

- We support Alternative 1 of the DSEIS, which is the "No Action" alternative and allows the rail corridor to remain as directed in the existing State Land Master Plan as well as the 1996 UMP which is the current UMP that guides the management and use of these lands. The "No Action" alternative is clear in that it pertains to exactly Remsen-Lake Placid railroad line and corridor, and it allows for upgrading the rails, as well as creating rails-with-trails opportunities within and connecting to the corridor.
- The preferred alternative (Alternative 6) does not adequately address Historic Preservation of the corridor and its appurtenances, which are listed on the State and National Historic Preservation Registers. The DSEIS states that "consultation" with OPRHP will take place and that *"The Department of Environmental Conservation will evaluate whether to preserve and/or restore historic railroad structures remaining in the railroad corridor in accordance with a historic preservation plan that is compliant with the State Historic Preservation Act and approved by the State Historic Preservation Office. This will enable the public to learn the history of the railroad and the importance of Adirondack railroads to the history and culture of the Park and the United States."* This language gives the reader the sense of lip-service being paid. While the language mentions preservation and restoration, it doesn't address the issue of the destruction of historic resources, which is what the DSEIS is more immediately proposing to do with the changed Travel Corridor definition.
- The "Public Need and Benefit" section (pg 9) of the DSEIS is outdated. The DSEIS should note that recreational trails within state highway travel corridors are allowed now that the Forest Preserve Land Bank Constitutional Amendment was accepted by voters in 2017. This makes the purported "need" for Alternative 6 to lack urgency and certainly proves that it is not necessary in terms of the broader spectrum of recreational use possibilities within the Park (which are full of thousands of miles of hiking, biking, and snowmobiling opportunities already). Similarly, if the 1996 UMP would finally be implemented, all diverse recreational opportunities (including trains) would be available to the public.
- Changing the travel corridor definition so that it simply would now include "rail trail" does not conform to the description and intent of the Travel Corridor classification in the SLMP which clearly deals with major forms of transport (cars, trucks, trains) and their associated intense, large-scale infrastructure. The addition of the word "rail trail" and its newly added description within the Travel Corridors section of the SLMP is out of place with the rest of what is a clear land classification characteristic. It is awkward and forced.
- Revisions to the State Land Master Plan are large undertakings that require a regional planning perspective, and a strong working knowledge of how changes to one land classification affect the other State lands of the Park, as a whole. The SLMP just underwent a major revision process, approved in December 2016. Though ongoing review of the SLMP is a stated guideline, frequent revision is not. SLMP revisions have taken place three times in 1979, 1987, and 2016. To do it again just two years later in 2018 is unprecedented and has the appearance of "spot zoning" and lacks a long-term, regional planning perspective.

- The proposed alternative is harms the status of this railroad as an active rail line, which receives oversight from the Federal Railway Administration. Even the Rails-to-Trails Conservancy - a rail trail advocacy group cited in the DSEIS - does not advocate converting active rail lines to rail trails.
- The State should prove that it actually owns the corridor fully in fee title before claiming that it does in the DSEIS.
- The DSEIS has a section titled "Growth Inducing Aspects of the Proposed Action" and mentions how Alternative 6 "will contribute to positive growth in recreation and tourism in the Adirondack Park." It is important to note that, for years now, this debate that this DSEIS continues to perpetuate, has caused a loss of tourism industry jobs - so touted in the DSEIS - as well as tens of thousands of visitors by stopping rail and railbike operations in the corridor.
- Working together for solutions (versus using taxpayer money to support only one side of a complex, multifaceted public issue) is the only means to long-term success on this and all issues.