



ADIRONDACK  
ARCHITECTURAL  
HERITAGE *Celebrating 25 Years*

1745 MAIN STREET, KEESEVILLE, NY 12944  
518.834.9328 | WWW.AARCH.ORG  
December 9, 2015

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Adirondack Park Agency

P.O. Box 99

Ray Brook, NY 12977

RE: Final Amendment to the 1996 Remsen-Lake Placid Travel Corridor Unit  
Management Plan (Alternative 7)

Dear Friends,

Thank you for this opportunity to submit comments on the Final Amendment to the 1996 Remsen-Lake Placid Travel Corridor Unit Management Plan (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 six 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. In recognition, we have bestowed Adirondack Architectural Heritage Preservation 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 develop a plan that allows for train service all the way to Lake Placid and improves the recreational opportunities within the entire corridor.

Simply put, we oppose the proposed final amendment to the Remsen-Lake Placid Corridor Unit Management Plan (Alternative 7) because it would adversely impact 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 would close the highly successful Rail Explorers business. Pulling up the tracks is not necessary for a robust recreational trail system along the Tupper Lake to Lake Placid (or any) section of the corridor. In an area rich with public recreational opportunities, there is no compelling need to sacrifice the existing railroad and potential future expansion of it for this trail.

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

Adirondack Architectural Heritage supports the preservation of all of the contributing historic features, including the railroad tracks themselves, of the entire New York Central Railroad, Adirondack Division corridor. This rail line made it possible for the interior of the western and central Adirondacks to be widely settled and to prosper economically. Its place in history and significance as a cultural resource is evident by its passing the rigorous reviews necessary to win designation 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 the New York state agencies involved in this proposal (DEC/DOT/APA) have not met their 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 closure of the Adirondack Scenic Railroad’s northern corridor and the removal of 34 miles of the railroad tracks. The preservation of historic cultural resources is best served by continuing to use them for their original function when possible. What the agencies should have explored here is how to support the continued use and expansion of the historic rail corridor for rail transportation into and through the region, and designed a compatible and robust recreational trail system alongside it. That “prudent and feasible alternative” would be the best outcome. The worst outcome will be the

destruction of a significant section of this cultural resource and an end to the possibility of restoring full passenger rail service in the central Adirondacks.

We also believe that the state agencies have not met their federal regulatory obligations under Section 106 of the National Historic Preservation Act of 1966 (NHPA) or under Section 4f of the United States Transportation Act of 1966. These more stringent obligations are triggered because the proposed amendment should be considered a "federal action" due to past, current, and likely future federal involvement with the development, maintenance, and management of this corridor. There is no record of the DEC or DOT engaging in the required consultation with the State Historic Preservation Office or the federal Advisory Council for Historic Preservation regarding these obligations.

### **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 and moving between communities. This is especially important for (urban, international or lower income) visitors who may not have access to a car. Rail is also a greener transportation alternative -- per passenger mile, it uses less energy and generates fewer carbon emissions. If the tracks were removed, the opportunity to develop and use this rail line will be lost forever.

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 service along its current routes for nearly 100,000 users each year. We have confidence in ASR's commitment and ability 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 now has a significant economic impact within the region and could have an even greater one in the future.

### **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 an existing, successful business and visitor attraction 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.

### **The proposed UMP amendment would shut down the Rail Explorers.**

This proposal would shut down the Rail Explorers, Adirondack Division, a thriving new business in Saranac Lake that employed 20 people and served 15,000 riders this year, most of whom came to the region specifically for the opportunity to ride these unique rail bikes. This is the only other location in the world, outside of South Korea, and is an opportunity to offer something else unique in the Adirondacks.

### **There is no need to remove the 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) has demonstrated that the railroad can be the organizing element in completing a “trails with rails” system, maintaining it, and providing access to Adirondack natural resources and communities. Coexisting “rails with trails” would permit development of more 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 crucial to allow access to more natural areas in a managed way to avoid overuse.

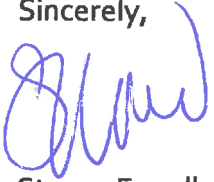
### **There is no compelling public need for the proposed rail trail**

We are big fans of rail trails – where they have been developed within abandoned railroad corridors, where there are limited recreational opportunities, and where public land may be limited. This proposal is the first instance that we can find anywhere in the United States where a trail would replace an **existing and active** rail corridor. The rail trail is being proposed in a region with nearly 3 million acres of public lands in which there are already thousands of miles of existing hiking, cross-country skiing, biking, and snowmobiling trails and roads. And one historic and active railroad. There is just no compelling public need for the additional 35 miles of trail proposed here.

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. Let’s fully implement this plan, allocate the necessary resources and preserve this historic and cultural resource.

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'S. Engelhart', written in a cursive style.

Steven Engelhart  
Executive Director