22.67
Total Existing Glades	2.14
<b><i>Total Existing/Approved and Proposed Trails and Glades</i></b>	<b><i>24.81</i></b>
<i>Conceptual Trails and Glades from Previous UMP's</i>	<i>1.14</i>

### Section 3 Analysis of Potentially Significant Environmental Impacts

ORDA, in conjunction with NYS DEC, and in cooperation with NYS APA, have closely examined, potential environmental impacts that could occur as a result proposed management actions in accordance with the requirements of SEQRA (6 NYCRR Part 617). **Exhibit 9** contains a completed Parts 1-3 of a SEQRA full environmental assessment form (FEAF) and a SEQRA Negative Declaration documenting why preparation of an Environmental Impact Statement is not warranted.

#### A. Impact on Land

Steep slope construction, shallow depth to bedrock, extended construction duration, and the erosion potential of the site’s soils all contribute to the potential for erosion of soil that is exposed during construction. Shallow depth of bedrock may require blasting of rock in some areas.

Site soils and the 2021 proposed management actions are shown on **Figure 5 in Exhibit 3**.

The following table shows the management actions that are proposed in areas of 993F and RaF soils with bedrock at 20 to 40 inches below grade, and actions proposed in HrF soils where bedrock is 10 to 20 inches below grade. (See Figure 5 in Exhibit 3 for a legend of soil series names and symbols.)

#### Site Soils – Bedrock

MANAGMENT ACTION	SOIL SERIES						
	993F*	HrF**	RaF*	MnD	MkD	MkC	FnD
<a href="#">Widen Upper Thruway Trail</a>	-	-	√	-	-	-	-
<a href="#">Widen Upper Parkway Trail</a>	-	√	√	-	-	-	-
<a href="#">Widen Lower Thruway Trail</a>	-	-	√	-	-	-	-
<a href="#">Widen Burton's Trail</a>	-	-	√	-	-	-	-
<a href="#">New Bear Den to Midstation Lift</a>	-	-	√	√	√	-	-
<a href="#">New Yellow Dot Trail</a>	√	-	-	-	-	-	-
<a href="#">Widen Wildway Trail</a>	-	√	-	-	-	-	-
<a href="#">New High Country Road Trail</a>	-	√	√	-	-	-	-
<a href="#">Widen 2200 Road Trail</a>	-	√	√	-	-	-	-
<a href="#">Widen Danny's Bridge Trail</a>	-	-	-	√	√	-	-
<a href="#">Widen Brookside Trail</a>	-	-	-	-	√	-	-
<a href="#">Expand NYSEF Building</a>	-	-	-	-	-	√	-
<i>*bedrock @ 20-40"</i>	-	-	-	-	-	-	-
<i>** bedrock @ 10-20"</i>	-	-	-	-	-	-	-

MANAGMENT ACTION	SOIL SERIES
------------------	-------------

-	993F*	HrF**	RaF*	MnD	MkD	MkC	FnD
Widen Upper Thruway Trail	-	-	√	-	-	-	-
Widen Upper Parkway Trail	-	√	√	-	-	-	-
Widen Lower Thruway Trail	-	-	√	-	-	-	-
Widen Burton's Trail	-	-	√	-	-	-	-
New Bear Den to Arena Lift	-	-	√	√	√	-	-
New Yellow Dot Trail	√	-	-	-	-	-	-
Widen Wildway Trail	-	√	-	-	-	-	-
New High Country Road Trail	-	√	√	-	-	-	-
Widen 2200 Road Trail	-	√	√	-	-	-	-
Widen Danny's Bridge Trail	-	-	-	√	√	-	-
Widen Brookside Trail	-	-	-	-	√	-	-
New ADA Hiking /Biking Trail	-	-	-	-	-	-	√
Expand NYSEF Building	-	-	-	-	-	√	-
*bedrock @ 20-40"	-	-	-	-	-	-	-
** bedrock @ 10-20"	-	-	-	-	-	-	-

Blasting – see pages V-1 through V-3 in the 2018 UMPA for a full discussion of measures to be implemented to avoid and minimize impacts associated with blasting, should blasting be required.

Site topography and the 2021 proposed management actions are shown on **Figure 6 in Exhibit 3**.

The following table shows the erosion potential of the soils in the areas of the proposed management actions. Steepest (F) slope soils have severe erosion potential. Erosion potential decreases to moderate in less steep D soils. Erosion potential in the MkC soils is slight. (See Figure 3 in Exhibit 3 for a legend of soil series names and symbols.)

### Site Soils – Erosion Potential

MANAGEMENT ACTION	SOIL SERIES						
	993F***	HrF***	RaF***	MnD**	MkD**	MkC*	FnD**
Widen Upper Thruway Trail	-	-	√	-	-	-	-
Widen Upper Parkway Trail	-	√	√	-	-	-	-
Widen Lower Thruway Trail	-	-	√	-	-	-	-
Widen Burton's Trail	-	-	√	-	-	-	-
New Bear Den to Midstation Lift	-	-	√	√	√	-	-
New Yellow Dot Trail	√	-	-	-	-	-	-
Widen Wildway Trail	-	√	-	-	-	-	-
New High Country Road Trail	-	√	√	-	-	-	-
Widen 2200 Road Trail	-	√	√	-	-	-	-

<a href="#">Widen Danny's Bridge Trail</a>	-	-	-	√	√	-	-
<a href="#">Widen Brookside Trail</a>	-	-	-	-	√	-	-
<a href="#">Expand NYSEF Building</a>	-	-	-	-	-	√	-
<i>***severe erosion potential</i>	-	-	-	-	-	-	-
<i>** moderate erosion potential</i>	-	-	-	-	-	-	-
<i>* slight erosion potential</i>	-	-	-	-	-	-	-

MANAGEMENT ACTION	SOIL SERIES						
	993F***	HrF***	RaF***	MnD**	MkD**	MkC*	FnD**
-	-	-	-	-	-	-	-
<a href="#">Widen Upper Thruway Trail</a>	-	-	√	-	-	-	-
<a href="#">Widen Upper Parkway Trail</a>	-	√	√	-	-	-	-
<a href="#">Widen Lower Thruway Trail</a>	-	-	√	-	-	-	-
<a href="#">Widen Burton's Trail</a>	-	-	√	-	-	-	-
<a href="#">New Bear Den to Legacy Lift</a>	-	-	√	√	√	-	-
<a href="#">New Yellow Dot Trail</a>	√	-	-	-	-	-	-
<a href="#">Widen Wildway Trail</a>	-	√	-	-	-	-	-
<a href="#">New High Country Road Trail</a>	-	√	√	-	-	-	-
<a href="#">Widen 2200 Road Trail</a>	-	√	√	-	-	-	-
<a href="#">Widen Danny's Bridge Trail</a>	-	-	-	√	√	-	-
<a href="#">Widen Brookside Trail</a>	-	-	-	-	√	-	-
<a href="#">New ADA Hiking /Biking Trail</a>	-	-	-	-	-	-	√
<a href="#">Expand NYSEF Building</a>	-	-	-	-	-	√	-
<i>***severe erosion potential</i>	-	-	-	-	-	-	-
<i>** moderate erosion potential</i>	-	-	-	-	-	-	-
<i>* slight erosion potential</i>	-	-	-	-	-	-	-

Erosion from Steep Slope Construction – see pages V-3 through V-9 of the of the 2018 UMPA for a thorough discussion of the measures to be undertaken to minimize soil erosion and prevent sedimentation in surface waters.

**B. Impact on Geological Features**

The cirques and aretes that are the unique geological features identified near summit of Whiteface Mountain will not be affected. The only management action proposed on or near the summit is a hiking trail that will make use of an existing ski trail.

**C. Impact on Surface Water**

See **Figure 7 in Exhibit 3** that shows mapped NYSDEC streams, mapped APA wetlands, and mapped waters of the US.

The location of the blue line stream 830-269 on Figure 7 is incorrect. The stream does not pass through the area of proposed widening of Brookside trail. This stream is located north of the Boreen Trail which is removed from any proposed management actions. The green line stream NWI mapping on **Figure 7** is closer to the actual location of the stream than the blue line stream.

This same stream flows past the NYSEF building, approximately 60 feet away from the north side of the existing building. **Exhibit 6** contains an initial assessment of stormwater management associated with the proposed building expansion. Installing drip strips or bioretention is recommended to capture additional runoff generated by the building expansion prior to runoff reaching the nearby stream.

The proposed hiking trails and mountain bike trails involve 11 new bridged stream crossings. Wherever possible, trails were sited to cross streams using existing alpine ski trails crossings. The 11 proposed bridge crossings will be clear spans with the crossing openings at least 1.25 times the stream width as measured bank to bank at the ordinary high water level. ~~See Exhibit 5 for a description and mapping of the stream crossings and Exhibit 5B for details of clear span bridge construction.~~

Hiking and mountain bike trail crossings of minor drainages and seasonal streams (unclassified and un-mapped) will be crossed either with stepping stones (for hiking trails), stone paved armor crossings or culverts. If culverts are to be used, they will be appropriately sized and placed so as to prevent scouring, erosion, clogging, and ponding, and shall be embedded so that the substrate and bedding is similar to the natural drainage.

Prior to construction, ORDA will have all work areas examined for unmapped waters and wetlands. If needed, permit applications will be filed with the proper regulatory agency(ies) for any unavoidable impacts to waters or wetlands (see Section 4 of this UMPA).

Measures to mitigate potential sedimentation impacts to surface waters from construction area soil erosion were discussed previously in section 3.A above.

There will be an incremental increase in snowmaking water withdrawal from the West Branch AuSable River to produce snow on the new trails and on the enlarged trails. ORDA will continue to abide by their current Cooperative Agreement with NYSDEC that controls snowmaking water withdrawal rates from the West Branch AuSable River.

D. Impact on Groundwater

No potential impacts associated with the proposed management actions were identified.

E. Impact on Flooding



No structures or any other type of fixed object are proposed to be placed in the floodplain of the West Branch AuSable River.

F. Impact on Air

No potential impacts associated with the new management actions were identified.

G. Impact on Plants and Animals

1. Significant Communities

Other than some proposed short, new hiking trails, the 2021 new management actions will not occur in any of the significant communities identified for the area by NY Natural Heritage Program in 2017<sup>3</sup>: ice cave talus, open alpine, alpine krummholz, mountain spruce fir or mountain fir. Proposed 2021 actions are in the following communities as illustrated on **Figure 9 in Exhibit 3**.

- Pioneer Hardwood Spruce-Fir (I): New Yellow Dot Trail, widening Wildway Trail (partial)
- Northern Hardwood (N): widening Wildway (partial), New High Country Road Trail, widening 2200 Road Trail, widening Upper Thruway Trail, widening Upper Parkway Trail, widening Lower Thruway Trail, widening Burton's Trail, New Bear Den to Legacy Lift (partially within White-Red Pine (W)), widen Danny's Bridge Trail, widen Brookside Trail, Expand NYSEF Building, ADA Hiking/Biking Trail.

2. Bicknell's Thrush (VINS Recommendations for Minimization of Project Impacts and Measures to be Incorporated at Whiteface Mountain)

Four (4) proposed hiking trails, or sections of these trails, are located in areas of mountain spruce fir forest and potential Bicknell's thrush habitat (>2,800' elevation, spruce-fir forest community).<sup>4</sup> See **Figure 10 in Exhibit 3**. ~~See the full trail descriptions of trails in Exhibit 5.~~

Hiking Trail "I" (Top of Summit Quad Lift to the Summit) is a proposed 0.3 mile trail that would replace the existing steep, unsustainable alignment, which is essentially a straight line, steep, +/- 0.13 mile climb from the top of the Summit Lift to the summit of Whiteface Mountain. The existing summit trail will be abandoned upon completion of the new trail to the summit. The proposed gradual Trail I would form a switch back to the summit after it connects with the existing Wilmington hiking trail. ~~Trail I is proposed to have a clear width of 6 feet when constructed.~~ For the existing straight uphill trail connecting the top of the Summit Lift to the summit of Whiteface Mountain, Tahawus Trails estimates that the time it could take for this

<sup>3</sup> A 2021 response letter from Natural Heritage Program focused on only that part of the Intensive Use Area where new management actions (other than proposed hiking and mountain biking trails) and previously approved, but not yet constructed actions are located. This resulted in Natural Heritage Program identifying the Mountain Spruce-Fir community and the Mountain Fir Forest community in their June 4, 2021 letter, a copy of which is included in Exhibit 8.

<sup>4</sup> All proposed mountain biking trails are located below elevation 2800'.

trail to revert back to vegetation at levels comparable to the adjacent forest would vary depending on the closure approach. With complete abandonment and no reforestation efforts, Tahawus Trails estimates 15-30 years. That time would decrease with naturalization efforts such as moving brush from the forest into the trail corridor. This would help to reduce runoff, block potential rogue trail users, and expedite the reintroduction of woody materials to the forest floor.

Trail "H" (Little Whiteface Mountain Ridge Trail) follows the northwest ridge of Little Whiteface to Parsons Run ski trail which continues up to the top of the Summit Lift and the mountain summit is beyond. This is a 0.25 mile section of proposed trail ~~that will have a clear width of six (6) feet.~~

Trail "C" (Little Whiteface Summit Path) is an existing 0.1 mile herd path that circumnavigates the summit of Little Whiteface. ~~The herd path will be widened to 6 feet and stone cribbing, benching and 2-3 wooden ladders are proposed to be installed.~~

Trail "K" (Parons Run to the Bottom of the Slides) is a 0.7 mile trail that will be a combination of new trail construction and existing ski trails. New construction will involve 0.2 miles of trail constructed between Parsons Run to Niagara.

The following language regarding mitigating potential impacts to Bicknell's thrush is ~~from the contained within the~~ 2006 UMPAA ~~which and~~ is incorporated into this 2021 UMPA. ~~by reference:~~

The primary resource for the analysis of impacts for trail construction above 2,800 feet is the Vermont Institute of Natural Science (VINS) report titled, "Evaluating the Use of Vermont Ski Areas by Bicknell's Thrush: Applications for Whiteface Mountain, New York" (BTAWM)<sup>5</sup>. The Executive Summary of the BTAWM states that there was "*no evidence that nest predation rates differed between ski area and natural forest plots, or that nests in either plot type were more likely to be depredated*", and that "*we (VINS) found no significant differences in adult survivorship, nest success, or breeding productivity of Bicknell's Thrushes between ski areas and natural forests.*" These findings indicate that development of ski trails on Whiteface Mountain can continue in partnership with sound environmental stewardship. The BTAWM includes recommendations for minimization of project impacts, recommendations for post-construction habitat maintenance, recommendations for project mitigation, recommendations for population monitoring, and introduces suggestions for opportunities for conservation education. The design and construction practices for all ski trails and other management actions over 2,800 feet elevation at WFM has embraced, and will continue to embrace, these aspects of the report. Additionally, WFM will embrace the opportunity to incorporate the BTAWM mitigation recommendations into the overall environmental stewardship program for all developed areas of the ski area over 2,800 feet.

<sup>5</sup>Rimmer, Christopher & McFarland, Kent & Lambert, J. & Renfrew, Rosalind. (2004). Evaluating the Use of Vermont Ski Areas by Bicknell's Thrush: Applications for Whiteface Mountain.

Field monitoring by the Wildlife Conservation Society's Adirondack Communities and Conservation Program (WCS) was performed in two seasons (summer 2004, 2005) on developed, proposed to be developed, and not proposed for development areas of the mountain. Findings showed no statistically significant effect of ski trails on the presence of Bicknell's Thrush, although WCS cautioned that sample sizes were small due to the nesting behavior of Bicknell's Thrush. WCS's study at Whiteface Mountain is funded by a State Wildlife Grant with matching funds provided by ORDA.

The following text addresses the recommendation of the BTAWM report in the order that the recommendations were presented in the BTAWM report.

### Methods for Avoidance of Project Impacts

#### 1. Timing of Construction Activities

a. Tree cutting operations above 2,800 feet in terrain identified as suitable Bicknell's habitat shall be prohibited between the dates of 15 May and 01 August to minimize impacts during the active nesting cycle. Additionally, during these times, all other construction activities above 2800 feet in terrain identified as suitable Bicknell habitat shall be reviewed for potential impact. Activities that may cause negative impact to Bicknell's Thrush will be scheduled for other times.

#### 2. Avoid Trail Construction within Suitable Bicknell's Thrush Habitat

a. Management actions should be designed to attempt to avoid areas where natural disturbance, either chronic or random, may be of suitable habitat for Bicknell's Thrush. These areas include west-facing slopes, ridgelines, fir waves and areas adjacent to fir waves that have been explored in the field with Department of Environmental Conservation staff and the Wildlife Conservation Society staff. While it is impossible to completely avoid all the above referenced areas and develop a ski trail system that provides suitable carrying capacities and adequate skier safety, all attempts have been made in the layout of the trails and will continue to be made during construction of the trails to minimize negative impact.

b. Widening of existing trails will embrace the same sensitivity as discussed above to areas where natural disturbance, either chronic or random, may be of suitable habitat for Bicknell's Thrush.

c. BTAWM recommends that ski trails should be less than 35-40m (115 feet to 131 feet) in width.

### Management Goals for Post-Construction Habitat Maintenance

## 1. Vegetation Management

- a. Ski trail vegetation management will include the feathering of trail edges, usually the wind-exposed side of the trail. This technique will develop a space between the ski trail and trees greater than five (5) meters to include woody vegetation of heights of 0.5-2 meters or more.
- b. Regeneration cuts to keep the spruce-fir feathered edge as a dense thicket will be performed as infrequently as possible to maximize Bicknell's Thrush habitat availability and continuity.
- c. WFM will partner with Stratton Ski Center for a review of vegetation management techniques that have been administered in Stratton's efforts of Bicknell's Thrush habitat management.

## 2. Glade Management

- a. Cleared vegetation on existing Glade trails will not be expanded beyond the current limits. Existing Glade trails will be kept as narrow as possible.
- b. Remaining patches of understory will be left in place when possible and minimally altered as required.
- c. New Glade disturbance will minimize understory removal.
- d. Annual maintenance will ensure that some young saplings are retained in order to allow continual recruitment for older age trees.
- e. Efforts will continue to prevent all unauthorized glade trail establishment and maintenance, or unauthorized habitat alteration.

## 3. Island Sizing and Spacing

- a. Islands will be designed to avoid small sizing. Size will be maximized and number of islands will be limited to facilitate movement of Bicknell's Thrush among suitable habitat patches and provide increased nesting opportunities.

## 4. Timing of Vegetation Management

- a. Timing of vegetation management in areas of Bicknell's thrush breeding habitat will be delayed until August 1 after most nesting activity has been completed.

## 5. Bicknell's Thrush Habitat Management Plan

a. A Bicknell's Thrush Habitat Management Plan is being developed and employed at Whiteface Mountain Ski Center. The management plan will be developed in the same spirit of cooperation as were the mitigation efforts presented in this document. DEC, APA, VINS, Audubon New York and WCS will assist WFM in the development of this plan. The plan will include items such as: GPS Identification, Scheduling, Orientation of Staff, Collaboration with other Ski Areas that have experience in these efforts, Periodic Evaluation and Review, and all other positive means the group determines to have a value at obtaining the program goals.

### Recommendations for Project Mitigation

#### 1. Mapping of Bicknell Thrush Habitat

a. Habitat for Bicknell's Thrush is inherently patchy and dynamic. Because Bicknell's Thrush respond to natural disturbances that are sometimes ephemeral in nature, it is difficult to accurately predict whether or not Bicknell's Thrush will occupy a given area. Regardless of whether a habitat classification is accomplished by means of satellite imagery or high-resolution aerial photographs, there will still be considerable inaccuracy in estimating the amount of habitat that is actually occupied.

#### 2. No Net Loss Mitigation

a. No net loss of Bicknell's Thrush habitat will be achieved by the creation of potential new habitat during the construction of new trail systems. Trail edges will be opened up and/or feathered to allow suitable habitat to grow. The planting of balsam fir seedlings will be targeted in areas that have potential for creating habitat.

b. Ski lift openings will be included in the Bicknell's Thrush Habitat Management Plan. Edges will be feathered to develop new habitat when allowed by NYS Department of Labor ski trail construction regulations.

c. Passive revegetation through natural succession will be embraced on existing trails that become obsolete. This process has begun at Trail #52 "Yellow Brick Road" which is at an elevation above 3,650 feet.

d. Restoration and new trail construction will include planting of balsam fir seedlings and saplings.

#### 3. Consolidation of Habitat Islands

a. Consolidation of existing small, adjacent habitat fragments (<0.1ha) into single, large blocks will be targeted as part of the passive revegetation planning. This process has begun at Trail #52 "Yellow Brick Road". The elimination of this trail will allow for the development of a larger potential habitat.

#### 4. Protection of Mitigation Sites

- a. Sites selected for forest regeneration will be protected with barriers from skier traffic and accidental passes by mechanized equipment.
- b. Protection barriers will include conspicuous signage to inform potential users about the closure and will educate them about its benefits.

#### 5. Habitat Development Standards

a. VINS in the BTAWM recommends that the development of standards to evaluate the success of the habitat restoration efforts is needed. The standards need to include explicit objectives for restoration:

- Timeline and measures to objectively determine success
- Continuing field surveys to monitor progress
- Contingency plan to address any failures in the restoration efforts
- Evaluation Standards

Currently there are no standards or explicit protocols to guide restoration of montane forest habitat. ORDA and WFM will continue to partner with the NYSDEC, APA, VINS, Audubon New York and WCS and establish Such protocols. Habitat Restoration and Evaluation Standards shall be included in the Bicknell's Thrush Habitat Management Plan to ensure a holistic approach.

#### 6. Hispaniola Wintering Grounds

a. The recommendation for the State of New York to contribute to a fund in the Dominican Republic to protect forest vegetation is not a measure that ORDA is able to authorize or in which it can participate.

b. The promotion of public awareness to the activities affecting the Bicknell's Thrush in the Dominican Republic is an activity in which ORDA is available to participate. ORDA will provide opportunities to non-for-profit groups to host informational and fund-raising events at ORDA venues. Additionally, ORDA will work to include information on the Hispaniola wintering grounds for the Bicknell's thrush in the conservation educational opportunities. ORDA and the DEC will work with stakeholder groups to develop a public/private partnership to create a mitigation fund for Bicknell's Thrush wintering habitat on the island of Hispaniola. ORDA and DEC will form part of a steering committee with non-profit 501©3 organizations, including: the Adirondack Council, Audubon New York, Cornell Laboratory for Ornithology, the Nature Conservancy, Vermont Institute of Natural Sciences, and the Wildlife Conservation Society to develop interpretative kiosks and other information at the Whiteface ski facilities to promote Bicknell's Thrush habitat conservation. A mitigation fund dedicated to protection actions

by Hispaniola non-profit conservation organizations focusing on the wintering range will be established and administered through a non-governmental fiduciary agent, such as the Adirondack Community Trust. The initial mitigation fund will be supplemented by a broad-based approach to securing additional public and private funds for this purpose.

## Recommendations for Population Monitoring

### 1. Sampling Methods

a. After a comprehensive review of available monitoring options expressed in the BTAWM and meetings with VINS and the WCS, it was agreed that a standard point count sampling method would be endorsed. The WCS used this method for the 2004 and 2005 monitoring season (see WCS reports: "Use of Whiteface Mountain by Bicknell's Thrush and other Montane Forest Birds Species" (Glennon and Karasin 2004) and "Use of Whiteface Mountain by Bicknell's Thrush and other Montane Forest Birds Species" (Glennon and Karasin 2005)).

### 2. Monitoring

a. The short-term monitoring program includes immediate implementation of ~~mitigation~~[mitigation](#) measures such as a limited construction season above 2,800 feet and updates to contract documents informing everyone working on-site is aware of this species of special concern. The intent of the short-term program is to obtain a third season of data collection before disturbance to the TIP area and a season of monitoring after disturbance is incurred. Work in other trail areas detailed in this Amendment may start before the third season of data collection.

b. A long-term monitoring program has not been completely established. Mountain Bird Watch will continue to be active on Whiteface Mountain and that post construction monitoring will be required to fully document the impact of the TIP project. A Bicknell's Thrush Population Management Plan will be developed for Whiteface Mountain Ski Center. The plans for long-term monitoring of Bicknell's Thrush be integrated into the Bicknell's Thrush Habitat Management Plan, such that habitat evaluation and thrush monitoring be coordinated in an adaptive management framework.

c. The management plan will be developed in the same spirit of cooperation as were the mitigation efforts presented in this document. DEC, APA, VINS, Audubon New York and WCS will assist WFM in the development of this plan.

## Opportunities for Conservation Education

### 1. Development of Informational Displays

a. WFM has developed several informational displays to educate visitors about the

Bicknell's Thrush and other montane forest bird species. Displays are present not only at Whiteface Mountain, but also on ORDA's website and at other ORDA venues.

b. ORDA will develop an informational display that can be used at other venues to educate visitors about the Bicknell's Thrush and other montane forest bird species.

c. DEC will work to help secure funds for kiosks.

## 2. Public Programs

a. WFM will work with the New York State Department of Environmental Conservation and the Adirondack Park Agency Visitors Interpretation Centers to Develop a partnership in developing public programs on montane forest ecology.

## 3. Summer Field Trips

a. WFM has expanded its weekly nature walks to a daily nature walk program for the summer operating season.

## 4. Develop Booklets and Brochures Summarizing the Ecology of WFM.

a. The Whiteface Wildlife program was started in 2003 and provides visitors a brochure detailing wildlife on WFM.

b. A web page will be added to the WFM and ORDA web sites. The page will detail the Whiteface Wildlife program and other environmental stewardship efforts.

## 3. Tree Cutting

Tree counts in this section relate only to constitutionally authorized ski trail widening and construction. The following table summarizes the tree cutting on Forest Preserve lands that will be needed to construct the proposed management actions. Detailed tree cutting data is in **Exhibit 54**. Total affected area is 12.5 acres of the 2,910-acre intensive use area.

The ~~net~~total number of trees greater than 3 inches to be cut is 3,335~~reduced over what was contained in the Draft UMPA (9,707 vs. 13,091 in Draft UMPA)~~ and the ~~total~~net cutting of 1-3" dbh is 6,593. ~~increases (19,802 vs. 14,738 in the Draft UMPA). The calculation errors in the Draft UMPA that are corrected here occurred when adding the tree cutting for hiking and mountain biking trails to the tree cutting for other management actions. The table that follows also provides numbers of trees previously approved to be cut that are no longer proposed to be cut.~~

These numbers of trees to be cut are reduced over the numbers contained in the Public Draft of



this UMPA because the tree cutting associated with management actions that were previously approved, but no longer proposed as part of this 2021 UMPA are now included in the calculations (they were not included in the Public Draft). ~~All cutting will be performed in accordance with DEC tree cutting policy LF-91-2.~~

<u>Tree Counts - 2021 Whiteface UMPA</u>			<u>Tree Counts - Homologated Trails</u>	
<u>Management Action</u>	<u>&gt;3"</u>	<u>1-3"</u>	<u>&gt;3"</u>	<u>1-3"</u>
<u>Upper Thruway</u>	<u>1,828</u>	<u>4,055</u>	<u>6,097</u>	<u>13,517</u>
<u>Upper Parkway</u>	<u>958</u>	<u>2,124</u>		
<u>Lower Thruway</u>	<u>2,524</u>	<u>5,600</u>		
<u>Burton's</u>	<u>787</u>	<u>1,738</u>		
<u>Lift D</u>	<u>1,408</u>	<u>1,738</u>		
<u>Trail 93 under Lift D</u>	<u>1,789</u>	<u>580</u>		
<u>Yellow Dot</u>	<u>73</u>	<u>81</u>		
<u>Wildway</u>	<u>90</u>	<u>7</u>		
<u>High Woods Road</u>	<u>678</u>	<u>1,661</u>		
<u>2200 Road</u>	<u>451</u>	<u>34</u>		
<u>Danny's Bridge</u>	<u>440</u>	<u>378</u>		
<u>Brookside</u>	<u>1,108</u>	<u>359</u>		
<u>NYSEF Expansion</u>	<u>110</u>	<u>36</u>		
<b><u>SUBTOTAL NEW ACTIONS</u></b>	<b><u>12,244</u></b>	<b><u>18,391</u></b>		
<u>(-) Trail 88</u>	<u>1,608</u>	<u>1,389</u>		
<u>(-) Trail 89</u>	<u>1,360</u>	<u>2,144</u>		
<u>(-) Lift B Replace/Extend</u>	<u>1,544</u>	<u>811</u>		
<u>(-) Lift I Realignment</u>	<u>2,209</u>	<u>2,024</u>		
<u>(-) Trail 30 Widening</u>	<u>711</u>	<u>3,732</u>		
<u>(-) Lift C Realignment</u>	<u>1,457</u>	<u>1,698</u>		
<b><u>SUBTOTAL NO LONGER PROPOSED</u></b>	<b><u>8,889</u></b>	<b><u>11,798</u></b>		

	<u>NET</u>	<u>3,355</u>	<u>6,593</u>			
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For just the trees to be cut for the new management actions proposed in this UMPA (not taking into account previously approved management actions that have been abandoned in 2021) 50% of the > 3" dbh trees to be cut are associated with the homologation of race trails, while nearly ¾ (73%) of 1-3" dbh to be cut are associated with the homologated race trails.

International ski race course such as those that will be used for the 2023 World University Games, must meet international dimensional course standards, including trail widths, which provide a suitable race course and are protective of ski racer safety (which is also protective of recreational skier safety). Of the total new tree clearing proposed for all new management actions in the draft UMP, ~~nearly two-thirds (2/3), or 64%,~~ the vast majority of the total trees to be cut are for widening of existing trails in order to meet Federation Internationale de ski (FIS, International Ski Federation) trail homologation standards involving the existing Upper Thruway, Upper Parkway, Lower Thruway and Burtons ski trails.

Cutting will occur over a two year time period. All of this cutting will take place outside of any critical habitats, including outside of any Bicknell's thrush habitat. All cutting will be performed in accordance with ~~DEC tree cutting policy LF-91-2,~~ the DEC Tree Cutting Policy.

~~the amount of Abandonment of previously approved trails 89 and 90 results in cutting of 3,452 trees 3" DBH and larger no longer being proposed. No longer proposing the Bear Lift (B) extension results in not needing to cut 2,305 trees 3" DBH and larger. The net proposed tree cutting for actions in this 2021 UMPA is 14,738 trees 3" DBH and larger. All cutting will be performed in accordance with DEC tree cutting policy LF-91-2.~~

#### 4. Lower Mountain Habitat Fragmentation

Regarding fragmentation of habitats on lower elevations on Whiteface as a result of hiking trail and mountain biking trail construction, these proposed activities will be occurring in the context of an already highly disturbed landscape within this Intensive Use Area, and over half of the proposed hiking and mountain biking trails make use of existing trails at Whiteface and do not require tree cutting.

~~For the proposed 3-5 feet wide mountain biking trails, half (49%) will be constructed using existing trails (7.9 miles) while 8.1 miles will require tree cutting (source: Exhibit 5, Summary of Proposed New Biking Trails table, p. 2).~~

For the 2-5 foot wide proposed hiking trails, 56% make use of existing trails (6.1 miles make use of existing ski trails and 4.7 miles will require tree cutting (source: Exhibit 5, Summary of Proposed New Hiking Trails table, p.4).

Since the landscape into which new hiking and mountain biking trails will be introduced at lower elevations is already highly fragmented, and because half (1/2) of these narrow trails will make use of currently disturbed areas, lower mountain habitat fragmentation is not viewed as a significant issue.

H. Impact on Agricultural Resources

No impacts associated with the proposed management actions were identified.

I. Impact on Aesthetic Resources

Changes in views of Whiteface from/near Route 86 because of the new management actions were assessed from 3 locations: at the entrance to Whiteface, on Fox Farm Road approaching the Route 86 intersection, and on Route 86 between Jay and Wilmington where there is a view of the mountain and its surroundings across an open field. Existing conditions photographs from these three locations, along with graphics illustrating new management actions within the views from the three locations are in **Exhibit 7**. Portions of the new lift will be visible from all 3 locations and part of the new Yellow Dot Trail will be visible from near the entrance, but not the other 2 locations. This additional development will not cause any significant visual impacts because the new management actions will be visible within the context of the existing lifts and trails currently visible on Whiteface.

J. Impact on Historic and Archeological Resources

NYS Office of Park Recreation and Historic Preservation (OPRHP) has determined that the proposed management actions in the 2021 UMPA will not impact historic or archeological resources. A copy of OPRHP's April 20, 2021 determination letter is in **Exhibit 8**.

K. Impact on Open Space and Recreation

The proposed management actions in the UMPA will have positive impacts on Open Space and Recreation. Management actions aimed at improving skier satisfaction and skier safety are proposed within the context of the currently developed areas within the Whiteface Mountain Intensive Use Area. The proposed hiking trails and mountain biking trails will expand the range of recreational opportunities available at Whiteface.

L. Impact on Critical Environmental Areas

There are no designated CEAs in the area of the proposed management actions. No impacts were identified.

M. Impact on Transportation

No impacts associated with the proposed management actions were identified. The proposed management actions are not intended to significantly increase attendance which would result in greater traffic generation.

N. Impact on Energy

The new lift will require additional electric energy. The amount of additional energy required for the new lift can be supplied by the renewable energy source and the local grid that currently serve Whiteface.

O. Impact on Noise, Odor, Light

There will be noise generated by construction activities as the new management actions in this UMPA are undertaken. Trail construction and widening and lift installation will involve cutting trees and land grading with mechanical equipment that generates noise. Lift installation may also involve the use of helicopters to set the towers for the new lift. Noise-generating activities will be short term and temporary and will occur within the interior of the intensive use area removed from sensitive noise receptors. None of the 2021 proposed management actions will be a significant source of odor or light.

P. Impact on Human Health

No impacts associated with the proposed management actions were identified.

Q. Consistency with Community Plans

Whiteface is an integral component of the Wilmington community. No inconsistencies with local land use plans were identified.

R. Consistency with Community Character

Whiteface is an integral component of the character of the Wilmington community. No impacts to community character were identified.

#### **Section 4      Additional Permits/Approvals Possibly Required for Implementation of Management Actions**

Additional permits may be required for certain management actions after the approval of this UMPA and prior to construction.

A.      Waters of the US, Section 404 Clean Water Act

Areas of proposed management actions will be field investigated for the presence/absence of Waters of the US, including wetlands. The limits of any such resources identified in the field will be delineated and mapped. Management actions will be adjusted, if feasible, to avoid delineated resources. Permit applications will be filed with the US Army Corps of Engineers for any unavoidable impacts to Waters of the US.

B.      NYS Regulated Wetlands, NYS ECL Article 24

There are no NYS (Adirondack Park Agency) regulated wetlands mapped for the areas of the proposed 2021 management actions. Any wetlands identified during the field investigation under “A” above will be evaluated for potential APA jurisdiction. Should any such wetlands be identified, and it is determined that there will be unavoidable wetland impacts, a permit application will be filed with APA.

C.      Wild Scenic and Recreational Rivers Act, NYS ECL Article 15

The West Branch AuSable River is a State-designated Recreational River under the Rivers Act. Any project requiring the construction of a new structure or the expansion of an existing structure within ½ mile of the River is jurisdictional and requires review and the potential application for permit to NYSDEC. Permit applications will be submitted to NYSDEC for the portion of the proposed Bear Den to Legacy Lift within ½ mile of the river, for the expansion of the NYSEF building, and for the EV chargers prior to undertaking these actions.

D.      SPDES Permit for Stormwater Discharges from Construction Activities, NYS ECL Article 17

Before commencing construction activity, the owner or operator of a construction project that will involve soil disturbance of one or more acres must obtain coverage under the State Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Construction Activity (GP-0-20-001). ORDA will prepare a Stormwater Pollution Prevention Plan (SWPPP) that demonstrates the project complies with the General Permit and submit a Notice of Intent (NOI) to NYSDEC prior to construction.