



February 2, 2017

Terry Martino, Executive Director
Milton Adams, Project Review Officer
NYS Adirondack Park Agency
P.O. Box 99
Ray Brook, New York 12977

RE: Barile Family LLC, APA Project No. 2016-0114

Dear Terry and Milton:

We hereby submit comments regarding the Barile Family LLC project on behalf of Adirondack Wild: Friends of the Forest Preserve. Adirondack Wild is an 800 member, non-profit organization dedicated to safeguarding, extending and educating about the Adirondack Park's wild land resources and values on Forest Preserve and private lands.

First, we thank Milt Adams for his assistance in allowing us to review the project file and design maps and we thank the Agency for this opportunity to comment. Adirondack Wild recognizes the sincere intent of both the applicant and APA staff to ensure that the subdivision provides open space benefits, resulting in the proposed 475 acre open space lot protected from development except for seven acres of roads and a barn maintenance structure. Given the tract's Resource Management classification and its location at one of the most scenic vistas in the entire Adirondack Park, the permanent protection of this open space lot from further development is significant.

However, we are very concerned by the spatial pattern and fragmenting impacts of 18 residential lots, driveways and accessory buildings spread across 110 acres north of North Meadow Brook all the way to Route 73 and in close proximity to the Adirondack Loj Road. The end result is further fragmentation of Resource Management, where the law's primary objective is to protect the open space resource of the Park for forestry, agriculture and open space recreation.

Because of the land's classification and character, we contend that these issues,

concerns and potentially significant fragmenting impacts warrant more discussion, review and comment opportunities through a legislative public hearing. At such a hearing the public could explore less impacting, conservation design alternatives that would still allow for the same number of lots while significantly reducing the project's adverse impact on the landscape and on the site's upland forests, scenic character and biota.

Adirondack Wild's specific concerns can be summarized as follows:

1. **Fragmenting Development and Roadway Design:** Lots 1 through 18 span the breadth and width of the northern portion of the tract spreading significant development impacts of upwards of 9,500 square feet of buildings per lot and adding several thousand feet of new paved roadways crisscrossing the landscape. As APA knows, the Ecological Impact Zone of this subdivision is much greater than the actual development footprint. We are very concerned that this EIZ may not have been adequately assessed, mapped and taken into account during project review.
2. **Terrestrial Uplands cut-off from lowland brook and wetlands, impeding species movement:** As presently designed, the 18 lots and roadways will effectively sever the movements of amphibians and reptiles moving between the protected wetlands and the unprotected, subdivided upland forest where these sensitive animals spend much of their lives. As you know, amphibians breeding in the vernal pools on the property require a protected upland forest zone of 700-800 feet all around the pools to survive during the non-breeding season. Other wildlife movements will similarly be severely constrained and connectivity impeded north to south for small mammals, meso-predators like bobcat and coyote and even large megafauna such as deer and moose.
3. **Wetland Buffer Inadequate:** A wetland buffer of only 100 feet is inadequate given the fragmenting nature of the upland development house lots and roadways as proposed. A more comprehensive ecological impact analysis is needed that may warrant a wider buffer and greater land connectivity, thereby requiring a change in project design in a manner that could still permit 18 homes-sites.
4. **Extent of Proposed Vegetation & Tree Removal:** The allowance for 60,000 square feet of tree clearing and grass lawn creation will pose a serious, negative impact to the terrestrial ecology, connectivity and scenic character of the site and adjacent wild lands. Such cutting and transformation of the forested landscape will impact the more sensitive interior forest birds requiring specialized habitats while favoring an increase in more human tolerant species like robins, blue jays and crows. More careful design planning and clearly prescribed, much reduced limits

to tree cutting and lawn creation and the use of native tree and shrub varieties can reduce the overall impact on the sensitive species occupying this site.

5. **Insufficient Biological Survey and Ecological Impact Analysis:** The “Qualitative Biological Analysis,” while helpful, was undertaken on only three site visits covering just 110 acres of the tract over a 4-month span of time. For a valuable section of Resource Management, where the legislature’s objective is to protect the delicate physical and biological resources, this cannot be considered an adequate biological survey. Three site visits in just one season of one year on such a small section of the tract cannot truly gauge the extent and scope of species present or anticipated and the potential impacts to their habitat integrity. As previously stated, we found no assessment of Ecological Impact Zones (EIZ) as undertaken or required by the Agency in past projects (such as Highland Farmers, LLC in Keene), an absence which is truly troubling. There is little question that the EIZ will span nearly the entire 110 acres of the northern portion of the tract and beyond, especially if the potential for 60,000 square feet of terrestrial vegetation and tree cutting are permitted.
6. **High Potential for Invasive Species Impacts:** The fragmenting project design holds high potential for the introduction and spread of invasive species across the tract and to adjacent private and public lands.
7. **Viewshed Impact Assessment:** Adirondack Wild was unable to locate a viewshed impact analysis within the file information or in the planning map resources. Because the site is Resource Management within close proximity to the High Peaks and may be quite visible from surrounding “Forever Wild” Wilderness and from nearby protected Conservation Easement, a thorough viewshed analysis should be undertaken and evaluated.
8. **Dark Night Sky Protection:** Adirondack Wild was unable to locate any analysis of the impacts of this project to dark night skies. This analysis and project requirements to reduce impacts to dark night skies is critical in this relatively undeveloped portion of the Park that offers valuable night sky viewing across landscapes like the Plains of Abraham towards the High Peaks.

In light of the above concerns, and because the project conflicts with core definition, purposes, policies and objectives of Resource Management land within the Park, Adirondack Wild opposes the issuance of a permit for the project as presented in the project file. Again, we urge the APA to move this project to a legislative public hearing which permits the public to explore further how to avoid undue adverse impacts and to investigate alternative conservation design

options that can meet the applicant's interests and those of a truly protected Adirondack Park.

Thank you again for the opportunity to comment.

Sincerely,

Dan Plumley

Daniel R. Plumley, Partner

David Gibson

David Gibson, Managing Partner

Adirondack Wild: Friends of the Forest Preserve
P.O. Box 9247, Niskayuna, NY 12309
www.adirondackwild.org

Cc: Rick Weber