

# VII. Comments and Responses

## Introduction

This section contains the responses to the comments received by OPRHP on the Draft Master Plan and Draft Environmental Impact Statement (DEIS) for Moreau Lake State Park. The Draft Master Plan/DEIS was issued on November 16, 2005. A public hearing was held December 13, 2005 at the Large Group Instruction Room of the South Glens Falls High School in South Glens Falls, NY. The comment period was scheduled to end January 18, 2006, but was extended to March 20, 2006 as a result of requests made at the public hearing. A public information meeting was held February 8, 2006 also at the Large Group Instruction room of the South Glens Falls High School to allow additional comments to be taken.

During the December 13, 2005 public hearing, 24 out of 51 attendees spoke and their comments were recorded. Including the Town Board, 44 people attended the February 8, 2006 public information meeting. A transcript from this meeting was submitted by the Town of Moreau Town Board for inclusion into the comment record. During public comment period for the Draft Plan/DEIS, the Agency received 35 written comment letters. A list of the persons and organizations providing comments is contained at the end of this chapter.

The types of comments received included document editing suggestions, requests for clarification of information presented in the document, and comments related to specific aspects of the plan. All comments were reviewed and are organized by categories. Responses to these comments are found in this section and were considered in the revisions found in this Final Master Plan/Final Environmental Impact Statement (FEIS).

OPRHP appreciates the time and effort that persons interested in the future of Moreau Lake State Park have invested in their review and comments on the Draft Master Plan/DEIS and their participation in the public hearing.

## Response to Comments

This section is organized by category. Following each category heading, there is a summary of the comments received. Following each summarized comment is the Agency's response.

### Plan and Process

#### Comment: Length of Comment Period

A number of comments were received regarding the length of the public comment period; its timing, and a one-month extension that was issued.

#### Response:

The length of the original comment period was from November 16, 2005 to January 18, 2006 or 64 days. Under the State Environmental Quality Review Act (SEQRA), the minimum requirement for a public review period is 30 days. If a public hearing is held, the public review period must remain open 10 days following the close of the hearing. The Agency typically allows 45 days or more when submitting a Draft Master Plan/DEIS for public review.

In the case of Moreau Lake State Park's Draft Master Plan /DEIS, the comment period was extended an additional 30 days to February 18, 2006 as a result of comments received at the December 13, 2005 public hearing. The Town Board for the Town of Moreau requested an additional extension, to which the Agency agreed and held the comment period open until March 20, 2006.

#### Comment: Local Notification

Many residents commented that obtaining information about the Plan, process, or public hearing was difficult and that many local residents do not receive the local paper. In addition, it was noted that the Town of Moreau Town Board was not at the Plan's December 13, 2005 public hearing.

#### Response:

Due to a scheduling conflict, the Town Board for the Town of Moreau was not able to attend the public hearing. To accommodate the Town Board's review of the Draft Plan/DEIS, a public information meeting was held during the comment period and the comment period was extended.

Consistent with SEQRA, the notice of a public hearing was published in a local paper. The Glens Falls POST STAR was chosen as it is the local paper within the area of the Park with the largest circulation. As required by SEQRA, the notice appeared in the paper at least 14 days before the hearing. All other notices, including the notice of hearing, were published in the Environmental Notice Bulletin, which is maintained and published by the NYS Department of Environmental Conservation.

The Agency also mailed information to all people and organizations who had expressed interest in the master plan process in the past. Copies of the Draft Master Plan and Draft EIS were available in the local libraries.

**Comment: Local Representation and Advisory Committee Composition**

Questions were raised as to who represented the local residents and interest groups on the Advisory Committee. Comments were made about notification of these Advisory Committee meetings and who was invited to attend.

**Response:**

The Advisory Committee for Moreau Lake State Park was developed shortly following the Public Scoping Meetings in 1998. Individuals and organizations who expressed interest in participating on an Advisory Committee for the plan approached the Agency. While the groups and local government organizations represented on the Committee have not changed since then, personnel changes during the past years did necessitate changing those individuals listed on the Advisory Committee.

A list of current Advisory Committee members is provided in the Plan under the Acknowledgements section. This Advisory Committee includes local government representatives, local residents, businesses, interest groups, and other State and local agencies.

The function of the Advisory Committee was to act as a sounding board for the Planning Team and to serve as an additional method of involving interested parties in the development of the Draft Master Plan to insure that all issues were covered during the Planning Process.

The goal of using an Advisory Committee during any planning process is to provide two-way communication between the Committee Members and the Planning Team. The Agency has made every effort to keep those people on the Moreau Lake State Park Advisory Committee informed and up to date on the progress of the plan. As requested, records of the Advisory Committee Members, meeting notices and invitations, meeting minutes and handouts were sent to the Moreau Town Supervisor, who represented the Town of Moreau on the Advisory Committee.

**Comment: Support**

General comments of overall support for the entire plan or certain elements of the plan were received, including: trail plans, trail issues and trail activities for the various management areas; the work of current Park management; the extent and features the Park has to offer; the complexities of the Park issues; the time, effort and work that it took to develop the plan; the vision for the Park and the plan goals; and, the balance of development and preservation of Park resources.

**Response:**

Noted.

**Comment: Emergency Services**

It was noted that the local Police, Fire and Emergency Service organizations were not consulted during the development of the plan.

**Response:**

The Police, Fire and Emergency Services were afforded the same notification of all other interest groups. In addition, representatives of each local government were part of the Advisory Committee and thus there was an opportunity for these organizations to confer with OPRHP on issues related to their interests. Several persons pointed to the need for Police, Fire and Emergency Service organizations input related to the proposal to close a portion of Old Saratoga Road and provide park access only. This Final Plan includes the early action and turning lane alternative as the preferred master plan alternative. The Final Plan states that before any future consideration regarding the closure of Old Saratoga Road, a series of detailed studies as well as a supplemental Plan/EIS will be prepared. All emergency organizations will receive all notices pertaining to this effort, if and when it occurs.

**Comment: Size of the Park**

Questions were raised about how many acres of the Park are located within the Town of Moreau.

**Response:**

The size of the entire Park as reported in the Draft Master Plan is more than 4,100 acres. The actual figure as of 4/14/06 is 4,184.3; this figure includes only acres owned in fee by OPRHP and DEC. 2,815 acres of the Park are located in Saratoga County and the remaining 1,369 acres are located in Warren County. Of the 2,815 acres in Saratoga County, 2,634 acres are within the Town of Moreau and 181 acres are within the Town of Corinth. In Warren County, 1,159 acres are in the Town of Lake Luzerne and 210 acres are in the Town of Queensbury.

**Comment: Taxes**

The Town of Moreau lost a couple thousand acres of taxable real property and we asked the State to give us an in-lieu of tax payment and it has fallen on deaf ears. Yet in the Adirondack Park they reimbursed communities on a per acre basis. This is something the Town would like to see worked on.

**Response:**

Payments in lieu of taxes (PILOTs) are specifically authorized by statute in Real Property Tax Law Section 532. State lands subject to taxes are specifically enumerated in this law. The Agency lacks the statutory authority to pay PILOTs to the Town or County unless they are listed in this law.

**Comment: Request for information on the Advisory Committee**

The Town Board for the Town of Moreau requested a list of names of individuals on the Advisory Committee, public notices of and/or invitations to Committee meetings, meeting notes and handouts for the Committee meetings.

**Response:**

The Agency responded to this request and included the above requested information along with a summary of comments received at the December 13, 2005 public hearing. As mentioned earlier, the goal of using an Advisory Committee during a planning process is to provide two-way communication between the Committee Members and the Planning Team. The Agency has made every effort to keep the people on the Moreau Lake State Park Advisory Committee informed and up to date on the progress of the plan. This also included one-on-one meetings and phone calls to various members of the Advisory Committee throughout the planning process.

**Comment: Money for Plan Implementation**

A question was asked as to whether the State had the money to implement the plan as it is proposed.

**Response:**

Many of the smaller projects proposed in the Master Plan can be implemented at the Park level such as signage improvements and education/interpretation programs. Major projects for Moreau Lake State Park will be considered along with all other state and regional projects and must compete for limited statewide funding.

**Comment: Preparation of the EIS, recommendations and review**

The Plan Team was asked to clarify the process of preparing the Final Plan/FEIS, who makes recommendations for the final plan, how are they reviewed and how they get to the Commissioner.

**Response:**

The Plan Team has listed substantive comments on the Draft Master Plan/Draft EIS and developed responses to those comments. Appropriate changes were also made in the document. A Preliminary Final Master Plan/Final EIS was prepared on the recommendations of the Plan Team. This Preliminary Plan was then submitted to OPRHP Executive Staff for review. The Commissioner has final approval of the content of the Final Master Plan/Final EIS that is released to the public.

**Comment: Metropolitan Planning Organizations (MPOs)**

It was noted that nobody from the MPO's are listed on the Advisory Committee. These people should have been at least consulted during the development of the Draft Plan/DEIS to coordinate regional trail network plans.

**Response:**

OPRHP spoke with Adirondack/Glens Falls Transportation Council (AGFTC) staff, and their bikeway plan was considered in the development of the plan.

**Comment: Phasing of the Plan**

Explain the phasing of the Route 9 property development, in phase 3, in relation to the closure of Old Saratoga Road in phase 1.

**Response:**

The closure of Old Saratoga Road is no longer the preferred alternative within the Final Master Plan/FEIS. The Implementation section of Chapter V contains a table that outlines the phasing for plan implementation.

**Comment: Local Growth**

How has the growth of the Town of Moreau, in regard to the increase in housing developments been considered in the Draft Master Plan/DEIS?

**Response:**

The increase in growth in the Town was considered in assessing the recreational needs and potential impacts on the Park. The projected growth in housing within the Town, especially within the vicinity of the Park, will create additional demand for recreational opportunity. Within the context of the capacity of the Park and its resources, the Final Master Plan/FEIS is designed to meet this additional demand (at the local level) as well as demand on a statewide basis. Increased growth in the Town as well as Park use will generate additional traffic, which comes under the purview of the Town and Department of Transportation.

**Comment: Growth and Overuse of the Park**

There is a lot of educational value to the Park; however, if the plan is successful, completed to full build-out, and more people come to the Park, then there are concerns of overuse.

**Response:**

The Master Plan has attempted to strike a balance between enhancing the recreational area around Moreau Lake while at the same time preserving its natural setting and limiting development of lands in other areas of the Park. The facility and use levels proposed for the Park are considered to be compatible with the natural and cultural resources. Overall use of the Park is limited by the number of campsites and parking spaces for vehicles. Currently the Park closes when it reaches capacity.

**Comment: Scale back the Plan**

If the plan is scaled back, it will still allow for the Park to grow with its neighbors and offer many new activities to handle the increases in public demand.

**Response:**

The Draft Master Plan/DEIS evaluated a range of alternatives including the Status Quo which can be considered a scaling back of the preferred approach in the Final Plan. Scaling back of the Final Plan is not consistent with the demand for recreation opportunities at the Park both from the local and statewide patrons.

**Comment: Development and Implementation Focus**

The focus of the plan should be on interpretive programs, acquisition of adjoining lands, and stabilization/improvement of existing facilities rather than expansion and development of new facilities.

**Response:**

The plan identifies the need for interpretive programs, acquisition of adjoining lands, and stabilization/improvement of existing facilities. Many of these are identified in the early implementation phases while development of most of the new facilities is in the later phases.

**Comment: Flow of the Plan**

The document was difficult to follow in terms of what is precisely being proposed and where it will take place. Much of the text seems to be addressing “future possibilities” rather than hard and fast plans at this point. The large grey scale map around page 248 is one of the more useful features of the plan.

**Response:**

The Final Master Plan/Final EIS provides both short and long term direction for the Park. Chapter V describes what is proposed for each of the Park’s four management areas. The “Implementation” section of Chapter V contains a table that outlines the phasing of proposed improvements. Detailed site development plans will be prepared as each project is advanced.

## Open Space Preservation

### Comment: Balance of Use and Preservation

How does snowmobiling and large RV parking areas fit with the open space and preservation aspects of the Plan?

### Response:

Snowmobiling currently takes place in the Warren County Management Area primarily by local residents. There are limited trail opportunities and currently no parking areas. A minimum number of parking spaces are proposed to support snowmobiling and other trail activities within the Warren County Management Area. The RV sites are proposed in the lands between Route 9 and Old Saratoga Road, an area originally purchased for a Park entrance. This area is closer to the main roads and not near the lake, the existing camping area or any of the lands proposed for dedication as a Park Preservation Area, Bird Conservation Area or a Natural Heritage Area. The location of these sites is consistent with the goal of the plan to balance recreational use and natural resource protection.

### Comment: Future Acquisitions

OPHRP is to be commended in its efforts to preserve large expanses of open space and increasing the size of Moreau Lake State Park. Future acquisitions should include a transfer to OPRHP of the northern section of Mount McGregor lands south of Lake Ann; the in-holdings in the interior of the Park; and adjoining parcels of land.

### Response:

Noted.

### Comment: Protect the Park Resources

OPRHP should be cautious and long sighted stewards of Moreau Lake State Park protecting not only its cultural and scenic qualities, but protecting it from over use and development.

### Response:

Park staff will continue to monitor the Park resources to ensure their integrity. If over use of a resource begins to occur, Park and regional staff will take appropriate mitigation measures to prevent any deterioration or impacts to the resources.



## Environmental Impacts

### Comment: Traffic Studies

What is involved with conducting a traffic study and what does it consist of?

#### Response:

If a traffic study is warranted, OPRHP will hire a consultant to count traffic volumes along current roads and intersections and determine levels of service for each. The consultant will then consider proposed work by OPRHP and model what the future impacts might be on these levels of service.

### Comment: PCBs in the Hudson River

The Draft Plan's proposal to increase development and human use of the Hudson River in the area of Potter's Point will leave OPRHP and New York State vulnerable to unacceptable legal and financial liabilities. OPRHP should not develop Potter's Point or in any way increase human use of the Hudson River until the PCB sediments are removed from river sediments adjacent to the proposed Corinth Road boat access.

There is an extreme danger that increased visitor traffic will disturb the sediments in shallow water and increase the risk of human contact with PCBs. Activities such as canoeing, kayaking, fishing and wading should not be encouraged as there is risk of contact with contaminated sediments. Visitors who walk through contaminated sediment will most likely experience a red rash.

#### Response:

OPRHP notes that there is an ongoing mitigation project at Site #55012 under the jurisdiction of NYSDEC. The following information is taken from DEC's website.

"This site is on property owned by Niagara Mohawk [*National Grid*] located along the Hudson River. The property was leased for use as seasonal residences. The site is approximately 0.8 miles upstream from the Queensbury Water Treatment Plant. An area adjacent to one of the seasonal residences (which has been removed) is near the river and is terraced. An area of soil was contaminated either by dumping of 37,737 ppm on the river bank and 86.5 on the river bottom adjacent to the shore. Niagara Mohawk completed a pair of Interim Remedial Measures at the site involving the removal and proper disposal of contaminated soil from areas with high PCB levels. The responsible party has completed a Remedial Investigation/Feasibility Study under the terms of a Consent Order. A Record of Decision was issued in March 1995 and divided the site into two Operable Units (OP UNIT 1 and OP UNIT 2). OP UNIT 1 addressed the dry portion of the site including the near-shore sediment that was exposed by lowering the Hudson River a total of four feet. The removal of contaminated soil and exposed contaminated sediment associated with this operable unit are complete. OP UNIT 2 addresses the rest of the contaminated sediment. A supplemental Feasibility Study under this operable unit is underway.

River bottom sediments contaminated with PCB's remain in a localized area adjacent to the site. The intake at the Town of Queensbury public water supply is downstream and the water supply is monitored quarterly. No PCBs have been detected. An annual fish sampling program starting in 1995 shows a decrease of PCB levels in fish. There is no longer a special advisory against consumption of fish from the Sherman Island Pool. The need for future advisories will be evaluated based on results of ongoing monitoring. Remedial options to address PCB contaminated sediments area being evaluated."

Based upon this information, OPRHP has concluded that this site does not pose a threat to recreational use of this section of the river. In addition, OPRHP will continue to consult with DEC on the progress of this remediation.

**Comment: PCBs flow down stream**

The potential for health hazards are presented not only to visitors, but to entire down stream communities that draw drinking water from the Hudson. A swimmer or flipped paddler who accidentally ingested water with suspended PCB contaminated sediment may experience gastrointestinal disorders in adults to neurological difficulties in children and could cause birth defects in developing fetuses. Any disturbance of the 8-acre sediment site would introduce PCB's into the water column and thereby creating a significant health hazard to downstream communities. The worst effects would be felt by the town of Queensbury who draws its water from the same side of the river as the PCB site.

**Response:**

As noted in the previous response OPRHP has concluded that this remediation site does not pose a threat to recreational use of this section of the river. In addition swimming is not proposed in the Master Plan as a use for the Hudson River. The property in question is not managed by OPRHP.

**Comment: Update PCB information in Master Plan**

The Draft Master Plan for Moreau Lake State Park must be updated to include all known information about the past and current state of the PCB sediments at the DEC's Niagara Mohawk (National Grid) site #55012. Once the mapped hazard is incorporated into the Draft Master Plan, there must be no attempt to implement any part of the plan until the PCB site is effectively remediated and tested to the DEC's clean-up requirement of fewer than 2 ppm for the entire site or whatever more applicable standard is imposed by DEC. Only then can OPRHP deliver the most important promise and provision of the planned expansion of Moreau Lake State Park – "Protect and maintain the quality of water resources both on and associated with the Park."

**Response:**

The site noted is not part of Moreau Lake State Park, and is not under OPRHP's jurisdiction. As stated above, NYS DEC is addressing this issue. Additional information has been added to the text of this document to clarify this. As noted above, OPRHP has concluded that this remediation site does not pose a threat to recreational use of this section of the river.

**Comment: Light Pollution**

Steps should be taken to limit light pollution within the Park and work with the town board to implement zoning requirements for impending commercial development in the exit 17 area.

**Response:**

The Agency is aware of this issue and future park facility development will be sensitive to reducing the impact of lights on the environment. Lighting requirements for the Exit 17 area are a local government issue. OPRHP will comment on any proposed adjacent development as appropriate.

**Comment: Air Quality**

Page 63 states air quality as having “good” health effects. Air quality should be assessed during a typical camping weekend to determine effects of campfire smoke on campers and adjoining residences. The proposed Rt 9 camping area should be evaluated to determine effects on the South Rd. residences. An upgraded loop with limits on fires (charcoal, group fire) may be warranted for persons with breathing ailments.

**Response:**

Campfires are considered part of the camping experience. Campfires will continue to be allowed and it will be up to the discretion of the campers on whether or not to have a campfire. At this time there are no proposed limits on campfires. In addition, there are very few homes in the close proximity of the proposed camping area on the parcel between Route 9 and Old Saratoga Road.

**Comment: Protection of Lake Quality**

The plan team should more thoroughly review proposed private development plans within the lake’s watershed specifically along Mill Creek; prepare modeling of groundwater contaminate transport within the recharge area of the lake for proposed septic systems especially those located in “severe” rated soil areas; and relocate the proposed dump station to outside the recharge area.

**Response:**

The impacts of private development outside of the Park should be part of the Town’s review process. OPRHP has an interest in any potential impacts from private developments that may impact the Park and will participate through the SEQR review process.

## Activities

### Comment: Spier Falls Dam

Information on the history and construction of the Spier Falls Dam is worth adding to the Park's interpretive programs.

### Response:

Information on the history of Spier Falls Dam will be added to the appropriate interpretive programs and is already included in a kiosk at the Spier Falls boat launch.

### Comment: Grant's Cottage

Will it ever be possible to walk to Grant's Cottage via park trails?

### Response:

Trail connections to Grants Cottage require crossing Department of Corrections' property. OPRHP will continue discussions and coordination with the Department for trail connections through their property.

### Comment: Disc Golf

A proposal for the development of a disc golf course within the Park was submitted. If the closure of a portion of Old Saratoga Road is implemented, then a disc golf course could be a very natural and beneficial addition to the Park. The area of the old gravel mine on the Route 9 property would be an ideal location. Please consider adding a disc golf course to Moreau Lake State Park.

### Response:

Currently site conditions are not appropriate for a disc golf course. In addition, through the Master Plan process, the Agency has identified the old gravel mine site as the future location for the maintenance facility.

### Comment: Trailhead Parking Security

Try to keep any trailhead parking close to roads for security purposes. Trailhead parking should be designed visible to the main roads. This will help to prevent personal assaults, vehicle break-ins and dumping. A plan should be developed and discussed that deals with security issues at remote trailhead parking locations.

### Response:

Although it may be preferable to have trailhead parking close to the roads for security purposes, the Park has few areas suitable for parking. In addition, these available locations for parking are constrained by the site conditions. Thus the proposed trailhead parking areas have been located back from the roads. Regular patrolling of these areas by Park staff will help discourage any vandalism.

### **Comment: Overnight Parking at Trailheads**

It is recognized that OPRHP has had little experience with trails long enough to be inviting to backpackers; hence they have instituted a requirement to obtain an overnight parking permit from Park headquarters if cars are parked at trailheads or at the two Hudson River boat access locations. This permit is expected to be an utter surprise to hikers or canoeists when they park their vehicle at the beginning of their outing. Any signage should assume that the driver has no idea where the Park headquarters is located.

### **Response:**

Appropriate camper registration and direction information will be included in the signage at the parking lots.

### **Comment: Trail Registers**

There was only one mention of the use of a trail register in the Master Plan. It would seem more effective if OPHRP adopted a system of registers for trailhead and water access sites at locations away from Park headquarters. Essentially, drivers would be self registering their overnight stay.

### **Response:**

In the short term, it is preferred to have overnight registration administered at the Park Office. Day use registers will be considered at the trailheads.

### **Comment: Hunting/ Hiking, Biking conflicts**

There is a potential for conflict between the hunting activity and the hiking and biking activities in the Palmertown Mountain Range. There is nothing in the Draft Plan for dealing with the potential dangers of hunting and hiking in the same areas. Add to the plan: 1) post seasonal signs at the trailheads reminding hikers and bikers that it is hunting season and to wear appropriate clothing; 2) use the kiosks to inform hikers and bikers how to increase their visibility to hunters; and, 3) offer to loan (or rent) cheap plastic "construction" vests to hikers and bikers at the Park headquarters.

### **Response:**

Park staff will continue to make the public aware of areas of the Park that are open to hunting. Posting signs at trail heads and kiosks is one way to inform the public. To date, hunters, hikers, and bikers have been sharing the area with minimal conflict.

### **Comment: Backcountry Skiing**

Backcountry skiing should be permitted off trail. Include off trail backcountry skiing in the plan. Opportunities for back country skiing in the area are limited. The required conditions include open woods, reasonable pitch, and most importantly-sufficient snow is rare opportunities. The west facing slopes near the Cottage Trail, some years, provide sufficient snow to enjoy backcountry skiing. On those few occasions, I believe that little or no environmental impact occurs due to the snow depth over the vegetation.

**Response:**

All trail users must stay on designated trails as per Park Regulations.

**Comment: Bike Trails**

All trails should remain open to bikes. The topography of the area tends to be self limiting. Trail damage and user conflict is more indicative of a lack of user education than unsuitability.

**Response:**

The trail system has been designed to provide for a variety of trail experiences. Through the planning process, trails were designated by use and not all trails allow biking due to terrain conditions.

**Comment: Trail Closures**

All trails should be open unless posted closed. Because installation and maintenance of signs takes effort, a closed unless posted open strategy often tend to prohibit access to a large area, rather than the specific trail. Open unless posted closed allows for control of specific trails if a need is identified.

**Response:**

The current practice is that all trails are open unless posted closed.

**Comment: Local Control of Trails**

The Park should retain local control of new trail construction and relocation of existing trails. The plan should contain a discussion of how local Park management will maintain the ability to plan and construct new trails or reroute existing trails as conditions dictate.

**Response:**

The Park Manager is the front line person in maintaining trails within the Park. The Manager can propose new trails or relocation of an existing trail for review by Regional Staff and Albany Office. This will be based on the demand, level and type of use, trail conditions, use conflicts, and environmental concerns.

**Comment: Geocaching**

Geocaching is not a recognized user group of the Park within the plan. They should be explicitly added to the plan.

**Response:**

Geocaching is an activity that is permitted in designated areas of the Park. Although most geocaches are located along side trails, they may also be located in other areas of the Park. The guidance for geocaching is through an Agency policy and not specific to the Park. However, all geocaches and their location must be approved by the Park Manager and

consistent with the guidelines within the Agency policy. Therefore, geocaching was considered as a program activity and not specifically addressed in the master plan.

**Comment: Snowmobile Use**

Due to the wintering Bald Eagle habitat along the Hudson River, it is recommended that absolutely no snowmobiles be permitted within ½ mile of the river.

**Response:**

Snowmobiling has been an activity within the portion of the park that is in Warren County. This use is local in nature and low in intensity. Vehicles and trailers for snowmobile use park along Hawk Road. The proposed plan will provide a parking area for 10 cars and 5 car/trailers that will accommodate those few users currently parking on the shoulder of Hawk Road. The plan does not call for expansion of snowmobile use.

Presently the informal trail will remain the same. The Master Plan for the park calls for a trails plan for the Warren County portion of the park. This trails plan will consider the creation of a looped trail system that can be used by snowmobilers and other trail users. This trails plan will be subject to supplemental review. The trails plan will provide improved recreation experiences for all trail users. However, this trails plan is limited to the park and will not be connected to or part of any larger snowmobile trail system.

OPRHP understands that wintering Bald Eagles adapt to existing environmental conditions including recreational uses. Thus, the Bald Eagles and existing limited snowmobile use have co-existed for many years. Since the plan does not call for expansion of trail uses, the current coexistence of eagles and snowmobiles is expected to continue at the same level.

Most of the existing trail on the Warren County side is set back about 1/8<sup>th</sup> of a mile from the shoreline. While there is a small segment of the trail that comes as close as 85 feet from the shoreline, the continuation of snowmobile use as has occurred over many years is not expected to impact the numbers or behaviors of wintering Bald Eagles. The Agency will continue to monitor Bald Eagle activity in the park along with snowmobile and other trail uses within the Warren County Management Area. It will consult with the Endangered Species Unit at the Department of Environmental Conservation on all matters pertaining to Bald Eagles, use and protection.

**Comment: Specialization**

It is time to stop trying to have places like Moreau Lake be all things to all people and “specialize” a bit. Offer a more unique, generally unavailable opportunity to the public.

**Response:**

The unique natural and cultural resources at Moreau Lake State Park were a primary consideration in the direction proposed in the master plan. As such, a “cookie cutter” approach that would provide activities/facilities to address every recreational need was not utilized.

## Closure of Old Saratoga Road

### Comment: Impact on Emergency Services

Closing Old Saratoga Road from Mountain Road to South Road would cause Emergency Services vehicles to be rerouted to South Road in order to access Old Saratoga Road residences south of the Park. The intersection of Route 9 and South Road is a very sharp turn and may not be safely navigated by large, fast moving fire trucks or ambulances. The reroute would also increase the response time of emergency vehicles attempting to reach Old Saratoga Road residences. The plan does not mention whether or not local Emergency Services were consulted.

### Response:

The closure of Old Saratoga Road is no longer within the preferred alternative of the Final Master Plan/FEIS. The master plan now proposes adding a turning lane at the entrance of the Park to address the concerns regarding vehicles waiting along Old Saratoga Road to enter the Park. As this is a town road, OPRHP will be working with the Town in the design and implementation of the improvements.

### Comment: Impact on School Bus Routes and other Community Services.

Closure of Old Saratoga Road would cause school bus routes and Town maintenance vehicles to be rerouted. Personnel from OPRHP should meet with the Town of Moreau, School Districts and Town Highway Departments to discuss alternatives that would better meet the needs of local residents and service providers.

### Response:

The preferred alternative no longer includes the closure of Old Saratoga Road. See also the response to the comment above.

### Comment: Safety of Alternate Routes

The alternative to using Old Saratoga Road to access Route 9 is South Road. This road meets Route 9 at a 30 degree angle and meets Old Saratoga Road at a similar angle. Entering and exiting traffic from Route 9 would be dangerous. In addition South Road has a steep grade that is difficult to navigate in winter and does have a blind spot at the crest of the hill. Residences are built very close to the road side, and the road does not have adequate shoulders for stopping, passing, walking etc. There is no room to widen or improve the road to handle more traffic. This does not adequately mitigate the impacts of closing a portion of Old Saratoga Road.

Traffic on Mountain Road is already horrendous. How will this new entrance impact Mountain Road residents' access to Route 9 and Exit 17?

### Response:

The closure of Old Saratoga Road is no longer within the preferred alternative of the Final Master Plan/FEIS. The master plan now proposes adding a turning lane at the entrance



to the Park to address the concerns regarding vehicles waiting along Old Saratoga Road to enter the Park.

**Comment: Historic Nature of Old Saratoga Road**

Old Saratoga Road is part of “Old Route 9” and is very scenic and historic to local residents. Closing this portion of Old Saratoga Road would ruin that scenic and historic quality that many residents enjoy.

**Response:**

The preferred alternative no longer includes the closure of Old Saratoga Road. The new preferred alternative calls for adding a stacking/turning lane to a portion of Old Saratoga Road near the entrance to the Park. The design of the improvements will be sensitive to the scenic quality of the road.

**Comment: Traffic Studies**

Traffic studies should have been conducted prior to the selection of closing Old Saratoga Road as part of the Draft Plan. Traffic studies should look at the impacts of traffic on Mountain Road; the increased traffic anticipated due to the addition of new housing developments in the area; impacts on the ability of local residents to access the Park; the impacts on residents of Old Saratoga Road and South Road; police and emergency service vehicle response times; and, the impacts on use by the general public.

**Response:**

The preferred alternative no longer includes the closure of Old Saratoga Road.

**Comment: Additional Housing Proposals**

The Town has approved a number of new housing developments in the area of the Park. This is going to increase demands on the Park and the local road system surrounding the Park. These new residential areas have not been taken into account in the proposal to close Old Saratoga Road.

**Response:**

The new housing developments in the area will increase the traffic on Old Saratoga Road and other local roads. This could result in additional concerns for patron safety and other users of the road. The overall impacts of the new developments should be addressed by the Town through their Comprehensive Plan.

**Comment: Internal Parking Issues have Nothing to do with the Road**

The lack of parking inside the Park is the problem. If parking inside the Park is increased then there will be no congestion on Park roads, or a need to stack vehicles on Old Saratoga Road. Fix the parking situation within the Park first. Closing Old Saratoga Road will not solve an internal Park problem.

**Response:**

The concern of vehicles waiting outside the Park along Old Saratoga Road cannot be addressed by adding more parking within the Park. There are limited opportunities to increase parking, especially at the beach/day use area. The Plan includes a recommendation for additional parking spaces at the day use area, but this limited number will not be sufficient to meet demand. The closure of Old Saratoga Road was considered to be one option that would help alleviate the stacking along the road and provide a safer condition for Park patrons. The new preferred alternative calls for adding a stacking/turning lane to a portion of Old Saratoga Road near the entrance to the Park.

**Comment: Reconsider other Alternatives**

Many suggestions were made to reconsider various alternatives already listed in the plan. These included: redesigning the existing entrance; making an entrance road from Route 9; seasonally closing Old Saratoga Road; and, widening Old Saratoga Road and making a turning lane into the Park.

Suggestions for new entrance alternatives included: creating a pedestrian bridge over or a tunnel under Old Saratoga Road; moving the existing toll booth further into the Park; relocating the entrance all together; relocating Old Saratoga Road to Route 9, creating a Park entrance off Route 9 and installing a round about on Route 9; and, developing a satellite park and ride.

Other suggestions included operational alternatives such as limiting the number of RVs allowed in the Park and having pre-registration on the internet.

**Response:**

The preferred alternative no longer includes the closure of Old Saratoga Road. The plan is now proposing the development of a stacking/turning lane.

**Comment: Stacking Issues**

Stacking on Old Saratoga Road occurs once or twice a season. Most residents have not seen the stacking and back-ups at the entrance to the Park. The issues regarding vehicle stacking on Old Saratoga Road should be better explained and illustrated.

**Response:**

The stacking situation on Old Saratoga Road is a complex situation that involves the movement of both day users and campers. Once the day use parking facilities have reached capacity, no more day users are allowed to enter the Park. Some choose to wait until parking spaces become available. At the same time, campers need to be able to enter the Park to access their sites. Thus, the stacking of day users also impacts the access of campers. The situation occurs primarily on weekends and may vary during the course of the day. As the Park becomes more popular, the situation can worsen. The camping parking area and stacking lane will hopefully reduce the situation.

**Comment: Eminent Domain**

If the Town will not turn the road over to the State, will the State take the road using eminent domain?

**Response:**

The position of the Agency is not to use its power of eminent domain. If this option is pursued in the future, it will be conducted through negotiations with the Town.

## Potter's Point Recreation Area

### Comment: Impacts on Residential Areas

The end of Potter Road is a growing residential area. The proposed recreation facilities (8 cabins/cottages and 40 tent/trailer campsites) will increase traffic on Potter Road, change the type of vehicles using Potter Road from family and commuter vehicles to large recreational vehicles and campers, and increase noise and air pollution. The safety of area children will also be put at risk due to increased traffic. The economic impacts of this recreation development will devalue the new homes being constructed while the taxes will continue to increase. Impacts to the residents' quality of life, such as these, are not adequately addressed in the plan. This is not an appropriate location for the development of a campground/cabin recreation area.

### Response:

The proposed recreation development at Potters Point includes 8 cabins/cottages and 40 tent/trailer campsites that will be phased in over a number of years. The campsites proposed for this area are 375 sq ft with a parking lane of 375 sq ft which will accommodate tents and pop-up trailers. The tent/trailer campsites are not designed for RV campers and will not be permitted in this area. The proposed campsite is approximately 1/3 mile from the residential development. Noise levels at the campsite should not impact the residents. The roads utilized to access the campsite would be similar to those that provide access from the main road to the residences. The amount of increased traffic at the campsite would vary between peak season and off season and from weekend to weekday. In most cases, property values increase when located adjacent to parkland. This site along the river provides an overnight recreational experience that is different than the campground around Moreau Lake.

### Comment: Conditions of Potter Road

Potter Road has lots of sharp turns and is barely wide enough to allow two vehicles to pass one another. Major improvements such as widening the road, will be needed to handle the larger recreational vehicles.

### Response:

The proposed tent/camper sites at Potter's Point are not designed for RVs and RVs will not be permitted. Potter Road is capable of handling the recreation traffic that would be accessing the Potters Point area of the Park.

### Comment: Entrance to the Potter's Point area

Paving on Potter Road currently ends at a gate before the Park entrance and then becomes a single lane dirt road. Who will be responsible for improving the road beyond the gate, the Town or the Park?

**Response:**

OPRHP will be responsible for the road improvements on parkland. However, road improvements may be implemented as part of the proposed county water supply project.

**Comment: Access Through a Residential Area**

It is not appropriate to have to drive through a residential area to access a campground. No other parks have this situation.

**Response:**

Given the configuration and topography of Moreau Lake State Park, this is the only reasonable option for accessing the site.

**Comment: Traffic Studies**

Are there traffic studies being done to evaluate the level of increased traffic on Potter Road due to the development of the campground/cabin colony?

**Response:**

Due to the relatively low volume of traffic that would be generated by the campsite, traffic studies were not conducted.

**Comment: No Problem with Potter's Point proposal**

A resident did not identify any issue with the Potter's Point development proposal. The area is a Park and as such should be available to a diverse user group including "monster" RVs. However, it is doubtful those large vehicles will be able to get over the speed limit given the sharp turns.

**Response:**

As noted earlier, the site is not designed for RV camping and RVs will not be permitted to use the sites.

**Comment: Black Bear Populations**

Black Bear populations in the area should be studied to see what impact, if any, the residential and recreational developments have on them.

**Response:**

This would be a broader study that goes beyond the scope of the Master Plan. The Agency would be willing to participate in a larger study if one is initiated. The Agency works closely with the Department of Environmental Conservation on matters pertaining to black bear populations that impact State Parks.

**Comment: RV Campground Development**

The large expansion of Potter's Point is very disturbing. The plan appears to be "all or nothing" and no middle ground is offered. The expansion states that there will be 40 trailer sites with water and electricity put into Potter's Point. Although only tents and pop-up trailers are intended to use the area, if water and electrical hook-ups are provided the bigger RVs will come.

**Response:**

Potter's Point will be developed in phases over a number of years. The initial phase will provide primitive camping opportunities. The full build out proposes campsites to serve tent and trailer (pop-up) campers. They will not be designed for RVs. Water and electric hookups are not being proposed for the campsites. The small number of campsites proposed in this area would not provide the critical mass necessary to cover operational expense of installing electric and water hook-ups. Water and electric will be needed for the toilet/shower building at the camping area as well as for the future cabins/cottages.

**Comment: Providing Emergency Services**

The Town has expressed concern about their ability to provide emergency services to the new Potter's Point camping development.

**Response:**

The Region will have discussions with the Town concerning emergency services at Potter's Point before the site is developed.

**Comment: Scale back development of Potter's Point**

The development of Potter's Point should be scaled back to provide only water-accessed camping, hiking trails and canoe/kayak access or located at the Sherman Island Boat Launch Site. Land access would cause recreational traffic to travel through a residential area and provide a means for campers to leave and head to the Lake to swim, thus aggravating the congestion at the Park entrance.

**Response:**

Low intensity site development is proposed in the initial phases with a focus on water access. Campers will have to travel to the beach at Moreau Lake to swim. Due to the relatively low number of patrons utilizing the area and the proposed modifications at the Park entrance and day use area, the impact at the main entrance of the Park would be minor. The Sherman Island Boat Launch does not have adequate area for the addition of a camping area.

**Comment: Modification and other Alternatives**

Just because this location housed cabins in the past it does not mean that their return is justified. Subsequent to the removal of the cabins, the wild and scenic character of the river was enhanced. A trail head with a kiosk should be developed at the end of Potter Road for hiking access to Potter's Point. Car accessible camping should be relocated further inland and

up against the base of the mountain, near the Sherman Island Boat Launch. This area provides better screening from the river, is not near any residential area and appears to have ample space to support a campground.

If car accessed camping is to be provided, the number of sites should be scaled back. The campsites are located 400-500 feet inland which is appropriate; however, the cabin colony still appears to be too close to the shore. These should be moved inland to a similar distance as the campsites.

**Response:**

Potter's Point was proposed for cabin and campsite development due to its topography, access and type of experience it would provide. The proposed site for development is approximately 1/3 mile from the residential development. The proposed cabins/cottages are sited approximately 200 feet or more from the shore. Given the vegetative buffer between the shoreline and the proposed cabins/cottages, this distance was considered adequate. More site specific plans will be prepared when the funding becomes available to advance the development of the cabins and campsites. There is insufficient flat, dry land outside of the FERC boundary at the Sherman Island Boat Launch to develop a campsite there.

## **Relation to Other Plans and Programs**

### **Comment: Connection to Local/Regional Bicycle Trail Systems**

The Draft Plan calls for OPRHP to “cooperate with local governments in developing connections to regional bicycle routes” in the Lake Recreation Area. It is suggested that the Plan Team investigate the potential for local trail connections (bike and pedestrian) to the State Park. The Plan Team should review the Town of Wilton’s Open Space Recreation and Pathways Plan, Moreau’s Comprehensive Plan and the Adirondack/Glens Falls Transportation Committee’s (the region’s MPO) August 2000 “South Glens Falls/Moreau Bikeway Conceptual Plan.

### **Response:**

These plans were considered during the planning process.

### **Comment: Trail Connections to the Northern Part of the Park**

If there is anything seriously looked at to make trail connection with existing trails that would come from Warren and Washington Counties and through Moreau and South Glens Falls that would connect to the north part of the Park, it would be nice to have it as part of the Plan. The plan reads not applicable as far as extension of trails to areas outside, either to the Recreation Management Area or to any other of the areas.

### **Response:**

Trail connections to the Warren County portion of the Park were investigated. However, no viable connections were identified. However, a Trail Plan for the Warren County management area is proposed for development in the future and if the opportunity exists, trail connections will be made.

### **Comment: Term of FERC License**

In the Plan, it reads the FERC license is for 50 years. This should be looked into, because it could be a 40 year license. Any agreements the Park has that relate to this license could be affected.

### **Response:**

The term of the FERC license is for the Hudson River Project (Spier Falls and Sherman Island facilities) is 40 years. The plan text has been changed in the appropriate locations.

### **Comment: FERC Approvals of New Riverfront Facilities**

The FERC license for the Hudson River Project is a standard license condition dealing with uses of project lands and waters. The Plan proposes facilities and uses that are not specifically covered in the license. The fact that the facilities are open to the public is in your favor; however, some of the new features such as a handicapped fishing platform and an additional car-top boat launch, may not be in the recreation plan approved by FERC. FERC



may require the power company to file an amended recreation plan and seek further approvals.

**Response:**

The recreation plan has been approved by FERC and includes a car-top boat launch and the fishing platform. Improving traffic flow and parking, access to a picnic area and the water's edge, including access for persons with disabilities are also proposals included in the Recreation Plan for the Sherman Island site.

**Comment: Connect Moreau Lake and Saratoga Spa State Parks**

A connector trail between Moreau Lake State Park and Saratoga Spa State Park should be developed. This non-motorized, multi-use trail is also envisioned in the Saratoga County Green Infrastructure Plan.

**Response:**

A connector trail route between Moreau Lake State Park and Saratoga Spa State Park, called the Palmertown Range Trail, has been identified by the County and Park Region and is currently being advanced.

**Comment: Regional Development**

The Park's Vision Statement should include integrating the Park into the regional recreational development plans. The Park should become the focal point of a regional trail system in northern Saratoga County. There should also be an effort to connect the Park to bike trail development to the north and west of the Park.

**Response:**

The Park is included within Saratoga Regional Trails Plan.

**Comment: Monitoring and Removal of Invasive Species**

A monitoring program for zebra mussels and milfoil should be implemented for Moreau Lake. Also, removal of other invasive species should be conducted in all areas of the Park. Currently, the plan only calls for removal of invasive species within the campground.

**Response:**

Currently, there is no monitoring program for zebra mussels or milfoil at the Park and boats are not inspected. Establishing a monitoring program is a good suggestion and will be considered. OPRHP is a member of the Invasive Species Task Force, a statewide group overseeing the preparation of a statewide plan for invasives management and a related grant program. Resources may be available to help OPRHP look into invasive species management controls at the Park.

## Rare, Threatened and Endangered Species

### Comment: American Chestnut and Black Tupelo

The existing flora section (pg. 63-64) did not include the American chestnut or black tupelo trees. Within the Park, the American chestnut has been observed bearing nuts. Based upon the threatened existence of this species any development should not impact its environment. The black tupelo is at the extreme northern limits of its range and should be given special consideration.

### Response:

The Agency agrees these species are important and special consideration is give to them when any work takes place nearby. Agency wide, minimizing the impact on trees is a concern during site development. Whenever possible, the cutting of trees is avoided.

### Comment: Lupine and Karner Blue Butterflies

There is Blue Lupine habitat along Loop “H” and the northeast corner of Mud Pond trail that should be protected. Also Blue Lupine and Karner blue butterflies have been found in the area between Route 9 and Old Saratoga Road.

### Response:

NYS DEC staff, have in the past, visited the Park to survey it for Karner Blue butterfly and other species of concern. At the time no habitat was found. This will be investigated further with the assistance of DEC staff as site specific plans are developed for these areas.

### Comment: Bald Eagle Wintering

Given the evidence that this is a winter use area and the need for more information as we move forward, OPRHP should continue and even expand eagle surveys within and adjacent to the Park, including during breeding season, as this area offers tremendous potential as future nesting habitat.

### Response:

A winter monitoring program for bald eagles is in place and OPRHP is participating in the program under the direction of the DEC. OPRHP will remain receptive to any enhancement of monitoring as well as to recommendations from DEC regarding park operations that are based on findings from such monitoring.

### Comment: Bald Eagles

It is encouraging to read language found in several places in the Draft Plan stating in effect that “potential impacts to the eagles’ use of the area will be identified as the project and proposals for new activities are evaluated”, this is important and necessary. However, more specific language regarding impacts is found in Appendix H (Management Guidance Summary for the BCA) which should be more mainstreamed in the Plan itself.

**Response:**

Information from Appendix H (the BCA Management Guidance Summary) has been added to the Master Plan proper (Chapter V), within the Designations section entitled “Bird Conservation Areas”.

**Comment: Critical Dates for Eagles**

The critical dates for eagles are December 1 – March 31 annually. Human activity within the Hudson River Corridor should be limited at this time; however, continue hunting under a permit system. Specific signage and closures will be required depending upon the access developed.

**Response:**

This period of time (December 1 – March 31) is a very low use period for recreation. The Master Plan does not call for significant expansion or enhancement of recreation activities during this period in the Hudson River Corridor area of the Park. The level of activity will essentially remain the same as it has been for many years. OPRHP will continue monitoring of Bald Eagle activity in consultation with DEC. Should monitoring show significant stress or pressure on the existing Bald Eagle wintering use, OPRHP and DEC will meet to determine first whether such stress may be related to park operations and if so, what steps will be taken to assure that Bald Eagle use is not impaired.

## Designations

### **Comment: Extend the BCA**

Designation of parts of the Park as Bird Conservation Area and Natural Heritage Area are good, but the BCA should extend into Potter's Point. The undulating coast line and protected bays of the river adjoining this area are not found elsewhere along the river within the Park.

### **Response:**

BCA designated areas within parks have been identified based on review of criteria specified within State Law. The Potter Point area does have attributes conducive to birds and bird habitat. However, the area was also previously disturbed and a determination made that the area did not meet the more rigorous criteria for designation. Birds and bird habitat protection, however, will be taken into consideration during the design and siting of facilities in the Potters Point area.

### **Comment: Park Preservation Area**

The Palmertown Area should be designated as a Park Preservation Area. Expansion of the PPA should be reevaluated in other areas of the Park as more information is generated and if proposed development is compatible. Critical habitat along the Hudson River (especially along the Warren County shoreline) should also be included in this designation.

### **Response:**

The Palmertown Area has been recommended as a Park Preserve Area (PPA) within the Plan. The Agency agrees that the Hudson River corridor is an important wildlife habitat area. However, designation of a PPA can only occur on State owned land. Since the land along the Hudson River Corridor is generally within the FERC boundary and not owned by the State, it is not eligible for designation.

### **Comment: Park Preservation Area Definition**

The meaning and effect of a Park Preservation Area designation is hard to find within the Draft Plan.

### **Response:**

Additional information has been added to further explain the implications of designating a Park Preservation Area.

## Warren County Management Area

### Comment: Corinth Road Boat Launch

The development of a car top boat launch would be beneficial. Limits on boat access from the possible future boat launch on the Hudson River should be included even though the public access easement for the road leading to the possible boat launch has not been obtained. Note that this car top boat launch site was to be provided by the Town of Queensbury according to the FERC settlement, not OPRHP.

### Response:

Noted

### Comment: Trails

Development of a non-motorized trail system in Warren County would be beneficial and should be encouraged. Non-profit organizations and the Town of Queensbury should be consulted in developing trails that extend beyond the Park to West Mountain and further north.

### Response:

The Master Plan calls for preparing a Trails Plan for the Warren County Management Area in the future and OPRHP will coordinate with non-profit organizations and the Towns during the development of the Trails Plan which will include potential connections to trail systems outside the Park.

### Comment: Uses and Eagles

The western portion (Luzerne Mountains) appears to be currently undeveloped and is a known winter-roost site for Bald Eagles. The concept should be to try and keep the area undeveloped and concentrate any believed desirable development to the southern portion of the Park.

### Response:

The Master Plan recognizes the importance of the Bald Eagle wintering area in the Park. The primary recreation activities and facilities are concentrated in the Lake Recreation Area which is south and east of the Hudson River and Luzerne Mountain areas. In addition, the uses in the areas adjacent to the Hudson River, particularly in the western section of the Park, will not be increased in any significant way.

### Comment: Hawk Road Trailhead/Access

The proposed trailhead and potential 4-season access at the Hawk Road entrance, poses serious concern given the sensitivity of Bald Eagles in their night roosts. It is strongly recommended that winter recreational uses of this area not be allowed especially snowmobiles. This would be one area where clear winter trail closure would be required if trails were open and attractive and cut directly through critical wintering eagle habitat.

**Response:**

Please see the response to the snowmobiling comment in the “Activities” section of this Chapter. The Plan does not call for any significant change in type or extent of recreation use associated with the proposed Hawk Road entrance. The parking area is being created to provide access for existing trail users, and not intended to expand use. Considering the limited parking area and limited extent of the trail system, this area is not expected to attract a large number of snowmobilers.

## Hudson River Corridor Management Area

### Comment: Definition of Corridor

The definition of the Hudson River Corridor is difficult to find within the Plan. Specifically, how far inland the corridor extends. An inland-shoreline buffer to the actual river in terms of definition is essential. It is recommended that the corridor buffer be a minimum of 300 feet.

### Response:

The Management Areas are defined in Chapter IV under “Resource Protection and Use Suitability”. The FERC boundary, topography, and physical constraints were taken into consideration in defining this area. Since the adjacent land to the Hudson River Corridor is parkland, a buffer is not required.

### Comment: Scenic Qualities

This is the southern most undeveloped area of the Hudson River within the classic gorge setting. It is pristine and should not be over developed. It is one of only a few such unique and undisturbed sections of the Hudson left and one deserving of our conservation attention.

### Response:

OPRHP acquisition of the steep upland areas and agreements with DEC and the operators of the power generating facilities within the Park, provide this section of river some protection from development pressures. The level of use of the area is controlled through the proposed designs for access sites and will be monitored for signs of overuse and resource impairment.

### Comment: Winter Uses

Overall there is little actual development proposed within the corridor. Human use of an area can change the character and value of such an area and should be carefully evaluated as to its potential and actual impacts and adaptive management anticipated as use occurs. Human activity during critical winter months when eagles are present, should be limited. Campsites and trails, especially if winter uses such as cross-country skiing and snowshoeing are to be permitted, should be located well away from the shoreline.

### Response:

Noted. The Plan does not propose any winter camping. Cross country skiing and snowshoe trails will be away from the river's edge.

### Comment: Motorboat Use

Motorboats should be removed from both or one of the river impoundments. If this is not feasible, then limits on horsepower and boat sizes should be instituted. Personal watercraft should be banned all together. Personal watercraft make waves and disturbs other boaters, Bald Eagles, bird watchers, etc.

**Response:**

Motorboats have been traditionally used on the two impoundments and access is required under the FERC settlement agreement. The narrowness and the length of the impoundments affect the type of boating experience which may influence a boater's desire to go on the river. The limited parking area at Spier Falls Boat Launch is the primary factor that limits use in the Spier Falls impoundment. The Sherman Island Boat Launch has a larger parking capacity than the Spier Falls boat launch site. However, it has a gravel launch that discourages a number of boaters. The Plan does propose that this launch will receive enhancements. The existing gravel, two lane launch will be improved, however, only as a textured concrete launch. These changes will result in improved efficiency of launches and retrievals. The existing gravel parking area next to the launch with a capacity of 15 car/trailers will not be expanded. There is also an informal open parking area away from the boat launch site. This area will be improved to provide spaces for approximately 20 vehicles. This second area, however, is designed for parking for hikers and picnickers and will not be used for car/trailer parking.

Again, it is the narrowness, length and depth of the impoundments that are the primary factors expected to limit demand for the type of boating that requires larger boats with greater horsepower. This is especially true given that there is a dam located between the Spier Falls and Sherman Island boat launch sites.

While the Agency does not anticipate any significant change in the number or type of watercraft using the impoundment, it will monitor such use to determine if further steps are needed to protect natural resources and the quality of the recreation experience along this stretch of river.

**Comment: Facility and River Capacity**

The Sherman Island Impoundment capacity and the parking capacity at the Boat Launch are inconsistent within the report. More information regarding the capacity of the Sherman Island Impoundment and the potential increase in the number of boats as a result of development proposals should be included in the Plan. There is a concern that overall boater use of the Sherman Island impoundment (canoe, kayak, rowboat, motorboat, etc) will lead to over use of the four-mile stretch of river and access proposals should be scaled back.

**Response:**

The Sherman Island Boat Launch has an existing capacity for 15 car/trailers and an additional 10 cars in the small picnic pull-offs along the entry road. The improvements to this facility are designed to improve non-boater parking and to provide a concrete ramp to improve access to the river. The number of car/trailerers proposed is the same as the current number of spaces provided. The only change is an additional 26-car parking area that primarily supports day use and the trail head. Therefore the existing level of use should not change. As described in Chapter V under the heading of "Physical Resource Analysis, Water, Hudson River" the capacity is based on the estimated surface area of the impoundment of 305 acres and the standards for boats (acres/type of boat). The maximum capacity of each boating type would be:



Row boats (1 acres/boat) = 305 boats

Power boats (6-8 acres/boat) = 50 boats

Water skiing (15 -20 acres/boat) = 20 boats

The non-motorized and power boats are currently the primary users. The existing parking capacity of 15 car/trailers results in a use pattern well within the maximum capacity.

The useage of the launch area and river will be monitored by OPRHP to maintain the river experience, prevent over use and ensure patron safety. Given that the number of car/trailer parking spaces will not change and based on existing use patterns, overuse of the river is not likely to occur. Boating access is also a requirement of the FERC settlement agreement.

#### **Comment: Sherman Island Boat Launch Improvements**

The boat launch should only be upgraded to a single lane launch. This will help to discourage the use of motorized boats. There are safety concerns about large boats being trailered down the steep hill of Spier Falls Road as they approach the entrance to the boat launch. Also, the Sherman Island impoundment is shallow and there are many submerged rocks, trees and other debris that pose a hazard to larger, deeper set boats. Water levels within the impoundment also change based on operation of the power stations.

Other improvements such as a picnic pavilion are inappropriate for this location. The picnic pavilions are too close to the river's edge and detract from the "wilderness" feeling of the shoreline. Picnic tables may be more appropriate.

#### **Response:**

The water depth and changing conditions of the river will be noted at the launch kiosks. Such conditions will limit the number and types of boats on the river and where they are located (use area). This area provides the opportunity for limited day use and a trail head supporting the Palmertown trails. The small pavilions will be located and designed in a manner not to adversely impact the river experience.

#### **Comment: Corinth Road Access**

The state has had opportunities to provide access to the river from the Warren County side. The town had an agreement with the State. A launch site was to be built off of West River Road but it hasn't materialized. The State should coordinate with the power companies to plant trees for a visual screen between the river and Corinth Road at the proposed Corinth Road access site. Use should be limited to hiking trails, primitive camping and canoe/kayak access. This will provide increased access and recreational use of the river without changing its appearance.

#### **Response:**

A canoe/car-top launch with parking is proposed off of Corinth Road just up stream from the Sherman Island Dam.

**Comment: Increase in Boater Use**

The Draft Plan states that the potential environmental impact is “minimal increase in boater use of the Hudson”. This is incorrect. Unless the proposed expansion of boater access to this section of river is scaled back, the character of this section of river will be changed forever. The proposed changes in access to the Sherman Island Impoundment section of river will result in a major change to its quiet and peaceful nature. The current boat access is sufficient and should not be increased. Any improvements to the launches would encourage motorized watersports to invade this area which is inconsistent with the other activities being conducted. The current access services the fisherman and other power users that currently use the river in tandem with human powered kayaks and canoes and very few user conflicts occur. Overall there is a concern that with the campground, cabins, primitive campsites, boat launch improvements and added boat access, over use of this stretch of river could occur.

**Response:**

As identified above, the number of car/trailer parking spots will not change and as such the number of boats using the river. In addition, the water depth and changing conditions of the river will limit the number and types of boats on the river and where they are located (use area). Boating access is also a requirement of the FERC settlement agreement.

**Comment: ADA Features at Existing Boat Launches**

Note that in both areas (Sherman Island and Spier Falls Launches) one picnic table must be suitable for wheelchair users, i.e. big overhang at one end. Note that the low angle path must go to the water’s edge at both launches. This is so wheelchair users can go to the water’s edge where their companions can transfer them to a canoe. This means the person will either be a passenger or may be a paddler if he/she has upperbody and arm strength. If the latter, this would be a great experience. Neither the picnic tables nor canoe access are mentioned in the Master Plan.

**Response:**

Noted. Accessibility is considered in the design of all the park facilities, and ADA features at the boat launches are specifically addressed in the FERC settlement agreement.

**Comment: Spier Falls Launch**

Support was expressed for the plan’s intent to continue to provide a remote river experience from the Spier Falls Boat Launch Site by limiting parking/boat access and maintaining the present launch ramp size.

**Response:**

There is a need to improve the parking facility at the Spier Falls Boat Launch to make it more functional and safe to use. Due to site limitations, the number of additional parking spaces is limited so the remote experience should be maintained.

**Comment: Spier Falls Portage Trail**

The Draft Plan fails to mention who is specifically responsible for maintaining the Spier Falls Portage. Will it be the power company or OPRHP. This should be clearly stated in the Final Plan.

**Response:**

The power company is responsible for maintaining the portage as they are on lands retained by the company and not managed by the Park.

**Comment: Water Trail Concept**

There is support for extending the water trail concept through the Park. Portages around hydro power plants generally get approved by the FERC as mitigation for the presence of a dam.

**Response:**

Portages are part of the FERC recreation plan and will be constructed and maintained by the power companies as they are on retained lands not managed by the Park.

**Comment: Water-accessed Campsites**

What happened to the canoe campsites that were located on the islands within the Sherman Island Impoundment as specified in the FERC settlement for the Hudson River Project? Were these locations changed due to a revised recreation plan or possibly due to enforcement abilities of OPRHP rather than the power companies?

**Response:**

The islands are not under OPRHP management. Locating campsites there would likely present sanitary and management difficulties, so these were replaced with the sites along the Warren County shoreline.

**Comment: Hartman Hill**

Our residents need a canoe/kayak launch site at the base of Hartman Hill in the area previously occupied by several cottages. This would save us a 12 mile trip by car to reach the existing launch site on the opposite side of the river. The launch site should not accommodate motorboats. In fact this stretch of river should be restricted to boats with small motors, no larger than 5 hp.

**Response:**

Two water-accessed campsites are located at the mouth of Hartman Creek. Land side access to this location is not possible using existing public roads or Park trails. A canoe/car-top launch is proposed off of Corinth Road down stream of the campsites within the Warren County area of the Park. The Hudson River is considered a navigable waterway and restrictions on the type and or size of vessel cannot be made on a State or federal level.

OPRHP and the power company are required to provide public recreational access to the

river. The existing launch areas provide that access. The available parking and river conditions help to limit the type and level of use on the river.

**Comment: Swimming in the Hudson River**

The “no swimming” determination of the Master Plan is disappointing. This policy places the responsibility on the Park to affirmatively “prevent” that activity. It is understood that there is no suitable formal beach site available, so no guarded site is being proposed, but going to the extent of not selecting the best picnicking spots because they may attract access to the Hudson is strange. This forces those intent on swimming in the river to find less desirable, and less safe spots.

**Response:**

The Agency policy is to allow swimming only in guarded areas and therefore, swimming will not be permitted in the Hudson River. The river will be monitored by Park staff.

## **Palmertown Mountain Area**

### **Comment: Primitive Backpack Camping and Lean-tos**

Primitive camping would be a positive use here if sites are developed far enough from the roads to limit partying. Yet there is concern regarding use of these sites regardless of their location. This type of camping opportunity is offered elsewhere in the region (Lake George) and may not be appropriate here. Development of these sites would concentrate use in a particular area and user impacts would spread to a wider area. Sites such as these would also be difficult to maintain and patrol. Allowing camp fires raises concern over forest fires and the proximity to residences south of the Park. There are also concerns about providing adequate water supplies and sanitary facilities on the ridge. The number of sites/areas being designated for camping may not be adequate for groups, i.e. boy scouts, hiking club outings, etc. The plan indicates that if the designated sites are occupied, the hiker must find another designated site or leave the Park. This is not practical if sundown is an hour away and the car is still a two to three hour hike to reach. It is recommended that OPRHP follow the same guidelines as DEC, allowing backpackers to camp at any undesignated spot 150 feet or more away from a trail, road or water body. Lastly, lean-tos could be a safety and security issue for the Park and users.

### **Response:**

Designating areas for backpack camping on Palmertown Mountain was considered a means to provide a different type of camping experience in a manner that could be readily controlled and monitored. This type of camping is primarily meant for transient trail users. The use will be monitored to determine if changes need to be made to the number, location, size, etc. of the sites. It was determined that it was preferred to have designated areas rather than having the activity occurring in an uncontrolled manner.

### **Comment: Horses, Snowmobiles and ATVs**

Support and agreement with the Plan's determination that Snowmobiling, Horse and ATV use is inappropriate for this management area was provided. However, some equestrian users expressed a desire to use the trails in this management area. More information regarding the decision and rationale to exclude this use was requested. Equestrians feel that all that is needed is horse trailer parking to make the area accessible for horses.

### **Response:**

The trails that access Palmertown Mountain are steep and rocky which can make it difficult for equestrian users. The primary area of use has been within the Lake Management Area (Moreau Lake). Due to the access conditions, equestrian use was not proposed for Palmertown Mountain. In addition, there is limited parking available for horse trailers. As a result, the Saratoga County portion of the Park would accommodate a certain level of equestrian use, but not be considered a destination for equestrian users.

### **Comment: Trails and Trail Development**

The non-development of additional proposed trails (i.e. the telegraph tree and Lake Ann) may aid in leaving enough open space for hunters. However, the development of new trail and trail connections is encouraged.

The plan provides an extensive description of the various trails, which means little because it tells of junctions with other trails. It would be far more instructive to delete these descriptions and replace them with a trails map that shows trail names.

The current trail closure policy should be changed to “trail open unless posted closed”. There is concern over a loss of local control over trail development/construction decision making as a result of this plan.

### **Response:**

The current practice is that the trails are open unless posted closed. The Park manager will continue to make recommendations on the trail system. Those that are significant in nature will be reviewed by the Region and the Albany Office. A trail map exists that provides information on the trails and has been added as map 12B in the Plan.

### **Comment: Trail Heads and Parking**

The Draft Plan provides for improved signage and trail head parking for the Palmertown Mountain Area trail network. This will benefit all users. A portion of the Sherman Island Boat Launch’s parking should be designated “hikers only” to help limit boating use as well as providing parking for hikers.

Support for development of the Western Ridge Trail Head was expressed along with general support for maintaining and improving existing access. However, concerns over personal safety and security were expressed over trail heads that are designed to be in the interior of the Park rather than along road sides.

### **Response:**

Noted. The number of parking spaces for cars at Sherman Island was increased in order to provide adequate parking for day users and hikers. Therefore, assigning specific space for hiking was not warranted. The availability of parking areas is limited by topography. In addition, OPRHP’s agreements with the power line corridor owners do not allow the use of these corridor lands for recreation. This has resulted in the need to locate parking areas off from the main road. The parking areas will be patrolled on a regular basis.

## **Lake Recreation Area**

### **Comment: Toll Booth/Contact Station**

Consider relocating the toll booth further in and providing appropriate staffing to reduce the stacking problem on Old Saratoga Road. The ratio between day users and campers may impact the situation.

### **Response:**

The relocation of the toll booth was considered in the planning process but rejected due to topography and the road configuration. The stacking situation is primarily caused by the dayuse/beach parking area reaching capacity and the conflict created between day users waiting to enter the Park and campers who want to access their campsite. Therefore, the situation is more capacity related than a ratio between day users and campers. The revised preferred plan now proposes a turning lane and a camper registration parking area.

### **Comment: Signage**

Improve the signage at the entrance.

### **Response:**

Improvements to the signage are proposed in the plan.

### **Comment: Parking**

Expand parking at the beach/day use area.

### **Response:**

The Plan calls for creating some additional parking by reconfiguring the existing area, but also recognizes that the steep slopes adjacent to the beach area limit any significant expansion of the parking lot serving the area.

### **Comment: Water Quality**

There was concern for the water quality of Moreau Lake in the future.

### **Response:**

The water quality of Moreau Lake should not be impacted by any improvements in the future. Proper construction techniques, including use of proper erosion and drainage control practices, will be utilized during any development/rehabilitation project to protect the water quality.

### **Comment: Maintenance Facility**

There were concerns on the need to move the maintenance facility as well as the need to develop a winterized multi use building and support facilities.

### **Response:**

The maintenance area is currently located adjacent to the Park entrance. It functions adequately but needs to be upgraded and expanded to accommodate the Park's growing needs. The current location is visually unattractive and can be seen by Park patrons entering the Park. The site could be reprogrammed to provide winterized recreation/program

opportunities. These improvements are proposed for Phase 3 of implementation of the Master Plan.

**Comment: RV Campsites**

The need for RV campsites on the Route 9 parcel was in question as was the impact additional campers will have on the swimming area.

**Response:**

With the aging population and trend by campers to utilize RVs, it was considered appropriate to provide a minimum level of RV campsites. Due to the limited available area within the existing camping area, it was determined that a new camping area on the Route 9 side would be appropriate. A trail system would connect this to the day use area. This would be a means of access to the day use area if the parking was full. The beach has a large enough capacity to accommodate the additional use by RV campers and others as walk-ins. Various methods will be considered in a fee collection/contact system. Although, a second contact station on the Route 9 land is an option, additional staff may not be available to run it. As with any development, there will be some displacement of animals and in particular deer.

**Comment: Air Quality**

Air quality is a concern during the camping season, especially the smoke produced by campfires. There should be a smoke free camping loop.

**Response:**

Campfires for many are an important part of their camping experience. The determination of whether or not to have a campfire has been left up to the individual. Although the concept of having a smoke free camping loop is an interesting one and one that will be explored further, the current practice will continue.

**Comment: Equestrian Trails**

Equestrian trails should be provided on the Route 9 parcel but banned from the beach area.

**Response:**

The Nature Trail and a portion of the Lakeside Trail have traditionally been utilized by equestrians and will be designated for such use. Horses are not allowed on the beach or on sections of the Lakeside Trail that are near the lake. A connecting trail from the Route 9 parcel to the Lake Recreation Area's trails will be considered.

**Comment: ADA Access**

Provide ADA access to the boat rental area.

**Response:**

ADA accessibility is considered in the development and rehabilitation of all the facilities within the Park. An appropriately designed path will be developed to access the boat rental area.



**Comment: Environmental Resources**

Improve and protect the environmental resources through invasive species control and resource management in the campgrounds.

**Response:**

The Agency is in the process of developing a more comprehensive program to reduce and control the invasive species within the Park. Studies have also been undertaken to identify the impacts on soils and vegetation with the campgrounds at Moreau. Various methods for encouraging vegetation growth within the campground are being considered.

**Comment: Mountain Biking**

Consider the development of a stunt mountain bike activity area.

**Response:**

Although this is growing in popularity with many mountain bikers, it was not considered an appropriate activity at the Park.

## Persons/Organizations Who Provided Comments

### Name, Title, Organization

Betty Lou Bailey, Chair, Schenectady Chapter, Adirondack Mountain Club

Niki Baker, Town Councilwoman, Town of Moreau Town Board

Jacqueline Bave, Conservation Chair, Glens Falls-Saratoga Chapter of the Adirondack Mountain Club

Michael R. Brandt, Partner, West Mountain Liquidation Partnership

Daniel Campagnone, Resident

Robert and Faith DeMarsh, Residents

Torry Dorsey, Resident

David Dyer, Resident

Roger A. Dziengeski, Woodlands Manager, Finch, Pruyn & Co., Inc.

Ron Farra, New York State Trails Council

Jeanne Fleury, Town Clerk, Town of Moreau Town Board

June Flodsand, Resident

Julie Francis, Resident

Amy Francis, Resident

John P. Freeman, Vice President, Executive Committee and Secretary, Conservation Committee, Adirondack Mountain Club

Daniel Galusha, Member, Riverview Galusha, LLC

Thomas and Marybeth Giorgianni, Residents

Robert M. Goodwin, Resident

W. Mark Graber, Mohawk-Hudson Cycle Club

Harry G. Gutheil, Town Supervisor, Town of Moreau Town Board

Rich Hewlett, Town Councilman, Town of Moreau Town Board

Patricia Hodgson, Resident

Chris and Mutita Honsberger, Residents

Tina and Glenn Kays, Residents

Jan Kropp, Resident

Todd Kusnierz, Town Councilman, Town of Moreau Town Board

Karl and Nicole Lankenau, Residents

Joseph LaPlant, Resident

Comments and Responses

Stephen LaPoint, Resident  
Phil Lindsey, Resident  
William and Linda McCarthy, Residents  
David McDonnell, Resident  
Robert and Diane Munyon, Residents  
David E. Nagle, Resident  
Peter Nye, Wildlife Biologist II (Unit Leader), NYS DEC - Endangered Species Unit  
Peggy Parker, Resident  
Robert Renaud, Resident  
Charles Rowson, Resident  
Dawn Roy, Resident  
Stephen Samuell, Mohawk-Hudson Bike Club  
Johnathan Schnieder, Mountain Bike and Hiker User Group  
James Underwood, Queensbury Land Conservancy  
Michael Valentine, Sr. Planner, Saratoga County Planning Board  
Ivan Vamos, NYS Bicycling Coalition  
Ross and Catherine Vrooman, Residents  
Jared L. Wells, Resident  
Laurie Williams, Friends of Moreau Lake SP  
Neil Woodworth, Executive Director, Adirondack Mountain Club  
Kyle D. York, Resident

