

CENTER FOR EARTH AND ENVIRONMENTAL SCIENCE

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August 15, 1984

Ivan Vamos
Deputy Commissioner for Planning and Operations
Office of Parks, Recreation and Historic Preservation
State of New York
Agency Building 1
Empire State Plaza
Albany, New York 12238

Dear Ivan:

I am pleased to submit these comments on the July, 1984 Draft Master Plan and Draft Environmental Impact Statement for the Point au Roche State Park. These comments are being submitted by me in my capacity as a member of the Ad Hoc Committee for Point au Roche State Park; however, I am not commenting for the Committee. I represent the Adirondack Mountain Club, Inc. on the Ad Hoc Committee; however, I am not commenting or giving any official Club position in these comments either. Please consider these comments to be my own as a resident of Clinton County who is very familiar with the park and who has participated in the park implementation process on a regular basis from the beginning.

Introduction

My initial reaction upon seeing the DEIS was great joy to see that the process was at last underway. Visible progress brings with it a sense that the land will soon be available in an organized and planned manner for recreation and education. I applaud this first tangible step.

During the process that has led to the DEIS I have had an opportunity to comment on my concerns that swimming, small-boat access, deep-draft vessel mooring and pumpout, and natural history education facilities be made available on the property in a manner that would minimize their impact on the natural ecological setting. I have argued strenuously against excessive camping facilities, the cabin colony concept and intrusion on the two types of vistas. The first type being the vistas as seen from the land including the near shore, Lake Champlain and the Adirondack and Green Mountains. The

second type being the shoreline vista of the park as seen from the lake.

As a result of many comments, including my own, the proposed plans have evolved considerably. I must compliment the staff of OPRHP on their response to my concerns about the number of campsites, shoreline development and wastewater disposal. As outlined below my concerns about the cabin colony and the socioeconomic impact of the park on the adjacent region have not been incorporated as completely.

Specific Comments

1. At several points in the DEIS it is noted that the Park is classified as Scenic. While this classification is briefly defined the DEIS never describes either the criteria or the evaluation that led to this designation. It is fundamentally important to provide the reader with this background, perhaps as in the form of an appendix, if the reader is really to understand the context of what follows from the Scenic classification. ①
2. The Socioeconomic Characteristics section of the Environmental Setting (page 12) seem to me inadequate. For example, the nearby acreage, outside agricultural districts, easily accessible and available for park-related support systems development are not even described, let alone analyzed. The existing private sector support systems are not inventoried or analyzed. Such support systems as marina/boat supply and maintenance enterprises, restaurants, motels, camping, boat rentals, camping equipment, fuel, etc. are not studied. Existing facilities when combined with future development potential on private land have a significant bearing on state development plans and should be addressed in the DEIS. The modern "greenline park" concept emphasizes the role of state facilities as highlights in a region. ②
3. Many of the inventory maps still show the old Park boundary prior to the recent agricultural land exchange. ③
4. The section on Alternatives notes that "no more than 30% of the park will be developed for intensive recreational uses such as camping and swimming". However, "development" is not clearly defined and the DEIS does not include a map showing, at least conceptually, where the development is proposed. I submit that "development" in the sense intended should be clearly defined and that a map, at a scale similar to Figures 8 or 9, should show the proposed "development" areas with a single shaded symbol for all. I am, of course, aware of Figure 17 that depicts use intensity. ④
5. Moorings in Deep Bay are frequently referred to as intended for sail craft. On other occasions I have noted that "deep-draft vessels" is a better term because it includes larger powered cruisers which, when moored, are entirely compatible with sail craft. ⑤

6. Table II does not include alternative locations for the allowed boat rental or cabin colony in Alternative (Preferred) No. 3. (7)
7. The section on Boating Facilities in the Preferred Alternative chapter does not describe any plans for a boat rental facility for boats under 10 h.p. The summary on page 65 notes this as a possible element. If it truly is a possible element the DEIS is grossly incomplete in that the supporting justification in the DEIS is inadequate. This respondent recommends that the possible element be moved to Alternative 4 only. (8)
8. The Cabin Colony is described on page 78 and now includes 12-15 winterized cabins capable of housing 48-60 people, presumably with showers, toilets and kitchen facilities. Such a facility is an expensive and unnecessary development escalation for the Preferred Alternative. Even though it is a possible element in the Preferred Alternative I recommend moving this to Alternative 4. The discussion offers little or no justification for this element and the DEIS is inadequate in its discussion of either the assessed need of the element or its impact on the private sector. It seems to be a continuance of a recreation form prevalent in "early" parks. (9)
9. In looking at the phase schedule outlined in Table 12 I detect a strong emphasis on paving roads and walkways in section II, III and IV. I would prefer to see some of the paving, assuming good gravel roads are built first, deferred by 1-2 phases, some of the camping deferred by one phase and, of course, the cabins deleted from the Preferred Alternative. The funds thus made available might allow the construction of the nature center to be moved up two phases and the development of the launch ramp to be moved up by one phase. (10)

Conclusion

In general, my specific comments suggest the need for some changes to be addressed in the Final Master Plan and EIS. I consider my suggestions to be very serious. However, most, but not all, can be effected with fairly simple editing. These should not delay the process. The lack of a true socioeconomic analysis is more troublesome, especially since the Preferred Alternative still includes two elements, boat rental and cabins, that could in the final analysis, be in competition with existing businesses. Without these potentially competing elements, I believe, our Clinton County Planning Office could complete the necessary socioeconomic analyses very promptly.

In closing, I wish to commend the OPRHP staff for their patience and responsive to my ideas in particular. Some of my early suggestions, as noted above, were not incorporated in the Preferred Alternative as described in the

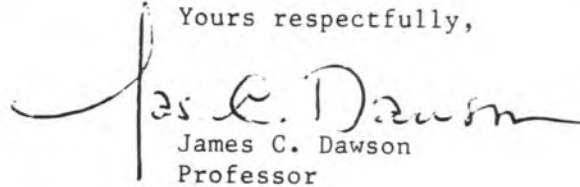
Ivan Vamos

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August 15, 1984

DEIS. On the other hand, many others were incorporated and I have confidence that all were carefully considered. Thank you for this responsive posture. I am confident that construction can begin soon on a final product that will have benefited from our collective efforts.

Yours respectfully,


James C. Dawson
Professor

JCD:CJT

cc: Wayne H. Byrne, Chairman
Ad Hoc Committee for Point au Roche

Charles Elliott, Regional Director
Thousand Island State Park and
Recreation Commission

Document: August 15, 1984 Letter from James Dawson, Ph.D,
Professor of Environmental Sciences at SUNY, Plattsburgh.

Response:

1. Parkland Classification. Additional detail on the scenic classification of Pt. Au Roche has been provided in the introduction section of the master plan. The classification of parkland is based on four elements:

- a) the history, philosophy, and purpose of the particular park or type of park as designated;
- b) the relation of the park's development (preservation) relative to all the other parks in the system;
- c) detailed park development/management issues including: master planning, policy review zoning land and open space and the management of forest and management of forest and vegetative cover, fish and wildlife and water resources.
- d) adjustment of management goals to recreational needs and program potential. Additional applications include interpretive programs, scientific research and education."

(from NYS Parkland Classification Report, 1981)

For those persons with an interest in obtaining more information concerning the classifications of state parklands, copies of the entire classification report are available from OPRHP.

2. Socioeconomic Effects The overall impacts of the capital investment, operation, and visitation at Point Au Roche State Park have been evaluated in the plan. While this does not indicate the specific businesses which will be affected, the normal market processes will certainly accommodate the levels of impact estimated within existing governmental and planning frameworks.

It is entirely appropriate that the Town of Beekmantown and Clinton County should plan for the future and in doing so take into account the impact of a developed Point Au Roche State Park on the land use and economy of the area. There are certainly sources of assistance available to local governments to help them plan. While the major federal-state planning assistance program (701) has been eliminated, a participating state agency, the Department of State, continues to provide assistance through its Division of Local Government Services. Another source of planning assistance may be the Lake Champlain-Lake George Regional Planning Board of which Clinton County is a member. Finally, OPRHP and other state agencies are sources of information and can provide assistance in their fields of expertise.

3. Greenline Park Concept. As indicated in the master plan, the development and operation of the park may have an indirect effects on land use outside of the park. There is a need for a coordinated approach to managing such changes. Presently, the primary mechanism for such control rests at the municipal level through the development and enforcement of zoning ordinances. The "greenline park" concept calls for a more regional planning effort with , as Dr. Dawson points out, an emphasis on the role of state property and facilities. There is a need to evaluate the significance of potential cumulative impacts on landscape character over a large area subject to the jurisdiction of several governmental agencies. Because of the costs involved, protection of the character of such large areas is not possible through acquisition alone. "Greenlining" or some similar planning effort can be of benefit in such instances and is worth pursuing, perhaps (in part) through the local citizens advisory committee, the Thousand Islands Park and Recreation Commission, or the regional planning board.

4. Park Boundaries. At the time of the preparation of the draft plan and the DEIS, the land exchange proposal was under negotiation and a determination was made to retain the original boundaries on the majority of the resource inventory maps. Revision of these maps to reflect the new park boundaries has not been done in the master plan because of time constraints in revising the draft. The maps, however, do provide the information needed to understand and appreciate the character of the resources in the park. Park boundaries on the inventory maps will be updated as time permits.

5. Developed Areas. Developed areas were defined within the policy section of the Draft Plan/DEIS. The general location and extent of proposed developed areas are shown on Figure 22, proposed development for the park.

6. OPRHP was not able to find a reference to sail crafts within the text of the DEIS. The terminology, which was inadvertently left on Figures 16, 17, and 18 (Alternatives), and been removed from the master plan.

7. The cabin colony is no longer a component of the master plan. A boat rental facility, if allowed, will be situated in Middle Bay. The alternative sites listed on Table 11 for a boat launch also apply to boat rental facility.

8. The possibility of providing a boat rental facility at Pt. Au Roche has been included within the master plan. Boat rental facilities provide an additional opportunity for recreation that day users and campers may not otherwise have. While the possibility of boat rental facility is addressed in the master plan, a decision regarding its actual implementation will depend on demonstrated need by patrons and additional resource capacity evaluation.

9. Cabin Colony. The proposal to provide cabin accommodations for ski touring groups and individuals interested in on-site programs in environmental interpretation was a result of use at other park facilities such as the Minna Anthony Nature Center at Wellsley Island State Park. The cabin colony proposal for Pt. Au Roche State Park, however, has been dropped as an element of the master plan.

10. Phase one includes only gravel access roads. The TISP&RC staff feel, however, that access roads should be surfaced as soon as possible. Gravel roads not only result in patron dissatisfaction but they also require higher maintenance costs. Additional information regarding the phasing of the elements of the park's development is contained in the master plan.



New York State Office of Parks, Recreation and Historic Preservation
The Governor Nelson A. Rockefeller Empire State Plaza
Agency Building 1 Albany, New York 12238

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AUG 30 1984
DEPUTY COMMISSIONER
PARKS, REC. & HIS. PRES.

M E M O R A N D U M

TO: Ivan Vamos
FROM: Neil F. Gillson
DATE: August 28, 1984
SUBJECT: POINT AU ROCHE STATE PARK

The park being located within Clinton County is in a well used snowmobile area, yet I see no indication of snowmobile activity within the plan.

I fully believe that for this area, snowmobiling should be included. Snowmobiling in itself does benefit local economy.

Please advise of this possibility.

NFG:smw

Response:

Snowmobiling will be a recreation opportunity at the park and has been addressed in the master plan. Snowmobile trails will focus on providing access to Lake Champlain.

Campground Owners of New York

P.O. BOX 143 DANSVILLE, NEW YORK 14437
CONY DEDICATED TO THE PROMOTION, GROWTH,
IMPROVEMENT & DEVELOPMENT OF PRIVATELY
OWNED CAMPGROUNDS



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EXECUTIVE ADMINISTRATOR
ROBERT KLOS
(716) 335-9989
or 335-4294

August 16, 1984

Point Au Roch State Park, Public Hearing

Good evening, My name is Robert C. Klos and I am the Executive Administrator of the Campground Owners of New York, which represents 251 privately owned campgrounds in New York State. I would like to thank Commissioner Orin Lehman, Deputy Commissioner Ivan Vamos and the New York State Office of Parks, Recreation and Historic Preservation for the invitation to appear at tonight's hearing.

CONY is indebted to the Office of Parks and Recreation for the development of a draft master plan for Point Au Roche State Park. We in the private sector know full well the impact our parks system has on tourism in New York State. For this we are grateful. However, we are also fully aware of the negative impact camping has on our industry when provided by the State parks. Camping, we all agree, is a form of recreation. It is also classified as a business when operated by the private sector. It is indefensible to the Campground Owners of New York that camping is included in the plans for Point Au Roche State Park. (1)

Camping is being provided by the private sector in this area. As I stated at the public scoping session on February 8, 1984 here in Plattsburg there are over 4000 campsites provided by the private sector within a 50 mile radius of Point Au Roche. Since February, I have broken this figure down to include a 25 mile (2)

radius of the proposed park and my findings indicate that there are available 1968 campsites in addition to a new facility currently being built directly across from the Point Au Roche entrance (Carpenters Travel Trailer Park) giving this immediate area over 2000 available campsites. According to my research the above mentioned areas are operating at a 39% occupancy rate or a return on investment of approximately 4%. I might add that the 2000 plus figure does not include the 331 sites provided by Cumberland Bay State Park and DEC operated Ausable Point State Park.

Campgrounds at State parks, unlike private campgrounds have no property taxes to pay, are self insured and use our tax dollars to fund land purchases and campground expansion. Although the income derived from their operation is returned to the State General Fund rather than to the area where it was generated they continue to operate at a great financial loss. The 1983 Federal Recreation Fee Report compiled by the U.S. Department of the Interior lists New York State parks with an operating budget of \$73,825,000.00 and a fixed capital outlay budget of \$15,549,576.00 for a total budget of \$89,374,576.00 for 1983. TOTAL revenue for our state parks for this period was \$21,310,000.00. Resulting in a deficit of \$68,064,576.00. New York State tax payers are the ones who suffer here. Our State Parks can not give us a figure on what it costs to operate their camping operations which, to my mind is ridiculous. Who else but the State could run a business without knowing what it cost to operate??? Is it, perhaps, that they do not want the public to know the extent to which camping is subsidized in New York State???

3

It would appear that in these difficult budgetary times, there may no longer be justification for state campgrounds to rent campsites at less than supporting rates. Rates were not raised in 1984 in OPR parks. A two dollar second vehicle charge has been assessed which has brought about a decrease in second vehicles brought into camping areas.

Our parks are under staffed. The work force was reduced by 1/3 because of budget cuts in 1980 and these employees have never been reinstated. Security is lacking or inadequate to the task. In my travels I visit many parks throughout the state and each year find more facilities in dire need of repair and routine maintance is lacking. Until such time as our present state park system is brouht up to par, I feel that there can be no justification for new facilities to be built, especially campgrounds. The private sector can and will continue to handle this need throughout our state.

SUMMARY:

1. By Federal law it is illegal for States to use Federal dollars in direct competition with the private sector. New York State Parks received \$3,946,576.00 from the Federal Government in 1983. (4)
2. Is it right for New York State taxpayers to subsidize the people from Canada who make up 41% of the occupancy at Cumberland Bay and Ausable Point and it is projected, will use the new Pt. Au Roche facility to the same extent? (5)
3. Should the taxpayers of this State be assessed for a camping facility which will be taking campers away from already existing state facilities at Ausable Point and Cumberland Bay? Your master plan seems to indicate this. (6)
4. What proof do you have that a new state camping facility will bring more camping families to Clinton County? Where will this vast new pool of campers come from? As we in the private sector know all too well, there are just so many campers to go around. Another campground can only succeed in reducing the number of campers per facility, (7)

5. How can the State justify spending 2.1 million on a camping complex in Pt. Au Roche? Given camping fees of \$90,000.00 annually, a high estimate indeed, it would take the State 23½ years to realize a return on its initial investment with no interest being paid on the principal. I ask you, COULD THE PRIVATE SECTOR GET THIS KIND OF FUNDING FOR SUCH A PROJECT????

8

6. There is only one month each year that camping is at full capacity at Cumberland Bay and Ausable Point, that being the month of July. Ausable Point records indicate this to be true. In 1982 Ausable Point (DEC operated) showed June occupancy at 36.57% and August at 65.68%, in 1983 June was at 55.17% and August 87%. 1984 figures at Ausable Point from May 20 thru July 29 show an occupancy of only 67.28% for the period. July again was at capacity. Camping throughout the north country peaks only in July. This again shows no need for a new State camping facility.

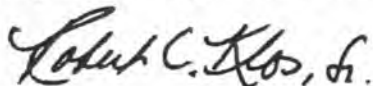
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7. Privately owned campgrounds in the Pt. Au Roche area would be ready and willing to expand their facilities should the new park materialize (for day use), however high interest rates and the "red tape" involved in expansion is most discouraging. The State legislature could help in this area.

10

In conclusion CONY would like to go on record as being opposed to the inclusion of camping in the proposed Pt. Au Roche State Park, not the park itself since there may well be a need for more day use facilities in the area. The needs of the camping public, however, are and will continue to be well served by the existing public and private campgrounds.

Respectfully submitted:



Robert C. Klos, Sr.
Executive Administrator
Campground Owners of New York

Document: August 16, 1984 letter from Robert Klos Executive Director of the Campground Owners of New York.

Responses:

1. Camping. Similar to CONY, a primary objective of OPRHP is to bring people into contact with resources. It is the OPRHP's position that the physical, biological and scenic attributes of Pt. Au Roche State park are outstanding public resources and also that the park possesses significant potential for increasing public access to the recreational resources of Lake Champlain. The camping development will provide improved access to the park for more people from more distant population centers, improve cost effectiveness of other park facilities by increasing overall use and spreading use to off peak periods, and improve the overall experience for park visitors by allowing them to camp within walking distance of the beach and other park resources.

2. Campsites. Based on data from a telephone survey by CONY and on information in OPRHP records (with respect to the campgrounds surveyed), there are approximately 1900 campsites in private campgrounds within 25 miles of Pt. Au Roche (Table 1). About 50 percent of these sites are for transient campers; the sites service campers who are only staying for short periods (e.g. 2 weeks or less). Percent occupancy of these sites ranged from 11 to 78 while overall occupancy rates (i.e. includes seasonal campers) ranged from 47 to 81 percent. The two camps situated on the shoreline of Lake Champlain have occupancy rates of 43 and 46 percent for transients and 84 and 68 percent overall.

Table 1 . Camping Sites and Estimates of Occupancy Rates of Private Campgrounds Within 25 Miles of Pt. Au Roche State Park. (Source: R. Klos, CONY Executive Director)

FACILITY	DISTANCE	TOT # SITES	SEASONAL	TRANSIENT	%OCC. TRANS.	%OCC. OVERALL
1	20+	354	210	144	11	64
2	-	60	18	42	30	52
3	15+	135	55	80	28	57
4	-	75	12	63	37	47
5*	5	92	65	27	43	84
6	5+	212	165	47	84	96
7	10+	225	125	100	40	73
8	10+	130	17	113	78	81
9	-	150	48	102	70	79
10	20+	120	55	65	30	63
11*	10+	145	58	87	46	68
12	-	150	-	-	16	-
Totals		1848	828	870		

* Situated on shoreline of Lake Champlain

While the data indicates that vacant campsites exist within 25 miles of Pt. Au Roche, there are other factors important in determining the need for campsites. These factors include the kind and quality of resources attracting campers. At Pt. Au Roche it is not only the features of the park that influence a recreationist's decisions on where to camp. Analysis of camper attendance at Cumberland Bay State Park indicates that there is also a strong camper interest in access to the resources of the Lake Champlain.

Development of camping at Pt Au Roche will proceed in two parts. The first part will consist of 60 unimproved sites and 30 carry-in sites. Most of the unimproved sites will replace sites removed from service at Cumberland Bay and Macomb Reservation State Parks. No decision regarding implementation of the second part of the camping proposal (i.e. up to 120 additional, unimproved sites) will be made until additional evaluation of the effect of operation of the Pt. Au Roche facility on the development or expansion of private campsites outside of the park has been conducted. This additional assessment will also include a more detailed evaluation of resource capacity for campground expansion.

The initial part of the camping development specifies up to 60 unimproved campsites. Assuming that a maximum of twenty of these sites are "new" sites and not replacements of sites removed from service elsewhere, the initial development will result in less than 1.5 percent increase in the the number of campsites (public and private) within a 25 mile radius of the park. The second portion of the camping proposal (providing that it does go forward) will result in an increase of up to 120 sites or about 8 percent.

3.Operation of State Campgrounds and Finances The success of operation (in terms of revenue and expenditures) of a state park facility is dependant on the quality of the resources present and the services provided. Some state parks bring in revenue in excess of operation costs while others operate at a deficit. Cumberland Bay State Park, for example, falls withn the former category; it operates in the black. For the 83-84 fiscal year the operation costs totaled \$143,500 while revenue for the same period amounted to \$221,500.

Deficits in the operation of State Park facilities can be attributed to a variety of causes. The quality of resources at the park may not be on par with the quality of resources at other facilities or user interests in recreational activities at a particular facility may have changed over the years. State park facilities often provide services which are not profitable for private enterprise such as boat launching facilities for small craft or unimproved camping facilities. The seasonal nature of state parks operations also has some bearing on the operational success. OPRHP also has a responsibility to provide opportunity for camping to individuals with moderate to low income.

4.Federal Law. Rather than being in direct competition with the private sector, state parks of high quality in both natural resources and services rendered can be of substantial benefit to the private sector including private campgrounds.

Camping facilities at Pt. Au Roche will be "basic" in design; there will be no hook-ups to utilities at the sites. Also the OPRHP will continue to explore private investment opportunities.

5.Subsidies. OPRHP recognizes the need for reciprocity in providing opportunity for Canadian use of NYS facilities . While Canadians use NYS facilities the same holds true for New Yorkers using Canadian National or Provincial parks. Use of New York State parks by campers from other states and Canada provides substantial tourism benefits.

6.Relationship of Pt. Au Roche State Park to Cumberland Bay and Ausable Point. At present, conditions are crowded at Cumberland Bay State Park due to the small size of campsites. At Macomb Reservation State Park, campsites are underutilized. The proposed camping at Pt. Au Roche will provide much needed access to a significant public resource. The plans calls for reductions in the numbers of sites at Cumberland and Macomb which will increase the quality of camping at Cumberland Bay and the operational efficiency of Macomb Reservation.

Ausable Point is a very well utilized facility operated by the State DEC.

The primary purpose in including camping as an element of the master plan for the park is to provide access to the considerable resources of the park and Lake Champlain. One reason for camping is not to take campers away from other state facilities but rather to ease overcrowded conditions which are stressing the natural and man made resources at Cumberland Bay State Park.

7. Additional camping facilities. User surveys demonstrate that persons using Cumberland Bay State Park for camping travel substantial distances to reach the facility. Improvements to existing facilities will serve as a "magnet" to attract new users (in a growing market) to the Plattsburgh region.

8. Return on Investment A primary goal of state parks is to provide a service to the residents of the state and not necessarily to generate revenue for the state. State Park facilities have higher costs incurred as a result of protection of important public resources. The expense is made greater by the need to blend capital investment into a scenic setting while minimizing the intrusion on aesthetics.

9. Camping Attendance. The seasonal nature of camping and the operation of unimproved sites both contribute to the marginal nature of the "profitability" of state park facilities. The OPRHP feels that these are actually reasons why state parks should be providing camping opportunity.

10. Expansion by Private Campgrounds. As is stated in the plan, the OPRHP will conduct a more detailed investigation of camping need and resource capacity before any decision is made regarding implementation of the second part of the camping element. CONY officials are encouraged to seek relief through the state legislature in regard to high interest rates and unnecessary "red tape" which may affect the potential for campground expansion by the private sector.



CLINTON
COUNTY
AREA DEVELOPMENT
CORPORATION

RECEIVED August 17, 1984

AUG 20 1984

DEPUTY COMMISSIONER
PARKS REC. & HIS. PRES.

Mr. Ivan Vamos
Office of Parks, Recreation and
Historic Preservation
Agency Building 1
Albany, N.Y. 12238

Dear Mr. Vamos:

The Clinton County Area Development Corporation is charged with the responsibility of representing the interest of people in Clinton County in the field of industrial development to provide gainful employment and spread the tax base.

We are on the cutting edge of bringing new industry into Clinton County and very often are asked by prospects what recreational facilities are available in the area. The development of the Point Au Roche State Park facilities would certainly be an asset to this area and create much needed jobs for our Clinton County residents.

We believe that Wayne Byrne's ad hoc committee, after meeting twenty-four (24) times, has done their homework well and the Park will be correct environmentally based on their recommendations. Therefore, we wholeheartedly endorse this development.

Sincerely,

WILLIAM J. MCBRIDE,
President

WJM/sbr

168

Administrator: U.S. Foreign-Trade Zone #54

BOX 19 • GOVERNMENT CENTER • PLATTSBURGH, NEW YORK 12901
(518) 561-8800 EXT. 264

National Audubon Society

NORTHERN ADIRONDACK CHAPTER
PLATTSBURGH, NEW YORK 12901

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AUG 3 0 1984

FORMAL STATEMENT ON THE DRAFT MASTER PLAN
AND DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR POINT AU ROCHE STATE PARK

COMMISSIONER
PARKS, REC. & HIS. PRES.

General Overview

Northern Adirondack Audubon Society would first of all like to thank the Office of Parks, Recreation and Historical Preservation for its cooperation and patience with those people and organizations who are trying to create a park which will serve the needs of the surrounding communities as well as the needs of the visitors to the Lake Champlain - Adirondack region,

The proposed plans for Point au Roche State Park, which are contained in the Draft Master Plan and Draft EIS, certainly take these needs into consideration. To leave this piece of land in its present state of limbo is to deprive the people of the use of a valuable resource. This resource must be treated gently and be carefully managed so as not to destroy its natural beauty. Generally, the plan takes this aspect into consideration.

Positive Aspects of Plan

1. The Plan emphasizes a year-round day use concept. Swimming, picnicing, hiking, boater recreation and cross-country skiing are certainly activities which are in demand at the present time.
2. A majority of the park land will remain undeveloped so as not to result in overuse. The natural beauty will be preserved wherever possible.
3. Existing ponds and major wetland areas will remain as such. These areas provide valuable habitat for wildlife and plant species.
4. The existing trail system will be improved and expanded.
5. The St. Armands Beach has been incorporated into a wildlife preserve area. The natural sand dunes should be allowed to return. This area is also a gathering place for waterfowl.
6. The boat pumpout facility in Deep Bay has been moved up to Phase I.

7. The environmental resource interpretation program offers great potential for community and organizational involvement in park activities.

Negative Aspects of Plan and Alternative Solutions

1. The first sentence on page 103 is incomplete. What information is missing? (1)
2. The proposed camping facilities should be left out of the Plan. The camping loops are located on soils that do not allow for adequate drainage. Land modification would be required which would add to the overall construction costs. The sites for camping are presently open fields. The map of the proposed facilities show these sites covered with trees. Does the State plan to plant trees or rely on natural growth? How many trees would be required to create suitable cover and how much would it cost? Camping should be left to the private sector outside the boundaries of the park. Campsites should not be constructed just because there is overcrowding at Cumberland Bay State Park. Private sector development would provide needed revenue for the town of Beekmantown and Clinton County. (2)
3. The proposed cabin colony needs to be reexamined. Twelve to fifteen cabins is too many. Four to six would be more acceptable. Primitive camping with lean-tos could also be an alternative. Cabin use should be limited to groups participating in nature center sponsored programs/activities. Since the cabins are part of Phase VI development, Audubon does not consider them to be a major issue at the present time. User demand would be a factor here. (3)
4. Page 78 states that the park managers residence will be relocated to the northeast corner of the park. It is not clear to Audubon whether a new residence is to be constructed or the old one moved. The Conner homestead should not be removed from its present location. It should be incorporated into the cultural resource program (4)
5. A food and drink concession should be provided. Cheap souvineers and alcoholic beverages should not be sold at any concession in the park. Concession facilities that are to be incorporated into the park plan need to be more clearly defined. (5)

Summary

Northern Adirondack Audubon Society Supports the development of Point au Roche State Park as a year-round day use facility. Audubon recognizes the need for greater public access to Lake Champlain just as we recognize the need to protect the natural environment. The Draft Plan attempts to accommodate both of these needs.

We view the Draft Plan as simply that, a draft. We have commented on a few aspects of the Plan we find disturbing and some we find favorable. Audubon is concerned with all aspects of the environment even though some may not have been specifically addressed in this statement. There are laws and regulations which protect the natural environment from abuse. We trust that these laws and regulations will be adhered to.

6

Money has been appropriated for Phase I of the Plan. Audubon recommends that Phase I development be started as soon as possible. Unless Phase I can get off the ground, Phase VI and everything inbetween will never materialize. The citizens of Clinton County have waited ten years. How much longer do they have to wait? Audubon is not strictly for the birds. We are for the people too.

7

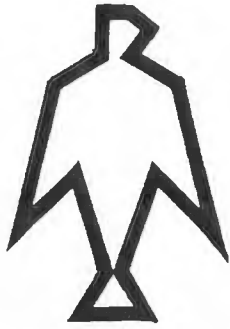
Respectfully Submitted
Susan A. Millar, Pres.
Northern Adir. Aud. Soc.

Document: Statement from Susan A. Millar, President,
Northern Adirondack Audubon Society

Response:

General : The OPRHP appreciates the listing of not only concerns over certain elements of the plan but the positive aspects of the plan as well.

1. The information missing from 103 was a result of a typographical error and it has been placed back in the plan.
2. The primary purpose of providing camping at Pt. Au Roche is to provide overnight public access to these public resources. The agency has recognized the severe limitation classification of the soils in the park. The agency has also initiated more detailed soils studies to determine more specifically the capacity of the soils for recreational use. Findings from these studies will be taken into consideration in the final design of facilities. As an example, results from soils investigations pertaining to Phase I of the master plan, indicate that point discharge of treated effluent to Lake Champlain will not be required. The characteristics of the soils indicate that construction and operation of standard or raised leaching fields will be feasible.
3. Cabin Colony. The proposed cabin colony has been removed from the master plan.
4. Park Manager's Residence. Due to its age and construction it is unlikely that the Conner Homestead can be moved from its present location. Thus, it is more probable that a new residence for the park manager will be constructed near the site of the proposed maintenance center. The final disposition of the Conner Homestead is not known at this time. Incorporation into the cultural (and nature) interpretation program is a reasonable suggestion which will be given serious consideration during the final phases of park plan implementation.
5. Concession facilities will be provided at the park according to existing guidelines for such facilities.
6. The OPRHP is obligated to promulgate and enforce regulations which pertain to protection of parkland resources.
7. The Thousand Islands State Park Commission and OPRHP are working as diligently to implement the elements of Phase I in as timely a fashion as possible.



WAKONDA

FAMILY CAMPGROUND, INC.

East Schroon River Road, Pottersville, New York 12860
Tel. (518) 494-2610

Campsites - Housekeeping Cottages

Your Hosts:

Gene and Marlene Ostertag

August 23, 1984

Mr. Ivan Vamos
Deputy Commissioner For Planning
and Operations
Office of Parks, Recreation & Historic
Preservation
Agency Building 1
Empire State Plaza
Albany, New York 12233

RECEIVED

AUG 27 1984

DEPUTY COMMISSIONER
PARKS RECREATION & HISTORIC PRES.

Dear Mr. Vamos:

Re: Point Au Rocne State Park
Draft Master Plan and DEIS

I was unable to personally attend the August 16, 1984 hearing on subject proposal, but my wife, Marlene, who attended the hearing with several other members of the Campground Owners of New York, brought me a copy of the DEIS, which I have read and on which I have a number of comments. I speak both as a professional civil engineer with 28 years of private and municipal practice and as a private campground owner and operator with 13 years of experience.

I want to say at the outset that I am opposed to having the State (1) enter into a business which private industry is perfectly willing to and capable of operating; (2) by entering into that business going into unfair competition with other already-established private businesses in the area; (3) spending significantly more capital in developing that business than private industry would; (4) charging less than prevailing private rates; (5) requiring the taxpayers to subsidize both (4) and (5) for a clientele which the State admits will be two-thirds Canadians and (6) permanently damaging a frail environment which has not been adequately investigated.

Letter to: Mr. Ivan Vamos
Page 2
August 23, 1984

My specific comments follow:

Market Justification pages 13-18

The report cites a deficiency of camping facilities in Jefferson and Clinton Counties, and overcrowding of Cumberland Bay State Park as justification for a new camping facility. There is no data in the DEIS on the number of private camp sites nearby, nor their utilization rate. Robert Klos, Executive Administrator of the Campground Owners of New York has determined that there are over 2000 private sites within 25 miles of Point Au Roche, and that their occupancy rate is on the order of 39%. In my opinion, these harsh economic facts cannot be overlooked. Until these private parks are pressed for space, there is no justification for additional campsites in this area.

1

Secondly, (page 14), 65% of campers and an even greater percentage of day users of Cumberland Bay were determined by surveys to be Canadian. There may be "a strong demand for access to Point Au Roche", but for New York State taxpayers to spend six million dollars in capital and then operate a park at a loss to subsidize Canadian visitors is absurd.

2

Engineering

To begin, it is evident that little engineering has been accomplished to date on this project. I am non-plussed, as an engineer, to find that the State of New York would advance a project as far as this one has gone, without more detailed engineering investigations. On private undertakings for which I served as an engineering consultant in the past, we were required to demonstrate in great detail at this stage (DEIS) just how much water could be delivered and what its quality was; how much water would be required daily; how much sewage would be generated; specifically how would it be disposed of, and so forth. I had to produce detailed documentation and plans, and I do not find evidence of such documentation in this case. The State of New York has no right to apply one standard to private applicants, and another less stringent standard, to itself.

3

Soils in the areas to be developed are repeatedly cited as being poor in quality and shallow to bedrock and ground water. The statement is made (page 79) that if sufficient percolation is not found, sand filters with point discharges to the lake will be constructed. I find it abhorrent and inconsistent in this day and age that the State would condone such a poor example of sewage treatment, which in my past experience, usually results in a poor quality nutrient-rich discharge, which in this case, will serve to pollute and fertilize whatever part of the lake it discharges into.

4

Letter to: Mr. Ivan Vamos
Page 3
August 23, 1984

Surface Water Quality will definitely deteriorate from bathing; septic system groundwater or point discharges; and the surface washing of camper's litter, undetected gray water discharge and vehicle gasoline, oil and tire wastes. (5)

Drinking water quality and quantity have not been demonstrated. (6)

Traffic Analysis is ludicrous. Dividing the total day-use visits for the season by a 100 day season to arrive at 115 cars per day (page 96), the only number shown for additional traffic, is misleading. A more realistic approach would be to say that a day use parking lot with a capacity of 350 cars, 30 RV's and 8 buses would generate $388 \times 2 = 776$ trips per day, that 240 campsites would generate at least one round trip a day, or 480 trips, that 13 cottages would add another 26 trips per day, and that a 30 unit boat launch facility would generate another 60 trips per day, resulting in a grand total of 1342 trips per day, or an increase of 45% in the daily traffic on Point Au Roche Road. That is a far cry from the misleading number "115" mentioned in the report. (7)

Solid Waste Management (page 105), not detailed. There is no indication of how many tons per year will be generated, where it will be taken, what the condition of the receiving facility is, nor what its life expectancy is. In these days of solid waste crises, it is an important factor not to be slighted. (8)

Other Competition

Although I am speaking as a campground owner, I am sure that private marina operators and cottage rental people are just as incensed as I am at State competition in terms of providing boat moorings, services, and cottage rentals at what I am certain will be unfair, below-cost prices, based on current policies. (9)

Aesthetic

You can say what you will about aesthetics, since it is as subjective as one can get, but I am of the opinion that looking at 1400 bathers and picnickers, many pillars of campfire smoke, acres of cars, tents, laundry and roads built on an open field is far less pleasant than looking at an open field. Screening will take years to mature, and will never completely replace what is being lost. (10)

Letter to: Mr. Ivan Vamos
Page 4
August 23, 1984

Economics

You project a unit cost of \$9,000 per campsite for development--private industry could do an outstanding job for half that figure.

You project a unit cost of \$34,000 for a "cabin". I consider that figure unreasonably high.

I want to take a moment to explore your costs from the perspective of a private businessman:

I am going to use your estimate of 100,000 visitors annually; municipal interest at 8%; and an amortization period of 20 years, which is what we in private industry must live with.

Annual Budget	\$214,000	\$2.14 per visitor
Amortization of 6.1 million construction cost \$621,300/year		6.21 per visitor
Amortization of property acquisition 78,700/year		.79 per visitor
		\$9.14 per visitor

11

If a typical campsite party consists of four visitors, it means that it is costing us \$36.56 per night to host them. I believe that your fee for such a campsite is either \$5.50 or \$6.50 per night, depending on its character. I charge \$12 to \$14 per night for similar campsites and make a small profit, despite the fact that in addition to your costs, I must pay insurance, property taxes, and sales tax on all goods and services I purchase. I cannot believe that the total operating cost of this facility will be \$214,000. I would like to see a more detailed outline of how this cost was derived. Does it, for instance, include equipment acquisition and amortization, allowance for the park's share of self-insurance costs, etc.

Economic Impact

Page 93 (d)-I fail to understand how \$1.00 spent by a visitor has an impact greater than \$1.00 on the economy.

12

Page 43 (c)-since day use and camper registration fees are included in the expenditures per group, the \$1.3 million in visitor expenditures is too large by perhaps 10%-12%.

13

Page 94 (e) claims that 80% of salaries would be spent locally, while page 94 (f) claims that 25% would be spent locally. (???)

14

Letter to: Mr. Ivan Vamos
Page 5
August 23, 1984

Page 94 (f) multiplies the sales tax rate by \$2.3 million rather than the \$1.3 million actually being spent. (15)

Page 49 (g)-The only impact I see from this inflated construction cost is on my tax bill and that of millions of other New Yorkers. (16)

Page 94 (h)-I disagree with the \$2.7 million impact figure, which from comments I have raised above, I feel should be less than half that number. I further raise the issue that if 100,000 annual visitors are costing us \$9.14 each, and paying on the order of \$1.50 each for admission to the park, we are losing \$764,000 a year on them at the park. (17)

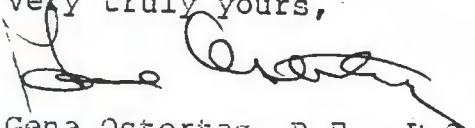
Page 97-98-I firmly disagree with the conclusion that the impact of 240 additional campsites at Point Au Roche is difficult to measure. I know that private campsites already struggling to stay in business will be adversely affected. (18)

Page 104-Anyone who has visited a number of State campsites, as I have, knows that vegetation is severely damaged and destroyed by trampling, unauthorized vehicular traffic and parking, and undetected hatchet work. State campgrounds rapidly become wastelands of hard-packed earth, even under mature trees. I invite anyone to visit my campground to see what caring stewardship of the earth is about. (19)

In conclusion, I feel that the DEIS is based on insufficient investigation in several areas, including soils, ground water, solid waste disposal, sewage disposal, economic benefits and economic impact. I further feel that the conclusions and narrative are biased by planners determined to create a facility at Point Au Roche at any cost. I feel that the development costs are too high, and the damage to the environment too great for the benefits received.

I recommend that Alternative I (page 63) be adopted, leaving Point Au Roche undeveloped.

Very truly yours,


Gene Ostertag, P.E., E.S.
President Wakonda Family Campground, Inc.

pp

Document: August 23, 1984 Letter From Gene Ostertag, P.E.
L.S., President, Wakonda Family Campground,
Inc., Pottersville, NY

Response:

1. Availability of Campsites. The OPRHP recognizes the existence of vacancies at private and public campsites within 25 miles of Pt. Au Roche. Vacancies are a product of a variety of parameters including fluctuations in visitation rates due to season and weather, availability of leisure time, and proximity to recreational resources. It has been the OPRHP's position that while the presence of campsites within the Plattsburgh area should be a consideration, the presence of the substantial parkland resources of Pt. Au Roche is of equal importance. Providing campers with an opportunity to experience the resources of Pt. Au Roche State Park and Lake Champlain is a reasonable and appropriate action. The existence of vacancies at transient campsites within a certain radius of the park (including Vermont) should not preclude access for the public to the enjoyment of substantial publicly owned resources of Pt. Au Roche State Park.

The service derived from the state's investment in the other recreational facilities at the park will be substantially greater if camping is provided on the park grounds. Furthermore, the quality of the camping experience will be that much greater if provided in such a beautiful setting and with fine recreation facilities immediately available.

2. Out of State Users. It is a policy to make visitors to our state feel welcome and, in turn, have our residents be welcomed by other states and countries. The addition of camping will make the park more readily accessible to distant New York population centers as well as to out-of-staters. Both will be better serviced because of the introduction of camping within the park.

3. Specificity of Plan and DEIS. The purposes of preparing the Draft Plan/DEIS for Pt. Au Roche include not only compliance with the (State Environmental Quality Review Act) but also to provide opportunity for public participation in the planning process. The Draft Plan/DEIS was written to provide interested persons with an overview of the type and extent of recreation activities being proposed at the park. The OPRHP has not yet applied for applicable regulatory permits. The application for such permits will include more specific construction plans as well as detailed discussion of site specific environmental effects. The State of New York is subject to the same regulations/permits/standards as are private campgrounds.

4. Sewage Treatment. Findings from a more recent study of soil characteristics in the park indicate that disposal of wastewater effluent via absorption fields or raised leaching beds will be feasible. Point discharge of treated effluent to Lake Champlain will not be required. Estimates of the volume of water use and wastewater generated are provided within the master plan.

5. Surface Water Quality. Findings from a preliminary baseline study demonstrate that the bays adjacent to the park have very good water quality. Data from this survey and information from the Lake Champlain monitoring program will serve as a comparison to information generated through future water quality monitoring. In this way, OPRHP can note any significant shifts (adverse) in water quality and take steps to eliminate the causes.

The OPRHP has and will take every precaution necessary to assure that the quality of the water resources of the park and lake is protected. Operation of Pt. Au Roche State Park will be done in accordance with state and federal regulations pertaining to water resource protection and is not expected to substantially affect water quality.

6. Drinking Water Quality. Additional information on the estimated volume of water needed to service the park has been included within the master plan/FEIS. Based on the quality and yield of existing wells, the OPRHP is confident that groundwater of sufficient quantity and quality can be obtained at the park.

7. Traffic Analysis. The traffic analysis section of the master plan/FEIS has been expanded. The original analysis was based on total estimated attendance at the park and did not address peak use. Based on the preliminary design in the master plan, there are a total of 720 parking places. Assuming a single trip to and from the park per vehicle a total of 1440 trips per day would be generated when the park is completely filled to capacity. Such situations are likely to occur only a few days of the year. As indicated in the master plan, however, even on days when the park is at capacity the total traffic flow on Pt. Au Roche Road would be 4,440 trips per day which is substantially below the Average Daily Traffic (ADT) guideline of 6,200 vehicles per day.

8. Solid Waste Management. The master plan contains additional information on this element of the Plan. Annual collections of solid waste is estimated to be 200 tons. The waste will be transported to the Clinton County landfill which has been estimated to have 14 years remaining until it is filled.

9. Other Construction. Initial plans for construction of a full scale marina were dropped earlier in the planning process. Also, the cabin proposal is no longer an element of the plan. The OPRHP strongly feels that the master plan reflects the agency's interest in minimizing the potential for competition with the private sector. This statement applies to all of the plan's elements including the camping.

10. Aesthetics. As is stated within the DEIS, the change in character of portions of the park from an undeveloped to developed condition may be viewed as an unavoidable adverse impact to some individuals. Landscaping and facility design can reduce the extent of such impact.

11. Economics. Mr. Ostertag's estimates of cost per visitor are reasonable figures which may be somewhat on the conservative side since the present state interest rate is around 10% vs. 8%. Also, the estimated annual budget (\$214,000) does not include costs such as insurance, equipment amortization, and maintenance.

It is important to recognize that the State of New York deems it appropriate to protect the substantial resources of the park regardless of whether more intensive forms of recreation are provided. Thus, amortization of acquisition costs should not be included within cost per site per night. Also, since the day use facilities will also be constructed to some extent independent of the camping element inclusion of amortization costs for development of swimming, boat launching, biking and nature interpretive facilities within the cost for camps may also be inappropriate. This also holds true for many of the operating costs associated with park operation. Even though there can be discussion regarding whether or not to include certain amortization costs within a cost estimate for camping, Mr. Ostertag is essentially correct in indicating that revenue from camping fees is not sufficient to cover costs. It is a general policy for parks to keep fees as low as possible so as to encourage use by persons with moderate and low income especially during off-peak periods.

The high costs of campsite development partly relates to the nature of the resource and the desire to be sensitive to its scenic beauty. The site was chosen, not because of its high development potential, but because of its natural scenic attributes. Protection of these same attributes, however, results in increased construction costs. Design and construction must be sensitive to natural assets in the layout and development of sites, roads, and comfort facilities.

12. Multiplier Effect. Additional dollars spent in the economy creates additional income to the persons providing the goods or services to the purchasers. Most of the additional income (say 80-90%) earned will in turn be spent buying goods and services from other individuals. These other individuals will also experience income increases and be able to spend more. The only reason the impact will not be 100 percent is because some will be saved (i.e. not spent) and some of it will leak out of the local economy, being spent on goods and services produced elsewhere.

13. Visitor Expenditures. Mr. Ostertag is essentially correct. Since registration fees go into the general fund, they should not have been included in estimating visitor expenditures. Based on Cumberland Bay State Park revenues, Pt. Au Roche may be expected to generate \$120,000 from fees. Thus estimated visitor expenditure is \$1.2 million per year rather than \$1.3 million.

14. Correction The statement under "f" has been corrected to "Assuming 25% of park wages are spent locally on non-taxable items, sales tax revenues from park expenditures equals \$9,000. The phrase "on non-taxable items" was inadvertently left out of the Draft Plan.

15. Sales Tax Generation. The report is correct. Additional sales tax will be generated by both the initiating expenditure increase (the \$1.2 million) and by the induced expenditure increase (the additional \$1.0 million).

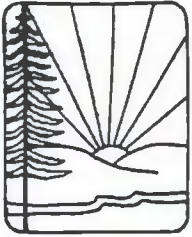
16. Construction Cost. The total estimated cost for construction of all facilities at Pt. Au Roche is 5.5 million. The OPRHP feels that this estimated cost is a reasonable starting point. Actual costs may be lower or higher depending on actual site conditions. As stated earlier, the need to include environmentally protective elements within the design facilities servicing resources such as those at Pt. Au Roche often results in additional costs.

17. Park Costs Much of the cost relates to the land and capital improvements designed to protect and yet make available this significant scenic resource to as many people as possible. Having made a substantial investment in the land and capital infrastructure, the smaller the charge, the more people who will avail themselves of its services.

18. Impact on Private Campgrounds. As stated in the master plan the first part of the camping development at Pt. Au Roche will consist of 60 unimproved sites and 30 carry-in sites. They types of sites are known to be marginal in terms of profit potential to private campgrounds. Also, since most of the unimproved sites will be replacements for a decrease in the number of sites at Cumberland Bay and Macomb Reservation State Park, OPRHP does not feel that construction and operation of this first part of the camping element will substantially affect (adversely) use of other private or public campgrounds.

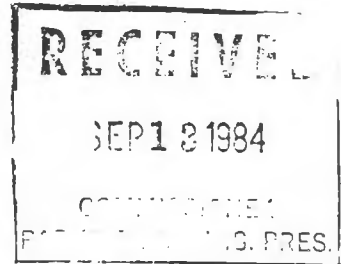
Potential effects of the up to 120 additional sites in the second part of the camping element will be evaluated before any decision regarding implementation.

19. Environmental Effects in Campgrounds. OPRHP recognizes that certain types of adverse environmental effects exist in some state campgrounds designed and built decades ago according to standards which are not as environmentally sensitive as those employed today. The agency has adopted a policy of redesigning such facilities so as to improve the quality of the campgrounds and reduce the extent of such effects.



Plattsburgh and
Clinton County
Chamber of Commerce

P.O.Box 310 Plattsburgh, New York 12901
Telephone (518) 563-1000



Associate Office-
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Commerce
Executives

New York State
Travel &
Vacation
Association

Business Council
of New York
State

September 10, 1984

Orin Lehman, Commissioner
Office of Parks, Recreation
and Historic Preservation
Agency Building One
Albany, NY 12238

Dear Mr. Lehman:

The Plattsburgh and Clinton County Chamber of
Commerce would like to offer our support of the
proposed development of the Point au Roche
State Park.

We believe that the development will benefit
our area through environmental enhancement,
tourism development, decreasing overcrowding
of other day use facilities, and significant
economic impact.

We urge the adoption of the proposed plan and
the prompt presentation of the plan to the New
York State legislature for appropriation of funds
during the 1984-85 legislative session.

Sincerely,

William D. Santa
President

WS/jd

TOWN OF BEEKMANTOWN

JAMES F. SEARS
SUPERVISOR

Regional Director	
Asst Regional Director	
General Park Manager	
Engineering	
Business Office Asst.	
Historic Sites	
Program Specialist	
Park Police	
Park Managers	

OFFICE OF THE SUPERVISOR
PO BOX 308
WEST CHAZY, NEW YORK 12002

TOWN HALL 583-4650
(AREA CODE 518)

August 28, 1984

Mr. Charles Elliott
N.Y.S. Office of Parks & Recreation & Historical Preservation
Thousand Island Region
P.O. Box 247
Keewaydin State Park
Alexandria Bay, New York 13607

Dear Mr. Elliott:

Our townspeople have followed the development of the proposed Pont au Roche State Park master plan with keen interest. Since the proposed park is located in our town, we have some interest in how it will be developed.

Our Town Planning Board and Town Board met and drafted a position statement regarding the master plan for the Pont au Roche Park. This statement is embodied in the attached resolution that was adopted by our Town Board at a special meeting held Monday, August 27, 1984.

We extend our statement and the suggestions therein with a constructive and supportive attitude. We want the best possible utilization of the funds available with maximum return to potential users of the parks services. We sincerely trust the Commissioners, the planners and the builders will work to those ends.

Thank you for soliciting our input. We support you in this effort and offer any help that we may render at your request.

Sincerely yours,
James F. Sears, Sr.
James F. Sears, Sr.
Town Supervisor

JFS/rca

Resolution Stating Town of Beekmantown Position on Development of Pont au Roche.

WHEREAS, the State of New York has revealed a plan for the development of property on Pont au Roche as a State Park, and,

WHEREAS, the State Legislature has provided initial funding for this project, and,

WHEREAS, the Thousand Island Park Commission and the State of New York are seeking public input in the planning process, and,

WHEREAS, the Town of Beekmantown Planning and Town Boards met and reviewed the Pont au Roche Plan, and,

WHEREAS, after said review, those Boards established a position for developing a park for maximum utilization at the lowest possible cost.

NOW THEREFORE, be it Resolved, that the following changes be made in the Pont au Roche State Park Development Plan:

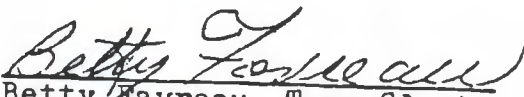
1. That the State of New York enter into an agreement with the Town of Beekmantown to lease a part of the St. Armands Beach for development by the Town, at Town expense for a Town Beach. (1)
2. That more wilderness camp sites be developed in lieu of the proposed cabins. (2)
3. That the boat moorings be limited to not more than forty (40). Limiting moorings to forty or less:
 - a. Would prevent water pollution and esthetic spoilage of Deep Bay.
 - b. Would allow for maximum control of boating traffic in what could be a very congested situation.(3)
4. That the proposed Nature and Historical Interpretation Center be scaled down. (4)
5. That existing roads in the park area be improved and used, thus allowing much of the proposed \$400,000 appropriated for a new road, to be saved. (5)

6. Forest and farm lands around St. Armands Beach should be managed to preserve the view of the Lake from the Pont au Roche Road. (6)
7. We urge the Thousand Islands Park Commission to move promptly to put the Pont au Roche master plan into effect and bring the development of the park to fruition. The Town of Beekmantown is most interested in the immediate development of the beach and day use facilities. (7)

Resolution offered by: James Garden

Seconded by: Earl Tom Sears

All were in favor.


Betty Favreau, Town Clerk

Document: Resolution of the Town of Beekmantown Town
Board -- August 27, 1984

Response:

1. Agreement between Town and OPRHP. The OPRHP will consider specific proposals for a leasing agreement. OPRHP feels, however, that use of the state facilities to be constructed is a more economic and environmentally efficient approach. An additional Town operated beach facility would require duplication of day use facilities such as parking lots, bathhouse, and operation and maintenance costs. Construction and operation of these facilities would occur behind and adjacent to the area designated for dune regeneration. A more efficient approach would be, for example, a Town/OPRHP swimming program using the state day use facilities. Such a program could be run during week days when attendance is normally not at maximum.

Another important consideration is that under any leasing agreement, the beaches at Pt. Au Roche State Park cannot be dedicated for the exclusive use of town residents (Appelbaum, 1983).

2. Campsites. Campsites at Pt. Au Roche will be of two types: unimproved (i.e. no "hook-ups") and carry in sites. The resources of Pt. Au Roche, while of substantial scenic and environmental character, do not offer opportunities for wilderness type experiences. The cabin proposal has been dropped as an element of the master plan.

3. Mooring Program. The need for and extent of a formal mooring program will be given further evaluation. The need for moorings, their number and spacing will be dependent on the findings from such an evaluation.

The water quality of Deep Bay has been recently tested (findings are in the master plan) and the Bay will be monitored for water quality.

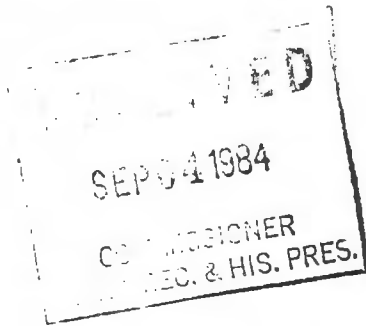
4. Interpretive Center. Based on the other comments received, the park's classification and the quality of resources at the park and Lake Champlain, the OPRHP remains convinced that an interpretive program (including a center) is an important element of the master plan. Construction of the nature and historical interpretive center has been moved ahead in the phasing schedule. Its size and scope will depend on patron interest and the need for supplementing other recreation programs such as winter recreation.

5. Use of Existing Roads. The importance of installing durable and efficient access roads has been stressed at several meetings of the Ad Hoc Committee, the public scoping session and the public hearing. The TISP&RC staff have considered the use of existing roads in the park.

Estimated cost of an entrance road using as much of the existing St. Armand's Road as possible (and still meeting recognized design criteria for such things as acceptable sight distance) is \$158,721. Estimated cost for all new construction is \$194,656. Cost for parking area facilities under both alternatives would be the same -- approximately \$162,650. Thus the total cost estimate (access roads and two parking lots) for the St. Armand's Road and all new construction proposals are \$321,371 and \$357,306 respectively. While total estimated cost for the St. Armands Road alternative is less, the OPRHP feels that the additional cost (approximately \$36,000) for the new construction proposal is worth the investment in terms of efficient park operation and functional relationship of master plan elements.

6. Forest and Farmland Management. The OPRHP recognizes the importance of the view from Pt. Au Roche road. Leasing of farmland in that area will continue as a means of protecting that scenic vista. Management of the trees behind the St. Armand's Beach will be undertaken if this growth substantially interferes with the vista.

7. Adoption of Master Plan. The TISP&RC is moving as quickly as possible in the adoption of the master plan and initiation of construction of Phase I elements (day use). While OPRHP is as interested as members of the Town Board in moving this project, it is also interested in assuring that the environmental review procedures are properly followed and that all persons and groups are provided with responses to their comments regarding the master plan and its potential impacts.



Hobbs Road
Plattsburgh, NY
August 29, 1984

Mr. Orin Lehman, Commissioner
Office of Parks and Recreation
Agency Bldg. #1
Empire State Plaza
Albany, NY 12238

Dear Commissioner Lehman:

The following statement is being submitted with regard to the development of the Point Au Roche State Park on behalf of the local residents whose signatures are attached.

In general, we support the development of a Master Plan for use of the Point Au Roche area. There are, however, certain items which need to be addressed and resolved before any construction can begin:

- (1) The classification of this area as scenic does not allow for the intensive development proposed by Alternate #3. We prefer instead reclassifying the area to "preserve" and limit development to no more than 15% of the available acreage. ①
- (2) We support the efforts of the State to maintain the shoreline and vistas as they now stand, and the development of a nature museum and educational center.
- (3) We support the development of the area for hiking and cross-country ski trails, picnicing, swimming, fishing, boat launching, and other day use activities.
- (4) We support the control of the use of Deep Bay, and the addition of a pump-out station and water quality monitoring program.
- (5) We strongly oppose the development of campsites or cabins on this property. Both types of lodging are already available at nearby privately operated sites. It should be noted that existing sites are not anywhere near capacity and should be able to handle additional tourist traffic without difficulty. Private development could meet other demands as they arise. ②
- (6) We feel an area should be set aside for small craft mooring off the beach area since this is the way a majority of people will travel to and from the swimming facility. ③

continued page 2.....

Commissioner Orin Lehman

August 29, 1984

page 2

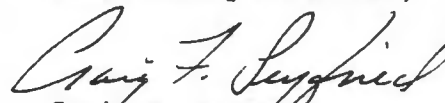
In summary, the undersigned support the development of Point Au Roche as a day use and educational facility (Alternate #2). We strongly oppose the addition of year-round cabins and campsites since we do not believe the area is environmentally suited for such use, and the critical issues of soil acceptability and sewage disposal have not been adequately studied and presented in the Draft Impact Statement. (4)

In addition, the construction of 240 campsites and 12 cabins suitable for year-round rental would seriously detract business from local residents who own and operate similar facilities nearby. (5)

Secondly, the financial benefits as outlined by Mr. Robert Anderson need to be broken down in detail and presented to the local residents for consideration. We do not believe Alternate #3 as proposed by the State will result in any significant increase in revenues to the community over Alternate #2 which we support. (6)

We commend the Ad Hoc Committee and the State for their fine efforts so far in developing this important natural resource area. We believe the State will continue to respond to the needs of the local community and residents by modifying the Master Plan and choosing Alternate #2 as the development scheme for Point Au Roche State Park.

Respectfully submitted,


Craig F. Seyfried

CFS/rl
Atts.

cc: Eleanor Berger, Lake Champlain Committee
Wayne Byrne, Chairman, Ad Hoc Committee

PETITION

WE THE UNDERSIGNED SUPPORT ALTERNATIVE #2 OF THE MASTER PLAN FOR THE DEVELOPMENT OF POINT AU ROCHE STATE PARK.

NAME

ADDRESS

Ed [unclear]	Box 67 R#1 Chazy NY 12921
Diana Yaska	RD2 Box 389 PLATTSBURGH (Pt. Au Roche)
Diana Yaska	" " "
Paul Yaska	" " "
Nita S. LeBlond	35 Lake St., Rouses Point, N.Y.
Charles J. Kelly	43 TRAFALGAR DR, PLATTSBURGH, N.Y.
Andrew M. [unclear]	Box 430 RFD 2 W. Chazy, N.Y.
Bernice [unclear]	RD#1 Box 275, Champlain, N.Y.
Richard L. Murrain	321st St Rouses Point, N.Y.
Richard L. [unclear]	Box 158 Chazy, New York
Ann M. Lorraine	Box 27, Champlain, New York
Regina C. Supan	RD2 Box 337 Plattsburgh - Pt Au Roche
Ed Conroy	R.D.#2 Stafford Drive Plattsburgh, N.Y.
Bernice Raffaele	RD#2 Box 307 Plattsburgh, Pt Au Roche
Robert A. Bryson Jr.	RD#2 Box 337 Plattsburgh, N.Y.
Ben Raffaele	RD#2 Box 307 PLATTSBURGH, PT AU ROCHE
Terry [unclear]	Box A4, Rouses Point, N.Y.
William [unclear]	2 Champlain Dr Plattsburgh N.Y.
Sherald M. [unclear]	81 Maple St Rouses Pt. 12929
Robert E. Werner	RFD2 BOX 327 PT AU ROCHE
Bruce J. Gray	3-5 College Ave, Plattsburgh

PETITION

WE THE UNDERSIGNED SUPPORT ALTERNATIVE #2 OF THE MASTER PLAN FOR THE DEVELOPMENT OF POINT AU ROCHE STATE PARK.

	<u>NAME</u>	<u>ADDRESS</u>
1.	Graig F. Seyfried	9 Hobbs Rd Plattsburgh N.Y.
2.	Rayne A. Silver	12 Hobbs Rd Plattsburgh, N.Y.
3.	Gilbert W. Winkler	15 Hobbs Rd Plattsburgh N.Y.
4.	William K. Kelliott	17 Hobbs Rd Plattsburgh, N.Y.
5.	Wray R. Brown	13 Hobbs Rd Plattsburgh, N.Y.
6.	C.R. Kerette	21 Hobbs Rd. Plattsburgh N.Y.
7.	Timothy H. Clum	11 Hobbs Rd. Plattsburgh N.Y.
8.	Cordy S. Clum	11 Hobbs Rd. Plattsburgh, N.Y.
9.	Ernest P. Piccolo	Stafford Dr., Plattsburgh NY
10.	Marcella Barcomb	25 Hobbs Rd Plattsburgh, N.Y.
11.	Alicia Barcomb	25 Hobbs Rd, Plattsburgh, NY
12.	Donald J. Sullivan	47 Hill St. Plattsburgh, N.Y.
13.	Joseph W. Sullivan	77 Hobbs Rd. Plattsburgh, N.Y.
14.	Phyllis C. Barnard	75 Hobbs Rd. Plattsburgh
15.	Russell H. Barnard	75 Hobbs Rd. Plattsburgh
16.	John M. Ryan	84 Hobbs Rd. Plattsburgh, N.Y.
17.	Amy A. Ryan	84 Hobbs Rd. Plattsburgh, NY
18.	Robert W. Ryan	84 Hobbs Rd Plattsburgh, NY.
19.	Robert D. Dushin	19 Hobbs Rd Plattsburgh
20.	Pamela D. Seyfried	9 Hobbs Rd Plattsburgh, NY
21.		
22.		
23.		
24.		

Document: August 29th Letter from Craig F. Seyfried

Response:

1. Scenic Classification. Scenic Classification does allow for the type of development described in the master plan providing that such development is done in a manner that is consistent or blends with the environmental resources of the park. With over 70 percent of the park set aside from intensive types of development, shoreline buffers and preservation of important scenic features, the OPRHP feels that the master plan is indeed consistent with the scenic classification.

Reclassification of the park to a preserve status is unlikely since its natural features have been altered over the years. For example, the park was the site of a Theme Park, the beginnings of a subdivision (roads and sewer lines are in place), and military training base. Substantial portions of the park were also cleared for agricultural purposes

2. Cabin Colony. The cabin colony has been dropped as an element of the master plan.

Primary purposes in providing camping at Pt. Au Roche are to improve: accessibility from distant metropolitan areas; the effectiveness of the investment in the other recreational facilities by increasing use during off-peak periods, and opportunity to experience fully the enjoyment of this scenic resource and quality water recreation facility. Campers will be able to walk to nearby swimming, boating, fishing, trail, playfields and nature facilities. Camping will offer to the general public the opportunity to picnic and live within a park of high stature along a beautiful stretch of Lake Champlain.

The effects of the initial phases of the park on private campgrounds will be monitored. The indications are that this resource will act as a magnet which will draw from a fairly large and growing pool of campers and thus make the area more familiar to others. Use of state parks by persons just starting out in camping improves the future prospects for the private sector as campers acquire more sophisticated equipment and wish to rent a campsite on a seasonal rather than a transient basis.

3. Small Craft Mooring. Provision of a mooring area off the beach area would represent a distraction to lifeguards thus represent a safety hazard. Mooring or landing of small boats will be allowed off the easternmost beach of Treadwell Bay (i.e. near Short Point). The extent and impact of such visits will be monitored and a formalized mooring program adopted if required.

4. Preference for Alternative 2 With respect to soils capacity and sewage disposal see the OPRHP response to Dr. Zinser concerns - number 2 and waste water treatment - number 3.

5. Detract from Local Business. The camping issue and its impact on private campgrounds is addressed in the master plan / FEIS and in the response to Mr. Byrne - number 3 and in responses numbered 1, 2, 3, 6, 7, 9 and 10 to the comments submitted by Robert Klos.

6. Financial Benefits. The financial benefits summarized by Mr. Anderson at the public hearing were taken from the plan's section on Regional Impacts of Draft Master Plan.