

**Final
Generic Environmental Impact Statement
for the Proposed St. Lawrence County
Multi-Use Recreational Trail System**

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**FGEIS Prepared for:
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Part I – Public Review, Comments, and Responses

St. Lawrence County (the “County”) is proposing to develop and maintain a County wide multi-use recreational trail system that will provide increased recreational opportunities for both County and non-County residents and increase tourism within the County. The County prepared a Draft Generic Environmental Impact Statement (DGEIS) for the proposed project in order to comply with the State Environmental Quality Review Act (SEQRA). The DGEIS was accepted by the St. Lawrence County legislature, as SEQRA Lead Agency, on May 16, 2011. Initially, the deadline for public comment was set to expire on June 15, 2011. A request for an extended comment period by the New York State Department of Environmental Conservation (NYSDEC) was approved by the County, allowing for an additional two month public comment period that expired on August 17, 2011.

The next step in the SEQRA process is to compile a Final Generic Environmental Impact Statement (FGEIS) that consists of responses to comments received during the public comment period, as well as portions of the DGEIS that have been revised in response to the received comments.

General Comment 1 – Addressing the potential for motorized trail users to trespass onto non-motorized use trails.

Several commenter’s expressed concern over the potential for motorized trail users, such as all-terrain vehicles (ATVs) and off-highway vehicles (OHVs), to trespass onto trails designated for non-motorized use, such as hiking and mountain biking. The potential for trespass onto private property was also a concern.

Response: The potential for motorized trail users to trespass onto private and state owned property is a valid concern and one the County does not take lightly. It is not possible to guarantee that this type of behavior will stop in the future, but the County’s trail design, as well as proposed monitoring component is believed to discourage

individuals from making decisions that could compromise the integrity of adjacent lands and/or trail systems. Usually an impact associated with motorized trail use is caused by the actions of a few individuals. The St. Lawrence County Recreational Trails Advisory Board's Safety and Enforcement Subcommittee has suggested measures that will aid in monitoring potential trespass and potential trail condition issues. These suggestions have been included in the FGEIS document.

General Comment 2 – Concerns regarding multi-user group conflict.

Numerous question and concerns revolved around multi-user groups and conflicts associated with sharing the same trail system.

Response: The majority of the trails that are being proposed within this document will act as main corridors of the County's trail system. The County anticipates the acquisition of additional trail segments that will branch off of the initial trails discussed within the DGEIS and FGEIS. These future trails will cater to certain user groups, in an effort to provide non-motorized users additional resources. All future trails will be assessed per the environmental checklist in order to comply with the ideas established within the FGEIS. The environmental checklist has been amended to include additional information and is found in Appendix A of the FGEIS.

General Comment 3 – What is the funding source for the proposed trail system?

Response – The proposed trail system will be funded by trail user permit sales. The County will be establishing a permit rate scale that will vary in price dependent on the type of trail use to be performed. It is anticipated that the revenue collected from permit sales will provide funding for proposed trail monitoring and maintenance measures. The permit system also takes the burden of funding away from the residents of St. Lawrence County and places it directly on the shoulders of those who will be using the trail system. Exact prices for permits will be determined by the County at a later date. The County will continue to research grants and other subsidies that may be available through public and private entities.

General Comment 4 – Who will be performing the maintenance and upkeep of the trail system?

Response – The County expects that the maintenance of the trail system will be a shared service between the County, Towns, and user groups. Shared service agreements between the Towns and County are currently being negotiated and Adopt-a-Trail agreements are being struck with local clubs.

General Comment 5 – Is there an enforcement plan for abusers of the trail system? Who will be policing the trails?

Response –Section 12.0 within the FGEIS addresses the comments associated with trail abuse and policing.

General Comment 6 – How are trails proposed on Town of Colton’s roads when a Court ruled it illegal? Legal issue of opening roads in general?

Response – All public highways not currently open to ATV or other recreational traffic will potentially be opened according to Article 48-c, Subsection 2405 of the New York State Department of Environmental Conservation’s Vehicle and Traffic Law.

General Comment 7 – Who performed and will be performing future trail assessments and inspections? And how will these assessments be performed?

Response - Ecology staff from the County’s consultant performed initial site evaluations of all proposed trail segments. Future trail segments will be assessed by the County’s consultant and/or qualified County staff for potential impacts in accordance with the Trail Checklist which has been amended to include all aspects of the DGEIS and FGEIS.

General Comment 8 – Is there a set speed limit for the proposed trail segments?

Response - The proposed speed limit for the proposed trail system is 25 miles per hour, unless otherwise posted. This information has been updated in the FGEIS.

Individual Comments

Letter from New York State Department of Environmental Conservation

Comment 1 – “Specific management and maintenance actions proposed by St. Lawrence County for the trail system should be part of the DGEIS.”

Response – The FGEIS has been updated to include proposed maintenance and management actions for the trail system.

Comment 2 – The NYSDEC wanted clarification as to what sections of the proposed trail system currently exist, what sections are proposed for the future, what trails have been assessed for potential impacts, and what mitigation measures if any need to be instituted for those trails.

Response – The currently proposed trail segments, as seen on the figures accompanying the DGEIS, are all pre-constructed trails. All of these segments were assessed for potential impacts associated with trail use prior to the writing of this document. The figures have been updated within the FGEIS to show the type of trail for each segment within the system. Trails have been classified into three categories; 1.) Local or County roads; 2.) Skidder trails; and 3.) Logging roads, improved and unimproved. Future trails could potentially consist of pre-constructed trails or the construction of new corridors. Prior to opening future trail segments to the public, they will undergo an environmental assessment by a qualified individual and the environmental checklist found in Appendix A will be completed. The County will then compare the conditions of the future trail to findings within the FGEIS and determine whether the future segment fits the criteria established within the FGEIS. An appendix has been added to the FGEIS that contains photographs of the currently proposed trail system. Appendix D will allow for a better understanding of existing trail conditions.

Comment 3 – “The DGEIS should include a proposed schedule for near and long-term actions.”

Response – The FGEIS has been updated to include information regarding near and long-term actions.

Comment 4 – “The DGEIS should provide additional background and history leading to the decision to take the proposed action.”

Response – The FGEIS has been updated to provide additional background information on why the County is perusing the proposed action.

Comment 5 - How will St. Lawrence County address unauthorized use of the trail system?

Response – This comment has been addressed under General Comment 5.

Comment 6 – “What benefit will the County provide to entities impacted by unauthorized use or what actions will the County take to repair damages caused by use of lands not included in the designated trail system?”

Response – The County realizes that there is the potential for trail trespass and trail damage associated with use. Proposed trails and adjacent private trails will be maintained accordingly if user damage occurs due to trespassing from the proposed County trail system. Maintenance activities will make use of a spectrum of available sources including localized gravel and sand pits along the trail system, County/Town/private machinery, and County/Town/system user labor.

Comment 7 – The NYSDEC is concerned that the system will not be able to provide a trail system that is compatible for use by multiple activities. In particular, the NYSDEC stated, “if a segment is intended to be compliant with the Americans with Disability Act for hiking trails.”

Response – This comment has been addressed under General Comment 2.

Comment 8 – The DGEIS appears to cater to impacts associated with ATV usage. What are the potential impacts associated with snowmobiles, mountain bikes, skiers, snowshoes, and horses?

Response –The FGEIS has been updated to provide additional information regarding potential impacts associated with snowmobiles, mountain bikes, skiers, snowshoes, and horses.

Comment 9 – How will the relationship between the County and Towns be discussed; use of memorandums of understanding or inter-municipal agreements?

Response – The County and Towns are currently in the middle of structuring a shared services agreement regarding the proposed trails system.

Comment 10 – Are existing trail systems within the County being enveloped by the proposed system?

Response – All existing trail systems within the County will eventually be incorporated into the County Wide Recreational Trails System. The trails being proposed within this FGEIS will act as the main corridors of the system, allowing access to other trails. Trail uses of existing trail systems will remain the same. Non-motorized trails will continue to be off limit to motorized equipment.

Comment 11 – Additional permits and approvals may be required depending on location of trail and associated infrastructure, including: Article 11 Part 182 Endangered and Threatened Species Incidental Take Permit; wild scenic and recreational permits from either the NYSDEC or APA depending on trail location; state land use easement and land use approvals, potential amendments to unit Management Plans for State lands; and potentially the need for a SPDES general permit and storm water pollution plan. The County is currently in the process of identifying recreational opportunities, including trail systems, within the County and producing a Master Plan and associated mapping.

Response – The County realizes that additional permits may be needed and will apply for them accordingly. Section 4.3 of the FGEIS has been updated to include potential permits that may be required by the trail system.

Comment 12 – Information needs to be provided for trail design of existing and proposed trail segments.

Response – Trail guidelines will follow those agreed upon by the NYSDEC and Heartwood Forestland Fund III (HHF III). This information has been added to the FGEIS as Appendix E.

Comment 13 – The impacts associated with erosion as the result of loss of vegetative cover needs to be further evaluated.

Response – Additional information regarding the relationship between loss of vegetation and erosion has been updated.

Comment 14 – Does data exist to support the DGEIS’s claim that “experience with the existing informal trail system has shown that the dispersal of invasive species has not been an issue to date”? Recommendation that an Invasive Species Control Plan be adopted for the trail system.

Response – The DGEIS addresses the valid concern regarding invasive species. It states that education will be used to help provide information to trail users who could potentially introduce invasive species. Trail users are expected to provide information about invasive species stands if observed on or adjacent to the trail system. The DGEIS also stated that aggressive management strategies would be implemented on located stands of invasive species included mechanical, chemical, and potentially biological control methods. Portions of the proposed trail system are located on private roads and logging roads. Local traffic and logging operations on these segments provide excellent carriers for invasive species seeds and are out of the control of the County.

Comment 15 – What mitigation measures will be implemented once a trail has been determined to be significantly disturbed during trail inspections? The NYSDEC also inquires about what efforts will be incorporated into the trail design to keep riders on the proposed trails.

Response – Trail design criteria has been included in the FGEIS. It can be found in Appendix E and is based on road guidelines developed by the NYSDEC and the Heartland Forest Fund III. Additional information regarding trail conditions is included in the FGEIS and photographs of existing trail conditions are available in Appendix D.

Comment 16 – The NYSDEC requested information regarding qualifications of the individuals who performed the review of the trail corridor for threatened and endangered species.

Response – The following lists the individuals who performed the environmental assessment of the proposed trail system and their qualifications. Todd J. Phillips holds an Associate of Applied Science in Fish and Wildlife Technology, as well as a Bachelor of Technology in Animal Science – Concentrating in Wildlife Management from the State University of New York at Cobleskill. He has 7 years of work experience conducting environmental reviews including those for threatened and endangered species, wetland assessments/delineations, and environmental permitting. Mr. James Saxton holds a Bachelor of Science in Environmental Science from Alfred State University and a Master of Agronomy from Cornell University. He has over 20 years of experience performing environmental site assessments, wetland assessments/delineations, and environmental permitting. All trails were walked, driven slowly by vehicle, or ridden slowly by ATV in an effort to assess trail conditions as well as document any threatened or endangered species. No threatened or endangered species were observed within any of the trail corridors, as stated in the DGEIS.

Comment 17 – What are the potential impacts to threatened and endangered wildlife species?

Response – Additional information has been added to the FGEIS regarding threatened and endangered wildlife and potential impacts associated with the trail system. The NYSDEC used Blanding’s turtle habitat as an example within its comments. Blanding’s turtles depend on wetlands, of which none will be impacted due to no wet crossings as stated in the DGEIS. The currently proposed segments of the system are not located within Blanding’s turtle habitat range. If future trails are proposed in the vicinity of wetlands in the St. Lawrence River Valley and Ontario Lake shore, care will be taken to identify potential habitat in close proximity to the proposed trail.

Comment 18 – What is the definition of “wet crossing” as used in the DGEIS?

Response – All trail segments were assessed for “wet crossings”. The term “wet crossing” has been assigned to any state or federally regulated wetland, as well as any NYSDEC mapped stream or any stream as defined and regulated by the United States Army Corps of Engineers. Wet crossings were assessed by the County’s consultants. The County realizes the importance of wetlands and streams and has mandated that they will not be crossed by the trail system without a bridge or culvert system.

Comment 19 - What are the potential impacts to threatened and endangered vegetation species?

Response – The individuals and methods that were used for assessing trails for threatened and endangered (T&E) wildlife species were also used for screening of trail segments for T&E vegetation species. Additional information regarding T&E vegetation in St. Lawrence County has been included in the FGEIS.

Comment 20 – What will the posted speed limit be for the proposed trail system?

Response – This comment has been previously addressed in General Comment 8.

Comment 21 – What upland natural communities were located within the proposed corridor? “The DGEIS does not contain an evaluation of potential impacts to upland

areas and therefore the proposed mitigation measures do not identify criterion for evaluation of alternatives.”

Response – Section 5.1.3 in the DGEIS made reference to natural communities that the proposed system would travel through, including upland settings. The DGEIS is a broad document, and is designed that way in order to span the entire project in accordance with the SEQRA process. All sections of the DGEIS that do not specifically call out wetlands or streams are relevant to upland areas.

Comment 22 – The NYSDEC requests clarity between “wet crossings” and excessive crossings.

Response – The word excessive has been removed from the first bulleted mitigation BMP and replaced with “any”.

Comment 23 – The NYSDEC requests additional information regarding the two crossing locations where a bridge and a culvert would be needed.

Response – These two locations were on segments of improved logging road that had washed out during the spring melt. Both of these crossings have been repaired by the road owner and provide dry crossings for potential trail users.

Comment 24 – In stream work windows may be limited depending on the season, for instance brook trout streams contain an in stream work window of May 1st to September 15th.

Response – The County understands that certain streams carry potential in stream work restraints and will plan accordingly when scheduling stream crossing maintenance.

Comment 25 – “Reference in the proposed mitigation section should also include the need to obtain permit coverage for crossing when required.”

Response – Information regarding the statement above has been added to the mitigation section for surface water resources. The potential for Article 15 permits was previously identified in Section 4.3 as well.

Comment 26 – The NYSDEC requests information on the assessment methodology used for wetland delineations, as well as any results from the assessment that was conducted.

Response – Each trail segment was assessed for wetland resources using the methodology identified in the 1987 United States Army Corps of Engineers Wetland Delineation Manual, as well as the 2009 Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Regions. None of the proposed trails were determined to contain wetland resources. Those trails that contained wetlands were removed from the proposed trail system. Data was not recorded due to trails being removed from the system if wetlands were identified as present.

Comment 27 – The NYSDEC requests that state and federally mapped wetland resources be included in the document.

Response – The figures found within the DGEIS have been updated in the FGEIS to include NYSDEC mapped freshwater wetlands, National Wetland Inventory wetlands, and mapped Adirondack Park Agency wetlands. Since a moratorium on wet crossings has been employed by this document there will be no impacts to jurisdictional wetlands, resulting in no need for mitigation.

Comment 28 – The NYSDEC identified the following statement as confusing. “In those areas where a bridge or realignment is not feasible the trail section will be closed.”

Response – The statement identified above is directed towards future trail segments that may be incorporated into the County wide system. The statement has been revised within the FGEIS.

Comment 29 – “State regulations for wetlands outside of the Adirondack Park regulate not only to the wetlands themselves but their 100’ adjacent areas. Organized intensive use of an adjacent area is generally considered a compatible activity which requires a permit in accordance with 6 NYCRR Part 663.”

Response – All portions of the trail system that are within the 100-foot adjacent area to a mapped NYSDEC wetland have been identified and included within Section 5.4 of the FGEIS. An Article 24 permit will be applied for and attained prior to opening these sections to the public. Section 4.3 of the DGEIS recognized the fact that the system could potentially require Article 24 permits for actions within the 100-foot adjacent area to a state mapped wetland.

Comment 30 – The evaluation of soils/slopes which are not acceptable for new trail segments should be evaluated on future trails, as well as on the proposed segments within the DGEIS.

Response – Trail segments proposed within the DGEIS were evaluated for potential erosion issues. All proposed trails were assessed and determined to be of good quality. The environmental checklist for future trails includes review of soil/slope conditions. Future trails that are determined possibly represent problematic soil conditions or slopes greater than 15% will not be incorporated into the trail system.

Comment 31 – The impacts and proposed mitigation measures associated with the increased traffic resulting from trail segments crossing forest preserve and easement lands need to be included in the FGEIS.

Response – A proposed trail segment will make use of existing roadways that travel through Forest Preserve land resulting in no additional removal of vegetation. There are proposed trail segments on easement lands. These trails consist of improved and unimproved logging roads, as well as ATV trails used by the owner and their lessees. Information within the DGEIS and FGEIS took into account these trail segments and

therefore all mitigation measures within those documents will be incorporated into the maintenance and enforcement of trails on easement lands.

Comment 32 – The NYSDEC requests that the DGEIS include specific descriptions of the parcels opened to ATV usage by St. Lawrence County Resolution Number 347-2006.

Response – The public lands opened to ATV use through Resolution Number 347-2006 include County Reforestation Areas. Resolution Number 347-2006 has been included in the FGEIS as Appendix C.

Comment 33 – The 12 principles for minimizing user conflict, as identified by the Federal Highway Administration (FHWA), needs to be included within the DGEIS since St. Lawrence County’s approach is reportedly based on this approach.

Response – The 12 principles identified by the FHWA are listed in the proposed mitigation measures of Section 5.9 in the DGEIS.

Comment 34 – Has the County considered the establishment of an enforcement advisory group, including judicial representatives, to monitor and implement trail system requirements?

Response – The County currently has a Safety and Enforcement Subcommittee that answers to the Recreational Trails Advisory Board. This subcommittee is made up of members of the Board from different user groups. Currently judicial representatives are not included within this subcommittee.

Comment 35 – The NYSDEC requests that information on the entity performing the environmental review of future trail segments be included on the form, as well as additional criteria that envelopes the entire environmental review that was included within the FGEIS.

Response – The environmental checklist has been updated to include additional items to be screened for as recognized in the FGEIS, including who performed the assessment.

Comment 36 – GEIS’s and their findings should set forth specific conditions or criteria under which future actions will be approved, including requirements for subsequent SEQRA compliance. What are the specific conditions or criteria that will result in the need for supplemental EISs to reflect site specific significant impacts?

Response – The County does not currently plan on issuing supplemental EISs. Future trail segments will be reviewed for potential environmental impacts prior to their opening to the public. If significant impacts are associated with the proposed future trail segment, that segment will not be considered for inclusion in the County trail system. All future trail segments will be required to fit under the boundaries of the environmental review reported within the FGEIS.

Comment 37 – This comment addresses requests and concerns by the NYSDEC regarding Appendix A’s environmental checklist. The NYSDEC suggests that a map be added to the checklist for future trail segments. The NYSDEC requests that a section be added to the checklist that lists all of the potential permits that may be required. The NYSDEC questions why a ford type crossing is included on the checklist. The NYSDEC questions the discrepancy between Section 5.5, which states that soil erosion increases when slopes are greater than three percent, versus the checklist which asks if potential trail segments have a slope of 15 percent.

Response – The assessment of future trail segments will include the environmental checklist as well as a map identifying the location of the future segment. The map will be on an aerial background and include mapped wetland resources and hydrography for the region. The figures that accompanied the DGEIS have been updated in the FGEIS to include mapped wetland resources. The environmental checklist itself has been revised to include additional environmental items, including potential permits and

approvals that may be required. The environmental checklist includes a question that asks what type of stream crossing is currently present on the proposed trail segment. A ford crossing is included in this question in order to identify the existing means of crossing. Fords are wet crossings and will not be allowed within the County trail system. Any future trails that contain a ford crossing during the initial site assessment will be required to update the crossing with a bridge structure that spans the entire resource or installation of an adequate culvert system before that segment is opened for public use. The environmental checklist has been revised to ask if the slope of the trail is greater than 15 percent and what is the condition of the soil on the proposed segment. Gravel roads and other travel corridors require a 4-6% cross slope in order to provide proper drainage. The majority of the trails within this document are improved logging roads that have been constructed with slopes greater than 3 percent. These improved roads are covered with gravel or rock dust which aids in minimizing possible erosion issues. The natural topography of St. Lawrence County is rolling hills to mountainous terrain that contains slopes ranging from 0-15%. Trails have been designed to fit naturally into the landscape of St. Lawrence County.

Comment 38 – This comment addresses requests and concerns by the NYSDEC regarding figures that accompanied the DGEIS. The NYSDEC requests that trail segments provide additional detail as to the evaluation of the potential environmental impacts of the proposed trail system, what segments of the trail are located on County or local roads, what trail segments already exist and what segments are proposed for the future, and what is the proposed use for each segment.

Response – The figures have been revised and include additional mapped resources that allow for a better understanding of potential environmental impacts. The figures that accompanied the DGEIS have been revised in the FGEIS to include what type of trail each segment is, i.e County road, local road, logging road. All of the segments included on the figures within the FGEIS currently exist and are proposed to be open to the public once the SEQRA process has been completed. Future segments will be mapped and accompany the environmental checklist as amendments to the FGEIS. All

trails represented on figures accompanying the FGEIS will be for use by all user groups. These segments are proposed to be the main corridors for the County trail system. Future trail segments will branch off of the currently proposed segments discussed within the FGEIS and will have designated trail uses assigned to them.

Letter from The Adirondack Council

Comment 1 – The Council is concerned about the effects of the trail system on wildlife in the area, in particular amphibian and bird species. “One reason why little impact from the trail system is expected is because illegal riding has already scared away or killed many species.”

Response – The County acknowledges that the chance for temporary displacement of wildlife may occur as a result of the proposed trail system. While the Council is concerned with the potential ATV impact on wildlife, it should be noted that other users such as mountain bikers, horseback riders, and even hikers all have the ability to impact wildlife species that may be on or in the vicinity of the trail system during use. Impacts to wildlife are not exclusive to ATV users. Maintenance of the proposed system will help to reduce impacts to amphibian species by repairing mud holes that could be occupied within the trail system. The County has also implemented a no wet crossings stance for wetlands and streams which will protect amphibian and fish species, along with their habitat. Songbirds that make use of the trail corridor in all probability will flee from all trail uses, not only ATV traffic. The idea that illegal riding has already, “scared away or killed many species” as the Council states in their comment letter, is speculative and not a fact. During the trail assessments, numerous species of songbird were observed making use of the adjacent landscape. The majority of the trails included in this system are part of an extensive logging road system that sees truck traffic during portions of the year. Vehicles associated with the logging industry are larger and louder than the proposed trail uses and already displace songbirds that are along the trail corridor.

Comment 2 – The Council is concerned about the potential for invasive species introduction to trail corridors and suggests that if invasive species are discovered, the trail segment should be closed and an independent third party should oversee the removal of the invasive species.

Response – This comment was also a concern of the NYSDEC and was addressed, with information on removal methods included in Appendix F. The County does not believe that a third party will be needed for oversight of any invasive species removal. Should chemical means of removal be employed, a NYS certified herbicide/pesticide applicator will be used.

Comment 3 – The Council believes that the checklist in Appendix A should contain additional questions. The Council also asks what kind of trails will require further study?

Response – The environmental checklist has been updated to include additional items in the FGEIS. No further study of the currently proposed trail segments is needed, as they have already been assessed for environmental impacts. The GEIS format is being used because of its ability to provide information at a trail system level, including the implementation of environmental review for future trail segments.

Comment 4 – The Council identified an error on page 17 in regards to Indiana bats (*Myotis sodalis*).

Response – The error on page 17 has been corrected within the FGEIS. Indiana bats do have the potential to inhabit portions of St. Lawrence County during the summer months below the 900-foot elevation. As such, the County has contacted the United States Fish and Wildlife Service regarding the potential for Indiana bats within close proximity of the trail system. The USFWS released a Biological Opinion in 2009 stating that Indiana bats do not travel far from their Jefferson County hibernacula and make use of only a small portion of southwestern St. Lawrence County. The proposed trail system is not located in this area and will therefore have no effect on Indiana bats. Based on this statement the County contacted the USFWS regarding this project and

received a letter stating that the USFWS concurs with the County's finding that no Indiana bats will be impacted by the proposed project.

Comment 5 – The Council states that trail widths and lengths should be included within the FGEIS. The Council suggests that a figure depicting the entire county and trails should be released.

Response – All trails will meet guidelines agreed upon by the NYSDEC and HFFIII for ATVs. This table has been included in the FGEIS as Appendix E. All trails currently proposed for inclusion within the system by this document are previously constructed. Appendix D within the FGEIS provides photographs of sections of the proposed trail system. A figure has been included within the FGEIS that depicts the entire county and the proposed trail system. Each figure that was released with the DGEIS contained Trail Index Grids that provided the reviewer with a general location of each figure.

Comment 6 – The Council would like the County to acknowledge that a segment of the trail system travels through a small portion of the Grasse River Wild Forest on Tooley Pond Road.

Response – The County realizes that a portion of the trail crosses a small area of the Grasse River Wild Forest. This trail segment is located on existing gravel roads and will result in no impact to vegetation within the forestland.

Comment 7 – The Council believes that long term funding needs to be set aside for mitigation activity.

Response – In order for the County to fiscally support the proposed trail system, users will be required to buy permits. The fee structure is currently being developed and will require all user types to buy a permit.

Comment 8 – The Council believes that the FGEIS should include more specific language involving trail assessment timeframes. The Council also believes that overused or mistreated trails should be closed rather than rerouted.

Response – Trail assessments will be performed prior to the opening of a trail segment and within the following time period, May 15th to September 30th. In affect when a trail is rerouted, it results in closure of the mistreated trail until maintenance activities result in an environmentally sound trail once again. Trails that are closed will be signed and detour routes provided for the user.

Comment 9 – The Council believes that the trail system is, in reality, an ATV system. It is the belief of the Council that the DGEIS takes the stance that non-motorized users can go somewhere else if they do not like the noise of motorized users. The Council also believes that the true reason for the trail system was hidden in the DGEIS, “This trail system is in part designed to justify the already occurring illegal ATV use, a purpose that should be expressed in the General Description or the Project Description Purpose.”

Response – While the proposed trail system will allow for ATV use, it is in no means an ATV only system as implied by the Council. The proposed system has been developed through the hard work of numerous user group representatives that make up the St. Lawrence County Recreational Trails Advisory Board. The statement within the noise section of the DGEIS regarding the displacement of birdwatchers has been updated within the FGEIS. It is not the intention of the County to cater to ATV users over other trail user groups. Every discipline of user has an equal right to use the proposed system. Noise from ATVs should only temporarily impact wildlife within the trail corridor. Non-motorized human activity also causes displacement of wildlife. The Council states that the purpose of the proposed system is to legalize ongoing illegal ATV activity. This statement is partially true. Currently ATV traffic is not structured within St. Lawrence County, as it is across the majority of New York State, and as such trails are not maintained and environmental hazards are present. By the County forming a trail

system, it allows for maintenance activities to take place, better policing of an authorized trail system, and provides a trail system other trail users can enjoy.

Comment 10 – The Council is concerned about the potential conflict between user groups on the trail system.

Response – This comment was previously addressed in General Comment 2.

Comment 11 – The Adirondack Council asks if the proposed trail system will be used during the winter season by snowmobiles or other winter recreationists.

Response – Sections of the proposed multi-use system are already part of the Statewide Snowmobile Trail System. These trails are maintained by private snowmobile clubs who are funded by club memberships and State registration subsidies. Other winter recreational activities that may make use of the proposed trail system include, snowshoeing, dog sledding, and cross country skiing.

Comment 12 – The Council asks that revisions to statements about the economic stimulus of the trail system be revised within the FGEIS due to it containing exaggerated and conflicting claims of economic benefits.

Response – The Council partially paraphrases and quotes two statements, “it is anticipated that [people from outside the region] will choose to travel to and spend recreational dollars in a region that allows them to enjoy their recreational passions.” and “Majority of trail users will be local residents.” There is no contradiction between these two statements. The first statement points out that it is anticipated that non-residents will travel to St. Lawrence County specifically to use the recreational system. While the second statement recognizes that the majority of users will be local users. The first statement never identified non-resident users as the majority demographic. The Council identifies the following statement within section 5.10 of the DGEIS, “Although some increase in ridership may result from this action, increased tourism is expected to be incremental and should not result in significant demands for growth...” If

one reads Section 5.10, they should identify that this statement was intended to point out that the significant growth identified by the Council, i.e. hotels, gas stations, are already in place due to the influx of snowmobiles during the winter months. This statement has been clarified within the FGEIS at the request of the Council.

The Council states that Tug Hill Study does not necessarily reflect the conditions within St. Lawrence County. The County believes that the Tug Hill Region and St. Lawrence County are very similar. While more snow may accrue in the Tug Hill during the winter months due to lake effect snow, the spring, summer and fall seasons have temperature ranges and precipitation totals that are very similar. The total population for the Tug Hill region is obviously much larger than that of St. Lawrence County, but that entire Tug Hill population is within a couple hours drive at most of the proposed County trail system. The proposed trail system does incorporate fees and fines. This information has been updated within the FGEIS, addressing the Council's concern over budgetary shortfalls, enforcement, and public subsidies.

Comment 13 – The Council is concerned about the speed limit of ATVs on paved roadways and the age of ATV operators.

Response – The proposed speed limit is 25 miles per hour, or as posted. Age limits have been established for the trail system according to the New York State Vehicle and Traffic Laws.

Comment 14 – The Council questions the legal justification for opening roads to ATV traffic.

Response – At present, the Motor Vehicle Law does not define the maximum distance that an ATV Trail can be on a road. The Law does specify that in order to include a road to connect trail sections, there can be no other way to get from one trail section to the other. All open trails that consist of roadways will follow the New York State Vehicle and Traffic Law.

Comment 15 – The Council questions the idea that states the trail system is just a “formality”, and states that this type of blatant disregard for the SEQR process opens the County up for litigation in the future for not conducting an environmental review.

Response – The County did not mean for the “formality” term to be taken as a blatant disrespect for the SEQR process. The point the County is trying to get across is that the proposed trail system will follow existing trails that have been in use for numerous years. The idea that the County disregarded the SEQR process is obviously not the case. Each one of the trail segments proposed for use in the County wide system was evaluated for potential environmental impacts and overall impacts were addressed within the DGEIS and FGEIS. An environmental review has been conducted of all currently proposed trails, as information within this document depicts. Future trail sections will have mandatory environmental screenings performed prior to inclusion in the County system. At no point does the County state that additional trail segments will be included in the system without performing an environmental review.

Comment 16 – The Council believes that motorized trail uses should not be encouraged over non-motorized uses.

Response – Nowhere in the DGEIS does the document encourage motorized use over non-motorized use. The County has spent money, time, and resources in an effort to propose a system that will provide enjoyment to multiple user groups, not just ATV use. This document has been reviewed by the Trails Advisory Board which is comprised of members who are associated with many different outdoor activities.

E-mails from Mr. Ernest Hutchins

Comment 1 – “All Town of Colton Roads were closed for ATV use in 2004 by the Supreme Court decision 1AS #441-2004-0170, you keep referring to existing roads and trails in use for ATVs, there are none in the Town of Colton. Do you plan on ignoring the decision of the NYS Supreme Court?”

Comment 2 – “Under Pette vs. Lewis County # CA 2010-000048 the judge will not allow the wholesale opening of roads like you want to do in St. Law Co by my house you will have 40 miles of road open with no trails this judge would not allow 2 miles of road open does St. Law Co have no respect for the decisions of the court?”

Response – Public highways not currently open to ATV or other recreational use shall be opened as per Article 48-c, Subsection 2405 of the NYSDMV Vehicle and Traffic Laws.

Letter from Mr. Nelson Russell

Comment 1 – Mr. Russell commented on the transition of mud puddles to mudpits. He states that, “necessary mitigation is to fill the depression so it ceases to hold water.”

Response – The County plans on providing maintenance to the proposed trail system that will include the filling and leveling of depressions and mudpits that may occur as a result of usage. This will not include the filling of any wetlands or Waters of the U.S. as defined by the United States Army Corps of Engineers.

Comment 2 – Mr. Russell’s second comment pertains to trail enforcement, which has been addressed in General Comment 5.

Letter from Ms. Mary Rutley

Comment 1 – Why does the DGEIS mostly address concerns regarding ATVs if the proposed trail system would be used by multiple users?

Response -It is the opinion of the County that both the Draft and Final GEIS provided general information about trail use and trail selection. The reason that it may seem to lean towards ATV use is because of the County and public’s belief, as proven by this comment letter, that an unchecked, non-maintained system that allows ATV use has the potential to cause environmental damage. The same is true for trail systems that do not

allow motorized use. Hiking, mountain biking, horse riding, and other man powered activities also have the potential to cause soil compaction and erosion, vegetation wear and disappearance, as well as trail widening. The County is trying to incorporate a trail system that will provide trail access for multiple user groups, while monitoring and maintaining environmental conditions.

Comment 2 – Ms. Rutley is concerned about ATV traffic, excessive speeds, and hours of operation on the trail system, especially in front of her house on Cold Brook Drive in the Town of Colton. This comment also questions the devaluation of property that is located adjacent to trail segments.

Response – The County is looking for potential ways to avoid Cold Brook Drive. The idea that a trail system could result in a decrease in property value cannot be confirmed nor denied. Depending on who the potential property buyer is, a statement could be made that a local, easily accessible trail system, which passes by one's property could result in an increase in that property value. Recreational opportunity is often a sought after trait when prospective home/property buyers decide on a purchase. Speed limits are scheduled to be 25 M.P.H., or as posted. The New York State Traffic Law forbids the use of an ATV within 100-feet of a dwelling between midnight and 6 a.m., at a speed greater than the minimum required to maintain forward movement (Article 48-C, subsection 2404).

Comment 3 – This comment addresses the differences between an ATV and OHV, asking why public roads and highways are being included within this system if OHVs are street legal.

Response – As stated in the Glossary of Terms on page 2 of the DGEIS, ATV stands for all-terrain vehicle and the acronym OHV stands for off-highway vehicle. OHVs include all motor vehicles with the capability of traveling off-road, such as ATVs, trucks, off-road motorcycles, and trucks/jeeps. ATV is a term that is applied to four-wheelers, three wheelers, and utility vehicles. Public roads and highways are being included

within the trail system as corridors for trails users to move from one off-highway trail to another. This method is already used by snowmobile trail systems statewide.

Comment 4 – This comment voices Ms. Rutley’s concern regarding the inclusion of State Route 56 as part of the trail system.

Response – The trail system will not make use of State Route 56, but will instead parallel the existing roadway, with crossings occurring at 90° angles.

Comment 5 – This comment is asking for more information to be provided on the relationship between the proposed trail system and its total mileage, trail mileage, highway mileage, private land, and how much is public lands and easements?

Response – The total proposed trail corridor is currently 204.2 miles, but is expected to change as trails are added and removed from the system in upcoming years. Fifty and eight-tenths miles are considered logging road, 4.1 miles are skidder trail, 3.2 miles are off-road and .9 mi. is utility road.

Vegetation Concerns – Ms. Rutley stated that she was able to find all but two of the threatened and endangered vegetation species listed in the DGEIS within a field identification book called *Plants of St. Lawrence County, NY* (Eldblom, N.C. and A.M. Johnson, 2010). She stated that she would reject the statement within the DGEIS that no threatened or endangered species were observed within or adjacent to the proposed trail corridors.

Ms. Rutley recommended modifying two statements on page 14 of the DGEIS. “Indirectly, trail traffic can cause compaction of soil in the immediate are...” to “trail traffic directly causes...” and “...secondary result of bare soil...is the possibility of soil erosion.” to ‘is erosion’.

“Who in St. Lawrence County has the expertise to or the time to monitor for the invasive species that the trail users will combat? ...this mitigation will be difficult to realize.”

Response – The County agrees that the use of current versus dated scientific names can be a problem. Unfortunately scientific names are constantly changing as subspecies are discovered. Threatened and endangered species were generated from the Natural Heritage Program’s (NHP) list for the St. Lawrence County Towns associated with proposed trail segments. Scientific names of threatened and endangered vegetation were reported from that list. The County agrees with the NHP in that endangered species are located within St. Lawrence County, but reiterates that no endangered or threatened species were observed within the current trail layout

The trail segments were walked, driven slowly by vehicle, or ridden slowly by ATV by a qualified individual with a background in vegetation identification, as well as college education involving natural resources, and years of field experience. Section 5.1.1 of the FGEIS has been revised to provide additional information regarding the threatened and endangered vegetation assessment method, as well as provide more information about listed threatened and endangered species within the County.

The County will make the necessary revisions to page 14, incorporating Ms. Rutley’s suggestions.

The County has revised the Proposed Mitigation Measures on page 15 of the DGEIS to include additional information regarding Invasive Species Management.

Wildlife Concerns – “Were no species identified in the corridor when surveyed because the survey was done on folks with ATVs? Again, who were your experts?..Other idealistic actions include p.19 on identifying “habitat tress before cutting” and on p20 the monitoring for “muffling of motors” and “low speeds.”

Response – Ecology staff from the County’s consultant assessed trail segments for potential habitat associated with the NHP listed threatened and endangered animal

species, as well as for the presence of the species itself. No threatened or endangered species were observed. Some trails do travel through habitat associated with the Indiana bats, but due to the distance between the proposed trail system and the nearest Indiana bat hibernaculum, along with information released by the USFWS in a Biological Opinion, dated 2009, there will be no effect and/or no impact associated with the trail system. This determination was supported by the USFWS in a letter dated February 6, 2012. ATVs using the trail system are required to meet standards set forth in the DGEIS for noise levels, this may include proper muffling. Blatant disregard for noise levels and speed will result in punishment as set forth in St. Lawrence County Resolution Number 347-2006 and the Vehicular Traffic Laws of New York State.

Surface Water Resources Concerns – How will the mitigation proposed be implemented? And will some steps for mitigation be selected and some ignored? How is the follow-up decided?

Response - Wet crossings of surface water resources will not be allowed. Mitigation measures within the DGEIS state that all waters will be bridged; if this is not possible then the trail will either be closed or rerouted so that impacts can be avoided. Bridge structures will span the entire resource. Trail conditions, including water crossings, will be reported by trail users who have made agreements through an Adopt-a-Trail program.

Wetland Concerns – How was the wetland review conducted? Were protected, classified stream maps, as well as, state and federal wetland maps consulted prior to conducting field surveys? Is this a site specific analysis yet to be done?

Response – As the DGEIS stated, all trails were reviewed for potential wetland impacts in 2010, with some secondary reviews in 2011. Information regarding how wetland reviews were conducted were previously answered in NYSDEC Comment 26.

Letter from Ms. Mary Jane Watson

Comment 1 – Ms. Watson is worried about Cold Brook Drive in South Colton being opened to ATV traffic. She states that the road is already congested with traffic associated with Higley Flow State Park.

Response – The County is searching for alternate routes that will result in minimal use of Cold Brook Drive.

Comment 2 – Will the new trail system have designated hours of operation?

Response – The proposed trail system does not currently have set hours of operation. The New York State Traffic Law forbids the use of an ATV within 100-feet of a dwelling between midnight and 6 a.m., at a speed greater than the minimum required to maintain forward movement (Article 48-C, subsection 2404. Operating Rules).

Letter from The Adirondack Mountain Club (ADK)

Comment 1 – The ADK voiced its concern regarding the illegal use of ATVs and OHVs on non-motorized recreational trails.

Response – The issue of potential trail trespass has been previously discussed in General Comment 1.

Comment 2 – The ADK is concerned about the potential for recreational conflict between user groups, in particular the effects ATVs may have on other user groups.

Response – Conflict between potential user groups was a concern of multiple commenters and was previously discussed in General Comment 2.

Comment 3 – The ADK is concerned about the safety of ATV riding.

Response – St. Lawrence County is also concerned about the safety of its residents and any potential tourists who may use the multi-use recreational trail system. ATVs

will continue to be used by people whether the County sponsors a trail system or does not. The segments of the trail system proposed to allow ATV traffic have been designed based on road guidelines agreed upon by the HFFIII and the NYSDEC, will be properly signed, and have a posted speed limit that will provide a safe riding experience. Kiosks at trailheads will provide information on ATV use and safety. St. Lawrence County encourages ATV users to take a safety course before riding ATVs. All ATV users are to comply with the New York Vehicle and Traffic Laws associated with ATVs found within Article 48-C.

Comment 4 – How will the County create infrastructure for a successful ATV tourism program?

Response – A large part of the trail infrastructure is already in place for use by potential tourists. The County's Chamber of Commerce currently promotes outdoor activities within the County. Numerous clubs currently exist, including those involved with the review of this document that promotes outdoor activities. The trails have been previously constructed over years of private use. The County wide system will offer a recreational opportunity to tourist, without the need for an increase in infrastructure.

Comment 5 – The ADK suggests that an assessment should be performed on the present trail utilization, in order to reflect a potential loss of income from non-motorized user groups.

Response –It is the belief of the County, that through proper maintenance, policing, and the implementation of safety devices that the multi-use recreational trail system can be enjoyed by outdoor enthusiasts from numerous user groups. The majority of the currently proposed trails will act as main corridors that will usher users to future or present trails that are user specific. The idea that non-motorists won't use the trail system due to motorized use cannot be confirmed. The St. Lawrence County Recreational Trails Advisory Board is comprised of numerous user groups, all of which believe that a multi-use trail system is an achievable goal. Off-road trail segments

proposed in this document are currently used for logging, hunting activities, and the occasional biker or hiker. There cannot be a negative impact on income if there is currently minimal use of the trails to be incorporated into the system. For trails that are proposed on NYSDEC Easement Lands, there will be no impacts to utilization as they have not yet been completely open to the public and have not had use patterns set for the areas.

Comment 6 – The ADK believes that the following statement within the DGEIS is incorrect and reflects what little control authorities have to prevent ATV trespass. “In reality, the creation of a St. Lawrence County Multi-Use Recreational Trail System is just a formality.”

Response – The statement above has been removed from the FGEIS. The County realizes that the trail system will require attention and constant monitoring. The County has prepared this document in good faith, realizing that a full environmental review of the trail system is required and in the best interest of the users, the residents of St. Lawrence County, and the County itself.

Comment 7 – The ADK suggests that non-motorized trail users should have their own trail system, separate from that being used by ATVs. The ADK believes that during the site specific trail assessments, care should be taken to determine potential impacts to other users by ATVs. The ADK believes that the trail system will inevitably benefit motorized trail use more than non-motorized use.

Response – The idea that the trail system will benefit motorized trail use more than non-motorized use is purely speculative. One could just as easily point fingers at another trail use and state that the impact associated with that use will result in impacts to other users. The trails currently proposed by this FGEIS and shown on the accompanying figures will act as the main corridors of the multi-use recreational trail system, providing access to additional trails, some to cater to certain outdoor disciplines. The FGEIS provides the process for which future trails will be assessed.

Currently proposed trails are designed to allow for multiple user groups in a safe and productive manner.

Letter from St. Lawrence County Mountain Biking Association

The St. Lawrence County Mountain Biking Association discussed two items within their letter. The first was potential trespass of ATVs onto non-motorized trails and secondly, how the trail would function to allow for a true multi-user system. Both of these concerns/comments are addressed in the General Comment section above.

Letter from The Laurentian Chapter of The Adirondack Mountain Club

Comment 1 – “We felt the tone of the DGEIS was too heavily slanted toward motorized vehicles. The report seems intended to justify the use of ATVs on all trails, and we hope that this will not prove to be the case. We hope a precedent will not be set that all trails and areas will be opened to motorized vehicles. We believe that any proposed additions should be treated on a case by case basis.”

Response – It is not the County’s intention to open existing non-motorized trails to ATV use. Trails currently proposed within the FGEIS are to be used by multiple recreational disciplines. These segments will serve as the main corridors of the system, allowing access to future trails that are discipline dependent. Currently developed trails that are closed to motorized usage will remain closed to motorized usage. All future trail segments will be assessed for environmental concerns and the trail checklist completed on a trail by trail basis.

Letter from Mr. Mark Simon

Mr. Simon had two main concerns regarding the DGEIS: conflicts between user groups; and ATV trespass. Both of these concerns have been addressed under the General Comments section of Part I.

Letter from Mr. Tom Ortmeyer

Comment 1 – Mr. Ortmeyer suggests that additional information be included in the FGEIS in regards to potential impacts and mitigation measures for wildlife in the vicinity of the trail system.

Response – Additional information regarding potential impacts and mitigation measures for wildlife are included within the FGEIS.

Comment 2 – Mr. Ortmeyer suggests that the language concerning potential trail closure due to unacceptable conditions within the DGEIS should be strengthened to, “reflect that trails will be closed if suitable stream/wetland crossings cannot be maintained.”

Response - The FGEIS has been updated to include stronger language in relation to closing trails where stream/wetland impacts occur consistently, this includes rerouting trails to other areas.

Comment 3 – Mr. Ortmeyer suggests additional information should be included on the proposed trailhead kiosks. This would include trail rules, information on surface water pollution concerns, and signage stating that intentional trail misuse will result in trail closure.

Response – Pamphlets associated with the additional information will be made available at kiosk locations.

Comment 4 – Requests that the statement, “In reality, the creation of a St. Lawrence County Multi-Use Recreational Trail System is just a formality.” be amended.

Response – The above statement has been removed from the FGEIS.

Comment 5 – Requests that the statement, “The proposed trail system will create public access to beautiful areas of the County that would otherwise be hard to access.

The geographic location of St. Lawrence County allows for multiple natural resources to be visited during a single trip, from views of the St. Lawrence River valley to awe inspiring panoramic vistas of the Adirondack Mountains.” be amended. Mr. Ortmeier feels that these statements overstate the scope of the project and requires modification.

Response – The County believes that the proposed trail system will allow users to enjoy the natural scenery that is located within St. Lawrence County. The proposed trails will provide access to areas of the County that are not currently available. The County believes that the statement above is within the scope of the proposed trail system.

Comment 6 – This comment points out a text mistake on page 36, as well as requesting additional information on user conflict.

Response – The necessary corrections/additions have been made to the FGEIS. User conflict was discussed in the General Comment 2.

Comment 7 – Request that recreational conflict/goal interference as a potentially unavoidable adverse environmental impact.

Response – The County does not agree with the idea that recreational conflict is an unavoidable adverse environmental impact. The County believes that through proper signage, education, maintenance, and regulation that the proposed trail system will allow multiple recreational groups the opportunity to enjoy their interests. Also, the proposed trails within this document are designed to provide main corridors that will allow for future user dependent side trails.

Part II – Revised Generic Environmental Impact Statement Sections

FGEIS Part II presents the DGEIS sections that have been modified in response to comments received during the public comment period.

Summary

St. Lawrence County is proposing the development of a County-wide system of trails and roads for use by ATV's, hikers, mountain bikers, horseback riders, dog sledding and other outdoor recreational activities. The system will be comprised of off-road trails, logging roads, and County and local roads that have been used by local ATVers and outdoor enthusiasts for numerous years. Portions of the proposed trail system will be comprised of long-standing snowmobile trails in place within St. Lawrence County. A managed County wide, multi-use trail system would create additional tourism revenue for the County. Presently, the County experiences a large volume of tourism from snowmobilers, skiers, and boaters. The possibility of advertising a County endorsed multi-use recreational trail system that is safe, well-managed, and environmentally friendly could provide additional County wide revenue.

In accordance with the requirements of the State Environmental Quality Review Act ("SEQRA"), St. Lawrence County has assumed Lead Agency status for environmental impact review purposes, and has previously issued a Draft Generic Environmental Impact Statement ("DGEIS") for the project. The following information has been revised based on comments from interested and involved agencies, as well comments received from the general public. This document will serve as the FGEIS. This FGEIS identifies and evaluates the potentially significant environmental impacts associated with the operation and use of such a network, including potential impacts to air, land and water resources, wetlands, wildlife, historic sites, community character, and community services. Where necessary, impact mitigation methods or actions have been identified and incorporated into the review process.

Glossary of Terms

Abbreviations and Acronyms:

ATV:	All terrain vehicle
BMP:	Best management practice
CO:	Carbon monoxide
dB:	Decibel, a unit of sound pressure
dB(A):	A-weighted decibel scale; unit used to measure the loudness of sound, weighted towards the sound frequencies to which the human ear is most sensitive (20 Hz – 20,000 Hz)
DGEIS:	Draft Generic Environmental Impact Statement
EPA:	Environmental Protection Agency
FGEIS:	Final Generic Environmental Impact Statement
Ft:	Feet
HC:	Hydrocarbon
Hrs:	Hours
Hz:	Hertz – number of wave cycles occurring in one second
M:	Meter
NO _x :	Nitrogen oxides
NAAQS:	National Ambient Air Quality Standards
NHP:	Natural Heritage Program
NYSDEC:	New York State Department of Environmental Conservation
NYSOPRHP:	New York State Office of Parks, Recreation, and Historic Preservation
NYSORVA:	New York State Off-Road Vehicle Association

OHV:	Off-highway vehicle
PM:	Particulate matter, PM ₁₀ is the fraction smaller than 10 microns and PM _{2.5} is the fraction smaller than 2.5 microns
SAE:	Society of Automotive Engineers
SEQRA:	State Environmental Quality Review Act
SO ₂ :	Sulfur dioxide
USDA:	United States Department of Agriculture
VOC:	Volatile organic compounds

1.0 General Description of Proposed Action

The proposed St. Lawrence County Multi-Use Recreational Trails System incorporates the use of existing Town and County roadways, logging roads, and off-road trails on County and private parcels of land, to form a network of trails that cover a large expanse of the County. A map of the proposed multi-use trail corridors can be found in the figures section of this report.

Through use of the Generic Environmental Impact Statement (GEIS) process pursuant to the State Environmental Quality Review Act (SEQRA), the County has evaluated the potential environmental impacts of establishing a network of trails for use by multiple outdoor recreational activities. A base network of trails has been identified and environmental conditions reviewed. This network consists of existing trails that have been used by local outdoor enthusiasts for years. Expansion of the trail system is expected in the future as a result of the County's cooperative efforts in working with local town governments, private landowners, local trail use clubs, the New York State Off-Highway Recreational Vehicle Association (NYSORVA), and other groups or individuals affiliated with the outdoor industry. Future trail segments proposed for inclusion into the County's trail system (whether privately or publicly owned) must undergo site-specific environmental evaluations if considered for addition to the existing trail system. The trail segments currently proposed within this document will act as the backbone of the trail system. Future trails will be evaluated and may provide recreational opportunity as multi-use trails or determined to be best suited for individual recreational uses. A checklist of these necessary reviews and evaluations are included in Appendix A.

A GEIS is a type of environmental impact analysis that deals in a broad-based or conceptual way with a number of related or similar actions in a single geographic area which may have common impacts or may impact the same set of resources. A GEIS identifies the important elements of the natural resource base, discusses in general

terms the constraints and consequences of narrowing future options, and can serve as a base for general projections for future activity or patterns of activities.

The anticipated expansion of the trail system in the future will require County personnel to conduct a series of analyses that are currently unknown, site-specific impacts, which are too speculative to be properly assessed as part of the current proposed network. The County wishes to create a template for future decision making regarding these expansion opportunities, in order to bring consistency and predictability to the trail expansion process. By providing a broad-based analysis of multi-use recreational trail impacts, this GEIS is intended to: organize and economize the County's decision process; establish criteria for simplifying future impact assessment pursuant to SEQRA; enhance sound environmental planning by allowing consideration of mitigation and alternatives at an early juncture when there is greater flexibility; providing early guidance on significance determinations; and providing public disclosure of agency considerations used in environmental decision making.

2.0 Background

St. Lawrence County contains numerous snowmobile trails that link the County with the surrounding region as part of an extensive State wide trail system funded and maintained by local, County, and State governments in partnership with snowmobile clubs and their members. The County has recognized that over the last decade ATV use and non-motorized recreational activities have been on the increase, creating the need for a trail system based on the concepts utilized by the snowmobile community. St. Lawrence County realizes that the opportunity to create a County wide trail system would allow for safe and environmentally friendly use, as well as provide additional economic stimulus for the County. The County believes that each citizen has the right to enjoy the natural resources that St. Lawrence County provides. As a result, the proposed trail system will not only provide excellent riding opportunities for ATV enthusiasts, but will also provide a trail system that is capable of supporting horseback riding, dog sledding, mountain biking, hiking, and other outdoor activities.

It is anticipated that the current proposed base network of multi-use trails within the County will be expanded in the future. This expansion will require the County to conduct an environmental assessment of each future segment, and any site-specific impacts which are too speculative to be properly assessed as part of the current proposed network. The County wishes to create a template for future decision making regarding these expansion opportunities, in order to bring consistency and predictability to the trail expansion process. By providing a broad-based analysis of multi-use trail impacts, this GEIS is intended to: organize and economize the County's decision process; establish criteria for simplifying future impact assessment pursuant to SEQRA; enhance sound environmental planning by allowing consideration of mitigation and alternatives at an early juncture when there is greater flexibility; providing early guidance on significance determinations; and providing public disclosure of agency considerations used in environmental decision making.

4.0 Project Description

4.3 Permits and Approvals Required

Portions of the proposed multi-use recreational trail system could potentially require permits from various regulatory agencies. Permits from the NYSDEC, USACE, and/or the APA may need to be obtained for maintenance and construction of the trail system in areas where stream crossings occur or where portions of the trail are within the adjacent area of a Mapped NYSDEC Freshwater Wetland. Trails proposed within this document and depicted in the Figures section are pre-existing trails. These pre-existing trails have been inspected for environmentally sensitive issues and specific structure needs have been identified. Possible permits required for the implementation, growth, and maintenance of the trail system includes the following:

NYSDEC Permits

- Article 11 Part 182 Endangered and Threatened Species
Incidental Take Permit
- Article 15 Stream Disturbance Permits
- Article 24 Freshwater Wetland Permits (Adjacent Areas Only)
- Wild and Scenic Rivers Permit
- SPDES Permit
- 401 Water Quality Certification

Adirondack Park Agency

- Wild and Scenic Rivers Permit/Variance

USACE Permits

- Section 404 Clean Water Act Permits
- Section 10 Rivers and Harbors Act of 1889

Future trail segment additions within the Adirondack Park will require notification of the Adirondack Park Agency (APA) and compliance with all applicable APA regulations.

4.4 Existing Trail Conditions

All trails proposed within this FGEIS are trails that have been used by recreationists within St. Lawrence County for numerous years. Trails are comprised of improved and maintained logging and truck roads, as well as unmaintained logging roads and skidder trails. Representative photographs currently proposed trail segments are located in Appendix D.

4.5 Future Implementation Steps

It is the County's intent to expand the opportunities available to users of the multi-use trail system over time. This will occur through the addition of privately or non-privately owned trails, as well as other municipal and private roads as they become available. These prospective trail segments have not yet been identified and specific details about these segments are not currently available within this specific GEIS, in particular the information that would be obtained through the necessary environmental review process. Fortunately, the GEIS methodology is designed to accommodate this circumstance by examining generic environmental impacts of the multi-use recreational trail system at present and providing a template for site-specific environmental reviews for future trail additions. Currently proposed trail segments are found on the figures included in this document. Future trail segments will be assessed for environmental concerns prior to inclusion in the trail system. Future trail segments may or may not be user group dependent. Proposed trail use for each segment will be determined by the County prior to public use. All future assessments should be added to this document as separate amendments.

5.0 Environmental Setting, Potentially Significant Adverse Environmental Impacts, and Proposed Mitigation Measures

5.1 Vegetation, Wildlife and Ecologically Sensitive Areas

5.1.1 *Vegetation*

Environmental Setting

Vegetation within St. Lawrence County is quite variable depending on the specific location within the County. There are three main hardiness zones within the County: Zone 4b (Ontario Lake Shore/St. Lawrence River Valley); Zone 4a (Interior portions of the County); and Zone 3b (Adirondacks and other elevated portions of the County). A hardiness zone depicts the annual average minimum temperature over a known span of years. The lowest annual temperature can be a determining factor as to what plants can survive in that geographical area. St. Lawrence County has an average annual minimum temperature between -20 to -35 degrees Fahrenheit. The difference in hardiness can determine the composition of a forest due to species not being able to survive below a certain temperature.

Currently, proposed trail segments are located mostly within the Adirondack Foothills of the County. Portions of the proposed trail system are located within the Adirondack Park Blue Line. Tree species range from hardwoods like sugar maple (*Acer saccharum*), black cherry (*Prunus serotina*), paper birch (*Betula papyrifera*), and American beech (*Fagus grandifolia*) to soft woods like white pine (*Pinus strobus*), as well as red pine (*Pinus resinosa*), scotch pine

(*Pinus sylvestris*), and eastern hemlock (*Tsuga canadensis*).

Groundcover varies in this region, consisting of saplings of the tree species listed above with inclusions of various grasses and forbs.

Federal threatened and endangered species lists were consulted to determine if any plant species identified by the US Fish & Wildlife Service (USFWS) are reported to exist in St. Lawrence County. There are no federally protected plant species within St. Lawrence County according to the USFWS website. The NYSDEC's Nature Explorer website was searched for the Towns of Pitcairn, Edwards, Russell, Fine, Clifton, Clare, Colton, Hopkinton, and Parishville to determine whether any State listed threatened or endangered plant species were reported near existing trails that will be included in the proposed trail system. Numerous plant species were reported for the search area and can be found in the table below.

List of Threatened and Endangered Plant Species in Towns with Proposed Trail Segments			
Common Name	Latin Name	Threatened and Endangered Status	Township Location
Farewell's Water Milfoil	<i>Myriophyllum farewellii</i>	Threatened	Parishville, Hopkinton
Fernald's Sedge	<i>Carex merritt-fernaldi</i>	Threatened	Parishville
Northeast Northern Redgrass	<i>Calamagrostis stricts app. inexpansa</i>	Threatened	Clifton, Parishville
Northern Bog Aster	<i>Symphotrichum boreale</i>	Threatened	Parishville
Schweinitz's Flatsedge	<i>Cyperus schweinitzii</i>	Rare	Parishville
Swamp Aster	<i>Eurybia radula</i>	Endangered	Clifton, Colton
Drummond's Rock-cress	<i>Boechera stricta</i>	Endangered	Clare
Balsalm Willow	<i>Salix pyrifolia</i>	Threatened	Colton
Northern Pondweed	<i>Potamogeton alpinus</i>	Threatened	Colton
Pod Grass	<i>Scheuchzeria palustris</i>	Rare	Colton

List of Threatened and Endangered Plant Species in Towns with Proposed Trail Segments			
Common Name	Latin Name	Threatened and Endangered Status	Township Location
Fir Clubmoss	<i>Huperzia selago</i>	Endangered	Colton, Fine
Ampulla Dung Moss	<i>Splachnum ampullaceum</i>	-	Hopkinton
Northern Bog Violet	<i>Viola nephrophyllum</i>	Endangered	Fine
Canada Ricegrass	<i>Piptatherum canadense</i>	Endangered	Fine

The County's consultant conducted a review of all existing trail corridors that are currently proposed for inclusion in the trail system. All proposed trail segments were either walked, or slowly driven by ATV or vehicle. Proposed trails have been used for numerous years and contain existing wheel paths or are comprised of previously established logging and truck roads. None of the species identified by the NHP were observed within or immediately adjacent to proposed trail corridors. Copies of the Nature Explorer reports are provided in Appendix B.

The County plans to incorporate new trail segments as they become available. Future trail segments will have an environmental review conducted and will include a survey for possible threatened and endangered species listed by the NHP's Nature Explorer for that particular township.

Potential Significant Environmental Impacts

The most common potential impact that may result due to the use of the multi-use trail system is the destruction of vegetation within and immediately adjacent to the trail. Direct contact with vegetation by trail users can result in snapping or breaking of

vegetation, as well as uprooting of existing ground cover. In addition, construction of new trails by mechanical means can result in impacts to vegetation within the trail corridor.

Trail traffic can cause compaction of soil in the immediate area, compromising root and pore space in soil that utilized by adjacent vegetation. A secondary result of bare soil due to the destruction of vegetation is soil erosion. The severity of erosion is heavily dependent on the slope of each trail. The greater the slope, the faster stormwater will runoff, resulting in a greater erosional force.

The potential for the spread of non-native or invasive species also exists within the proposed trail system. Seeds from invasive species are opportunistic and can be transported by trail users from one area of the state to another if proper decontamination techniques are not followed. Invasive species seeds can be translocated in dried mud on ATVs, mountain bikes, footwear, or in the coats of horses and dogs, allowing for the easy dispersal of unwanted or invasive vegetation. Experience with the existing informal trail system has shown that the dispersal of invasive species has not been an issue to date and it is anticipated that with the modest increase of use expected with this action, and increased user education, that this experience will continue. The site inspection performed on the proposed off-road trails did not identify the presence of invasive species.

The proposed multi-use recreational trail system will make use of pre-existing, previously non-regulated corridors. The corridors are composed of paved local roadways, seasonal

roadways, existing logging roads, skidder trails, and currently private trails that will require minimal disturbance of vegetation.

Proposed Mitigation Measures

Potential mitigation measures relative to the disturbance of vegetation are as follows:

- Post trail markers to inform riders of the proper trail location
- Keep trails narrow, reducing the amount of tire tread disturbance.
- Maintain trails for fallen trees, by keeping trail clear; new trails will not be created.
- Use education to discourage off-trail travel and increase awareness of user's potential to spread invasive species. Encourage the use of proper decontamination methods prior to travelling to another trail destination and before leaving it.
- Trails will be periodically inspected by the County to identify and map any new stands of invasive species.
- Aggressive measures will be taken if new colonies of invasive species begin to establish along the trail system. Potential control measures include physical removal, as well as biological and chemical controls.

Trails proposed within this document will travel pre-constructed segments that were investigated for threatened and endangered species. The majority of these trails use

County and local roads, improved logging roads, and trails that have been used for numerous years. No threatened or endangered species were observed within the trail corridor. Future trails will be inspected for threatened and endangered species prior to the segment being opened to the public. Proposed trails will also be inspected for threatened and endangered species during periodic trail inspection. These trail inspections will also identify areas that need to be revegetated through the use of plantings or seeding.

5.1.2 Wildlife

Environmental Setting

St. Lawrence County's mixed landscape of mature forest, successional forest and fields, agricultural fields, different classes and orders of streams, and various stages and forms of wetland complexes provide adequate habitat for almost every wildlife species that resides in New York. Mammal species large and small, like whitetail deer (*Odocoileus virginianus*) and eastern gray squirrels (*Sciurus carolinensis*), as well as breeding songbirds, make use of the upland habitat provided by the County. The warm and cold water lakes, streams, and wetland complexes provide ample habitat for fish, waterfowl, and amphibian species.

The extensive range of habitat provided in St. Lawrence County results in the potential for threatened and endangered wildlife species to be present within the proposed trail segments. The federal list of threatened and endangered species contained two federally regulated species for St. Lawrence County, the

endangered Indiana bat (*Myotis sodalis*) and the de-listed bald eagle (*Haliaeetus leucocephalus*).

An Indiana bat winter hibernaculum is located in the adjacent Jefferson County. When Indiana bats emerge in the spring from their hibernaculum, they disperse across a geographical area, searching for proper roosting and feeding habitat. During daylight hours the Indiana bat inhabits trees with loose bark, split trunks, or other possible opening like knots and holes that provide roosting habitat. Due to the close proximity of St. Lawrence County to the hibernaculum in Jefferson County, there is the potential for Indiana bats to be present in the southwestern portions of the County. A Biological Opinion regarding the Jefferson County hibernaculum was released by the USFWS in 2009. Based on information within that document, Indiana bats from Jefferson County do not stray too far from the hibernaculum. As such, St. Lawrence County believes that no effect/impact will occur to Indiana bats or their habitat as a result of the proposed project. A letter from the USFWS, received February 6, 2012, concurred with the County's findings of no effect and/or no impact determination. Both of these letters can be found in Appendix I.

The bald eagle is an American icon that through federal protection has reestablished breeding populations in their historic range. The bald eagle has been de-listed from the Endangered Species Act, but is still warranted protection under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA). Bald eagles inhabit areas near water, including lakes, rivers, or freshwater wetlands. They make use of trees along these waterways for nesting and perching.

Currently proposed trails will follow corridors that have been in use for numerous years, resulting in no cutting of trees that could potentially act as habitat for Indiana bats or bald eagles. No bald eagles or their nests were observed during the field inspection of the trail system.

The NYSDEC Natural Heritage Programs (NHP) Nature Explorer was searched for State recognized threatened and endangered wildlife species in townships where trail segments are currently proposed. Numerous wildlife species were reported within the project area and are listed in the following table.

List of Threatened and Endangered Wildlife Species in Towns with Proposed Trail Segments			
Common Name	Latin Name	Threatened and Endangered Status	Township Location
Common Loon	<i>Gavia immer</i>	Special Concern	Colton, Hopkinton, Parishville, Clifton, Fine
Black Tern	<i>Chilidonias niger</i>	Endangered	*
Common Tern	<i>Sterna hirundo</i>	Threatened	*
Golden Eagle	<i>Aquila chrysaetos</i>	Endangered	*
Henslow's Sparrow	<i>Ammodramus henslowii</i>	Threatened	*
Least Bittern	<i>Ixobrychus exilis</i>	Threatened	*
Loggerhead Shrike	<i>Lanius ludovicianus</i>	Endangered	*
Northern Harrier	<i>Circus cyaneus</i>	Threatened	*
Peregrine Falcon	<i>Falco peregrinus</i>	Endangered	*
Pied-billed Grebe	<i>Podilymbus podiceps</i>	Threatened	*
Sedge Wren	<i>Cistothorus platensis</i>	Threatened	*
Short-eared Owl	<i>Asio flammeus</i>	Endangered	*
Spruce Grouse	<i>Falcipennis canadensis</i>	Endangered	*
Upland Sandpiper	<i>Bartramia longicauda</i>	Threatened	*
Blanding's Turtle	<i>Emydoidea blandingii</i>	Threatened	*
Eastern small-footed Myotis	<i>Myotis leibii</i>	Special Concern	*
Eastern Sand Darter	<i>Ammocrypta pellucida</i>	Threatened	*

List of Threatened and Endangered Wildlife Species in Towns with Proposed Trail Segments			
Common Name	Latin Name	Threatened and Endangered Status	Township Location
Lake Sturgeon	<i>Acipenser fulvescens</i>	Threatened	*
Mooneye	<i>Higdon tergisus</i>	Threatened	*
Pugnose Shiner	<i>Notropis anogenus</i>	Endangered	*
Round Whitefish	<i>Prosopium cylindraceum</i>	Endangered	*

Note: *Species listed for the entire County, no township given.

None of the species identified by the Nature Explorer were observed in the field during trail inspections. Currently proposed trails are part of a system that has been established for numerous years and will result in no additional habitat destruction. No potential habitat trees are proposed to be cut and “wet crossings” are not being allowed within the trail system protecting water quality for fish and amphibians within the area. Impacts to wildlife species by the proposed multi-use trail system is expected to be minimal. All correspondence related to threatened and endangered species is provided in Appendix A.

Potentially Significant Environmental Impacts

The impacts associated with recreation are very difficult to identify and quantify due to the complicated relationships between wildlife, their habitat, and human influences. Kuss (et. al, 1990) and Vaske (et. al., 1995) identified five major issues that make it difficult to assess these impacts:

- Recreational activity generates multiple, interrelated environmental and behavioral responses in wildlife

- Relationships between user density and impact severity are complex and unpredictable
- Wildlife responses to recreational activity varies both among and within species
- Group size, behavior, and equipment type can affect the impacts of a given recreational activity; and
- Impacts of recreational activities can differ with season and location

Trail systems can result in fragmentation of landscapes and create edge habitat, resulting in isolation of habitat and communities (Malone and Emerick, 2003). Certain wildlife species take advantage of trails, while other species are impacted negatively, often results in an unbalanced ecosystem (Malone and Emerick, 2003).

Disturbances associated with trail use can result in impacts to breeding songbirds. In particular, Knight and Cole (1995) determined that trail use during songbird breeding seasons has the potential to decrease nest success.

It is possible that some direct mortality may occur with respect to smaller animal species (amphibians, reptiles, and small mammals) much the same as that which occurs on the public roadways. It is anticipated that the mortality rates will be less than that experienced on a public road due to the slower speeds, less frequent trips, and better visibility associated with trail users.

Amphibians such as frogs, salamanders, and newts are susceptible to impacts if trails are not level and provide temporary ponding in depressions. These areas often hold individuals after snow melt and spring rain events during the mating season providing breeding habitat for amphibians.

Proposed Mitigation Measures

Requiring proper muffling of motors and requiring users to remain on the designated trails at low speeds will properly reduce the potential disruptive impacts (primarily noise) to wildlife resulting from recreational trail use. The proposed trail system is pre-existing and has been used by private landowners, lessees, and the public for numerous years. The creation of a County wide trail system will allow for better management of the trail system. Through proper signage and narrowing of trails, fragmentation of the landscape will be reduced, resulting in less impact on wildlife species in the area.

Indiana bats have been found to only live at elevations below 900-feet within New York State. For areas of the trail system that are below 900-feet in elevation, no cutting of trees with a diameter at breast height of 5-inches or greater will occur from April 1st through September 30th. This period reflects the time when Indiana bats have emerged from their hibernaculum and can be found actively feeding and roosting in forested areas. In order to protect these endangered animals, the County will follow the United States Fish and Wildlife recommended “no cut” timeframe previously listed.

Trails will continually be monitored for Bald eagle usage. Bald eagles are extremely mobile animals and juveniles can establish home ranges in new areas every year. Trails will be inspected annually for eagle usage. If eagles are found to be using trail segments for habitat, they will be abandoned for the period of rearing and fledging.

St. Lawrence County has direct experience with wildlife reactions to manmade trails. Wildlife populations have adapted to the snowmobile system and their associated impacts during the winter months. Adherence to posted speed limits and adaptive modifications to the system in response to observed effects will address potential animal mortality.

The proposed trail system as it stands now will have no impact on threatened and endangered species. The investigations of the trail segments resulted in no visual observation of threatened or endangered wildlife.

Trails will not be open until snowmelt is complete and trails have dried. Every spring, trails will be inspected for potential grading and improvement needs. These measures will aid in protecting potential amphibian impacts on the trail system. Trails will also be inspected for any new presence of threatened or endangered animals at this time.

5.3 Surface Water Resources

Environmental Setting

St. Lawrence County is located within the St. Lawrence River Drainage Basin and contains thousands of surface water resources ranging from small brooks to large rivers, and from small ponds to lakes. The Saint Lawrence River drains a large portion of the northwestern Adirondacks, as well as the Great Lakes. The water in the St. Lawrence River flows in a northeast direction through Canada, before contributing its contents to the Gulf of St. Lawrence. Major tributaries in the County that contribute to the St. Lawrence River include the Grasse River, the Raquette River, the Oswegatchie River, and the St. Regis River.

Potentially Significant Environmental Impacts

The usage of trails in and around surface water has the potential to cause pollution of these resource areas. Possible pollution factors to take into account include the introduction of soil into a surface water system by way of eroding stream beds and upland areas, the introduction of hydrocarbons into the water body, and introduction of invasive vegetation. Surface water degradation due to the introduction of sediment in the water column can have a detrimental effect on stream health, ranging from macroinvertebrates to fish. The introduction of hydrocarbons into surface waters not only affects the immediate resource but those downstream. Aquatic wildlife does not fare well when hydrocarbons are introduced to the ecosystem. Large hydrocarbons introduction to surface water can result to the demise of plant, macroinvertebrate, and wildlife. Driving ATV's, mountain bikes, or even walking through surface water may allow for the deposition of non-native species into a water course. The

introduction of invasive plant species can significantly alter the biological productivity of stream ecosystems and reduce both plant and animal diversity associated with such areas.

Proposed Mitigation Measures

The county-wide trail system will include no wet crossings. All surface water/wetland crossings will be completed by using bridges which completely span the resource. Where such spans are determined to be too lengthy, the trail will be routed to a location which can be crossed in this way or avoid the resource altogether. The trail crossing approach areas will be developed to preclude avoidance of the bridge structures and the use of these structures will be monitored when the trails are open. Individuals found to be bypassing these structures will be ordered to leave the County system. Best management practices (BMPs) will be employed for the construction of stream crossings whenever physical disruption to surface water resources occurs. These BMPs include, but are not necessarily limited to:

- Check trail system for any crossing of streams and other surface waters on a regular basis during the open season.
- Use of silt fences at construction sites where appropriate and as necessary to help protect nearby water resources from siltation during storm events.
- All stream or surface water crossings will be constructed during times of low flow.
- Seeding/planting of construction areas as soon as possible after completion to minimize erosion and stormwater runoff impacts.

- Kiosks will relay the importance of keeping OHVs clean in terms of possible invasive species and remnants of petroleum products.
- Closure of trails until bridges or other pollution controlling structures can be built.
- Closure of the trails during the spring mud season.
- Any in stream work will be performed during periods of the year when NYSDEC permits deem safe to aquatic life. For example, in stream work for trout streams would only be allowed from May 1st to September 15th.

It is possible that permits may be needed when crossings are installed depending on the class of stream the trail will be crossing and what type of structure is being installed. Permits should be obtained prior to any instream work.

5.4 Wetlands

Environmental Setting

Wetlands are readily accepted as some of the most productive ecosystems in the world. Not only do wetlands provide habitat for various plant and wildlife species, but they also provide multiple functions associated with water quality. Therefore, the preservation of wetlands is of extreme importance to the County.

All proposed off-road trails on private and non-private property that are to be incorporated into the multi-use recreational trail system were reviewed during the late spring and summer of 2010.

Potentially Significant Environmental Impacts

Trail user traffic has the potential to cause impacts to the soil, water quality, vegetation, and wildlife habitat value within a wetland resource area, thereby affecting the wetland functions and values. Soils can become puddled or be subject to substantial compaction, the water within the wetland can become turbid and sediment laden from the introduction of soil, and petroleum compounds on OHVs and bicycles can be flushed into the water, thereby contaminating it. Vegetation can be permanently removed or altered in its composition by repeated user impacts.

Proposed Mitigation Measures

The proposed trail system will not contain any “wet crossings”. The only way that trail users can cross wetlands without impacting them would be on a bridge over these resources, or circumnavigate the wetland resource. If such bridging of wetlands is not feasible, the only alternative is to avoid the wetland impacts altogether, by re-routing the trail to upland areas. This allows trail users to bypass the wetland, causing no impact to the natural resource. If on future trail segments a bridge or realignment is not feasible in order to avoid wet crossings, the trail section will not be incorporated into the system.

NYSDEC Mapped Freshwater Wetlands

Article 24 regulates activities not only within a mapped NYSDEC wetland, but also within the 100-foot adjacent area of that mapped wetland. The table below identifies areas of the currently proposed trail that are within the 100-foot adjacent area of a mapped NYSDEC wetland. The proposed trail system makes use of existing road and bridge infrastructure that carries motorized residential and commercial vehicles.

Trail Segments within the Adjacent Area of a NYSDEC Mapped Wetland			
NYSDEC Wetland ID	Location	Crossing Location	Figure Location
H-24	Fullerville Road	Adjacent Area	1
H-26	Edwards Road	Adjacent Area	1
H-34	Vrooman Road	Adjacent Area/Local Bridge Crossing	1
H-37	Town of Pitcairn	Adjacent Area	1
FI-1	Edwards Road	Adjacent Area/Local Bridge Crossing	2
FI-12	County Route 23	Adjacent Area	1
SE-2	County Route 24	Adjacent Area/Local Road Crossing	7
SE-40	River Road	Adjacent Area	2
SF-2	Santamont Road	Adjacent Area/Local Road Crossing	16/18
DG-1	Silver Hill Road	Adjacent Area/Local Road Crossing	8
HE-21	County Route 24	Adjacent Area	7/10
NV-20	Santamont Road	Adjacent Area	18
NV-23	Lake Ozonia Road	Adjacent Area/Local Road Crossing	18

5.5 Soils

Environmental Setting

St. Lawrence County stretches from the St. Lawrence Lowlands in the north to the Adirondack Mountains in the south, resulting in a large range of soil profiles. Due to the wide-reaching nature of the proposed

County trail system, a wide variety of soil types are likely to be found along the proposed trail corridor ranging in texture from silty clays and mucks in the lowlands to loamy sand and exposed bedrock in the Adirondacks and St. Lawrence River Valley. The St. Lawrence County Soil Survey Report (USDA, 2005) provides information on soil management, soil types, and soil mapping.

The development of soil within St. Lawrence County was directly impacted by the Wisconsin Glaciation approximately 110,000 to 10,000 years ago. Glacial till was dropped as the glacier retreated and deltaic sediment settled within inland seas. These deposits became the parent material that would become the soil of today (USDA, 2005). The retreat of the Wisconsin glacier also resulted in exposed bedrock across the St. Lawrence County landscape. Soil depths within the county vary greatly and are dependent on depth to bedrock (USDA, 2005).

Potentially Significant Environmental Impacts

The proposed trail system will be available for various types of recreational activities that have the potential to cause erosion or compaction of the soil within the trail corridors. Other impacts include loss of forest floor litter and the exposure and destruction of plant root networks, (Marion, 1998; Foltz and Meadows, 2007).

Soil compaction is often caused by the downward force of a tire or foot, in turn creating pressure on the underlying ground surface, which reduces the size of the soil pore spaces. Soil compaction can damage adjacent vegetation by decreasing gas exchange in the root systems, decreasing water availability, and potential compression of the root system itself.

The displacement of soil is also a potential impact. This occurs when users drag or slide their feet or tires across the soil resulting in the movement of soil from one area to another. Soil displacement often leads to the exposure and destruction of plant roots and increases soil erosion. The degree to which these impacts are caused depends largely on slope, soil type, frequency and duration of precipitation events, amount of trail usage occurring in a specific area, vegetation type, and elevation (USDA, 2005). The loss of vegetation on trails has the potential to result in an increase in erosion activity. Vegetation is a natural way to alleviate problematic erosion areas.

Trail construction and reconstruction activities also have the potential to cause soil erosion if vegetation is removed, soil is displaced, and/or drainage considerations are not properly taken into consideration and planned for accordingly.

In general, soils with a moderate to high moisture content, and a high mineral content of varying particle size, are most prone to compaction, and those that have a narrower range of particle sizes, mostly in the silt and fine sands range, tend to be more likely to erode (Marion, 1998). Erosion has the potential to increase on non-vegetated areas with a slope of three percent or higher (USDA, 2005).

Proposed Mitigation Measures

The County will conduct periodic monitoring of the trail system. Monitoring will assess potential problems associated with soil erosion and displacement. Physical indicators of problematic areas include but are not limited to: elements of over use, undesignated trailheads, rutting, trail blow outs, bank erosion at stream crossings, and trail widening.

The adaptive maintenance approach will be implemented on existing trail corridors, during new trail construction, and/or during trail reconstruction and maintenance. These mitigation measures include: removing vegetation from the smallest practicable area, managing surface water runoff to deflect runoff from areas of exposed soils, and reestablishing vegetation as soon as possible. General maintenance techniques that may be used to reduce soil erosion along active trails include: re-grading the trail or installing ditches to facilitate surface water runoff, installing water bars to direct surface water runoff to a desired location, installing surface-hardening materials (such as gravel), installing bridges, setting reduced speeds, rerouting the trail segment, or closing the trail.

The use of best management practices (BMPs) will also be employed in an effort to stabilize trail corridors. At a minimum, trail segments will be inspected during trail construction, reconstruction, or during maintenance activities. BMPs include, but are not necessarily limited to:

- Constructing stream crossings during periods of low flow
- Constructing stream crossings at a 90-degree angle to the stream
- Stabilizing stream banks with natural materials such as wood or stone whenever stabilization is needed
- Limiting the amounts of cut and fill whenever practicable on new trail corridors
- Using natural materials whenever feasible to blend human-made structures into the surrounding area

- Limiting the size of parking areas to the minimum size practicable
- Locating parking areas/trailheads where minimal tree cutting and soil cuts and fills are needed
- Locating parking areas/trailheads where they are screened from nearby roadways and residences by wooded buffer areas
- Establishing new trails on existing former roads or skidder trails whenever possible to reduce the amount of vegetation clearing required

5.6 Noise

Potentially Significant Environmental Impacts

When assessing noise impacts, several characteristics of sound must be taken into account, such as sound level reduction over distance and the additive effects of multiple sound sources (NYSDEC, 2001).

As distance increases between the producer of a sound and the receptor, the sound level decreases. In fact, if the receptor is at a distance of greater than 50 feet, the sound level is reduced by 6 dB(A) for every doubling of the distance (NYSDEC, 2001).

Another important factor that must be considered is the additive effects of multiple sounds. If, for example, four ATVs are riding in a group, and each produces a sound level of 85 dB(A), the resulting sound level would not equate to the mathematical addition of the individual sound levels (i.e., $85 \text{ dB(A)} \times 4 = 340 \text{ dB(A)}$). The following table is provided in

the NYSDEC's Program Policy document for Assessing and Mitigating Noise Impacts (2001) to assist in determining the effects of multiple sound sources:

Difference Between Two Sound Levels	Add to the Higher of the Two Sound Levels
1 dB or less	3 dB
2 to 3 dB	2 dB
4 to 9 dB	1 dB
10 dB or more	0 dB

For example, to calculate the total sound level produced by three ATVs operating in a group, an evaluation of the differences between the three sound levels would need to be made. If the sound levels of the three ATVs were 89 dB, 91 dB and 94 dB, the difference between the two lowest sound levels would be determined first ($91 \text{ dB} - 89 \text{ dB} = 2 \text{ dB}$). According to the table above, 2 dB should be added to the higher of the two sound levels ($2 \text{ dB} + 91 \text{ dB} = 93 \text{ dB}$). The next step involves determining the difference between the combined sound level of 93 dB for the first two ATVs, and the sound level of the loudest ATV, at 94 dB ($94 \text{ dB} - 93 \text{ dB} = 1 \text{ dB}$). According to the table above, 3dB should be added to the higher of these two sound levels ($3 \text{ dB} + 94 \text{ dB}$), resulting in a total sound level for all three ATVs operating in a group at 97 dB.

There will be impacts (due to the large difference between ambient noise levels and that of trail users), but the noise impacts will be fleeting in much the same way that automobile noise from moving traffic is fleeting, or that experienced during winter months due to snowmobile traffic.

Two primary areas of concern regarding noise impacts along the proposed trail system are the potential impacts upon humans and

potential impacts upon wildlife. Specific trail uses produce more sound than others. Obviously, ATV usage is the loudest of the proposed trail users and as such could potentially have the greatest impact on wildlife and other trail users. Noise along the trail system will be temporary. As a user travels along a trail segment any noise produced by that user also travels along the segment. As the user progresses, the trail left behind returns to its ambient sound level. Recreational conflicts are often the result of goal interference. For example, if the goal of a group of birdwatchers is to enjoy the peacefulness and serenity of birds on a parcel of county reforestation land, and that goal is interrupted by a group of ATVs that pass by on the trail, there is a high likelihood that the group of birdwatchers will feel impacted by the noise generated from ATVs. The degree of impact felt by different members of the group will vary, based on their personal tolerances (FHWA, 1994). ATVs and bicyclist tend to pass through quickly, allowing wildlife to return to their normal activities, which provides viewing opportunities for those who pursue that recreational activity.

5.10 Growth and Character of the Community

Environmental Setting

Due to its geographic location, St. Lawrence County is a tourist destination. The County sees an influx of snowmobile riders during the winter months, while boaters, hikers, and camping enthusiasts make use of the County's natural resources during the summer months.

Much of the trail use today will continue under the proposed action and it is anticipated that the community will utilize the same lodging, dining, and other services left idle by the snowmobiling economy in the

non-winter months. The proposed action is not expected to create significant numbers of jobs, in the short term, but to potentially turn part-time jobs into full-time, while increasing the value of those existing jobs.

Potentially Significant Environmental Impacts

The proposed trail system has historically been used by multiple recreational disciplines. A County run trail system will result in better maintenance, safety, and environmental conditions for trail users. This proposal is simply applying structure, rules and environmental improvements on currently used trails in the County. Although some increase in ridership may result from this action, increased tourism is expected to be incremental and should not result in significant demands for growth in services such as hotels, gasoline retailers, etc. due to the existing infrastructure associated with the influx of snowmobilers and other outdoor recreationists during winter months.

Proposed Mitigation Measures

There are no significant environmental impacts identified therefore no mitigation is necessary.

5.11 Community Services

Proposed Mitigation Measures

The County will monitor the impacts to community services, identify needs and develop solutions to address those needs. Funding will be identified on an annual basis, with the majority of funds coming from annual trail use fees. Trail fees will be determined by the County and will vary depending on the type of trail use an individual will be performing.

11.0 Future Expansion

The intention of this document is not only to provide a comprehensive look at the currently proposed trail segments discussed within this report, but also to provide a template for future environmental review of new trail segments as they are identified by the County. The GEIS format allows for the assessment of new trail segments by providing an efficient and competent review on a trail-specific basis. Future trail reviews will be appended as supplements to this GEIS so as to not only identify possible individual environmental and safety concerns of the new trail, but also assess the collective effects of the future trail segments with those reviewed in this GEIS. A Proposed Trail Segment Environmental Checklist is provided in Appendix A. This form will be used to develop relevant information regarding potential impacts associated with proposed trail segments. The form will provide necessary information for the proper SEQR process to take place. The trails proposed within this document are to provide trails for multiple recreations, acting as the main trails for the proposed system. Future trails have the potential to be user dependent and also incorporate existing single use trails. These trails would remain open for the existing uses. Non-motorized trails would remain off limits for motorized recreationists.

12.0 Public Safety, Trail Monitoring and Resource Conservation

The St. Lawrence County Recreational Trails Advisory Board is comprised of members that represent multiple outdoor recreational groups that have an interest in the proposed multi-use recreational. As such, the Safety, Education and Enforcement Subcommittee has addressed comments that were submitted during the DGEIS comment period.

EDUCATION AND TRAINING:

- 1) Organized clubs subscribe to and promote safety and resource conservation through education programs such as “Tread Lightly”, ATV Safety, International Snowmobile Manufacturers Assoc.’s “Safe Rider”, manufacturer training and others. Trail user groups currently conduct certified safety training on state and local levels, and will continue to do so.
- 2) Public education will be promoted with clinics, as well as posters and handouts in trail kiosks, service businesses and so on. Public promotions prior to seasons can be conducted at club clinics, outdoor trade shows, informational meetings, sportsmen’s shows, etc.. Brochures on soil compaction, wetlands, endangered species and invasive species will be available at Kiosks and be integrated into other training initiatives.
- 3) Maps issued will have trail rules and regulations, as well as any specific rules or restrictions pertinent to any given area. NYS DMV ATV and Snowmobile regulation brochures should be available at trail kiosks also. Rules and regulations will be periodically reviewed and revised as circumstances dictate. In all instances, NYS regulations come first, with specific trail guidelines added appropriately.
- 4) Strong trail signage, particularly in areas with a potential for problems will be utilized.

- 5) “Adopt a Trail” programs, utilizing trail stewards, will be available to give users a greater vested interest in keeping trails safe, monitored and natural resources protected.

COMMUNITY POLICING:

- 1) A community oriented approach to policing is the preferred approach to developing responsible ridership and relationships with law enforcement. Forest Rangers, State Police and County Sherriff’s will be encouraged to participate in County ATV meetings, safety training and other gathering where riders are educated and briefed on the responsibilities of safety and resource conservation. Meetings will be held pre-season with these agencies (including judicial entities) to ensure critical issues and areas needing attention are addressed.
Communication is crucial for the success of the trail system. Existing police agencies currently have enforcement authority in areas to be covered by the trail system and currently we believe sufficient resources are available. To assist in agency efforts, every attempt will be made to secure funding grants and legislation for trail funds, to provide agencies with time and equipment.
- 2) Institution of a revocable permit system, with violators having their permit suspended for a specified period of time and repeat offenders may lose the permit permanently. A portion of permit fees will be dedicated to public safety, trail monitoring and resource conservation.

TRAIL MONITORING:

- 1) It is widely recognized that user groups are most effective at monitoring their own. Responsible trail users will report misuse, and to promote safe and responsible trail use among others they encounter on trails. Violations will be reported to the appropriate authorities.

- 2) Trail stewards, individuals who frequent specific sections of trail will record safety and other issues and bring them to the appropriate committee of the Trail Advisory Board. Areas of concern will be documented via digital camera.
- 3) User groups and other community organizations are encouraged to engage in “stationary monitoring” during periods of high trail usage (holiday weekends, etc.), acting as “Trail Ambassadors” will hand out literature, answer questions, and promote our area, while ensuring that trail users are aware the trail is monitored. Environmental management students, YCC, Scouts, Sportsmen groups, etc. might find this a worthwhile volunteer opportunity. This would also provide an excellent opportunity for state and local law enforcement to interact positively with trail users and become a part of the “trail community”.
- 4) The prevention of problems is always best, and in areas with a greater potential for violations, or in areas where it is found that problems are occurring, several methods may be instituted. These may include screening with natural planting (hedges), the placement of natural barriers, fences or gates, rerouting, or concentrated enforcement efforts.
- 5) In areas with reports of repeated violation, the use of trail cams and video technology may be employed to identify violators for prosecution.
- 6) Fines and penalties associated with infractions are currently in place through the Vehicle and Traffic Law, as well as the Environmental Conservation Law and other relevant statutes. Local laws and penalties may be adopted as needed.

The St. Lawrence County Pilot Trail has been open since 2006. To date, no complaints, accidents and violations have been reported to the County or the Town of Parishville, where the trail is located. Utilizing the best trail planning practices, maintenance and monitoring activities have resulted in a very positive start for the County’s system and will continue to do so. The County’s focus will remain **“A multi-faceted approach to public safety and resource conservation consisting of education, awareness, safety training, monitoring and a community oriented**

approach to policing.” The County believes that all stakeholders working together and in partnership will help in achieving the County’s long term goal of providing a safe trail that conserves natural resources, promotes families enjoying the out of doors together and economic prosperity for the region.

13.0 Bibliography

- Camoin Associates, 2006. Tug Hill Region ATV Economic Impact Study.
- Cordell, H.K. and M.A. Tarrant. 2002. *Socio-6: Forest-based outdoor recreation*. Southern Forest Resource Assessment Draft Report. Available online at: < <http://www.srs.fs.usda.gov/sustain/draft/socio6/socio6.htm> >
- United States Environmental Protection Agency. 1995. *Compilation of Air Pollutant Emission Factors Volume I: Stationary Point And Area Sources*. Office of Air Quality Planning and Standards, Office of Air and Radiation. Ap-42 Fifth Ed.
- (EPA, 2002) Environmental Protection Agency. Regulatory Announcement – Frequently Asked Questions from ATV Riders. Document No. EPA420-F-02-0378.
- (EPA, 2002 ^(b)) Environmental Protection Agency, November 8, 2002. Final Rule for Cleaner Large Industrial Spark-Ignition Engines, Recreational Marine Diesel Engines, and Recreational Vehicles – Final Rulemaking Documents and Fact Sheets < <http://www.epa.gov/otag/regs/nonroad/2002/cleanrec-final.htm>>
- Federal Register, Vol. 65 No. 236, Thursday December 7, 2000, Proposed Rules – Control of Emissions From Nonroad Large Spark Ignition Engines, Recreational Engines, (Marine and Land Based), and Highway Motorcycles.
- Federal Register Vol. 67, No. 217, Friday, November 8, 2002. Final Rule - Control of Emissions From Nonroad Large Spark Ignition Engines, Recreational Engines, (Marine and Land Based), and Highway Motorcycles.
- Gartner, W.C. and Lime, D.W. 2000. *Trends in Outdoor Recreation, Leisure and Tourism*. New York, NY: CABI Publishing.
- Moore, R.L. 1994. *Conflicts on Multiple-Use Trails: Synthesis of the Literature and State of the Practice*. (FHWA-PD-94-031). Washington, D.C. Federal Highway Administration.
- Foltz, Randy B. and Dexter L. Meadows, Impacts of ATV Traffic on Undesignated Trails, 2007, < http://www.stream.fs.fed.us/news/streamnt/apr00_2.htm >
- Foss, C.R. 2006. A preliminary Investigation of Impacts of AV Activity on Breeding Birds in the Nash Stream Forest, Coos County, New Hampshire.
- Gibbons, S. and E. Ruddell. 1995. The effect of goal orientation and place dependence on select goal interferences among winter backcountry users. *Leisure Sciences* 17, 3: 171-183.

- Hammitt, W.E., and I.E. Schneider. 2000. "Recreation Conflict Management". Trends in Outdoor Education, Leisure, and Tourism, edited by W.C. Gartner and W.D. Lime, 347-356. New York: CABI Publishing
- Knight, R.L. and D.N. Cole. 1995. Wildlife and Recreationists, coexistence through management and research, eds., R.L knight and K.J. Gutzweiller. Island Press, Covelo, California.
- Kuss, F.R., A.R. Graefe, and J.J. Vaske. 1990. Visitor Impact Management: A Review of Research. National Parks and Conservation Association, Washington, D.C.
- Malone, D.G, and J.C. Emerick. 2003. Impacts of Trails and Recreationists on Wildlife. Aspen Wilderness Workshop. EPA Project Number: MM988655-01.
- Marion, Jeffrey, Recreation Ecology Research Findings: Implications for Wilderness and Park Managers, 1998, < <http://www.cnr.vt.edu/forestry/cpsu/rececol.html> >
- Merriam-Webster's Online Dictionary, no date provided, "Noise," < <http://www.m-w.com/cgi-bin/dictionary> >
- Minnesota Department of Natural Resources. 2002. White Earth Forest ATV/OHM Trail Project Environmental Assessment Worksheet.
- NYSDEC. 2001. *Assessing and Mitigating Noise Impacts*. Program Policy
- (NYSDEC, 2007) NYSDEC, History of State Forest Program, no date provided, < <http://www.dec.ny.gov/lands/4982.html>>
- NYSDEC, 2007^(b) New York State Department of Environmental Conservation Air Resources, no date provided, < <http://www.dec.ny.gov/dardata/airmon/parameterpage1.htm> >
- New York State Department of Motor Vehicles. Article 48-C – New York Vehicle and Traffic Law, Sections 2400 through 2413.
- Seattle Department of Planning and Development, DPD's Noise Abatement Program "What is Noise?", May 24, 2005, <[http://www.seattle.gov/dpd/Enforcement/Noise Abatement/What Is Noise /default.asp](http://www.seattle.gov/dpd/Enforcement/Noise%20Abatement/What%20Is%20Noise%20/default.asp) >
- Society of Automotive Engineers. 2008. Measurement of exhaust Sound Pressure Levels of Stationary Motorcycles. Standard J1287.
- Watson, A.E. 2001. "Goal interference and social value differences: understanding wilderness conflicts and implications for managing social density." USDA Forest Proceedings RMRS-P 20: 62-67.

United States Department of Agriculture Soil Conservation Service in cooperation with
Cornell University Agricultural Experiment Station. 2005. Soil Survey St.
Lawrence County New York: U.S. Government Printing Office, Washington, D.C.

Sheridan, Julie M., Assistant Solicitor General. Informal Opinion No. 2002-1.

Appendix A

St. Lawrence County Recreational Trails System Proposed Trail Segment Environmental Checklist

Proposed Multi-Use Recreational Trail Environmental Checklist

The following environmental checklist is to be used to assess environmental impacts associated with potential future trails segment. The checklist will allow for a determination of whether the proposed segment contains factors that could be considered environmentally significant. By completing this checklist, the SEQRA process is being fulfilled, linking the proposed segment with the FGEIS.

St. Lawrence County Multi-Use Recreational Trail System Environmental Checklist For New Trail Segments

Screener:

Date:

Location and length of proposed segment:

Description of proposed segment linkage to existing system:

What are the cover types through which the trail travels?

Attach any legal instruments that establish access to the proposed trail segment.

Provide figure of trail segment that includes an aerial background with mapped wetlands and hydrography of the trail location, as well as representative photographs.

Identify potential permits associated with proposed trail segment.

	Yes	No
Is the proposed segment located on private property?		
Does the proposed segment involve removal of vegetation (i.e., clearing of trees or brush)?		
Does the proposed segment require any grading, filling or other land modification?		
Are there steep slopes (greater than 15%) on the proposed trail?		
If yes, provide additional information as to what condition the proposed trail is in.		
Does the trail cross any NYSDEC Mapped Freshwater Wetlands or their adjacent areas? If yes, provide crossing method and NYSDEC wetland ID.		
Does the trail cross any other jurisdictional wetlands?		
Does the trail cross any streams or other surface waters?		
If yes, how is the current crossing accomplished (i.e., culvert, bridge, or ford)?		
Is the proposed trail within an archaeo-sensitive area?		
Are there any threatened or endangered species or associated habitat present on or immediately adjacent to the proposed trail?		
Does the trail travel through any ecologically sensitive areas?		
Are invasive species present within or adjacent to the proposed segment?		

Summary of Ecological Assessments to be Performed

Wetlands

Prior to assessment of the trail segment in the field, an office review of the trail corridor should occur. This will include but not be limited to review of mapped wetlands, hydrography for the region, aerial photographs, and topography maps.

Trail assessments in the field consist of walking and/or riding each segment of trail in order to observe any wetlands that may be found within or along each trail segment. If wetlands were determined to be present, a determination should be made as to whether the trail was impacting the wetland either directly or indirectly. The location of wetlands along future trail segments will be located using GPSs. Depending upon the impacts observed by the proposed trail system on any wetlands, a determination will be made on whether the trail segment produces significant environmental issues and whether the trail segment complies with items within the FGEIS.

Threatened and Endangered Species

The NYSDEC's Natural Heritage Program's Nature Explorer will be reviewed for potential threatened or endangered species known to inhabit the Town in which the proposed segment is located. This step should be performed prior to a field inspection. USFWS threatened and endangered species list are by County. Currently St. Lawrence County only has two federal species that are protected, the Bald eagle and the Indiana bat. The review will include reviewing the area for potential Indiana bat roost trees if the trail is at an elevation below 900-feet. The proposed trail segment will also be inspected for potential impacts to ecologically sensitive areas.

Surface Waters

Surface waters were evaluated through desk top resources prior to the field inspection. This information will be utilized during the field inspection to determine if bridging of these resources is possible. If it is determined that bridging of surface waters is not a viable solution, that trail segment will not be incorporated into the trail system. Alternate routes may then be inspected for potential inclusion in the system.

Land

The proposed trail segment will be assessed for potential erosion issues, including steep slopes greater than 15%. Soil maps will be reviewed to identify potential problem soils in proximity to the proposed trail segment. Depending on the results of the inspection, potential modifications to the proposed segment may be required.

Appendix B
Agency Correspondence



United States Department of the Interior



FISH AND WILDLIFE SERVICE

New York Field Office

3817 Luker Road

Cortland, NY 13045

Phone: (607) 753-9334 Fax: (607) 753-9699

http://www.fws.gov/northeast/nyfo

To: William Dashnaw

Date: Feb 6, 2012

USFWS File No: 120116

Regarding your: Letter FAX Email

Dated: December 12, 2011

For project: St. Lawrence County Multi-Use Recreational Trail System

Located:

In Town/County: (T)s of Pitcairn, Fine, Clifton, Clare, Colton, Hopkinton, Parishville, Russell & Edwards/St. Lawrence Co.

Pursuant to the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.), the U.S. Fish and Wildlife Service:

- Acknowledges receipt of your "no effect" and/or no impact determination. No further ESA coordination or consultation is required.
- Acknowledges receipt of your determination. Please provide a copy of your determination and supporting materials to any involved Federal agency for their final ESA determination.
- Is taking no action pursuant to ESA or any other legislation at this time but would like to be kept informed of project developments.

As a reminder, until the proposed project is complete, we recommend that you check our website (<http://www.fws.gov/northeast/nyfo/es/section7.htm>) every 90 days from the date of this letter to ensure that listed species presence/absence information for the proposed project area is current. Should project plans change or if additional information on listed or proposed species or critical habitat becomes available, this determination may be reconsidered.

USFWS Contact(s): Robyn Ani

Supervisor: Patricia Cole

Date: 2/7/2012

Appendix C
Public Comments Received

August 17, 2011

William Dashnaw
44 Park Street
Canton, NY 13676

Re: St Lawrence County Multi Use Trail Proposal

Dear Mr. Dashnaw:

The Adirondack Mountain Club (ADK) would like to thank you for the opportunity to submit comments on Draft Generic Environmental Impact Statement (DGEIS) regarding the county Multi-Use Trail Proposal.

The Adirondack Mountain Club is a statewide organization dedicated to conservation, education, outdoor recreation and protection of New York's Forest Preserve, parks, wild lands and waters. ADK represents over 28,000 hikers, paddlers, skiers and backpackers.

It is evident that this proposal seeks to make the most of its recreational attributes, currently attracting our members from all over the State. We hope that moving forward this plan takes into consideration the needs of all recreationists and not just the ATV community.

Last year the Department of Environmental Conservation (DEC) released a Strategic Plan for State Forest Management that outlined the management issues that they have encountered since allowing their use. Because of the numerous issues they decided to discontinue allowing ATV use in State Forests. Some concerns broached in the document that this plan has not adequately considered in the current proposal are as follows;

- Illegal use of ATVs and OHVs on trails officially closed to ATV and OHV use is frequent, difficult to prevent, and presents significant enforcement issues.
- The environmental impacts (including noise), intensity, and nature of both legal and illegal ATV use has been shown to cause other recreational uses to decline, and in some cases completely cease, once an area is opened for ATV use.
- ATVs raise substantial safety concerns in comparison with various recreational activities because they are especially prone to accidents. In a 17-year period, New York State recorded 137 ATV-related fatalities, and New York has been ranked third highest in the nation for ATV related deaths.
- Environmental impacts from ATV and OHV use include soil erosion, displacement and compaction, direct impacts to streams and wetlands from ATV

crossings, including increased siltation and turbidity, noise, disturbance to wildlife and their habitats, damage to vegetation, and air pollution.

Our local chapters have devoted working volunteers locally to educate the public on the value of wilderness; how to conserve and enjoy it. The Laurentian Chapter, based in St. Lawrence County promotes responsible recreational use of wild places by organizing outdoor trips. This chapter is concerned the tone of this plan is too heavily slanted towards motorized use. Specifically they are concerned with the encroachment onto non-motorized trails as has been the case in Postwood Park, Stone Valley, 7 Springs, the Red Sandstone Trail, and High Flats.

The current proposal reports encouraging economic figures, while ignoring several important disruptive impacts. Missing are details regarding how to create the infrastructure for a successful ATV tourism program, or considering the decreased passive recreationists that will be deterred from using trails also utilized by ATV's. This plan is also lacking an assessment of the impacts ATV's have on the trail system when going off the trail or when exceeding speed limits.

This plan should assess what user groups are currently utilizing the trail system in order to determine the potential negative economic impact caused by a decrease in non-motorized recreation. This assessment could then be used as a tool for future development of trails, as well as an effective way to monitor the impacts this plan will have on current user groups.

As this plan acknowledges, the proposed trail traverses numerous wetlands, and significant impacts can be expected from off trail use through lack of installation or maintenance of suitable bridges or other stream crossing methods needed for wildlife as well as a for an overall successful trail. No trail should be open for use until installation of all identified mitigation methods is complete.

ADK takes issue with the document stating:

"In reality, the creation of a St. Lawrence County Multi-Use Recreational Trail System is just a formality."

This statement is incorrect and reflects what little control authorities currently have to prevent ATV trespass. This plan should include a policing and enforcement strategy, as well as a methodology for assessing the effectiveness of the measures that have been put in place to maintain a successful ATV system.

Non-motorized users should have their own trail systems separate from motorized users. While multi use sounds equitable, these trails will inevitably benefit motorized use more than other users. Section 6 lists potentially unavoidable or inadequately mitigated environmental impacts. It is ADK's position that before any new trail segments are considered, a site specific environmental assessment be completed. This section should also include unavoidable impacts to other users.

ADK strongly believes that economic growth and environmental sustainability can be achieved with cooperation between state and local governments, residents, and the environmental community. With suitable modification, this document will provide the basis for a successful multi-use trail system. Thank you for the opportunity to express our concerns and opinions. Please feel free to contact us with any questions.

Respectfully submitted,

Neil F. Woodworth
Executive Director and Counsel

Joelle Foskett
Public Lands Advocate

COMMENTS ON DRAFT GENERIC ENVIRONMENTAL IMPACT STATEMENT FOR THE PROPOSED ST. LAWRENCE COUNTY MULTI-USE RECREATIONAL TRAIL SYSTEM

Statement by Mary S. Rutley, 325 Cold Brook Drive, Colton, NY 13625

Thank you for this mandated period for public comment. I have many reservations about your proposed trail system. The length of the Draft document requires lengthy study and has generated many questions. The preliminary sections are addressed with the following ten points:

1. Let me begin with the title of this draft, why is this "Multi-Use Recreational Trail System" discussed as multi-use when most of the document continues to address the primary use and impacts made by the ATVs? Many of the current ATV trails are so eroded and muddy that one would be hard pressed to want to use the trail for hiking, biking or horseback riding.
2. The **Summary** promotes the 'positive' economic aspects of the trail system. As taxpayers and residents on Cold Brook Drive which becomes part of the system, my family sees many negative economic aspects for such a system. As a highway that becomes traveled by ATV at all hours and conditions, the landowners property has certainly been devalued. Does this mean the landowners will receive a reduction in their property assessment?
3. **Summary**, p. 1, "a County endorsed multi-use recreational trail system" appears in reality to be a County funded system. In this time of economic hardship for so many during the current recession, we do not need additional taxes to support a Trail Coordinator or the many staff that would be required to administer the System as outlined in this document.
4. In your **Glossary** of terms, pp. 2 and 3, ATV and OHV have minimal explanations given; the document never clarifies the relationship of these two acronyms. If the ATV is an OHV that is licensed and described as such, why are you creating a trail system that incorporates public roads and highways? Further, if the roadways in the Town of Colton are closed by court order to ATV traffic, why are many of those roads included in the proposed system?
5. On p. 4, the **Description** of the Proposed Action identifies "use of existing Town and County roadways" but fails to mention incorporating a section of State Highway 56 in the hamlet of South Colton. Perhaps the summer congestion around the few existing businesses should have been addressed as one of the site-specific impacts.
6. The section on **Description**, p. 5, addresses "anticipated expansion" with little of this document explaining how and when "a series of analyses of that are currently unknown, site-specific impacts, which are too speculative to be properly assessed as part of the current proposed network." Does this statement mean that we'll just overlook all the 'site-specific impacts' that could occur when the trails shown in Figures 1 through 12 are implemented in the network? And then on p. 6, in the second paragraph, second sentence, reinenforces misgivings about the current proposed system.
7. Under **Public Need and Benefits**, p. 7, it is ironic that because someone owns an ATV, a public need is created for the taxpayer to 'foot the bill' for their recreation. Hunters and fisherpersons are required to pay for their use of the State's resources even on their own property.

8. Again, on p. 7, the reader cannot foresee “unbiased use by other outdoor enthusiasts such as mountain bikers, hikers, and horseback riders.” Once motorized, off-road vehicles are present, they usually prohibit safe use by those other enthusiasts.
9. In the **Purpose**, p. 8, it becomes clear that the network will be “managed and maintained by the County”. What is the cost of management and maintenance? Is this like our National Health Care System, that we have to implement the network before we know the costs? The biggest costs may become the burden of the St. Lawrence County environment. Then on p. 9, Development of Cooperative Relationships with Towns, suggests that the County won't bear the burden alone. Will it ask each Town to pick up part of the tab?
10. With the Figures of the trail system provided, why is no summary ever given of the total miles in the network? How many miles are actually trails? How many miles are highways? How much private land is included? How much is public lands or easements?

At last, the reader arrives at the 'meat' of the document, with the descriptions of the **environment**, the significant **impacts**, and the proposed **mitigation**.

Vegetation

I would refer the firm that prepared your document to Eldblom, NC and Johnson, AM. 2010. Plants of St. Lawrence County, NY. Bloated Toe Publishers, Peru, NY. (ISBN 978-0-9795741-4-6).

In that source I could find the rare plants, except two, listed in the table on pp. 12-13 of the GEIS. Use of dated vs. current scientific names seemed to be the problem. I would reject your statement on p. 13: “None of the species identified by the NPH were observed within or adjacent to proposed trail corridors.” Who was your plant expert? Many of these plants are small in size and difficult to identify by anyone but the expert.

From any reading I have done on impacts on soils along trails, I would modify two statements included on p. 14. “Indirectly, trail traffic can cause compaction of soil in the immediate area...” to 'trail traffic directly causes...' And, “...secondary result of bare soil...is the possibility of soil erosion.” Possibility is too weak a word. Erosion results.

Who in St. Lawrence County has the expertise or the time to monitor for the invasive species that the trail users will combat? With the decline in staffs at the USDA, Cooperative Extension, NYSDEC, etc. this mitigation will be difficult to realize.

Wildlife

Who proof read this part of the GEIS? Please, the table on p. 18 is a list of animals. Were no species identified in the corridor when surveyed because the survey was done on folks with ATVs? Again, who were your experts? Was this another 'pie in the sky' prediction? Other idealistic actions include p. 19 on identifying “habitat trees before cutting” and on p. 20 the monitoring for “muffling of motors” and “low speeds”.

Surface Water Resources

I support mitigation measures proposed especially “no wet crossings”. How will the mitigation proposed be implemented? And will some steps for mitigation be selected and some ignored? How is the follow-up decided?

Wetlands

On p. 27, I question again, "All proposed private and non-private property...were reviewed in the late spring and summer of 2010". How was this review conducted? Were protected, classified stream maps, as well as, state and federal wetland maps consulted prior to conducting field surveys? Is this one of those 'site-specific' analyses yet to be done? I find this section of the GEIS notably brief for the geographic area where wetlands are a major feature.

In conclusion, among the reasons I oppose the proposed trail systems are the following: 1) the issue of the ORV, the ATV, use on highways is unclear; 2) ATVs are not allowed on Colton highways by court order; 3) a GEIS is a wish list of worthy goals without grounding them on site-specific problems; 4) the cost of the trail system should not be the responsibility of already tax-strapped citizens of the County; and 5) the expense for the County in covering liability of this trail system and dealing with litigation of citizens who oppose the system. I cannot in good conscience reverse the position I took as a ten-year member of the Board of Directors of the SLCSWCD. I stated then that you cannot meaningfully use ATV and soil and water conservation in the same sentence. Existing impacts of ATVs in recreational use are evident all over this County. And, finally, as one of the residents impacted by this trail system on Cold Brook Drive, you have a major safety issue of ATVs travelling with trailers and huge Rvs that come and go from Higley Flow State Park. Cold Brook Drive is in terrible condition and has many areas where sight distance is limited. In addition, vehicles travel at speeds well in excess of 55 mph in the section where I live. Please, not in my front yard!



The mission of the ADIRONDACK COUNCIL is to ensure the ecological integrity and wild character of the ADIRONDACK PARK.

BOARD OF DIRECTORS

August 17, 2011

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William Dashnaw
St. Lawrence County Highway Superintendent
44 Park Street
Canton, NY 13617

Re: St. Lawrence County Multi-Use Recreation Trail Plan DGEIS

Dear Mr. Dashnaw,

DAVID E. BRONSTON

JOHN P. CAHILL

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EXECUTIVE DIRECTOR

BRIAN L. HOUSEAL

Thank you for providing ample time and opportunity to comment on the Draft Generic Environmental Impact Statement for the proposed St. Lawrence County Multi-Use Trail System (DGEIS). The Adirondack Council is a member-supported conservation advocacy organization dedicated to ensuring the ecological integrity and wild character of the Adirondack Park. We envision an Adirondack Park with clean water and air, large wilderness areas, surrounded by working farms and forests and vibrant local communities.

The Council would like to express several concerns with adequacy of the DGEIS. The DGEIS does not encompass all environmental costs, such as harm to nesting birds, habitat segmentation, and invasive species introduction. As proposed, the St. Lawrence County Multi-Use System is not a multi-use trail system, but serves the interests of the ATV-user group at the expense of other interested recreational groups. Moreover, the DGEIS contains vague mitigation standards and no funding provisions, which places policing and maintenance funding in serious doubt. In addition, further public safety and legal issues need to be addressed in the Final Generic Environmental Impact Statement.

The most stringent environmental policy should be utilized, particularly when ATVs are involved. Sensitive creatures, particularly amphibians and terrestrial invertebrates, are difficult to account for in a GEIS because there is little knowledge of their habitat and life cycles. "Unfortunately, we have only rudimentary knowledge of the recreational impacts of flora and fauna...and very rarely have studies focused on birds, lizards, frogs, terrestrial and aquatic invertebrates, and terrestrial and aquatic plants." J. Pigram and John Jenkins, *Outdoor Recreation Management* (2006). Nesting birds are disturbed by

DEFENDING THE EAST'S GREATEST WILDERNESS

342 Hamilton Street Albany, New York 12210 tel 518.432.1770 fax 518.449.4839 info@adirondackcouncil.org
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noise and proximity to human activity. Not only will increasing trails reduce the species richness of St. Lawrence County, but the quality of birding, which is quite popular in the area, will be reduced. One reason why little impact of the Trail System is expected is because illegal riding has already scared away or killed many species. We believe this fact should be taken into account when looking for potentially impacted species.

Invasive species pose a serious threat to our world today. Preventing new invasions, as opposed to the task of management after an invasive has taken hold, will save the state millions of dollars in not only the cost of management but in decreased tourism and recreation and loss of valuable forest products. Travel corridors represent the number one invasive transport vector. If any invasive species is discovered, the trail or area where it is discovered should be closed immediately and remain closed until an independent, third party has verified that it has been properly managed and that continued use will not cause the further spread of the invasive. Many organizations would be willing to help St. Lawrence County with public awareness and education to prevent initial invasions.

Wildlife is mostly unaccounted for when the county applies the Environmental Checklist for New Trail Segments. The nine (9) question environmental checklist is not a sufficient environmental review. The DGEIS offers no guidance as to what kinds of trails will require further study. The Council would like to see the precautionary principle used when wetlands and vernal pools are concerned.

The discussion of the Indiana bat on pages 16-17 is confusing and seems to contradict itself. Specifically, it states, "Due to the close proximity of St. Lawrence County to the hibernaculum in Jefferson County, there is the potential for Indiana bats to be present at elevations below 900 feet in St. Lawrence County during the summer months." Later, the document states, "Additionally, the proposed trail corridor is significantly distant from Jefferson County to be outside of the habitat area for the Indiana bat."

In addition, trail width limits and specific guidance should be set. It is impossible to determine how many trees may need to be removed or how much habitat would be impacted if you do not have a clear sense of how wide the trails will be. More important, the number of miles within the trail system should be known and published. The maps provided so far are inadequate. There needs to be at least one map showing the entire County and the trails. Having 18 maps which need to be taped together in order to view the whole county is not acceptable. Adding more sections to the Trail System could be viewed as segmentation under the SEQRA process if not properly considered.

The Council would also like the County to acknowledge that the anticipated trail travels through a portion of the Grasse River Wild Forest on Tooley Pond Road. It is illegal for ATVs to travel on Wild Forest lands and the County should provide extra signage and increased enforcement to minimize illegal trespass from the town road into the forest preserve.

Resources are not guaranteed for the policing and maintenance of trail systems, leaving environmental protection in question. Section 7.0 St. Lawrence County's Commitment of Resources should be expanded with more detail and planning. The pilot project in Parishville is a good example of what can happen with even a minimal amount of overuse. While many areas of the trails looked great and were very smooth for mountain bike riding, there were sections that were muddy and rutted. I did not see anyone on the trails while covering about 90 percent of the system one weekday during early summer. I talked with the only ATV rider I encountered on

one of the roads and the individual claimed to not know anything about the trail system. This leads me to believe that even with minimal use, portions of the pilot trails are damaged, without the trail being closed for rehabilitation. Long term funding must be set aside to provide for mitigation activity.

There are many instances in the DGEIS that use vague language involving timeframes, often in the proposed mitigation measures section. Examples include, "periodically", "periodic" and "regular basis". The DGEIS should be more specific on whom and when the trails will be inspected, monitored or mapped regarding environmental mitigation.

Also, relating to the maintenance of trail networks, the Council would like the County to consider simply closing overused or environmentally sensitive trails instead of rerouting them, as the Proposed Mitigation Measures dictate in § 5.1.3 *Ecologically Sensitive Areas*.

This multi-use trail network, in reality, is an ATV trail system. The Council does not see true effort to create a system that will cater to "multi-use." In fact, in § 5.6 *Noise*, it appears the EIS takes the position that if passive users of the outdoors (i.e. birdwatchers) do not like the noise of ATVs, they can go somewhere else to enjoy their activity. One of the purposes of creating this system, hidden in the Public Need and Benefits section (§3.0 page 7), is to provide environmental regulation and safety controls to the current trails system consists of "illegal or non-approved trails on public lands." This trail system is in part designed to justify the already occurring illegal ATV use, a purpose that should be expressed in the General Description §1 or the Project Description Purpose §4.1.

Peaceful coexistence between motorized and non-motorized recreation has not been the case on other multi-use systems throughout the country. Moore, R. *Conflicts On Multiple-Use Trails: Synthesis of the Literature and State of the Practice* (1994). The Council is hopeful that the proposed mitigation measures listed in the DGEIS (p. 48 – 51) are taken seriously to address user conflicts.

The Adirondack Council does not believe that by creating a legal trail system, illegal ATV use will decrease. In fact, it is our experience that opening up additional areas for legal riding only provides more access to illegal riding. Mostly, we are concerned with enforcement levels and further environmental degradation of both illegal and legal trails. "The mega-trend of population growth has led to decreased environmental quality." Gartner and Lyne, *Trends in Outdoor Recreation, Leisure and Tourism* (2000). Just because ATVs are using trails illegally, that does not create a public need to simply designate those areas as trails and paper over illegal activity. Instead, the County should consider better enforcement of existing laws as one of its alternatives, instead of simply a *No Action Alternative* in §9.1.

DGEIS is unclear as to what the plans are for winter time recreation use. This document should account for winter use and discuss whether groomers will be allowed on the trails for snowmobiling or cross-country skiing. The presence of funded groomers requires wider trails and further noise and air pollution. Signage should also denote snowmobiles for winter trail use.

DGEIS contains exaggerated and conflicting claims of economic benefits. The Camoin Associates study is quoted to support the public benefit of this project with estimates of "...\$14.1 million with a 25% increase in ridership." "...it is anticipated that [people from outside the region] will choose to travel to and spend recreational dollars in a region that allows them to

enjoy their recreational passions.” DGEIS, §3 page 7. Then contradicting this in a later section the DGEIS claims that the “Majority of trail users will be local residents.” §5.9 Proposed Mitigation Measure #11. Also stated in the DGEIS, “Although some increase in ridership may result from this action, increased tourism is expected to be incremental and should not result in significant demands for growth....” These statements contradict the message of the Public Benefit section and should be reconciled. We would give the consultant the benefit of the doubt if this was the first time we had seen such language. Unfortunately, the group that prepared the DGEIS used nearly identical language when it prepared a similar document for Lewis County’s trail system and the Council asked the language be clarified in that FGEIS. It was not. Because of this, we have to interpret the re-use of this language as an intentional attempt to deceive the reader and make it sound like the economic benefits are higher than they actually will be and the environmental impacts are less than they will be.

Expected growth shown in the Tug Hill study does not necessarily reflect what will happen in a different area, with different demographics, regulations and weather patterns. In addition, we believe the Camoin study overestimated economic benefits because it simply asked ATV riders to estimate what they spent on their activity and then used a multiplier. The study’s conclusions are that extending the ATV trails in the Tug Hill region would create a \$300,000 budget shortfall, increased enforcement is needed (through increased fees and fines), and that trails should be placed on private land as part of a private trail system, which could be publicly subsidized. These conclusions are not mentioned in the DGEIS.

In the *Background* section, the fact that ATV activities have been on the increase is questionable, at best. Using the number of ATV registrations in St. Lawrence County, as provided by the Department of Motor Vehicles, the opposite appears to be true. In 2003, there were 7,445 registered ATVs in St. Lawrence County. The number grew to 7,880 in 2007 and has been steadily declining since then, with only 6,253 registered last year and probably a similar number or even fewer in 2011. We believe there should be some evidence of growing ATV use, not just baseless, blanket statements.

Public safety issues surrounding the opening public roads is not addressed in this document. County officials and the general public should be concerned with the opening of paved roads posted at 55 mph. This is not only an issue for ATV riders but the automobile drivers themselves. ATVs can be operated on the trail system by individuals ages 10 and older with a safety certification for 16 and under. Such a high level of decision making should not be left to a child, regardless of the safety lessons received.

Per the Environmental Conservation Law of New York State § 617.11, a DGEIS findings must “consider the relevant environmental impacts, facts and conclusions disclosed in the final EIS.” The Council believes this includes weighing or at the least, discussion of public safety against the creation of a multi-use trail system.

Legal justification for opening roads to ATVs does not exist. Municipality must first show that it is otherwise impossible for ATVs to gain access to area or trails adjacent to the highway before opening public highway or positions to ATV travel. Vehicle and Traffic Law § 2405 [2]. Considering the section of the VTL has been upheld, if this process has already been examined, the DGEIS should state so. See *Brown v. Town of Pitcairn*, St. Lawrence County Index No 114295(Aug 2003); *Santagate v. Franklin Co*, Franklin County index No. 99-23 (1999).

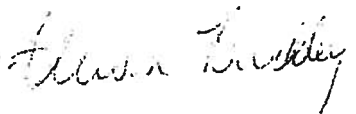
In 2005, the New York State Attorney General issued an informal opinion stating, "...the Legislature did not intend ATVs to regularly travel on highways and, accordingly, did not intend highways or roads meant for ordinary vehicular traffic to be considered "trails" as that term is used in VTL § 2405(1). A contrary conclusion could result in the opening of a substantial number of municipal highways to ATV use, thus eviscerating the Legislature's intent that ATVs be primarily operated off-highway."

Approximately 80-85 percent of proposed trail map is roads. The Adirondack Council would like the County to consider the statements made by the Attorney General regarding Lewis County's legal troubles surrounding the opening of roads to ATVs.

The Council believes that this Trail System should not be just a "formality." Statements such as that show a blatant disregard for the SEQRA process and open up the County for litigation for not taking a serious look at potential environmental impact. The DGEIS should discuss the true environmental and social impacts and adjust the trail plans accordingly. The Adirondack Council also believes that motorized recreation is not something that should be encouraged over low impact, non-motorized recreation. It is understandable that St. Lawrence County would like flexibility in the addition of new trail sections but the County should ensure that public health, safety and environmental protections are more carefully addressed to ensure that this plan is both environmentally and economically sustainable.

Thank you for accepting and reviewing our comments. We look forward to seeing the Final Generic Environmental Impact Statement.

Sincerely,



Allison Buckley
Conservation Director

New York State Department of Environmental Conservation
Division of Environmental Permits, Region 6
Dulles State Office Building
317 Washington Street, Watertown, New York 13601-3787
Phone: (315) 785-2245 • Fax: (315) 785-2242
Website: www.dec.ny.gov



My Copy 1
AUG 11 2011

August 9, 2011

Mr. William Dashnaw, Supervisor of Highways
St. Lawrence County
Department of Highways
44 Park Street
Canton, NY 13617-1430

**RE: St. Lawrence County Multi-Use Recreational Trail System
Draft Generic Environmental Impact Statement**

Dear Mr. Dashnaw,

The Department of Environmental Conservation (DEC) received the Draft Generic Environmental Impact Statement (DGEIS) for the Proposed St. Lawrence County Multi-Use Recreational Trail System dated May 2011. DEC as an Involved Agency in this State Environmental Quality Review (SEQR) will be actively engaged in the process in the role as stewards of the State's natural resources. DEC staffs reviewed the DGEIS, and have significant concerns regarding the scope and evaluation conducted regarding this proposed action. The specific purpose for a Generic Environmental Impact Statement (GEIS) is to provide logic and rationale for the choices projected and to facilitate a review of the cumulative impacts of the proposed action. This document will provide a record for the County and the State in supporting future decisions on trail development, permitting and land use planning activities.

The purpose of this letter is to provide comments to the DGEIS; the other issue of significance for the state involves the County's request to cross state land in multiple locations. DEC recognizes that the County has endeavored to avoid using state land and that the request is limited to three areas. As you are aware, the use of Forest Preserve lands, particularly for an activity that is known to often cause significant environmental harm, must be analyzed carefully by the agency pursuant to an established process. DEC is currently assessing the legal, environmental and practical impacts of the proposed use, and will analyze that pursuant to a transparent public process.

The following are comments by section from the review of the DGEIS:

Section 1.0 General Description of Proposed Action

- a. The preface stated that St. Lawrence County was sponsoring the trail system; the summary stated St. Lawrence County was proposing development of a County-wide system. Specific management and maintenance actions proposed by St. Lawrence County for the trail system should be part of the DGEIS.

Section 1.0 General Description of Proposed Action (continued)

b. The terms existing, established, informal, future, and proposed are used throughout the report. It is critical that the DGEIS be clear on what already exists and has been evaluated to determine current impacts, what is being proposed to assess cumulative/future impacts and to evaluate the proposed mitigation measures.

c. The DGEIS does not propose a tentative schedule or timeline for the proposed development of the trail system. When the DEC reviews or screens potential projects, it is recommended that the if the proposed action is still being proposed one year from the initial review date that the project be reviewed again to determine if new information is known. The DGEIS should include a proposed schedule for near and long-term actions.

Section 2.0 Background

a. The DGEIS should provide additional background and history leading to the decision to take the proposed action. For example, The DGEIS does not address the apparent conflict between the Motor Vehicle Traffic Law and development of an All Terrain Vehicle (ATV) trail system that uses many miles of roadway to create a trail system. Does the development of this DGEIS support a resolution to that end or propose alternatives?

Section 3.0 Public Need and Benefits

+ a. The DGEIS states that the development of a County sponsored system will provide a controlled, environmentally sound system. The DGEIS does not address how St. Lawrence County will address unauthorized use of the trail systems.

+ b. The DGEIS does not discuss what actions are proposed to address off-trail use and how St. Lawrence County proposes to regulate these unauthorized activities. What benefit will the County provide to entities impacted by un-authorized use or what actions will the County take to repair damages caused by use of lands not included in the designated trail system?

c. The trail system is proposed to be unbiased and capable of supporting diverse activities, however, the uses proposed may not be compatible on the same trail system. Designation of uses for proposed segments or trail design criterion would be needed to support the diverse use, i.e. if a segment is intended to be compliant with the Americans with Disabilities Act for use as a hiking trail.

Section 4.0 Project Description

Section 4.1 Purpose

+ a. While the trail system is described as a "Multi-use" trail system, the DGEIS is predominately focused on ATV's. Hikers, people who snowshoe and skiers have much different impacts than ATVs. Likewise snowmobiles, mountain bikes, and horses also have much different impacts than ATVs.

Section 4.2 Project Features

- 7 a. The form of relationships between the County and Towns should be discussed; will there be memorandums of understanding or will formalized inter-municipal agreements be enacted?
- 7 b. There are existing or known trail systems within the County. They need to be recognized within the DGEIS. The DGEIS should state whether each of those trail systems will be subsumed into this project or will remain separate. This should include all existing horse, snowshoe, ski, mountain bike, hiking trails if the County is proposing to make this a comprehensive document.

Section 4.3 Permits and Approvals Required

The following permits and approvals were not included in this section:

- a. Article 11 Part 182 Endangered and Threatened Species Incidental Take Permit.
- b. Wild, Scenic and Recreational Rivers permits from DEC for state lands or from the Adirondack Park Agency (APA) for private lands within the Adirondack Park.
- c. Article 9 Part 190 and 196 Regulations relating to the use of State owned lands. Temporary Revocable Permits or Adopt a Natural Resource Agreements will be required for use of easement, forest preserve, state forest, wildlife management areas, and other state lands.
- 7 d. The use of forest preserve, state forest and wildlife management lands may require a Unit Management Plan (UMP) to be completed, or an amendment to an existing UMP to be completed. For easement lands, a Recreation Plan may need to be completed to permit the use.
- e. If the trail construction, maintenance activities, and parking area construction will result in a total combined disturbance of greater than one acre, coverage under the SPDES General Permit for Stormwater Discharges Associated from Construction Activities must be obtained.

5.0 Environmental Setting

- 8 a. The DGEIS did not provide specific information on trail design for either the existing or proposed segments. Without this component, the evaluation of the impact cannot be completed. Trail design standards must be established for the various conditions likely to be encountered in trail establishment as part of the initial effort to establish current impacts, evaluate future impacts and for evaluation of alternatives for both.

5.1 Vegetation, Wildlife, and Ecologically Sensitive Areas

Section 5.11 Vegetation

- a. Soil erosion due to loss of vegetation does pose a significant environmental impact. Soil erosion will result in stream sedimentation and loss of aquatic habitat, and in some instances, deposition of fill in wetlands. Contravention of water quality will also be a concern due to runoff. These impacts need to be further evaluated.

Section 5.11 Vegetation (continued)

b. The primary spread of invasive species occurs along road sides and trail networks. What data exists to support the DGEIS's claim that "experience with the existing informal trail system has shown that the dispersal of invasive species has not been an issue to date"? An Invasive Species Control Plan should be adopted for the trail system and incorporated into any trail system plan especially if biologic or chemical controls are proposed.

c. The proposed mitigation measures include a number of efforts that are not described. Relating back to trail design standards, the mitigation measures to be utilized to keep trails narrow should have been included. If a periodic inspection reveals areas of disturbance off the trails, the steps to be taken to restrict access, restore, replant, re-grade, and potentially increase enforcement in the area need to be detailed.

d. The DGEIS states the County conducted a review of the trail corridor for Endangered and Threatened (E/T) plant species and concluded none were present. Information about the qualifications of the individuals conducting the review, the assessment methodology used, and the results need to be included.

Section 5.1.2 Wildlife

a. The potential significant environmental impacts section clearly states it is difficult to predict negative impacts to E/T animal species; therefore it made little effort to detail what potential impacts could be identified. However, impacts created by routing a trail segment through Blanding's turtle habitat could cause both direct mortality of adults, and the destruction of nests. A new trail under a Bald eagle or osprey nest with motorized vehicle traffic could cause nest abandonment or failure. The DGEIS should have further detailed and evaluated the potential impacts for E/T animal species.

b. The term "wet crossing" is first used in this section to detail that "wet crossings are not being allowed within the trail system". This term is also used in Sections 5.3 *Surface Water* and 5.4 *Wetlands* to refer to areas which will be avoided or spanned with bridges. The specific criteria by which an area could be considered a "wet crossing" was not described. Were only streams which appear as perennial on published 1:24,000 scale Hydrographs considered or will ephemeral drainages also be considered "wet crossings"? Similar questions can be asked when referring to wetlands, jurisdictional or any seasonally wet area. Without this information, the impacts to existing resources and the potential for future impacts cannot be assessed as part of this DGEIS.

c. Similar to the comment above regarding assessment of E/T plant species; information about the qualifications of the individuals conducting the review, the assessment methodology used, and the results need to be included. This review would also need to consider not only the presence of the individuals but an assessment of the potential use of an area as habitat for the species.

x d. The proposed mitigation measures include requiring use of trails at low speeds. The DGEIS did not state what those limits would be or if the posted limits would be set for specific trail segments or through-out the system. The legal authority to establish limits will need to be investigated prior to offering it as a mitigation measure.

Section 5.1.3 Ecologically Sensitive Areas

a. The maps included in the report should have identified trail segments located in the defined ecologically sensitive areas. Not all of the natural communities identified are wet locations. The DGEIS does not contain an evaluation of potential impacts to upland areas and therefore the proposed mitigation measures do not identify criterion for evaluation of alternatives.

Section 5.3 Surface Water Resources

- a. Proposed mitigation measures discusses the establishment of Best Management Practices (BMPs) After stating that the system will include no wet crossings, the first bullet under the BMPs is to monitor the system for excessive [emphasis added] crossing of streams and other surface waters. Please clarify this discrepancy.
- b. The DGEIS identified two stream crossing segments where a bridge and a culvert would be needed. These segments were not identified on the maps included in the report. The DGEIS needs to provide the assessment methodology used, and the results need to be included.
- c. In stream work windows are important BMPs. For instance, work on trout streams will only be allowed during the work window of May 1st to September 15th of each year.
- d. Reference in the proposed mitigation section should also include the need to obtain permit coverage for crossings when required.

Section 5.4 Wetlands

- a. As noted above, the DGEIS needs to provide the assessment methodology used, and include the results of the review of wetlands conducted of the existing system.
- b. The relationship of state and federal regulation and their associated wetland resource maps should be included in the DGEIS for purposes of evaluating existing and future impacts. Non-jurisdictional wetlands may still be impacted and mitigation needs to be considered.
- c. The proposed mitigation measure states that bridging is the only way a wetland can be crossed without impact, then goes onto say bridging of wetlands is not feasible. But the last sentence in the section states, "In those areas where a bridge or realignment is not feasible the trail section would be closed". For a segment to be closed it must already exist. This section is confusing, please consider revising.
- d. State regulations for wetlands outside of the Adirondack Park regulate not only to the wetlands themselves but their 100' adjacent areas. Organized intensive use of an adjacent area is generally considered a compatible activity which requires a permit in accordance with 6 NYCRR Part 663.

Section 5.5 Soils

- a. The existing/proposed trail corridor potentially significant environmental impacts should have identified the presence of highly erodible soils, or areas where the slopes were greater than 3 percent. The evaluation for future additions should have established soils/slopes which are not acceptable for new trail segments.

Section 5.8 Transportation Facilities and Traffic

a. The proposed trail will cross Forest Preserve and Easement lands that currently receive little or no use. The increased traffic resulting from the new trail system will be significant when compared against current conditions. The impacts and proposed mitigation measures for these areas need to be included.

Section 5.9 Recreational Activities

a. The DGEIS included a statement regarding St. Lawrence County Resolution Number 347-2006 opening certain public lands to ATV usage; where and what are these "public lands"? The DGEIS should include specific descriptions of the parcels.

b. The proposed mitigation measures identified a Federal Highway Administration report stating 12 principles for minimizing conflict. St. Lawrence County's approach is reportedly based on that report, but a copy of the plan was not included in the DGEIS. The actual mitigation being proposed to address the potential impact needs to be included.

Section 5.11 Community Services

⌘ a. Enforcement of mitigation provisions contained throughout the DGEIS will be critical to address the significant environmental impacts. The DGEIS should contain an enforcement strategy including a commitment of resources by the involved community. Has the County considered establishment of an enforcement advisory group, including judicial representatives, to monitor and implement trail system requirements?

Section 11 Future Expansion

a. In order to capitalize on the benefits of a GEIS, the Proposed Trail Segment Environmental Checklist will need to closely conform to the identification of potential impacts from the DGEIS. The process needs to be more detailed on the entity completing and evaluating the information on the form. The form will provide a written record of the County's action on future trail segments.

b. GEISs and their findings should set forth specific conditions or criteria under which future actions will be undertaken or approved, including requirements for any subsequent SEQR compliance. This may include thresholds and criteria for supplemental Environmental Impact Statements (EISs) to reflect specific significant impacts, such as site specific impacts, that were not adequately addressed or analyzed in the GEIS. This DGEIS did not propose specific conditions or criteria.

Appendix A - Environmental Checklist

⌘ a. Consider adding a map and, if appropriate, plans/drawings as an attachment to the checklist.

b. The number of questions should be expanded to include, at a minimum, all of the screening items contained in Section 4.3 Permits and Approvals

c. The checklist includes a question on stream crossing that includes a ford as a type of crossing. Fords are a type of wet crossing, if the trail system proposes utilizing this type of crossing it will need to be discussed in the appropriate section of the DGEIS.

Appendix A - Environmental Checklist (continued)

d. Section 5.5 stated the potential for erosion on slopes of 3 percent yet the checklist asks only if there are any slopes greater than 15 percent, this apparent discrepancy should be resolved.

Figures - Proposed Multi-Use Recreational Trail System

a. The maps provided did not include sufficient detail on the evaluation of the potential environmental impacts for the proposed trail corridor.

b. The maps did not include what segments are on Town or County roads or are off road; or if on public or private lands.

c. The maps did not indicate what trail segments already existed or those that will be future segments.

d. The maps did not state if all segments in the corridor were proposed to be multi-use capable of use by all users or if specific segments had specific designated uses, i.e. horseback riding, mountain biking.

We look forward to your response to our request. Please feel free to contact me should you have any questions.

Sincerely,



Thomas Voss
Environmental Program Specialist 1
Region 6
tgvooss@gw.dec.state.ny.us

Ecc: Todd Phillips, Environmental Scientist III, B&L
Judy Drabicki, Regional Director
Ken Kogut, Regional Natural Resource Supervisor
Dave Smith, Regional Forester

ATV

MAY 25 2011

May 20, 2011

William Dashnaw
Superintendent of Highways
Department of Highways
44 Park Street
Canton, NY 13617

Dear Bill:

I have reviewed the Draft Generic Environmental Impact Statement for the Proposed St. Lawrence County Multi-Use Recreational Trail System, dated May 2011. As a member of the County's Recreational Trails Advisory Board, I have been involved in the conceptual development of the proposed trail system, and look forward to seeing the proposed trail system become a reality.

Overall, the document is well prepared and adequately addresses many of the major issues involved in the successful development of the proposed Multi-Use Trail System. However, there are a number of items that need attention in the document before it is finalized. These include:

1. On page 20, the report states: "Requiring proper muffling of motors and requiring users to remain on the designated trails at low speeds will properly reduce the potential disruptive impacts (primarily noise) to wildlife resulting from recreational trail use."

There are certainly greater disruptive impacts than noise if trail users do not remain on the designated trails or exceed the speed limit. As the document notes, the trail traverses numerous wetlands, and significant impacts can be expected from off trail use or through lack of installation or maintenance of suitable bridges or other stream/wetland crossing methods, for wildlife as well as for the overall success of the trail. The potentially disruptive impacts are much broader than noise, and this statement needs to be modified accordingly.

2. The document states "If conditions have changed dramatically and the existing water crossing cannot be repaired, the associated trails should be closed permanently and an alternate, non-invasive route developed." The wording of this statement must be strengthened, to reflect that trails will be closed if suitable stream/wetland crossings cannot be maintained.

3. On page 26, mitigation methods for protecting surface water resources states "Kiosks will relay the importance of keeping OHVs clean in terms of possible invasive species and remnants of petroleum products." Further information needs to be required on the kiosks for protecting surface water resources. In particular, the kiosks and other trail use information must state the trail rules, and that improper use and/or stream/wetland damage will result in trail closure.

4. The document states "In reality, the creation of a St. Lawrence County Multi-Use Recreational Trail System is just a formality." This statement is incorrect. The cross county multi-use trail system will provide significant opportunity for ATV riding that does not legally exist today, and the statement must be modified accordingly.

5. The document states "The proposed trail system will create public access to beautiful areas of the County that would otherwise be hard to access. The geographic location of St. Lawrence County allows for multiple natural resources to be visited during a single trip, from views of the St. Lawrence River Valley to awe inspiring panoramic vistas of the Adirondack Mountains." This overstates the scope of the proposed trail, and needs to be modified.

6. On page 36, the report states "As previously stated in Section 5.5, recreational conflicts are often the result of goal interference." Section 5.5 discusses soils, not recreational conflict. There is not a sufficient discussion on recreational conflict in the report, and this material needs to be added.

7. Section 6.0 lists potentially unavoidable or inadequately mitigated environmental impacts. This list must include recreational conflict/goal interference as a potentially unavoidable adverse environmental impact. The mitigation of this potential impact must be considered both in the trail as currently proposed, as well as in the proposed future environmental review of new trail segments, as discussed in Section 11. Similarly, the proposed environmental checklist for new trail segments must be amended to include assessment of this adverse impact when evaluating new trail segments. Without this consideration, the environmental assessment will not be complete.

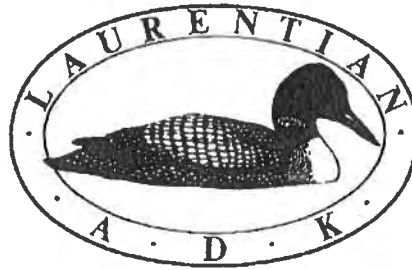
I appreciate the opportunity to comment on this draft EIS. I believe that with suitable modification, this document will provide the basis for a successful multi-use trail system.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Ortmeier". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Tom Ortmeier

AUG - 1 2011



THE LAURENTIAN CHAPTER OF THE ADIRONDACK MOUNTAIN CLUB

July 25, 2011

Mr. William Dashnaw
Superintendent of Highways
St. Lawrence County Department of Highways
44 Park Street
Canton, NY 13617

Dear Mr. Dashnaw -

I am writing on behalf of the Laurentian Chapter of the Adirondack Mountain Club (ADK) regarding the draft Generic Environmental Impact Statement (DGEIS) for the Proposed St. Lawrence County Multi-Use Recreational Trail System.

The Laurentian Chapter, which is based in St. Lawrence County, organizes all the ADK's activities in this region. Our mission mirrors that of the ADK as a whole: advocating for the preservation of wilderness; educating the public about the value of wilderness and how to conserve and enjoy it; and promoting the responsible recreational use of wild places by organizing and leading outdoor trips. The Laurentian Chapter has about 400 members, the vast majority of whom live in St. Lawrence County; about two dozen of them live in nearby areas of New York, other states, or Canada, and a few live farther away. The entire ADK has about 25,000 members in New York and other locations.

The ADK promotes self-propelled travel (e.g. hiking, skiing, snowshoeing, cycling, canoeing, and kayaking) as the best way to enjoy wild spaces while having a minimum impact on the countryside. The Laurentian Chapter organizes one or more outings in these activities almost every weekend throughout the year. The general public is welcome to participate. Chapter members also coordinate and perform the maintenance, on a volunteer basis, of the Red Sandstone and Stone Valley trails, as well as other trails in St. Lawrence County.


One of our members, Tom Ortmeier, belongs to the St. Lawrence County Recreational Trails Advisory Council, and we have been following the evolution of the proposal for a recreational ATV touring trail with interest for a long time. In general we think the DGEIS has been well done and we agree that the specific trails identified on the maps in the annexes can be used for ATV touring with acceptable environmental impact, if properly used and maintained. We think these routes can support motorized traffic, and with care it may be possible for self-propelled users, such as cyclists and mountain

bikers, to share them successfully with motorized traffic. We hope that by establishing specific routes designated for motorized use there will be minimal need for motorized vehicles to use other backcountry routes where they can both cause more environmental damage and potentially interfere with the enjoyment and possibly the safety of self-propelled traffic.

We felt the tone of the DGEIS was too heavily slanted toward motorized vehicles. The report seems intended to justify the use of ATVs on all trails, and we hope that this will not prove to be the case. We hope a precedent will not be set that all trails and areas will be opened to motorized vehicles. We believe that any proposed additions should be treated on a case by case basis.

We feel we represent a large constituency of self-propelled users of wild areas. We ask that in any possible future expansion of the Multi-Use Recreational Trail System that the needs and desires of those who have the least impact on others be considered.

Sincerely,

A handwritten signature in black ink, appearing to read "John Barron". The signature is fluid and cursive, with the first name "John" being more prominent and stylized than the last name "Barron".

John Barron
Chair, Laurentian Chapter
Adirondack Mountain Club
(613) 828-2296

Dashnaw, Bill

From: Ernest Hutchins [1eldad@hughes.net]

Sent: Friday, June 24, 2011 7:51 PM

To: Dashnaw, Bill

Subject: ATV Trail

All Town of Colton Roads were closed for ATV use in 2004 by supreme court decision 1AS # 441-2004-0170 , you keep referring to existing roads and trails in use for ATV'S , there are none in the town of Colton , Do you plan on ignoring the decision of the NYS supreme court ?

Page 1 of 1

Dashnaw, Bill

From: Ernest Hutchins [1eldad@hughes.net]

Sent: Tuesday, June 28, 2011 11:24 AM

To: Dashnaw, Bill

Subject: ATV trail

Under Pette vs Lewis County # CA 2010- 000048 the judge will not allow the wholesale opening of roads like you want to do in ST Law Co by my house you will have 40 miles of road open with no trails this judge would not allow 2 miles of road open does St Law Co have no respect for the decisions of the court ?

Appendix D
Trail Photographs



















Appendix E

Heartland Forest Fund III/NYSDEC Trail Design Guidelines

1 VEHICLE VOLUME SPECS:

LOW: +/- <20 ROUND TRIPS/MONTH

MEDIUM: +/-20-300 TRIPS/MONTH

HIGH: +/- >300 TRIPS/MONTH

2 ALL CULVERTS SHALL BE PROPERLY HEADED WITH STONE, WOOD, OR STEEL/PLASTIC COLLARS

3 THE CONDITION AND TYPE OF THE SURFACE WILL SET STANDARDS FOR SEASONAL USE. CLOSED DURING MUD SEASON(S) AS POSTED

4 DEC/APA REGULATIONS ON WETLANDS, STREAM CROSSING, ETC.

5 NYS REGULATIONS ON INSURANCE REQUIREMENTS FOR VEHICLES

6 HFF III IS RESPONSIBLE FOR INFORMING LESSEE'S OF RULES AND REGS OF TRAILS, DEC HAS LEGAL AUTHORITY FOR ALL REGULATORY COMPLIANCE AND TICKETING FOR FAILURE OF ALL MEMBERS OF THE PUBLIC, INCLUDING HFF III LESSEES.

Appendix F
Invasive Species Control Measures

Invasive Species Control Methods	
Mechanical	The use of mechanical means employs the use of human labor and tools to cut shoots and or dig up root masses. All species removed by this method should be placed in garbage bags and disposed of offsite at a solid waste facility or burned. When removing root systems, care should be taken to remove as much of the root mass as possible since many invasive species regenerate from a single rhizome. Continued monitoring of the area is required and often more than one removal effort is needed.
Chemical	Chemical control of invasive species is performed through the use of glyphosate based herbicides. A solution of 1 to 1.5% glyphosate has been proven to have the best results when applied during blooming or shortly thereafter. This method tends to work better for larger populations and can be coupled with mechanical methods. Continued monitoring of invasive vegetation stands will be required and potentially numerous rounds of treatment may be applied. Application of herbicides should only be performed by a NYS qualified individual. Glyphosate control costs are approximately \$60-100/acre.
Biological	A third method of invasive species control is biological. This method employs the use of insects to actively feed on the species of concern. This method is still being researched by scientists. Due to the unknown damage that could occur from introducing non-native insects into the County, this method will not be employed in invasive vegetation management.

Appendix G

Shared Services Agreements and Adopt-a-Trail Agreements (To be included as agreements are signed)

Appendix H

St. Lawrence County Resolution Number 347-2006

December 4, 2006

Finance Committee: 11-27-2006

RESOLUTION NO. 347-2006

**ADOPTING LOCAL LAW B (NO. 2) FOR THE YEAR 2006, A LOCAL LAW
PERMITTING AND REGULATING ALL - TERRAIN VEHICLE OPERATION ON
CERTAIN PUBLIC LANDS OTHER THAN COUNTY ROADS**

By Mr. MacKinnon, District 4
Co-Sponsored by Mr. Grow, District 13

BE IT ENACTED by the Board of Legislators of the County of St. Lawrence as follows:

Section 1. This Local Law shall be known as "County Land ATV Use Law".

Section 2. Purpose and Findings

The purpose of this Local Law is to open certain public lands other than County roads for travel by all-terrain vehicles and to impose certain restrictions and conditions for the regulation and safe operation of ATVs on such public property pursuant to the authority granted in Section 2405 of the New York State Vehicle and Traffic Law. This Board has found that the use of all-terrain vehicles in St. Lawrence County has grown in recent years and St. Lawrence County has the highest number of registered ATVs in the State of New York. The County has furthermore, determined that the use of ATVs has thus far been largely without appropriate local regulations. Therefore, in an effort to give riders safe and legal trails, the County believes that this legislation is in the general overall public interest. This Board further finds that promoting opportunities for recreational use of all-terrain vehicles will stimulate the local economy and offer enjoyment for the citizens of the County and for tourists traveling in the area.

Section 3. Definitions

ATV: An all-terrain vehicle, as defined in Section 2228(1) of the New York State Vehicle and Traffic Law.

County: County of St. Lawrence

County Road: A highway designated as a County Road on the Official County Highway Map as provided by Section 115 of the Highway Law of the State of New York.

Designated Trail: An area specifically designated for use by ATV's by this Local Law.

Operator: "Operator" as defined by Section 2401(4) of the Vehicle and Traffic Law.

Owner: "Owner" as defined by Section 2401(3) of the Vehicle and Traffic Law.

St. Lawrence County Multi-Use Trail System: A system of trails suitable for use by ATVs operated by St. Lawrence County that includes developed trails on certain municipally, state, and privately owned lands and designated connecting highways.

Vehicle and Traffic Law: The Vehicle and Traffic Law of the State of New York.

Section 4. Designation of Public Lands for Travel by ATVs

December 4, 2006

The following Public Lands are hereby designated as appropriate public lands as places open for travel by ATVs on County Reforestation Areas in the Towns of Parishville and Pierrepont as part of the St. Lawrence County Multi-Use Trail System: (Public Lands)

- a) County Reforestation Areas 12 and 14 on the Picketville Road.
- b) County Reforestation Area 21 on the Cook Road.
- c) County Reforestation Area 9 on the Russell Turnpike Road.
- d) County Reforestation Area 13 on the Cobble Road.
- e) County Reforestation Area 37 off the Russell Turnpike Road.
- f) County Reforestation Area 32 on River Road in Pierrepont and the Benson Road in Parishville.

Section 5. Closure of Public Lands for Travel by ATVs

a) County Reforestation Areas 19, 26, 27 and 28 in the Town of Colton and County Reforestation Area 33 on the Lenny Road in the Towns of Colton and Parishville are specifically closed to ATV use.

b) County Reforestation Areas 30, 31, and 35 on the River Road in the Towns of Pierrepont and Parishville, are specifically closed for ATV use, with the exception of a single trail for ATV use connecting the River Road with the Benson Road on Reforestation Area 35 which will be open to ATV use consistent with this law.

Section 6. Rules, Conditions, and Restrictions

The use of ATVs on the foregoing Reforestation Areas is subject to the following restrictions and conditions:

a) Designated Trails. ATV use under this Local Law shall be limited to only the Designated Trails on the specified Public Lands. ATV use on any area of the Public Lands other than the Designated Trails is strictly prohibited.

b) Hours of Operation. No person shall operate an ATV on a Designated Trail between the hours of 12:00 a.m. and 6:00 a.m.

c) Operation. ATV use under this Local Law shall be in compliance with all the applicable provisions of the Vehicle and Traffic Law and shall not preclude the availability of the designated trails for other public uses such as skiing, hiking and biking. ATV's shall at all times be operated on the designated trails in a reasonable and prudent manner at reasonable and prudent speeds so as not to pose a danger to either the operator nor any other user of the Designated Trails.

Section 7. Penalties

December 4, 2006

Any person who violated any provisions of this Local Law shall be guilty of an offense as defined by Section 10.00 of the Penal Law of the State of New York, and the violator or offender shall be liable for a fine of not less than \$25.00 and not more than \$150.00 for the first offense; for a fine not less than \$50.00 and not more than \$200.00 for a second offense committed within two years from a previous conviction under this Local Law; and a fine of not less than \$100.00 nor more than \$500.00 for a third or subsequent offense all committed within three years.

Section 8. Severability

If any part of this Local Law or the application thereof to any person or circumstance be adjudged invalid by any court of competent jurisdiction, such judgment shall be confined in its operation to the part or provision in application directly involved in the controversy in which such judgment shall have been rendered; and shall not affect or impair the validity of the remainder of this Local Law or the application thereof to other persons or circumstances, and the Board of Legislators of the County of St. Lawrence hereby declares that it would have passed this Local Law or the remainder of it had such invalid application or provision been apparent.

Section 9. Posting of Designations

The Forester of the County of St. Lawrence shall install signs and markers identifying the Designated Trails. Said Superintendent shall also post signs on which shall appear the Rules, Conditions and Restrictions set forth in this Local Law, to the extent that such Rules, Conditions and Restrictions exceed those set forth in the Vehicle and Traffic Law.

Section 10. Effective Date

This Local Law shall take effect immediately upon filing with the Secretary of State.

* * *

Mr. MacKinnon moved to adopt Resolution No. 347-2006, seconded by Mr. Wilson and Mr. Grow, and carried unanimously by a roll call vote.

Appendix I

**St. Lawrence County
Recreational Trails Management Plan**

Saint Lawrence County
Recreational Trails Management Plan
Cross-County Multi-Use Trail System
August 2012



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EXECUTIVE SUMMARY

This document is the Management Plan for the St. Lawrence County Cross-County Multi-Use Trail System. The management plan is a living document, to be updated regularly to ensure currency in the operation and maintenance of the system.

The County recognizes its responsibility as a governmental agency, to develop trail plans that will provide and encourage the wise use of bountiful natural resources for a wide variety of venues, including walking, hiking, running, cycling, mountain biking, horseback riding, cross-country skiing, snowshoeing, dog sledding, snowmobiling and ATVing.

Responsible use of ATV's is an important part of trail planning in St. Lawrence County, in response to greatly increased usage of trail machines and a corresponding demand for safe and legal trails .

This Management Plan is developed to ensure the successful development and operation of the multi-use cross-county trail system. This plan discusses trail usage, maintenance, insurance, public education and enforcement. It sets standards for trail construction and signage. It describes the environmental monitoring and protection that will be in place during trail operation, and set the criteria for closing the trail due to environmental conditions, lack of maintenance, and misuse.

It is the intent of the County to work in unison with groups and others to ensure that the system outlined in this plan will be managed appropriately and provide for safe and enjoyable use for residents and visitors alike, while preserving the natural scenic landscape that St Lawrence County is noted for.

PROJECT HISTORY

St. Lawrence County has always enjoyed a wide variety of outdoor recreational opportunities, often with limited, stand-alone trails developed and maintained by volunteer private groups, i.e. hiking and cross-country skiing, on public land. Snowmobiling has been a popular winter activity, as part of the New York State Trail system, administered through the NYS Office of Parks, Recreation and Historical Preservation, with trails maintained by the St. Lawrence County Snowmobile Association. Those trails have become a vital part of the winter economy in Northern New York.

In 2003 an organized group of All-Terrain Vehicle (ATV) riders approached the County for help in developing safe and legal trails for ATVs. The popularity of these machines had exploded in the last several years, yet no trails were developed to accommodate the growth. Indeed, very few trails existed. St. Lawrence County had the highest number of registered ATVs in New York State, but few opportunities to enjoy trail riding. Additional impetus for the development of the plan was the knowledge of successful trail systems in other states that were providing significant recreational and economic benefit to tourists, citizens businesses, communities and governmental entities.

The County formed an informal committee to study the issues involved in ATV use. The ATV users, having been excluded from all other trails, were adamant their trails should be multi-purpose – open to anyone who would enjoy them. Soon the committee began to study the future of all trails in the County.

Concurrently, neighboring Counties began to develop systems and were enjoying some success.

In 2006, the Legislature formed the Recreational Trails Advisory Board, to begin development of a multi-use trail system that would cross the entire county. This system would not only address the desire for thoughtful, organized development, but would eventually connect with adjoining counties to create a regional tourism draw, such as those enjoyed in many other states.

To test the feasibility of developing and maintaining such a trail, particularly one used by ATVs, a pilot project was created. A 22-mile trail was developed in cooperation with the Town of Parishville, utilizing several County reforestation properties, with town and county roads to connect riding areas. Construction, maintenance, and signage standards were adopted and implemented for this trail. The work was done mainly by volunteers and the County Highway Dept. A set of usage rules was developed as well. These include speed limits, operating hours and seasons. The pilot trail opened in 2008 and has operated successfully since that time. The experience gained with the pilot will be valuable in developing and operating the larger county trail system.

Since the pilot trail was opened, the county has pursued the development of the cross county trail by working to identify a route for the trail. Once a potential route was identified, they initiated the development of a Generic Environmental Impact Statement for the Proposed St. Lawrence County Multi-Use Recreational Trail System. This is currently in a final stage. The goal for the cross county trail system is to develop a quality touring experience that minimizes the amount of road travel, has suitable trail surfaces, meets highway and landowner laws and requirements, and experiences a wide variety of usage.

THE RECREATIONAL TRAILS ADVISORY BOARD AND THE TRAIL COORDINATOR

Two significant events that have advanced trail development in St. Lawrence County were the formation of the Recreational Trails Advisory Board in 2006 and the contracting for a Trail Coordinator in 2012.

The Advisory Board brings together representatives of each of the outdoor recreational venues in a cooperative effort to address the wants and needs of each group and to insure that the concerns of each group are taken into account in trail development. In addition, advisors from DEC, land managers, the Legislature, economic development, sportsmen, business owners, etc., hold seats or are on hand. This provides perspective from many different viewpoints and interests, as well as insuring balance and compromise when needed. The Advisory Board meets monthly and makes recommendations to the County Legislature.

Contracting for a Trail Coordinator allows for a dedicated, full-time contact person to manage input/output from everyone involved in the development of this major trail system. It also insures that legalities are covered and work logistics are coordinated. He/she also looks for opportunities for trail funding and is responsible for marketing the trail system in a way that maximizes its potential for economic return.

OUR VISION

A multi-use recreational trail system that capitalizes on the region's open space and forestry assets to provide quality outdoor recreational activities for visitors and residents, stimulate and support local business and regional economic development, and conserve natural resources for future generations.

THE PURPOSE OF THIS RECREATIONAL TRAIL PLAN

This Plan will be used as a developmental tool in the creation of a countywide trail network. It is intended to provide guidance for the location and construction of trails and associated areas. Further, the Plan is intended to improve the operation, design and utilization of the County's current trail systems, allowing equal and safe use for all recreational activities.

The Plan will identify existing trails and alignments for future trails which will guide land use and site planning. The Plan will provide the vision and policy guidance for the County's trail planning efforts in order to take full advantage of trail benefits and ensuring strict environmental protections.

The Plan shall be at all times guided by Generic Environmental Impact Statements and subsequent SEQRA studies, which shall be added as attachments to this Plan and which will be the definitive protective criteria for trail development.

Proposed trail alignments shown in the Master plan are conceptual in nature, and are for planning purposes only. The trail alignments are shown at a corridor level which means the trail will be located anywhere within approximately 100 feet of the location shown on the map. The final trail alignments are subject to further analysis of geologic, topographic, environmental, hydrology, property ownership, and other factors.

GOALS AND OBJECTIVES

To provide

- 1) To provide guidance and standards in the design of an integrated trail system that connects communities and allows greater access to open space and existing resources within St. Lawrence County, in order to stimulate economic growth, create greater recreation and educational opportunities, increase tourism, and to promote the health and well-being of our citizens.
- 2) To provide trail construction and maintenance standards in a manner that prevents environmental degradation and protects environmentally sensitive areas. Multi-purpose does not mean all uses in all areas. Segments may require restriction based on environmental attributes.
- 3) To provide community connections and recreation corridors as part of a greater regional trail system, to encourage long distance trail users to travel thru St. Lawrence County, extending their visits and related spending.
- 4) Establish uniform protocol and standards for trail signage and identification, provide easy and plentiful access points, and allow for attractive informational and educational kiosks.
- 5) To give people of all ages and abilities access to the scenic lands of St. Lawrence County.
- 6) To set safeguards for the safety and well-being of all families and individuals traversing our trails.

- 7) To create a regional economic development component that will encourage entrepreneurs to invest in related business opportunities and provide a four-season recreational asset that enhances the quality-of-life that St. Lawrence County is able to offer as a benefit to employees of the area's businesses.

PARAMOUNT BENEFITS OF A MULTI-USE (SHARED USE) RECREATIONAL TRAIL

Benefits of the proposed multi-use trail fall into four related areas; economy, preservation, recreation and health.

REGIONAL ECONOMIC BENEFITS

A high quality trail system that provides family oriented outdoor activities will create a destination for tourists in St. Lawrence County and surrounding counties. The trail is being developed via a community based recreation planning model and will result in community recreation corridors that utilize forest lands as a net benefit for surrounding communities, not only in St. Lawrence County, but neighboring counties as well. This approach will encourage tourists to travel to St. Lawrence County and remain longer. Visitors will seek local restaurants, lodging, fuel stations, merchandise sales and vehicle services. Many visitors are expected to arrive by car and will seek additional services at trail heads. Numerous national studies show the potential for this trail to create new jobs in St. Lawrence County. Recent economic impact studies show that the ATV industry brings in over 200 million dollars and the snowmobile industry brings in over 260 million dollars to the State of New York each year. In addition, a recent study estimated that over 2 million bicycle tourists spent 36.3 million dollars in one year. With the development of this trail, St. Lawrence County should capture more of these revenues.

The construction of a multi-use trail of this significance would make St. Lawrence County and surrounding counties a more attractive destination for outdoor enthusiasts of all kinds. It will provide the opportunity to showcase the wide array of recreational and cultural opportunities available, encouraging people to come and stay longer

Other states are already capitalizing on this type of approach and studies near other large regional trail systems show an overall increase in property values, as people like being near such a great resource. It can be an incentive to seasonal residents and a selling point to business and individuals to relocate to our area which increases our tax base.

PRESERVATION BENEFITS – ENVIRONMENTAL, CULTURAL & HISTORICAL

Years of sporadic maintenance and neglect have allowed sections of our older trails to suffer extensive deterioration to the infrastructure. Active use as part of a greater system, with increased oversight and maintenance, will increase awareness and result in earlier intervention before problems become more dangerous and more costly.

The North Country has a long and proud heritage of living, working, and playing in the great outdoors. Our traditions will be preserved with a better understanding of the wise use of our natural resources, careful planning and maintenance, and better management. It is our sincere belief in environmental protection that will guide this plan.

The North Country also has a long history, from logging and railroads to agriculture and traditional sportsmen's camp. It is our hope that this history can be illuminated at many points

along our system. This not only preserves that heritage and history, but provides educational opportunities and adds much to the interest and enjoyment of a great trail experience.

RECREATIONAL BENEFITS

Our residents who live near the trail will have the opportunity to use it frequently, and it also will attract visitors who will find the length of the trail, the easy grades and unparalleled natural beauty an enhancement to their vacation plans.

The fastest growing segment of recreational trail users in the last several years are the ATV/UTV riders. The criticism of this group has been widespread; however, we believe safe and legal trails will provide ATV riders with an alternative to informal trails that may be damaging to the environment. With an aging population and the advent of more comfortable machines, a well-planned and managed trail system can be a boon to both sides of the motorized use argument.

HEALTH BENEFITS

The trail would be part of a county and statewide effort to provide opportunities to engage in exercise to improve cardio-vascular health and reduce obesity. Numerous studies have proven the health benefits of trails, to all users, from hikers and cyclists to ATV and snowmobile users.

In addition, a good trail system allow for the youngest and oldest of our population to access our wonderful outdoors. People with disabilities benefit greatly from easy entry and well maintained terrain.

Providing access for rescue and/or emergency vehicles should not be overlooked. Many agencies and fire departments are adding all-terrain rescue vehicles to their inventories, and just getting to an injured or lost person in the woods can be a critical issue.

MULTI-USE TRAIL MANAGEMENT

Ultimate management responsibility for this trail system lies with the entity whose name it bears: St. Lawrence County. Major management/legal decisions will be approved/disapproved by the Board of Legislators, based on recommendations provided to it by the Recreational Trails Advisory Board, whose job it is to research, plan and implement trails. The Trail Coordinator has daily management oversight of the system and works to facilitate plans and monitor trail usage, oversee maintenance and make recommendations to the Advisory Board and/or Board of Legislators per the Coordinator's contract.

This Multi-Use Trail System will be made up of trails on both public and private lands. Multi-purpose does not mean all uses in all areas. Segments may require permanent restriction based on environmental attributes or the wishes of landowners. Site-specific and seasonal closures of trails, or portions thereof, may occur in order to perform maintenance, minimize soil displacement, protect public safety, protect resources, or other management needs which may arise. Alternative trails, when needed, may be established and rehabilitated as part of the maintenance program.

The intent of this plan is to develop a system that provides access to trails from the Lewis and Jefferson County trail system across St. Lawrence County into Franklin County. This system should have a series of loops in order to maximize functionality and to minimize impacts. It is also the intent of this system to encourage, to the greatest extent possible, off-road use of ATV's on a managed trail system. However, the use of connecting roads to complete the loop is unavoidable. Therefore, as the plan evolves over time, and

more opportunities for public off road use arise, these additional elements will be incorporated. The Trail Plan will therefore be comprised of the following potential components:

County Reforestation Lands	Private Trails
Railroad Corridors	Utility Corridors
Recreation Easements	Town Roads
County Roads	Recreation corridors/connectors
State Lands	Recreation corridors/Community connectors

The development of the system will be facilitated by community based recreation planning where stakeholder groups from communities, other recreational stakeholders and governmental agencies will collaborate to develop this comprehensive network.

INSTITUTION OF A REVOCABLE PERMIT SYSTEM (ATV/UTV)

The County understands that there are different legal standards involved in opening trails to ATV traffic and will work within the law to make a safe and legal system for ATV users. An ATV/UTV permit system will be implemented to assist in several ways. It is an effective tool for monitoring trail use and provides funds for higher anticipated implementation/maintenance requirements and is a visible reminder of the privilege of trails.

A portion of permit fees will be dedicated to public safety, trail monitoring and resource conservation.

Trail riders who violate trail or safety regulations will have their permit suspended for a specified period of time and repeat offenders may lose the permit permanently.

St. Lawrence County may institute its own permit system, or partner with neighboring counties as part of a regional system.

SPECIAL USE EVENTS

The County will develop regulations for special events where the Multi-Use trail system is to be used.

For example, competitive motorized events will not be permitted anywhere within the County trail system. Motorized events will be limited to noncompetitive touring events or rally-style events. Non-motorized events, competitive and non-competitive will be permitted when and where appropriate. Examples of some non-motorized events are: mountain bike races, cross country ski races, dog sled races. Permits from governmental agencies will be secured as required.

MAPPING, MARKETING AND INFORMATION RESOURCES

Well detailed maps are essential to the operation and enjoyment of the trail system and should be kept current and updated as necessary to provide accurate information.

A central website trail users can go to for information, education, maps, regulations, latest conditions, contacts and comments, with links to local businesses and services will be established, regularly updated and kept current.

A marketing plan utilizing the concept of destination marketing will maximize return on the investment in the trail system and will be formulated in coordination with the County, the County Chamber of Commerce, user groups, local businesses and other stakeholders.

TRAIL ENGINEERING

General

Users should be provided a variety of quality trail experiences that enhance the enjoyment of our natural resources. This can be accomplished by providing a mix of tight trails and open trails that provide a variety of settings, appropriate speeds, and challenges.

A trail experience will be provided, not a highway experience. This will be accomplished through tighter alignment, narrower clearing, leaving more obstacles in the trail, and other methods that produce slower speeds.

The Trail Coordinator will research other trail systems to build on successful methods and provide the best trail experience for users and the best return on investment as it relates to our trail system.

Trails will be designed and located, to the extent possible, in a manner that maximizes the views of the region's outstanding natural features and take advantage of changes in settings, vegetation, soils, and topography.

Trails will be constructed and maintained, to the extent possible, to blend with the topography by curving and flowing with the natural contour. They will be self-draining where possible with rolling grades where possible. Where grades cannot be rolled, erosion-controlling structures will be installed. Removal of vegetation, rocks, and other features will be kept to a minimum.

Soils exhibiting the potential for unacceptable levels of displacement or dust levels would be hardened or stabilized with gravel or other means. This does not mean that fill will be placed within wetlands, their buffers or other environmentally sensitive area.

Trails will be designed following guidelines established by the United States Forest Service, the National Off-Highway Vehicle Conservation Council, and the International Mountain Biking Association.

New trail construction will be designed to avoid sensitive areas, whenever possible. If avoidance is not possible, mitigation measures will be employed.

Vegetation removal will be to the minimum extent possible and managed for safety including sight distances.

Existing roads that are currently impacting resources at unacceptable levels would be re-routed or improved to reduce impacts

Safe riding practices will be promoted. It is recognized that accidents and personal injury are inherent risks and there is often a fine line between a hazard and an obstacle or experience that requires challenge or technical skill. Generally, a natural feature will not be considered a hazard as long as the skill required does not exceed the difficulty level of the trail. Any feature that creates an obvious potential hazard will be removed or mitigated.

Trail Treads

Trail treads when constructed, will be constructed 50" or less depending upon difficulty level. Narrow treads and narrow clearing reduces speed and increases the trail experience. Reducing speeds increases safety, reduces trail maintenance because moguls develop slower, and increases the amount of time users are on the trail.

All trails will be two-way use except where designated. Speeds should be reduced and trail users should be anticipated around every turn.

Clearing

An acceptable clearing width will be maintained in order to further reduce speeds and provide a natural experience. Safety will not be compromised. Green limbs and flexible brush that encroach within the clearing limits will generally be left in place if they do not unduly infringe on sight distance or form a safety hazard.

Signing

Quality signing and mapping will be provided to promote visitor safety and user knowledge of their location. Signing on the ground that matches information on maps and vice-versa will be emphasized.

Signing will be kept to a minimum to increase the trail experience and improve aesthetics. Reassurance markers will be placed after each junction, at all road crossings, and at any point where there may be confusion as the continuing direction of the trail. Stop and Stop Ahead signs will be used as needed where trails cross other trails or roads.

Signage will be adapted from NYS OPRHP Snowmobile signage regulations, as well as other OHV trail systems in the area including the Lewis, Franklin and Jefferson County's systems. To the extent possible sign colors (county specific), shapes, and messages will be consistent throughout the trail systems.

Travel management signs will be placed at trailheads and other key areas to inform the public as to which uses are allowed on particular trails and other regulations.

Facility Design

Informational kiosks will be located at trailheads and other appropriate locations. These structures will offer information on interpretive opportunities, general area regulations, maps, noxious and invasive species control, wildlife, and other issues. Whenever possible, native materials will be employed to blend with the setting of the kiosks.

Trailheads will be of a primitive design with few facilities. Restrooms may be installed as deemed necessary. Trailheads will be designed to accommodate larger vehicles towing trailers.

The perimeter of the trailhead would be fenced where needed to prevent user created expansion and impacts.

Roads and Engineering

If skidder roads are converted to trails, narrowing and the use of natural features would be incorporated into the trail design when possible, in order to increase trail diversity, reduce vehicle speeds, and minimize visual resource impacts.

Existing roads that are utilized as part of the designated trail system will be signed as Shared Use Roads.

Trail closures will be conducted utilizing one or several mechanisms such as signing, gating, blocking, obliterating or camouflaging. Each closure will be evaluated individually to insure the most appropriate methods are employed.

Private Land

There are existing trails currently in use across privately owned land within the County. These trails may become part of the Trail System. The policy and process for accepting a private trail into the Trail System will be outlined in the generic environmental impact statement. No part of the Multi-use Trail System will cross private land unless an agreement, right-of-way or easement is in place.

TRAIL MAINTENANCE OBJECTIVES AND MAINTENANCE GUIDELINES

The purpose of trail maintenance is threefold: protect user safety; maintain the trail in a condition where the width, depth, drainage, and control of the riders are adequate to protect adjacent resources; and keep the trail within the parameters of the designed trail management objectives.

Maintenance needs are dynamic as they are constantly changing and growing. This plan outlines the work anticipated to meet the above objectives, but at no time will a large trail system be in a condition of being 100% maintained. Trails will require periodic maintenance to ensure continued ride ability and compliance with the criteria set forth in this plan. Some trail treads will be in very good condition, some will be in good condition, and some will be in poor condition. Those in poor condition will be identified and placed on the maintenance plan, unless there is a safety or resource concern that dictates immediate attention.

Maintenance will be based upon results of physical monitoring.

Trails will be maintained as needed to protect resources, maintain design standards, and insure public safety. The St. Lawrence County Trail Coordinator will ensure that appropriate maintenance is performed in a timely and effective manner with the use of the St. Lawrence County Highway department, Towns and ATV club members.

General Maintenance

All maintenance will be completed in a timely manner as need arises, dependent on the availability of personnel, equipment, and appropriate weather to effectively perform the work.

A Trail Patrol Program will be setup by the St. Lawrence County Trail Coordinator that would assist with day-to-day maintenance such as pruning of vegetation and the picking up of litter. Garbage and litter along roads, trails, and in trailheads will be picked up regularly to maintain a neat, clean, professional appearance.

They would also assist in identifying maintenance needs and reporting this back to the Trail Coordinator and Recreational Trails Board. Any undue hazards that are identified will be treated as a priority.

Results of physical monitoring will direct annual trail maintenance and the trail areas to be worked on and the recommended treatments. All maintenance performed will be recorded in a maintenance log to facilitate future planning and accounting of the maintenance work performed.

Trail condition surveys may also be employed, seeking user comments, to identify maintenance needs.

Trail grooming will be performed on high use trails to slow the growth of moguls and deter the degradation of trail surfaces. Before moguls have developed to the point that users ride off to the side of the trail, the trail will be scheduled for reconstruction.

It is extremely important not to over-maintain the trails. These are trails, not roads, so they must be challenging and interesting.

Any off-trail tracks will be restored to a natural state or obliterated whenever practicable.

Clearing Maintenance

Dead, inflexible limbs will be pruned during regular maintenance. To the extent possible, pruned limbs should be cut flush with the trunk.

The hauling out of debris and logs should be performed to ensure that adequate width and turning radius is maintained.

Debris, logs, and other cut material should be placed strategically to prevent shortcutting the trail or to deter off-trail use.

Logs meeting a specified obstacle height may be left in place provided they are solid, do not move or roll, and are nearly perpendicular to the trail.

Trees that are leaning over the trail or suspended over the trail may be left in place if at an appropriate height above the trail tread and there is adequate sight distance in both directions to see and react to the potential obstacle.

Signing Maintenance

Any trail signs that are vandalized would be replaced as soon as practicable. Replacing safety and regulatory signs will be a priority.

PUBLIC SAFETY, TRAIL USAGE MONITORING & LAW ENFORCEMENT

Public Education

Most often rules are violated out of ignorance, not out of spite or malicious intent and this plan reflects this. Engineering and education will be the primary tools to gain compliance; law enforcement will be secondary.

A full program will be developed for public presentation on a regular basis. This program would not only concentrate on safety issues, but should include strong promotion of "best use" practices, which will demonstrate how to use/ride trails to minimize human impact on terrain and natural resources. It should also include a section on current rules, regulations and laws pertaining to use. Public clinics, sponsored by the County and user groups, prior to season, should be conducted at outdoor trade shows, informational meetings, sportsmen's shows, etc.

Literature, posters and handouts will be made available in trail kiosks, at trail service businesses and so on. Brochures on safety, soil compaction, wetlands, endangered species and invasive species should be available and be integrated into other training initiatives.

Organized clubs subscribe to and promote safety and resource conservation through education programs such as "Tread Lightly", ATV Safety, International Snowmobile Manufacturers Associations "Safe Rider", manufacture training and others. Trail user groups currently conduct certified safety training on state and local levels, and will continue to do so.

Maps issued will have trail rules and regulations, as well as any specific rules or restrictions pertinent to any given area. NYS DMV ATV and Snowmobile regulation brochures will be available at trail kiosks also. Rules and regulations will be periodically reviewed and revised as circumstances dictate. In all instances, NYS regulations come first, with specific trail guidelines added appropriately.

Trail Monitoring and Community Policing

A Community oriented approach to policing is the preferred approach to developing responsible ridership and relationships with law enforcement.

It is widely recognized that user groups are most effective at monitoring their own. Responsible trail users will report misuse, and to promote safe and responsible trail use among others they encounter on trails. Violations will be reported to the appropriate authorities.

Trail Incident Reports (see sample attached) will be available at all kiosks and trailhead parking areas, as well as on the Trail website, where a trail user may report any maintenance problem, user violation, conflicts, etc. These should be collected frequently by trail stewards and immediate follow-up action taken.

Trail stewards, individuals who frequent specific sections of trail, will also record safety and other issues and bring them to the appropriate committee of the Trail Advisory Board. Areas of concern may be documented via digital camera.

User groups and other community organizations are encouraged to engage in "stationary monitoring" during periods of high trail usage (holiday weekends, etc.) acting as "Trail Ambassadors" who will hand out literature, answer questions, and promote our area, while ensuring that trail users are aware the trail is monitored. Environmental management students, YCC, Scouts, Sportsmen groups, etc. will be encouraged to participate in the worthwhile volunteer opportunity. This would also provide an excellent opportunity for state and local law enforcement to interact positively with trail users and become a part of the "trail community".

The prevention of problems is always best, and in areas with a greater potential for violations, or in areas where it is found that problems are occurring, several methods may be instituted. These may include screening with natural planting (hedges), the placement of natural barriers, fences or gates, rerouting, or concentrated enforcement efforts.

In areas with reports of repeated violation, the use of trail cams and video technology may be employed to identify violators for prosecution.

Fines and penalties associated with infractions are currently in place through V&T, Environmental Conservation law and other relevant statutes. Local laws and penalties may be adopted as needed

Engaging Law Enforcement Entities in Efforts Relating To Trail Use

A strong coalition of all involved trail administrators, educators, enforcement agencies, and local courts will be forged to promote universal understanding of the most current laws and regulations and mutual vision of enforcement and penalties.

Forest rangers, State Police and County Sherriff's will be encouraged to participate in meetings, safety training and other gathering where riders are educated and briefed on the responsibilities of safety and resource conservation.

Meetings will be held pre-season with the coalition to ensure critical issues and areas needing attention are addressed. Communication is crucial for the success of the trail system.

Existing police agencies currently have enforcement authority in areas to be covered by the trail system and currently we believe sufficient resources are available. To assist in agency efforts, every attempt will be made to secure funding, grants and legislation for trail funds, to provide agencies with time and equipment.

KEEPING OF EMPIRICAL DATA

Over and above standard best expense/income accounting practices, the gathering and keeping of empirical data is essential to making a trail system sustainable and providing a great experience for everyone using the trail, which achieves our goals and objectives. The Trail Coordinator will employ systems to track data. Such statistics may include, but are not limited to:

Number of trail users	Complaints and violation/penalties levied
User comments	Community comments
Results of surveys	Education and training sessions and meetings

MEASUREMENTS

Also of extreme importance is data related to measuring the effectiveness of the trail system in meeting goals and objectives. These statistics can be of great value in seeking future expansion, funding and marketing. Such information should be updated regularly:

- Number of partners in public-private organization
- Value of in-kind and cash investment committed to projects
- Evaluation of value of new private investment encouraged trails
- Evaluation of new visitor spending encouraged by trails
- Evaluation of jobs and business income supported by trails
- Evaluation of increased property values supported by trails
- Evaluation of improved State and Federal investments due to trail planning
- Evaluation of perceived quality-of-life improvements

Revised Figures
Proposed Multi-Use Recreational Trail System