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December 2, 2015

NYS Adirondack Park Agency
P.O. Box 99
1133 NYS Route 86
Ray Brook, NY 12977

Attention: Kathy Regan

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

I write to comment about the proposed amendment and provide factual information regarding the concept and design of the trail system that is addressed in Appendix 3 of the written and oral presentation made by Rob Davies, representing the NYS Department of Environmental Conservation, to Commissioners on November 12, 2015.

I am a founding member of the volunteer group of seasonal and permanent residents of the Tri-Lakes region that is called Trails with Rails Action Committee (TRAC). This group started in the early Spring of 2013, building on the work of residents in Tupper Lake who raised funds and refurbished the railway station there.

The detailed drawings in the attached binder are the result of hundreds and hundreds of hours of volunteer time spent walking, measuring, and detailing the route described. The purpose of this effort was to demonstrate that a trail can be built within and alongside the rail travel corridor from Tupper Lake towards Lake Placid.

This volunteer effort included numerous meetings with Region 5 DEC personnel in Ray Brook; in these meetings staff provided maps with land use classifications that will be part of the Saranac Lakes Wild Forest Unit Management Plan that is being prepared. The maps show existing roads, DEC designated trails (some of which can only be accessed using the travel corridor). The extent of the collaboration on the development of the TRAC design included DEC representatives walking trail section 2 (see maps 1A and 2A in the "Maps of the Corridor" segment of the binder); on this former IP logging road, also known as Dear Pond Road, DEC personnel described how a trail could be constructed to avoid extreme wetland areas in the travel corridor between mile 115.7 and mile 118.29. This out-of-corridor solution inspired similar design improvements in other segments, in particular using existing DEC trails.

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In other meetings, DEC personnel noted that the original 12-foot width of TRAC's early designs probably exceeded what the design criteria are for their trails that intersect with the travel corridor. The explanation provided was the trails are suitable for walking, hiking, off-road biking, snow shoeing, cross-country skiing, but are not designated for snowmobiles. The TRAC design within the corridor was modified along the entire length to provide for an 8-foot width trail. TRAC's work presumed that snowmobiles would use the rail right-of-way during the designated season, and would not be allowed to use its designed trail system.

Historically the railroads that have operated in the 100-foot corridor have needed to expand capacity with sidings; this was accomplished with minimal disturbance of wetlands. Installation of needed culverts, bridge abutments and other infrastructure remains a necessary purpose; careful planning and installation of trail infrastructure within the corridor can be safely accomplished with minimal disturbance of wetlands. There has been no further consultation by DEC staff since Alternative 7 was made public and TRAC presented its final design to Region 5 in December 2014. In fact a significant effort has been made to denigrate the work done as infeasible.

The TRAC work demonstrates in fact that a trail system using the corridor, combined with existing DEC designated trails, would provide a year-round, safe, varied and interesting experience that can be built at a significantly lower cost than removing the rails and creating a "rail trail." The TRAC system is an integral part of the win-win: upgrading the rails and investing in trails that connect communities that is the policy objective of the current Alternative 6 of the RLP UMP

A detailed page-by-page analysis of the Proposed Final Amendment dated November 2015 is appended to this letter. We request that this be included in the consideration of this submission to the comment period.

Respectfully,

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APPENDIX
PAGE-BY-PAGE ANALYSIS OF ALTERNATIVE 7

By way of introduction to this analysis, I am obliged to comment on the fundamentally wrong approach of the proposal submitted by NYS DEC. Since 1996, little or no visible effort has been made by NYS DEC to implement the trail concepts embodied in Alternative 6. There are abandoned rail right of way trails that lead to and from the three communities of the Tri-Lakes region, each of which offer the flat terrain touted as a rationale for creating a rail trail. These are poorly maintained and lightly used. The impetus to remove the historic rail infrastructure at a significant cost, to then spend more funds to make the rail trail, is in fact the initiative of a very small group of private citizens; this has now become a proposed NYS policy initiative, that is in effect an attempt to amend the State Land Master Plan without the due process that such amendment would require.

The extensive effort in the written and oral presentation by DEC personnel to dismiss the work by volunteers to demonstrate that a feasible trail system can co-exist with the rail infrastructure within and alongside the travel corridor must be challenged. The comments that follow below address many misleading statements:

Page 5, ¶ 2 (last sentence): “A second round of public involvement in 2014 confirmed their decision to amend the 1996 UMP / FEIS ...”

Comment: The Utica Hearing was overwhelmingly in favor of retaining the tracks from Utica to Lake Placed. A few ARTA members who also spoke at previous hearings (the same 10 persons who also provide reoccurring Newspaper articles on a regular basis) did also come and repeat their views.

Page 5, ¶ 3 (last sentence): “The entire length of the Corridor would remain in DOT ownership ...”

Comment: Does DOT agree that tracks of an active railroad which are on the state and national historic registers and partially funded by the Federal Highway Administration should be torn up?

Page 8, ¶ 5 (first sentence): “The preferred alternative ...”

Comment: “preferred” should be replaced with “proposed”. These words have entirely different meanings. Preferred implies “better than other options.”

Page 8, ¶ 5 (third sentence): “the corridor without rail infrastructure is wide enough to accommodate multiple recreation activities, unlike a “rail with trail development that would in places require a barrier to safely separate recreation activity from the train.””

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Comment: the corridor is 100 feet wide. In many places in the corridor the top surface of the railroad bed is 8'-0" wide. TRAC has not been able to determine from DEC sources or from the proposed final amendment what trail width is being proposed. Our original measurements and drawings prior to 8/26/2014 were based on a 12'-0" wide trail beside the track. This was later revised to a 8'-0" wide trail which would be the width of a trail on the existing rail bed in most places. If the trail needs to be wider than 8'-0" TRAC's planned trail can be adjusted. I'm not sure of the additional expense of adjusting the "rail trail" on top of the rail bed to wider than 8'-0". It causeways it could be expensive.

Comment: Safety fences are an issue that seems to be lacking in TRACs as well as the proposed final amendment. If small children on tricycles, skates, bikes with training wheels, etc. etc are using either DEC's trail or TRACs trail on causeways with 15:0 to 20:0 drop-offs on the side or sides of the trail a fence or railing should be provided or life jackets required.

Page 10, ¶ 2 (last sentence): *"The 1996 UMP / FEIS concluded that 'both the rail and trail potential of the corridor should be developed: no action should be taken to eliminate the rail potential of any segment of the corridor ..."*

Comment: Exactly what we should be doing. Keep the rails and build trails beside of them. This would make the entire corridor available to all people of all capabilities and economic status and provide the greatest tourism and economic impact to the Adirondack region.

Page 10, ¶3 (last sentence): *A second round of public involvement in 2014 confirmed their decision to amend the UMP ..."*

Comment: Not so! The same few individuals spoke at both hearings. The majority want both rail and trail which was not even offered as an option at the second round. (see comment re: Page 5, ¶2)

Page 10, ¶4 (bold letters): *"this 2015 UMP / DEIS amendment proposes a new alternative ..."*

Comment: Most sensible and less expensive would be: (segment 1) fix rail service to Tupper Lake, (segment 2) provide rail and trail from Tupper Lake to Lake Placid. This segment 2 option which was not offered would accommodate the needs of everyone, provides **maximum** economics and tourism, and would be less expensive and easier to maintain. Also it would eliminate tearing up the tracks that were just reconditioned in the year 2000 along with numerous highway signals and payback of 2.3 million dollars to FHWA.

Page 11, ¶2 (sentence 2): *Due to extensive wetlands along this segment (Ray Brook to Lake Placid) and legal limitations for moving this trail onto neighboring Forest Preserve lands ..."*

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Comment: I do not believe that this has been investigated. APA please investigate these legal issues if within you power. TRAC has details of a trail outside of the corridor through neighboring Forest Preserve lands without significant gradations or wetland impacts or significant economic non-feasibility. This trail would have maximum grades of 5'-7 ½" in 100 feet in a few places and would run 4.3 miles from Lake Placid to Ray Brook. Gary Hodgson and Ed France have similarly traversed this area as brought out at our meeting with DEC last year.

Page 11, ¶2 (sentence 3) *"This trails and rails action committee (TRAC), a local group from Tupper Lake..."*

Comment: TRAC is not a local group from Tupper Lake. Members span a large area from Tupper Lake, Saranac Lake, Owls Head, Lake Clear, Rainbow Lake, Syracuse, and Memford together with other supportive organizations and represent many professional backgrounds.

Page 11, ¶2 (sentence 4 and 5) *The concept they (TRAC) proposed included extensive earth moving, and filling, cantilevering... and ... appears to be cost prohibitive, contains unacceptable impacts, and would not result in a flat, long-distance trail capable of safely accommodating bicyclists and pedestrians."*

Comment: None of the above. Trail design incorporates minimum earth moving, minimum filling all of which could be accomplished from equipment via the adjacent railroad with minimal impact on wetlands. Where necessary, options of either: (1) cantilevered trail bridging (see TRAC ledger "construction details" CD-15, 16, 17), (2) Gabion (stone crib construction) (see trail sect. 3, pg 3a attachment 3, alternate B), or (3) Geotextile retainment wall - GRSS wall (see TRAC ledger "construction details" CD-17A-17C) would provide little or no wetland involvement. The above trail construction would more than likely be less expensive than tearing up the tracks, disposing of the ties (the ties less than 20 years old could be reused), testing the remaining surface under the ties for creosote, arsenic, or other toxic elements and removal of the same and then transporting new resurfacing materials miles up the corridor from the nearest access point. Access points from each section are noted on "Construction Details" CD-3, CD-5, CD-7, CD-8, CD-10, and CD-13. A trail beside the track would be much more cost effective, contain many less unacceptable impacts and would result in a reasonable flat, long distance trail capable of safely accommodating bicycles and pedestrians. Having "rails with trails" will be a win-win situation both economically and for the best interest of the greatest number of users.

Page 12, item 1.C.: *Rail infrastructure would be removed between Tupper Lake and Lake Placid and ... would be converted to a recreational trail."*

**Daniel Mecklenburg
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Comment: Rail infrastructure should remain to assist the transporting materials for trail building beside the tracks. (see comments re: page 11, ¶2, sentence 4 and 5) Entire infrastructure should remain and be rehabilitated between Tupper Lake and Lake Placid.

Page 13, ¶2 (sentence 2): *“Segment 1 would be managed by DOT. Segment 2 would be managed by DEC.”*

Comment: Segment 1 would be managed by DOT and the railroad aspect of section 2 would be managed by DOT. Section 2 in corridor and out of corridor trails would be managed by DEC.

Page 14, ¶3a: *“DOT has estimated ... cost of rail restoration between Big Moose and Tupper Lake @ 45 miles @ \$250,000 / mile @ 24 miles or \$11 million ...”*

Comment: ... and between Tupper Lake and Saranac Lake @ \$200,000 / mile @ 24 miles or \$4.8 million for a total of \$15.8 million.

Page 14, ¶3b: *“Recreation trail”*.

Comment: If a recreation trail is built both on and off the corridor as proposed by DEC utilizing existing conservation trails which parallel the tracks in the section between Tupper Lake and Saranac Lake and a new trail is built in the Forest Preserve lands from Ray Brook to Lake Placid, the overall trail cost in the corridor will be reduced. (see comments re: page 11, ¶2 sentence 2). With elimination of the cost of tearing up and disposal of the tracks and associated negative salvage value and elimination of FHWA payback in segment 2 the cost of trail construction may be considerably less and not offset the rail rehabilitation cost added to segment 2. The new trail along the corridor between Tupper Lake and Saranac Lake, adds up to 12.22 miles of new trail. If trail section 11A (see map 6 of corridor maps) were added this would amount to an additional 2.1 miles for a total of 14.32 miles within the corridor. Trail section 11A has not been detailed yet but would follow similar design of other in corridor sections with at least 0.4 miles of cantilever, crib, or Geotextile retainment wall (see comments re: page 11, ¶2, sentence 4 and 5). Completion of trail section 11A would create a loop trail around Lake Colby and was being considered for a later date. The existing DEC trails which parallel the corridor (identified as section 2, 4A, 4B, 6, 8, 10, and 12 between Tupper Lake and Saranac Lake are existing trails which are described as woods trails about 6'-0" wide and suitable for bikes other than road bikes, hikers, snowshoes, and cross-country skis. DEC trail expert Steve Guglielmi stated that these DEC trails would not be suitable for wheel chairs, tricycles, roller skates, etc. Total miles of these off corridor trails and lanes and roads are 11.34 miles. An additional trail (see comments re: page 11, ¶2 sentence 2) from Ray Brook to Lake Placid of 4.3 miles would complete the “off corridor” trail network. (See TRAC ledger divider “Trail Ray Brook to Lake Placid”)

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Page 15, No. 4, ¶2

Comment: The primary economic impacts of full corridor development would come from full rehabilitation and operation of the rail line from Remsen to Lake Placid and by construction of a recreation trail between Tupper Lake and Lake Placid and from the spending by the people attracted to the area because of these services and recreational activities.

Page 16, ¶2 and 3: *“Camoin Associates examined economic impacts of three scenarios that are: 1. Rail from Remsen to Lake Placid. 2. Recreation trail Remsen to Lake Placid with complete rail removal. 3. Rail from Remsen to Tupper Lake and rail removal and recreation trail from Tupper Lake to Lake Placid (alternate 7)”*

Comment: Unfortunately Camoin Associates did not look or report on scenario number 4, which is the most logical and would provide the **most** impact. 4. Rail from Remsen to Lake Placid and trail from Tupper Lake to Lake Placid. This would provide the best economic impact of all alternatives and the best opportunities for all ranges of abilities.

Page 17, ¶3: *“The full study concludes that Alternative 7 is projected to provide the greatest economic impact to New York State.”*

Comment: The full study leading to alternative 7 fails to include the economic impact of the railroad connecting Lake Placid and New York City and the rest of the Country via Amtrak railroad.

Page 20, ¶3 (first sentence): *“Because a large investment would be required for the restoration of rail infrastructure between Big Moose and Tupper Lake ...”*

Comment: Restoration would continue from Tupper Lake to Saranac Lake.

Page 24, ¶2 (first sentence): *The Tupper Lake to Lake Placid segment would provide in corridor recreation, such as hiking, running, roller skating, roller skiing, and snowmobiling, but also new opportunities for hunting, fishing, camping, paddling, and hiking on adjacent state lands, since multiple state trail connections would be made.”*

Comment: the in-corridor trail sections 1, 3A, 3B, 3C, 5, 7, 9, 11, and 11A will facilitate in-corridor recreation, such as hiking, running, snow shoeing, cross country skiing. New opportunities for hunting, fishing, biking, camping, paddling, hiking, and cross country skiing and snow shoeing would be available on off-corridor t-rails 2 (see map 1A and 2A rev 11/24/14), 4A and 4B (see map 2A and map 3), 6 (see map 3 and 4), 8 (see map 4), 10 (see map 5, 5A), and 12 (map 6). DEC felt that snowmobiling should be on the formal railroad section of the corridor, because these off-corridor trails are not designated or designed as snowmobile trails. Activities such as roller skating, rollerblading naturally

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would be dependent on the selected trail surface on the in-corridor trails. The trail from Ray Brook to Lake Placid would be similar to the other off-corridor DEC trails discussed above. Trail section 2 above follows a logging road and would be beside that existing road and could have a hard finish if desired.

Maps 25, 28, 29:

Comment: Revise maps to show railroad-snowmobile corridor and separate recreation trails between Tupper Lake and Lake Placid.

Map 33 and Page 32J:

Comment: Boy Scout Camp off Sabattis road adjacent to Upper Lows Dam could be listed @ trail connection / whistle stop No. 26.

Page 87, ¶2:

Comment: This paragraph describes many of the conditions of the 100 ft right-of-way between Big Moose and Tupper Lake and between Saranac Lake and Lake Placid. The section of the travel corridor between Tupper Lake, Lake Clear, and Saranac Lake will accommodate a trail utilizing the 100 ft. wide corridor as well as some existing DEC trails paralleling the corridor (see comments re: page 24, ¶2) with minimal traverse or interruption of wetlands (causeways) ledge or excavation. (See “Construction Details” section of TRAC ledger pages CD-1 through CD-20). From Ray Brook to Lake Placid, snowmobiles would use the railroad tracks and 4.3 miles of DEC trail through Forest Preserve land would avoid all wetlands which exist immediately beside the railroad bed in the right-of-way. (see comments re: page 24, ¶2).

Page 87, ¶2 (last sentence): *“A safety fence to separate a train from other uses adds significantly to the expenses, and cantilevering, fencing, and wetland filling arguably alters the historic character of the corridor more so than removal of the rails.”*

Comment: In the 22.96 miles of trail between Tupper Lake and Saranac Lake and the 4.3 miles of trail between Ray Brook and Lake Placid, a cumulative total of 170 linear feet of 4’-0” chain link fence would be required in a few places where the trail and rail bed are closer than 10’-0” from one another. (see “Construction Details” page CD-19 for locations) Not addressed in this paragraph is what DEC’s plans are for fencing along the two sides of this 8’-0” wide trail where it drops off in some cases 20’-0” on either side of a causeway. Will fences be provided (miles and miles of fences) or life jackets be required for younger children on tricycles or roller skates. (see TRAC ledger trail section 5, page 5, attachment 8 as an example).

Comment: Cantilevering or Gabion or Geotextile GRSS construction would be necessary only at separate areas along the corridor as indicated to avoid wetlands. This construction would be 12.871 feet or 2.27 miles out of the 22.96 miles of corridor between Tupper Lake and Saranac Lake (see

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“Construction Details” CD-14). If trail section 11A (see comments re: page 14, ¶3b for 11A) across Lake Colby were built, this would add an additional 0.40 miles of the above construction for a total of 2.67 miles. The DEC trail of 4.3 miles would not require any cantilevering. The only way the historic nature of the trail would be altered is by provision of a trail in the rail corridor on 11.48 miles of the corridor between Tupper Lake and Lake Placid.

Page 87, ¶3: “... *rail bed and trail along side of it are not conducive to one another in the 100 ft wide corridor from Ray Brook to Lake Placid.*”

Comment: We agree. On December 1, 2014 at 11:00 AM meeting @ DEC headquartered in Ray Brook with representatives of ARPS, TRAC, DOT, and DEC, it was mentioned that south of the rail corridor in Forest Preserve land the possibility of a trail avoiding wetlands existed. Apparently two different foresters (see comments re: page 11, ¶2, sentence 2) had walked this area in the past. On February 26, 2015, TRAC member Dan Mecklenburg sent a map of trail from Ray Brook to Lake Placid to Steve Guglielmi @ DEC and he asked if I had the coordinates. Coordinates were sent on February 28, 2015 and Steve thanked him on March 2, 2015. This material is in the TRAC ledger tabbed “Trail Ray Brook to Lake Placid”.

Page 102 and 103, Map label #1: “*An estimated 1 mile of potential wetlands would need to be filled in.*”

Comment: No wetlands need to be filled in. If these “potential” wetlands are filled in, the water would be over the level of the tracks. (See TRAC ledger drawings section 1, pages 1-2 through 1-10). Note: In some instances the trail gradually follows the level of the terrain (i.e.: mile post 114.5, the trail level is shown 18” below the level of the top of the track. This could be raised up 10” to 8” below the level of the top of the tracks so that “potential” wetlands do not flood the trail.) At mile post 114.54 the trail is within 6” of the top of the rail. At mile 114.65 it lowers to 3’-6” below the rail top and could be raised 2’-6” to avoid “potential” wetlands or both the tracks and the trail would be under water. At mile 114.8, the trail could be raised 12” to prevent flooding by “potential” wetlands. At mile 14.9 the trail could be raised 12 to 15”. At mile 14.99, the trail could be raised 12”. At mile 115.01, the trail could be raised 12”. Miles 115.2 though 115.7 there is no issue as the trail is higher than the track level. Perhaps when the railroad was built this area along the tracks in its 100’ right-of-way was partially filled in for stabilization purposes making a non-issue of map label 1. Another possibility is that the wetland designation does not adjust to variations in the elevations of the ground.

Page 104, Map label #2: “*This is not the route of the trail*”

Comment: At the suggestion of Steve Guglielmi for the reasons cited TRAC map 1 and 2 and the index map were revised to an alternate suggested

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trail as maps 1A revised 11/24/14 trail section 2 along Deer Pond road, map 2A rev 11/24/14 trail section 2 continued along Deer Pond road. This revision was made @ DEC suggestion. We will revise our trail section 3A attachment 1, mile post 118.294 to 118.33 to reflect this change which will avoid crossing a dam and avoid a track crossing. This change is for everyone's benefit.

Page 105, Map point 3: *"... passes through significant wetlands that would need to be filled in for estimated 1/3 of a mile."*

Comment: Our TRAC ledger page 3A attachment 3 indicates 0.2 miles between mile post 118.6 and 118.8 the use of cantilever, gabion, or Geotextile (CRSS) retainment wall design with little to no impact on wetlands.

Page 107, Map point 4: *"... there is a significant causeway at a rail bridge with Rollins Pond ... making it too narrow for rail and parallel trail."*

Comment: Not so. See TRAC drawing section 3A attachment 8. Cantilever, gabion, or Geotextile options will have no impact to wetlands.

Page 107, Map point 5: *"Use of Paradise Lane"*

Comment: Most of the land owners are infringing on railroad right-of-way. We may be reinstalling our previous siding in this area. There may be two narrow pieces of camp property that cut slightly into the right-of-way. Any part of Paradise Lane which is not on railroad property should be negotiated. Paradise Lane was originally built for access to the railroad siding which held 52 to 60 cars, and to an adjacent sand pit. There was also a station on this road.

Page 107, Map point 6:

Comment: Map point 6 should be shown in its proper location between map point 4 and 5 or between Rollins Pond and Flood Pond (see TRAC drawing 3BC No. 17 of 8/2/2013 for a more accurate location.) Crossing to the trail from Rollins Pond - Flood Pond trail is at mile post 121.0

Page 108, Map point 7: *"...segment approximately 0.5 miles which would result in adverse impact of loss of regulated wetlands."*

Comment: This is a 0.284 mile section between mile 123.2 and 123.484 (see TRAC drawings 5-4 through 5-7). Cantilever, gabion, or Geotextile (GRSS) would be used with little or no impact or loss.

Page 109-110, Map point 8: *"Trail around Hoel Pond. Trail bypasses potential future access location for people with disabilities. Corridor offers easier water-access potential."*

Comment: Trail around Hoel Pond provides almost twice the shoreline potential access than the corridor and at closer to water level. Corridor is about 17'-0" above water level, making access very difficult.

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Page 110, Map point 9: *“Private property at access point to corridor, access would need to be negotiated.”*

Comment: This was pointed out to us to be a DEC trail. Check deeds and possibly negotiate.

Page 111, Map point 10: *“Trail goes through wetlands and over open water causeway.”*

Comment: Mile post 126.43 Beaver Dam has raised water level 4’-0” causing damage to this causeway. Beavers should be controlled before the integrity of the causeway is lost. The entire corridor should be raised and side or sides of causeway expanded for trail, or emergency work road.

Page 112, Map point 11: *“Snowmobiles and bikes are prohibited in Canoe Area.”*

Comment: This was discussed at our meeting with DEC, ARPS, DOT, and TRAC in Ray Brook headquarters on December 1, 2014 at 11:00 AM with TRACs map no. 5A of 11/3/2014 was presented showing bypass of the canoe area for bicycles and other users. Snowmobiles are to use the corridor unless a DEC trail is so designated. You will note on map on page 112 that this is marked in yellow as a trail proposal.

Page 112, Map point 12: *“trail along road not good for safety of family oriented recreation.”*

Comment: Move trail back a few feet like the Fish Creek bike trail or like a sidewalk path.

Page 113-114, Map point 13: *“1 mile long segment would result in adverse impact of wetlands.”*

Comment: A possible adverse impact of 0.1 miles between mile 14.70 and 14.60. Culverts need to be extended to facilitate drainage at 10’-0” and 12’-0” respectively. Other areas between mile 14 and 15 are not impacted, and are treated with cantilever, gabion, or Geotextile (GRSS) retainment wall with no impact in other areas in question between miles 15 and 14.

Page 115, Map point 14: *“... a segment approximately 0.7 miles along the corridor would result in adverse impact or loss of regulated wetlands.”*

Comment: The area between mile 12.9 and 12.2 has no construction which will adversely effect or cause loss of regulated wetlands. Our drawings trail section 11 attachments 15, 16, 17, and 18 show construction using cantilever, gabion, or Geotextile construction which is installed from the railroad tracks and does not impact the wetlands.

Page 116 and 117, Map points 15 and 16: *“Trail along the causeway for fishing and paddling access for persons with disabilities.”*

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Comment: Our trail map 6, revised 8/21/2014 shows trail section 11A across Lake Colby causeway which runs 2.1 miles and forms a loop trail out of Saranac Lake along with trail section 12. This provides fishing access (see “Construction Details” CD-15, 16, 17). This trail section will have detailed drawings similar to the other and could be constructed at the same time or later. Family oriented recreation could use this trail instead of trail section 12 which runs beside Route 86.