



14 April 2017

Kathy Regan
Deputy Director for Planning
NYS Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

Peter Frank
Forest Preserve Bureau Chief
NYS Department of Environmental Conservation
625 Broadway, 5th Floor
Albany, NY 12233-4254

Conservation

*

Education

*

Recreation

Since 1922

Member Services

814 Goggins Rd.
Lake George, NY
12845-4117

Phone: (518) 668-4447

Fax: (518) 668-3746

e-mail: adkinfo@adk.org

website: www.adk.org

North Country Operations

PO Box 867

Lake Placid, NY

12946-0867

Reservations: (518)523-3441

Office: (518)523-3480

Fax: (518)523-3518

Albany Office

301 Hamilton Street

Albany, NY

12210-1738

Phone: (518) 449-3870

Fax: (518) 449-3875

Via Email:

SLMP_Comments@apa.ny.gov

peter.frank@dec.ny.gov

RE: Minimum Requirements Approach (MRA) Guide

Dear Peter and Kathy,

The Adirondack Mountain Club (ADK) appreciates the opportunity to comment on the Draft Minimum Requirements Approach Guide: Construction of Trail Bridges in Wild Forest Areas in the Adirondack Park, Decision Making Workbook (hereafter the draft Guide).

We appreciate the thoughtful effort in developing the draft Guide and feel that with a few adjustments this will prove to be a valuable tool for the protection and management of the Forest Preserve. Please consider the following changes:

Under the Alternatives Comparison Criteria:

The criteria of **Cost** and **Construction Duration** should not be factors in deciding a preferred alternative and should be removed from the criteria. Bridge Transparency should also be removed. "See through" transparency does not have any bearing on the aesthetic value of a structure in a wilderness area. If it is a suspension bridge, stringers with decking, or a bridge with trusses, one does not see the transparency of the structure but the raw profile.

The remaining criteria should be weighted such that **Impacts to Habitat**, and **Bridge Raw Profile (aesthetics)**, have the greatest weight, with **Impacts to Habitat** having the greater weight of the two.

We would also like the Department of Environmental Conservation (DEC) and the Adirondack Park Agency (APA) to explain how the public will have an opportunity to comment on bridge projects and the alternatives analysis that this process will generate. Ideally, bridge projects should be identified and analyzed with notice in the ENB in a Unit Management Plan (UMP), a UMP Revision, or UMP Amendment.

Finally, the final Guide for MRA should be implemented by means of a Memorandum of Understanding between the Department of Environmental Conservation and the Adirondack Park Agency.

Sincerely,

Neil F. Woodworth
Executive Director and Counsel
Adirondack Mountain Club
neilwoody@gmail.com
[518-449-3870](tel:518-449-3870) Albany office
[518-669-0128](tel:518-669-0128) Cell
[518-668-4447](tel:518-668-4447) x-13 or 25 Lake George office

Wes Lampman
Adirondack Mountain Club
North Country Operations Director
[518-523-3480](tel:518-523-3480) ext. 18

