



September 18, 2018

Ariel Lynch, Project Review Officer
NYS Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

Re. P2018-0123, Woodward Lake, Large-Scale Subdivision Application

Dear Ms. Lynch,

Adirondack Wild offers the following pre-application comments about this first subdivision to be reviewed under new APA standards and procedures for large scale subdivisions. We appreciate the new opportunity to comment about natural resource/site information and conceptual design early in the project review process before the application is deemed complete.

According to the new APA application, large scale subdivisions are to “encourage development of projects in compliance with the agency’s review criteria...**and in accordance with the objectives of conservation design**” (page 1).

A key objective of *Conservation Design* is “to shrink the ecological footprint of a proposed development through innovative planning and site design techniques. While the developed footprint and the ecological footprint are never equal, the goal of Conservation Design is to try to bring the ecological footprint into closer harmony with that of the developed footprint, while maintaining the development values of the parcel” (from *Pathways to a Connected Adirondack Park – Practical Steps to Better Land Use Decisions*, 2017 by Dr. Michael Klemens, Adirondack Wild’s Advisor in Landscape Conservation).

In furtherance of conservation design, APA’s Large-Scale Subdivision application states that **“the preferred project design should minimize creation of new areas of disturbance to the greatest extent practicable and should concentrate development to the greatest extent practicable”** (page 9).

We detail below why the applicant's preferred design (36 lots) and the alternatives (26 lots) contradict these APA objectives and fail to attain the most basic standards required of conservation subdivision design.

- The concept sketches appear to maximize, rather than minimize creation of new disturbance, fail to concentrate development and fail to minimize the ecological impact zones of the development footprint. The preferred design and the alternatives all ring the entire shoreline of 130-acre Woodward Lake with new shoreline and back-lot homes, driveways and accessory buildings;
- The designs appear to make no discernable effort to avoid impacts to the identified natural systems. They appear likely to disrupt and sever habitats of sensitive biota, such as amphibians breeding in vernal pools and then migrating to upland forest. Also, at least one-half the new home lots appear to have streams draining to the lake. None of the sketch maps establish buffer or protective zones around these streams, or create building envelopes which exclude these stream systems from development impacts;
- They appear to site one or several lots in the very headwaters of what the applicant describes as a "massive wetland" fringing the lake's southern shore, described by The Nature Conservancy as a wet meadow and shrub swamp. Development near the wetland would be the antithesis of "conservation design." All development here should be avoided;
- They site considerable residential development on the eastern shore of the lake where the applicant's data describes soils and substrate to be "somewhat poorly drained" or "very bouldery" or "very rocky." Limited development ought to be concentrated in the north and western part of the tract where soils are described as "loamy sand." The choice to concentrate development on shallow, poorly drained soils or bouldery substrates should be an obvious red flag. Here, along with the southern wetland and stream corridors, is precisely where development should not take place;
- They fragment a locally significant northern hardwood/hemlock matrix forest above the lake's eastern shoreline with new homes, new access roads and driveways;
- They fragment all of Resource Management (RM), more than 500 acres, into multiple ownerships where haphazard or conflicting management can be expected over time instead of keeping these lands in one useful, contiguous open space lot available for forestry and open space recreation, as the APA Act intends. Conservation of RM in a contiguous tract is especially important because these lands border state-owned Shaker Mountain Wild Forest;
- They disrupt connectivity between the rugged RM portion of the project area and adjacent Forest Preserve west of the lake. The 500+ acres of RM border 4,000+ acres of Wild Forest which has Wilderness potential. While APA chose not to reclassify the Benson and Tomantown Wild Forest to Wilderness in 2016, APA did consider such a reclassification. In future, APA may reconsider and seek to reclassify this Forest Preserve to Wilderness. Dividing up the RM lands into multiple ownerships fragments a private-public forested landscape, with negative consequences for private forest management and future wilderness potential of adjacent public land.

Given the rich suite of sensitive natural resources which appear to be present on this ownership, we are forced to conclude that all of the designs perversely concentrate development on sensitive shoreline, fragment a matrix forest as well as Resource Management and maximize negative impacts to streams and wetlands. The applicant's preferred design and alternative concepts appear to badly undermine the objectives of the APA's Large-Scale subdivision application.

APA should expect the applicant to deliver a more innovative design that significantly shrinks the ecological footprint to bring it into greater harmony with the development footprint, clusters development on suitable sites, minimizes the fragmenting, negative impacts of roadway and driveway development on wildlife movement, keeps all of Resource Management in one common ownership, and leaves a significant portion of the shoreline of Woodward Lake undeveloped.

Thank you for considering our comments.

Sincerely,



Dan Plumley

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Cc: Rick Weber, Regulatory Programs, APA

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APA Members