



July 24, 2013

Daniel Whitehead
Region 3 Environmental Permit Administrator
NY State Department of Environmental Conservation
21 South Putt Corners
New Paltz, New York 12561

RE: Comments on the Belleayre Mountain Ski Center Unit Management Plan (UMP-DEIS) and the Modified Belleayre Resort Project Supplemental Draft Environmental Impact Statement (SDEIS)

Dear Mr. Whitehead:

Adirondack Wild: Friends of the Forest Preserve submits the following comments in regards to the above proposed actions involving the Belleayre Resort Project and Belleayre Mountain Ski Center; the latter of which exists on State held lands of the New York State Forest Preserve in an intensive use classification. Furthermore, Adirondack Wild is concerned with seeing the NYS-DEC safeguard both the private lands, the ski area and evaluate, control and mitigate potential impacts that may reach or extend to forest preserve lands and wilderness resources of the Catskills in close proximity to the proposed resort – the future of which is of concern and interest to all New York citizens.

Primary Comments and Concerns: Complexity, Market Demand, Scale, Immediate and Cumulative Impacts

While Adirondack Wild: Friends of the Forest Preserve (hereafter, Adirondack Wild) was not a party to the September 7, 2007 “Agreement in Principle,” we do commend the NYS-DEC and all parties for seeking proactive forward dialogue and consensus building where possible. Clearly, this and prior adjudicial decisions led to the current provisions of these recent modified proposals and SDEIS and the value of those proposals and additional environmental review is open for all public comment, review and consideration.

The complexity of this project's history over several years and the bi-furcation vs. integration of the Department's environmental SEQRA and UMP review procedure has been a clear challenge no doubt. No less more so for the general public seeking to parse the project history and the thousands of pages of documentation available.

We find that more guidance to the general public in how to faithfully understand and review the resort project and UMP modifications was clearly needed. In the future it may be beneficial to provide overview summations of planned Department actions seeking review in writing as well as guidance to the various sections – and a direct link to either a You Tube or other web-based presentation format - that provides the overview for public comment in the context of geographic map background and visuals. Such an effort could give critical guidance to non-direct stakeholders and the general public to understand better the project as well as the focus for public review, evaluation and comment.

Scale of Project in Full Build-Out Alternative, Highmount and Intensity of Ski Area Upgrades

Despite the additional extensive environmental review and consultant provisions in the SDEIS for the Modified Belleayre Resort and the analysis provided within the Ski Center UMP-DEIS, Adirondack Wild believes the overwhelming scope and scale of the Full Build-Out Alternative and Ski Area upgrade remain totally out-of-scale with the character of the Catskill Mountains and Park and the resource characteristics on site.

In particular, Adirondack Wild is very concerned that the Highmount portion of the project would pose undue adverse impacts short and long-term for the environment, critical wildlife habitat, scenic viewsheds and scenic resources, and water quality and quantity challenges (in runoff) if it were approved. We contend that resorts of this massive scale are, largely, archetypes of a more wasteful past and that, given what we as a society should be learning in terms of the impacts of sprawl development – especially in high mountain terrain – erring on the side of caution and reducing development, size, scale and intensity is to be urged.

Adirondack Wild finds the SDEIS lacking in fully assessing the impact of the Full-Build-Out and Lower-Impact Alternatives for their cumulative impacts on ecological connectivity, impacts to wild character to the Catskill Park and both state and private lands and highways within the vicinity of the proposed resort and Belleayre Mountain Ski Center. Most of the impact analysis, including the cumulative impact analysis reports appeared written to establish a fait d'compli that evaluation and impact metrics would not lead to serious impacts, however, little recognition was given to the integration of the impacts of further climate change, reduced winter cold and snow levels, growth inducements and ski area recreational competition regionally and nationally – from which only an adequate evaluation can be fairly governed.

Adirondack Wild believes that the lack of ecological impact zone analysis and the failure of the SDEIS to consider the impacts of roadway and sprawl development on site, or induced by follow-on growth may have on amphibian, mammal and bird pathways to represent one of the most serious flaws in the SDEIS and UMP-DEIS.

Adirondack Wild shares the concerns of many other stakeholder organizations (CHA, Catskill Center, etc.) in that the market analysis for the resort as well as the proposal by NYS-DEC to seek to double the usership for the Belleayre Mountain Ski Center appear weak, unsubstantiated and problematic. Large scale development projects that may have long-term local and regional impacts on character, environment, wildlife habitat, etc. should, by the very nature of their resort base, should be required to demonstrate positive market value long-term without harming local hamlets and businesses so as not to overly burden the Catskill Park with potentially failed, “white elephant” projects that become only half-built, or less, and lead only to new forms of land subdivision and speculation without deep benefits and at great cost.

In the same manner, Adirondack Wild rejects the NYS-DEC’s proposals to double the usership of Belleayre Ski Mountain without any demonstration of need or market demand. We do support upgrades and enhancements where needed for the core ski resort facilities and appropriate, limited additional trail development as long as they do not pose undue adverse environmental or wildlife habitat impacts. In this regard, we would like to see the NYS-DEC hire outside biological consultants to review whether Bicknell’s Thrush exist, nest or transition in and through the alpine zone areas and to determine impacts that may occur to other wildlife, bears, mammals and herpetofore (amphibians and turtles) from new trail development.

\$ 74 Million Expansion of Belleayre Mountain Ski Center Untenable

At this point in New York State history, Adirondack Wild does not believe that spending \$ 74 million on ski center redevelopment, expansion and the doubling of ski area users is supported by either common sense, the State Budget, much less the citizens of the State. We would support core facility enhancements and upgrades, limited and environmentally safe trail development well within the constitutional limits if they were possible and appropriate with the approval of a lower-impact alternative for the proposed Modified Belleayre Resort Project.

Wilderness and Forest Preserve Impacts and Analysis

Adirondack Wild believes that both the Belleayre Resort Project SDEIS and the Belleayre Mountain Ski Center UMP-DEIS needs to go farther to assess and evaluate short, medium and long-term impacts on adjacent forest preserve – especially high mountain wilderness lands within the Catskill Park. Cumulative Impact Analysis should include

some reasonable studies of the growth of user numbers and resulting impacts on state held forest preserve, wilderness trails and high country, trout-fishing access areas, boat launches, etc., etc. as a basis for impact review and future planning under the different resort build-out and ski center enhancement scenarios. With roughly 330,000 acres of forest preserve in the Catskill Park and the location of the proposed resort central and pivotal to the Park region, this kind of analysis and evaluation could benefit the project review and public understanding immensely.

Current use versus short-term growth in trail and facility use, and the range of uses and impacts should be analyzed for each build-out scenario along with environmental impacts and management cost-growth assessments.

Staged Low Impact Alternative with Enhanced Project Integration

Adirondack Wild believes that all parties must take serious lessons from Hurricane Irene, Hurricane Sandy, Hurricane Lee and other recent impacting storm events to prepare for and counter challenges to our common environment, our economy and our communities in the future. Lessons learned from these catastrophic events serves to give pause to over-developing rural areas – especially lands that represent high mountain terrain and critical watershed and wildlife forest habitats such as exist at Belleayre and surrounding, adjacent wild lands and private land holdings.

We urge the NYS Department of Environmental Conservation and all stakeholders (those who are parties to the 2007 Agreement in Principle, and others) to jointly seek to advance a dialogue seeking a new, more limited scale, low-impact, tightly clustered conservation design alternative for the Belleayre Resort that can enhance local and regional buy-in, integrated mountain and hamlet benefits while safeguarding the local and regional watershed capacity, wildlife and fisheries habitat, and overall capability to adapt under climate change and severe storm events on the rise.

Modest development recognizing the economic and environmental trends is well warranted and can empower local communities while advancing the Catskill Park towards global status conservation model opportunities so rare and essential today and in the future.

Adirondack Wild would welcome joining in on such a dialogue. We thank the NYS-DEC for the opportunity to comment on this matter.

Sincerely,

/s/ Dan Plumley

Dan Plumley, Partner

/s/ Dave Gibson

Dave Gibson, Partner