



ADIRONDACK  
ARCHITECTURAL  
HERITAGE *Celebrating 25 Years*

1745 MAIN STREET, KEESEVILLE, NY 12944  
518.834.9328 | WWW.AARCH.ORG

July 9, 2015

BOARD OF DIRECTORS

PAT BENTON  
*Blue Mountain Lake*

SALLY BERK  
*Indian Lake*

JENNIFER BETSWORTH  
*Troy*

ROBERT FAULKNER  
*Raquette Lake*

EDWARD FINNERTY  
*Lake Placid*

RICHARD FROST  
*Plattsburgh*

SUSAN HARRAL  
*Keene Valley*

DAVID HISLOP  
*Essex*

ED HODGES  
*Boston*

WILLIAM JOHNSTON  
*Wadhams*

HOWARD KIRSCHENBAUM  
*Raquette Lake*

RICHARD LEVENGOD  
*Spitfire Lake*

JOYCE MCLEAN  
*Lake Placid*

WESTER MIGA  
*Newcomb*

WILLEM MONSTER  
*Northampton*

STEFANIE NOBLE  
*Syracuse*

CAROL NORDMANN  
*Saint Regis Lakes*

MARTHA SPEAR  
*Lake Placid*

JULIA TANSOR  
*Plattsburgh*

MARCY WEISBURGH  
*Port Kent*

STAFF

STEVEN ENGELHART  
*Executive Director*

MICHELE DROZD  
*Communications and  
Development Director*

KATE RITTER  
*Program Director*

VIRGINIA SISKAVICH  
*Office Manager*

John Schmid, Natural Resources Planner  
New York State Department of Environmental Conservation  
625 Broadway, 5th Floor  
Albany, NY 12233-4254

RE: Remsen-Lake Placid Travel Corridor Unit Management Plan Amendment –  
Alternative 7

Dear John,

Thank you for this opportunity to submit comments on the Remsen-Lake Placid Travel Corridor Unit Management Plan Amendment (Alternative 7). I offer these comments as executive director of Adirondack Architectural Heritage (AARCH), the private nonprofit, historic preservation organization for the Adirondack Park. AARCH has a membership of more than 1800 people and is dedicated to protecting and preserving the irreplaceable architectural heritage, historic places, and communities of the region. In addition to our far-ranging educational programs, technical assistance work, and partnership projects, we have helped to successfully solve several contentious conflicts over the preservation of historic and cultural resources within the Forest Preserve, including at Camp Santanoni and at more than a half-dozen fire observation towers.

AARCH has long supported the preservation and public use of the railroad infrastructure within the region, including the Remsen-Lake Placid corridor and the now active corridor between Saratoga Springs and North Creek. We have seen first-hand the ways in which preservation and excursion initiatives along these corridors have enhanced the economic and cultural life of corridor communities and, as a way of recognizing this good work, we have bestowed Adirondack Architectural Heritage Awards on the Adirondack Railroad Preservation Society (2014), the Lake-Placid-North Elba Historical Society (2011), the North Creek Railroad Depot Preservation Society (1998), and the Village of Saranac Lake/Historic Saranac Lake/Adirondack North Country Association (1999) for their work to restore historic depots and bring economic life back to the railroads in the region.

AARCH has also been part of the Trail with Rails Action Committee (TRAC), a group which has worked with great energy and imagination to craft a solution to the railroad corridor issue that would allow for the continuation of rail use all the way to Lake Placid and improve the recreational opportunities within the entire corridor.

Simply put, we oppose the proposed draft amendment to the Remsen-Lake Placid Corridor Unit Management Plan that would adopt a preferred "Alternative 7" because it would diminish an important National Register listed historic resource, would forever eliminate rail service to the two most important central Adirondack communities, would shut down a successful excursion railroad between Saranac Lake and Lake Placid, and – perhaps most importantly – pulling up the tracks is not necessary to having a robust recreational trail system along the Tupper Lake to Lake Placid (or any) section of the corridor.

### **The Proposed Amendment would forever diminish an important historic resource**

Adirondack Architectural Heritage supports the preservation of the contributing historic features, including the railroad tracks themselves, of the entire New York Central Railroad, Adirondack Division, corridor, which is listed on the State and National Register of Historic Places. This corridor is an historic resource of great importance. This railroad made it possible for the interior of the western and central Adirondacks to be more widely settled and to prosper economically. Its significance is evident by its listing on both the State and National Registers of Historic Places.

We concur with the opinion of the Office of Parks, Recreation, and Historic Preservation (OPRHP) that the "removal of the railroad tracks from the historic right-of-way would be considered an **Adverse Impact** . . . and would diminish those qualities which made the railroad State and National Register of Historic Places eligible."

### **DEC has not met all of its regulatory (historic preservation) obligations**

We believe that DEC has not met its regulatory obligation under the State Historic Preservation Act (SHPA), an obligation that includes exploring "prudent and feasible alternatives" to a proposed adverse action, in this case, the removal of the tracks. What DEC should have asked and explored is whether or not a robust trail system were possible along with the tracks and recognized and embraced that a prudent and feasible alternative *was* available as per the excellent work of TRAC's volunteers and consultants to design such a compatible and robust recreational trail system .

We also believe that DEC has not met its federal regulatory obligations under Section 106 of the National Historic Preservation of 1966 (NHPA) or under Section 4f of the United States

Transportation Act of 1966. These even more stringent obligations are triggered because the proposed amendment should be considered a “federal action” because of past, current, and likely future federal involvement with the development, maintenance, and management of this corridor. It appears that DEC has been quick to decide, if not been outright dismissive, regarding these obligations has not adequately consulted with the State Historic Preservation Office or the Advisory Council for Historic Preservation.

### **The proposed UMP would forever extinguish rail service to the two most important central Adirondack communities**

We believe that a healthy transportation infrastructure for the Adirondack region should include good rail access. This provides an alternative means, besides the automobile, of getting to the region. This is especially important for (urban or lower income) visitors who may not own a car. Getting here by rail is also a greener transportation alternative, as per passenger mile, rail transportation uses less energy and generates less carbon emissions. If the tracks were removed, the opportunity to fully develop and use this rail line will be lost forever.

The full potential of this corridor for rail transportation has still not been realized but just as it took decades for the use and condition of the corridor to decline, so too will it take time for the rail infrastructure to be improved, for addition tourism services and amenities to be developed, and for ridership into and out of the region to be cultivated. All of this is in motion and just needs time and additional resources to come to fruition.

The Adirondack Scenic Railroad has demonstrated its ability, over time, to make needed improvements to the rail infrastructure, to develop new excursion rail experiences, and to provide excellent experiences along its current routes for about 85,000 users each year. We are confident in ASR’s commitment and abilities to continue to propel this railroad into a bright future. ASR is operated by a group of about 350 volunteers who give a collective 15,000 hours per year to the railroad, serving as conductors, engineers, board members and others who maintain the 119 mile corridor. Volunteers not only keep the railroad running but lower corridor maintenance costs substantially. Just as this railroad was an economic engine during its heyday, it presently has a significant economic impact within the region and will have an even greater economic impact when its potential is fully developed.

**The proposed UMP amendment would shut down a portion of a successful excursion rail business between Lake Placid and Saranac Lake.**

The short excursion railroad between Lake Placid and Saranac Lake is a major draw for thousands of tourists (from 50 states and 12 countries) in the central Adirondacks every year. That the state would make a conscious decision to eliminate a successful economic engine in the region is baffling and goes against everything that other state agencies, regional and local nonprofit organizations, and the business community have been trying to cultivate for decades here.

**There is no need to remove tracks to achieve the stated recreational trail objectives**

We believe that a robust recreational trail system is completely compatible with the existence of the railroad. The work of the Trails and Rails Action Committee (TRAC), of which we are a member, has demonstrated that the railroad is the organizing element in completing a “trails with rails” system, maintaining it, and providing access to Adirondack natural resources and communities. One of the most important reasons for the rails and trails to co-exist is the opportunity for further development of train excursions that would drop off hikers, bicyclists, campers, boaters, birders, photographers and other outdoor enthusiasts at various points along the corridor. In the middle segment of the corridor, the train is a crucial organizing element in accessing more natural areas in a managed way to avoid overuse.

AARCH supports the multiple public and nonprofit use concept for the corridor as envisioned and outlined in its 1996 management plan for this corridor, including the development of a compatible recreational trail system along the corridor.

Thanks again for the opportunity to comment on the Remsen-Lake Placid Travel Corridor Unit Management Plan Amendment – Alternative 7.

Sincerely,



Steven Engelhart  
Executive Director