



February 6, 2014

Dennis B. Bulger
Supervisor – Town of Colton
94 Main Street
Colton, NY 13625

Dawn C. Howard
Conservation District Manager
St. Lawrence County Soil and Water Conservation District
1942 Old Dekalb Road
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Matt Johnson, Compliance Manager
Brookfield Renewable Energy Group
399 Big Bay Road
Queensbury, N.Y. 12804

Re: Comments on Stone Valley Management Plan (electronic submission only)

Dear Land Managers:

The following comments are being submitted on behalf of the Colton Dirt Dogs ATV Club Inc. Our club is comprised of fifty outdoor enthusiasts from Colton, South Colton, and the surrounding area, and countless more supporters who are not active members. While the primary focus of our club is the promotion of safe and responsible motorized trail use, we are supporters and participants in all trail sports, and avid users of the trail systems located alongside the Raquette River.

Specific comments with the documents provided are as follows:

1. Draft Management Plan

a. Item number (7) under “Current Concerns” states:

“Motorized access. Towns of Pierrepont, Colton, and Parishville have requested Brookfield to permit ATV access within the Stone Valley Cooperative Recreation Area. Motor access would add economic benefit to the area, say proposers. Currently, Brookfield Land Use Policy excludes motors from company land.



FERC and Brookfield are both concerned about safety and security issues on that route. Other avenues to the hamlet may be explored.”

- i. How can a request by three of the property owners be seen as a concern for a group that is representing those land owners. Furthermore St. Lawrence County has been outspoken in its support for responsible ATV and snowmobile trail use. Therefore, can the source of this concern be identified (i.e. who has this concern)
- ii. Motorized use is clearly called out as a permissible “special use” under **Section III (B)** and also **Section III (G)** of the **Brookfield Land Use Policy**. It also specifically calls out ATV/Snowmobile trails as a permissible special use. Literally every use that is described in the **Stone Valley Management Plan** is listed as a “restricted” or “prohibited” activity per the **Brookfield Land Use Policy**. This includes swimming, entering the river bed, and mountain biking. Calling out motorized use as an activity that is treated differently than any other activity detailed within the **Stone Valley Management Plan** is completely inaccurate and misleading. For this reason we request that **Item 7** under **Current Concerns** should be removed in its entirety from the **Stone Valley Management Plan**.
- iii. This item additionally states “*FERC and Brookfield are both concerned about safety and security issues on that route*”. Is there any documentation that validates that FERC has reviewed this issue, and in fact deems ATV use as a concern? Furthermore, is there any documentation that details specifically what FERC regulation is the source of this concern, and how allowing motorized use of certain access roads is a deviation in the current protocol in regard to security or safety? Motorized vehicles as well as foot traffic current have no standoff distance from the power house critical structures (you can drive a vehicle right to the power house without a robust barrier to prohibit this action). How is ATV or snowmobile access viewed as a deviation from the status quo?

2. Map Of Stone Valley Corporative Recreation Area

- a. Have the areas that are highlighted on this map been designated as solely falling under the jurisdiction **Stone Valley Cooperative Recreation Area**. When the area was first designated in 1989, was this the original size of the area, or has it changed since. What is the process for changing the footprint of the area?

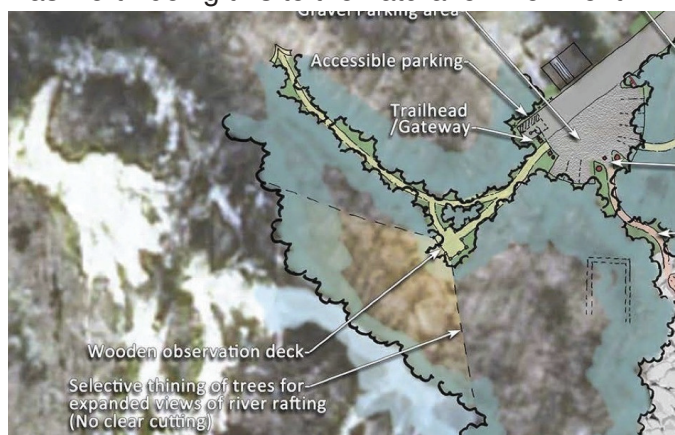


3. Map Of Planned Trail Near O'Malley Brook

- a. Why is this trail called out as a “planned trail” when it has already been constructed? This is also called out under “planned” work in the **Draft Management Plan** on **page 12**, yet in this section it specifically states that this work began in June of 2013 and was completed in Dec of 2013 (which is inaccurate).

4. Map of Plans near SE entrance in Colton

- a. The portion of this map that details a “museum and paddling center” at the Town’s fire station is outdated and needs to be revised to remove these areas
- b. Is the overflow parking area shown on this map within the **Stone Valley Cooperative Recreation Area** or is this the area where the Fire Department currently parks their equipment? Has the Fire Station granted permission for this parking area?
- c. Does this map depict a walkway within the river bed? Is this not a violation of the Brookfield Land Use Policy, and has the permitting been obtained to modify the river bed in this fashion? Furthermore is this not a violation of the **Draft Management Plan** section on protecting geological features.
- d. The plan depicts a large area of trees to be cut at the entrance of the trail for a viewing area. This area appears to be **over half an acre** of land to be cleared. What was the basis for the decision that the added value of this viewing platform was worth doing this to the natural environment?





5. O'Malley Brook Bike Trail Project Description

- a. Why is the submission date for this plan **Dec 10, 2013** when construction of this trail was substantially completed prior to October, 2013?

6. Project Description Form

- a. *"The Stone Valley partners request that proposed work on land within the SVCRA boundaries be reported to them for discussion and suggestions before pursuing acceptance from the relevant property owner(s)."*
 - i. It is our opinion that the Stone Valley Partners to this point have not been objective when considering the interests of all user groups. The biased approach that has been taken is evidenced in the draft of the **Stone Valley Management Plan** itself. The plan highlights a specific group of users, including the use of photos that add no value to the plan. At the same time, it lists other activities that are supported by the majority of the land owners, and residents of the area as a "concern". Thus, we feel the request by the Stone Valley partners to have proposed work by other groups be submitted to them for review to be completely unreasonable, and feel this provision should be eliminated in its entirety.

Thank you for the opportunity to comment.

Daniel J. Murphy
President and Co-Founder
Colton Dirt Dogs ATV Club Inc.

CC;

Town of Parishville (electronic copy only)
Town of Pierrepont(electronic copy only)
John Omohundro(electronic copy only)

February 4, 2014

Matt Johnson, Compliance Manager
Brookfield Renewable Energy Group
399 Big Bay Road
Queensbury, NY 12804

Dawn C. Howard
Conservation District Manager
St. Lawrence County Soil and Water Conservation District
1942 Old Dekalb Road
Canton, NY 13617

Re: Comments on Stone Valley Management Plan

Dear Land Managers,

The following comments are offered after review of the draft plan submitted by the proposed management partners and attendance at last night's presentation meeting:

1. The opening paragraph of the plan states that the purpose was to coordinate among multiple owners, managers and users with enjoyment by all. While stated, this does not appear to be true throughout the entire document. The discrimination against motorized access and use is prevalent within all aspects of this plan. The authors have been aware for quite some time that a community connector trail has been desired in this area by residents of Colton, Pierrepont and Parishville as evidenced by numerous public conversations and correspondence dated August 2013 from these communities to Brookfield. Motorized access had been allowed by Niagara Mohawk since before the SVCRA 1989 dedication until approximately 2007 when Brookfield disallowed utilizing the penstock trail under "special use" as a community connector. This point was reiterated and shown as

an obvious bias towards these user groups in the plan and at the meeting. Also, during this time period there was never a recorded safety or security issue relative to the penstock trail.

2. The original SVCRA did not include property owned by Parishville or Pierrepont and the original footprint was not as large as shown by the maps attached to the current plan. This is verified by original documents and correspondence from Saratoga Associates. Any type of land management plan typically includes defined boundaries as well as a detailed inventory of assets, notable features and current improvements as a basis for potential design and/or use changes. Proposed improvements or changes to the property where economic and environmental impacts will occur should be addressed in an approved format as well. The plan does not include these basic components.

As owners and managers of this beautiful and unique property I ask that you reject this plan until a more balanced and objective plan can be formulated utilizing all affected user groups and participants without bias.

Thank you for the opportunity to comment on this matter.

Respectfully submitted,

Schyler J. Shea

Colton, NY

cc: Town of Colton

Town of Parishville

Town of Pierrepont

Feb. 5, 2014

Dear Mr. Omohundro,

I've read with interest your Stone Valley Trail Report. I think it would be a great improvement in drafting this plan if you & your friends considered the disabled and elderly who would enjoy this type of scenery, but can't.

Why cut out our friends and neighbors who would ride in a side by side or 4 wheeler at a speed of 5mph or less. I brought this idea up at an earlier fall meeting but it fell on deaf ears.

Unless this provision is provided, I will be encouraging fellow Town Board members in my town & other towns to not approve your plan. In my mind this is a form of discrimination and short sightedness.

Please make this trail for everyone.



Copies to
Town Board
&
Coastier
&
North Country

Sincerely

Conrad Cook

Parishville Councilman

Conrad & Yvonne Cook
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