Snowguns and Hose

Tower Guns

Hose

Estimated Capital Costs

Total (+5% engineering and design fees and 15% contingency) – $2,180,003

d. Base Area/On-mountain Guest Services Improvements

No proposed actions.

e. Utilities

No proposed actions

4. **Phase 4 - Immediate Improvements**

a. Improvements of Ski Lifts

Lift B – The existing Bear double chair lift should be replaced with a fixed grip quad chair, and the bottom terminal should be relocated as shown on the drawings to make it more easily accessible to the novice and low intermediate skiers.

This action was proposed in the 1996 UMP.

Estimated Capital Costs

Lift B (replace double with quad) - $719,040

Total (+ 15% contingency) – $826,896

b. Improvements of Ski Trails

Lower Mountain: The improvements on the lower mountain consist mainly of the widening of certain low intermediate, and intermediate trails in order to satisfy FIS requirements for Downhill homologation. A minimum 40 meter-wide route must be established through the mid-mountain area. Routing the Downhill course down Broadway, Ladies Bridge, and Lower Gap,

circumventing the mid-station/ mid-mountain lodge intersection is also recommended. Each of these trails will be widened to a minimum of 40 meters. This solution will allow downhill races to occur without disturbing the traffic patterns on Lower Valley, allowing intermediate skiers to descend Little Whiteface and upper mountain areas without interfering with race events.

Estimated Capital Costs

Lower Mountain - $50,400

Total (+ 15% contingency) – $57,960

*c. **Base Area/On-mountain Guest Services Improvements***

No proposed actions.

*d. **Utilities***

No proposed actions.

5. Phase 5 - Immediate Improvements

*a. **Improvements of Ski Lifts***

No proposed actions.

*b. **Improvements of Ski Trails***

Easy Acres pod (formerly Kid's Kampus): Selective widening of Bronze, Gold, Silver, and Silver Shoot in order to lower the effective ability levels of these trails and improve traffic flow patterns in this designated novice learning pod is recommended. These suggestions were approved in the 1996 UMP, however most but not all improvements have been implemented.

Estimated Capital Costs

Easy Acres - $16,500

Total (+ 15% contingency) – $18,975

c. Base Area/On-mountain Guest Services Improvements

Mid-station Lodge – The Mid-station Lodge will be relocated approximately 150 feet to the south of its current position to improve skier circulation in this area and particularly on the Lower Valley trail.

This action was proposed in the 1996 UMP.

Estimated Capital Costs

Mid-Station Lodge relocation - $385,000

Total (+5% engineering and design fees and 15% contingency) – $462,000

d. Utilities

No proposed actions.

E. Future Planning

Although the content of any UMP is dictated by the Adirondack Park State Land Master Plan, and it is not required to identify future projects and activities that are conceptual in nature, in a effort to forecast future projects, information concerning a number of projects that are conceptual in nature has been included in the GEIS.

The inclusion and discussion of these conceptual actions, such as the snowmaking reservoir, the Cloudsplitter Lodge, and the Tree Island Pod, in this GEIS as potential future actions to be covered by separate UMP amendments and accompanying SEQRA reviews, demonstrates ORDA's commitment to long range future planning.

The 1996 UMP for Whiteface called for creation of additional downhill trails. As can be seen in Section I.E., Table I-1, "Status of 1996 UMP Update and Amendment," much of this work remains to be completed and is incorporated into the 2004-2009 management actions. Similarly, the improvements proposed within the 2004 UMP will be realized over time, as time and budget constraints are prioritized.

Whiteface staff work hard to maintain the Ski Center and to provide some of the best ski terrain in the country, for recreational and ski racing teams, serving beginning through expert skiers and snowboarders. The economic benefits realized by the community as a result of patronage at

Whiteface is due in large part to the quality experience enjoyed by skiers at Whiteface, and is based on much hard work and skilled management by ORDA's staff.

With regard to future planning, there are no plans to increase the constitutional limit on the total length of ski trails allowed at Whiteface. The long term goal is to improve the skier experience while not expanding the ski slopes beyond the allowable limit. Whiteface is unique in the northeast as the former site of two Olympics. The available terrain has challenged the best skiers in the world, and modifications since 1980 have made the mountain skiable for the recreational skier. Recent improvements to lifts, including the installation of the gondola, improve the capacity of the mountain while simultaneously improving the skier experience. These types of upgrades have been and will continue to be the focus of mountainside improvements.

This UMP represents the continuation of a planning process for Whiteface that takes into account the Adirondack Park State Land Master Plan and Article XIV of the NYS Constitution, including the special provisions of Article XIV that authorize the construction and operation of ski facilities on Whiteface Mountain. Whiteface is quite unique because it is a designated Intensive Use Area within the Forest Preserve. As an Intensive Use Area, Whiteface's basic management guidelines include providing facilities for intensive forms of outdoor recreation by the public. At the same time, Whiteface is still required to blend with the Adirondack environment and have minimum adverse impacts on surrounding State lands.

The project has not been segmented since the known or likely programs and construction projects have been disclosed in the UMP/DGEIS. Therefore, SEQRA has not been avoided by dividing the UMP into smaller segments not subject to SEQRA. Further, the UMP/DGEIS recognizes that further management actions will be subject to either a UMP update or a site specific EIS as may be required to adequately evaluate the potential environmental impacts. Critical to the success of an EIS is the availability of adequate factual information, plans, and reports in order to make as full as possible an evaluation of impacts. At this time that level of documentation is not available for substantive discussion of the Cloudsplitter Lodge, the snowmaking reservoir or the Tree Island pod, therefore, future analyses of these currently conceptual actions will be required. Refer to GEIS Section V for the discussion of the potential environmental impacts and mitigation measures and alternatives.

V. POTENTIAL IMPACTS AND MITIGATION MEASURES

This section discusses potential impacts from the proposed 2004 management plan actions. In some instances, potential impacts from Conceptual Actions are also preliminarily discussed. Where significant impacts are identified, mitigation measures are accordingly proposed. Site-specific impacts generally relate to natural resource features such as vegetation, soils or visual characteristics. The specific number of trees, type of soil, or extent of viewshed affected is presented for such impacts. Lastly, traffic impacts have been assessed based on peak use characteristics, including Conceptual Actions, since such occasions have the greatest potential to impact traffic.

There are no other projects of significance in the study area which affect the calculations in this section; hence a separate discussion of cumulative impacts is not warranted.

A. Physical Resources

1. Topography, Geology and Soils

Impacts

Impacts to soils and slopes associated with the proposed improvements are most likely to occur in areas of construction of new ski trails and widening of existing trails. For non-trail areas, slopes in the area of the new NYSEF building are in the range of 15% to 20%. Mitigation measures are provided.

Trees and other woody vegetation will be removed over a total area of about 16.35 acres. In some places, it may be necessary to remove boulders and to grade, which will involve cutting and/or filling. These activities will result in exposure of soils, which will then be susceptible to erosion.

Most of the soils mapped on the mountain and observed during numerous visits to the site are shallow to very deep, coarse textured glacial till soils. Organic soils (Folists) on steep uplands are generally in a complex pattern with the local deep or shallow glacial till soil. There will not be any extensive areas of folist soils that will be impacted by this project.

Mitigation Measures

The following measures will be employed to mitigate the potential impacts on soils and topography during construction:

1. Construction Pollution Prevention Plans and Best Management Practices

Erosion control measures, including such best management practices (BMPs) as filter fabric fences, erosion-control blankets, water bars and staked straw bale filters will be used downslope from all areas where soils will be disturbed by excavation, grading, or deposition of fill. These BMPs are specified in the Draft Construction Pollution Prevention Plan in Appendix U.

- Whiteface personnel are experienced in ski trail and lift construction, including erosion control techniques. In June of 2003 Whiteface hosted an erosion and sediment control workshop that was taught by one of the region's leading experts on this subject. Personnel from Whiteface as well as the APA and DEC participated in this workshop that combined teaching sessions and on-mountain examinations of past and on-going erosion control measures at Whiteface.

- A revised draft Construction Pollution Prevention Plan (CPPP) has been prepared and the draft CPPP identifies specific best management stabilization and erosion control measures to be taken during construction. See Appendix U. The CPPP includes details of specific best management practices produced by the USDA – Natural Resources Conservation Service, as well as other practices and materials that have proven to be effective in controlling erosion, particularly on steeper slopes. A discussion of specific erosion control products recently developed for the purpose of establishing vegetation on steep slopes is provided, as are specifications for their use. The Construction Pollution Prevention Plan (CPPP) presented in Appendix U is a draft and not intended to satisfy all of the requirements of either the old NYSDEC General Permit (GP-93-06) or the current version (GP-02-01) for stormwater discharges from construction activities. However, this draft version of the CPPP was prepared and included in this GEIS to provide information on the practices that will be implemented on a site-wide basis during individual construction projects.

- Specifics of the CPPP such as the "site specific plans" and "future schematic design phases" are required to be prepared and submitted to NYSDEC under their General Permit GP-02-01, "SPDES General Permit for Stormwater Discharges from Construction Activity" (January 8, 2003). In accordance with GP-02-01, these materials will be prepared by a licensed/certified professional and submitted to NYSDEC for review and approval prior to beginning construction of the pertinent management activity. As required, this submission will contain stormwater quantity analyses, detailed plans, BMP installation details, as well as construction specifications. Prior to beginning construction, project-specific CPPPs will also be provided to the Adirondack Park Agency for review and appropriate determination to ensure compliance with applicable regulations and Agency guidelines.

- For example, Appendix P contains the CPPP prepared specifically for the construction of Lot #5 which is a proposed action in this UMP. This CPPP contains sufficient construction details and specifications necessary to ensure proper BMP implementation during construction of Lot 5 and has been submitted for agency review prior to construction.

- As proposed in the Lot 5 CPPP, it is best to limit the areal exposure of soils as much as possible through proper project phasing, and to install filter fabric fences, water bars and erosion control blankets and other best management practices as needed in order to minimize or eliminate the potential for erosion of exposed soils.

- It is recommended that the construction manager for all construction projects be equipped with a copy of "New York Contractors Erosion and Sediment Control Field Notebook" prepared by NYSDEC and the USDA-NRCS. This is a pocket-sized document that provides contractors a quick handy guide for the installation and maintenance of erosion control practices as well as guidance for field-adjustment procedures to be implemented during construction on an as-needed basis.

2. Seed Mix for Slope Stabilization

Stabilizing newly constructed ski slopes with vegetation was closely examined to determine what products and practices could be effectively implemented to

provide rapid vegetation establishment and long term sediment and erosion control.

The seed mix proposed for stabilizing the majority of the constructed ski trails at Whiteface Mountain is known as an "Adirondack Mix" that is commercially available from local seed suppliers. The composition of this mix from one such supplier (components are the same, proportions may vary slightly) is as follows:

43.65% Boreal creeping red fescue
34.3% Perennial ryegrass
17% Kentucky bluegrass

The boreal red fescue is well suited to the climatic conditions on Whiteface Mountain while the perennial ryegrass will provide rapid germination (as soon as seven days). Kentucky bluegrass is a good general use low growing species that is capable of spreading in open areas via its rhizomes.

The Adirondack seed mix that is recommended in the draft CPPP for Whiteface has proven to be very effective when used to stabilize soils as part of ski slope construction in the Adirondacks. Recent trail construction at Gore Mountain for the Bear Mountain Pod utilized the Adirondack seed mix. Gore Mountain reported that the Adirondack Mix performed very well with good germination and good coverage providing effective post-construction stabilization on their new ski slopes. The advanced trails at Gore Mountain on which the Adirondack Mix was used consisted of many areas where slopes were 40% or slightly steeper. The slopes, soil types and elevations where the Adirondack Mix was successfully used at Gore are similar to the conditions at Whiteface. The seed mix has also proven to be tolerant of the different microclimate conditions created on ski trails caused by a deeper and longer lasting snow pack due to snowmaking operations.

A seed mix devised by NYSDOT for use on road construction projects involving steep slopes was considered as an alternative to the Adirondack Mix. This seed mix contains a number of wildflowers as well as sheep fescue and annual ryegrass. Components of this mix were chosen by NYSDOT because of their ability to produce a root system of varying root types, including fibrous shallower roots and deep tap roots.

Given the fact that the Adirondack Mix has proven to be effective for stabilizing ski trails constructed in the Adirondacks that are as steep, and even steeper, than those proposed at Whiteface Mountain, and given the fact that the Adirondack Seed Mix is more economical (some 30 times less expensive than the alternative NYSDOT mix) the Adirondack Seed Mix will be used to stabilize the majority of the trails constructed as part of the current UMP for Whiteface Mountain. The alternative NYSDOT seed mix will be used under those special conditions that may be most suitable, including steeper slopes (i.e. > 25%), or wherever the Adirondack Mix does not become effectively established. Appendix U contains the Draft Construction Pollution Prevention Plan. This plan states that, including Conceptual Actions, approximately 29.8 acres would be affected by ski trail construction and identifies the vegetation practices used for erosion and sediment control.

3. Other BMPs

Other BMPs proposed to control erosion during construction of ski trails on Whiteface Mountain, including mulches, tackifiers, water bars, silt fences, etc. are discussed in detail in FGEIS Appendix U, Draft Construction Pollution Prevention Plan.

- Seeded areas will be mulched with straw that will be secured in place physically or with a non-asphaltic tackifier. Alternatively, seeded areas may be hydromulched with wood cellulose mulch that may also include a non-asphaltic tackifier.

- Water bars will be used extensively during construction to prevent erosion. This BMP has proven to be effective on sloped areas such as ski trails and has been found to be effective when constructing other ski trails at Whiteface in the past. The spacing interval between water bars will depend on the slope on which they are installed as per specifications included in the CPPP.

- Silt fences will be installed to protect surface water resources that are in the vicinity of construction. Silt fences will be installed in accordance with the

details included with the CPPP and will be inspected on a regular basis to make sure that they are functioning properly.

4. Inspections

Because the proposed construction activities are located within the Champlain watershed, which is a TMDL (total maximum daily load) watershed for phosphorus, site assessments and inspections during construction will be carried out by a qualified professional in accordance with the requirements of NYSDEC's General Permit GP-02-01. This qualified professional will be responsible for conducting site inspections prior to construction and then during construction once every seven (7) calendar days and within 24 hours of the end of a storm event of 0.5 inches or greater. Inspections will track the construction process and document the effectiveness of the appropriate erosion and sediment control practices. The qualified professional will also perform a site inspection following completion of construction to certify that the site has undergone final stabilization in accordance with the best management practices specified in the CPPP.

5. NYSEF Training Center Building

- Due to the existing slope of the site, grades are in the 15 to 20% range. Siting of the proposed building is such that it allows for a walk out basement along its east end. To avoid steep grade between the east end of the building and the edge of asphalt driveway, a five (5) foot high retaining wall will be built along the road pavement edge. An additional five (5) foot high retaining wall will be built in the rear of the building to avoid steep grades there. Using the two retaining walls the proposed the elevation drop from the west end of the building to the east will be approximately eight (8) feet. The design of the site by placing the proposed building "into" the existing grade and by construction of retaining walls will allow the final grades around the building to be constructed in the 8 to 15 percent range. This will allow grading of the site to finish grades which will be easy to stabilize by topsoil, seeding and mulching.

- During construction, erosion from the site will be prevented by BMPs described in the CPPP (Appendix U), including a properly constructed silt fence barrier which will totally encircle the building construction site. This barrier will prevent soil erosion from the site into site into downstream areas.

Also, a siltation basin will be constructed at the proposed storm drain pipe outlet to provide pre-treatment for runoff before discharge to existing drainage channel. The silt fence will remain in place until all disturbed areas are completely stabilized by lawn and erosion resistant ground cover.

- At its closest point, Stag Brook is 50 feet from the corner of the proposed NYSEF building. Due to its steep streambed, the brook suffers bank erosion. To stabilize banks, slow the flow of water in the brook, and protect the foundation of the NYSEF building for the long term, native rock revetment will be placed along the streambed between the culvert crossing the Boreen/Home Run trails and the NYSEF parking lot. This stabilization will be implemented with the storm water control system related to the new building.

- All disturbed areas around the building will be topsoiled and mulched. Stone ground cover will be constructed along the building walls below roof drip edge to prevent erosion of soil.

- The site will be graded to drain as sheet flow. One catch basin with a 12" diameter pipe will be constructed at the edge of the existing asphalt to drain a low area. A silt basin will be constructed at the pipe outlet to provide pre-treatment before discharging into the existing drainage channel.

2. Visual Resources

Impacts

A. Base Area

The low elevation of proposed Parking Lot #5 and the maintenance building relocations preclude them from being visible from locations removed from the immediate vicinity of the Mountain. Views into Parking Lot #5 from Route 86 will be blocked by the landform (hills) and vegetation that exist on both sides of the entrance road to Whiteface. Placement of the NYSEF Training Center in close proximity to the base lodge and in an area of other existing improvements consolidates building mass and does not increase visibility of this portion of the Ski Center from locations removed from the immediate vicinity of the mountain.

B. General

Development of the improvements in the Five-Year Plan will have minimal visual impact since the ski center already consists of cleared terrain along ski trails, and all new trails are proposed to be located in the vicinity of existing trails.

Two actions from the DGEIS, the Tree Island Pod and the Cloudsplitter Lodge, had potential for producing some visual impact. However, these two actions are no longer proposed, and are only Conceptual Actions at this time. Nonetheless, preliminary evaluation of potential visual impacts of these actions are included this section, and may be used as a starting point for any future UMP amendment/SEQRA review that may include either, or both of these actions.

The Ski Center is only minimally visible from area roadways. As indicated by the viewshed analysis, roadway views of ski trails on Whiteface Mountain are available only from locations that vary from northeast to east-southeast of the mountain. Apart from the conceptual Tree Island Pod and conceptual trails 82 and 83, most of the new trails will be created among existing trails, and will not stand out significantly. Similarly, the visibility of places where trail widening occurs will not increase significantly, since most areas of widening will be less than 100 feet wide. The conceptual Tree Island Pod would constitute a relatively large area of disturbance, its position would be such that it would be visible only from a narrow sector lying due east of the Ski Center. Conceptual trails 82 and 83, which would run mainly along the crest of a ridge, would be visible from a larger part of the mountain's viewshed, but they would be only 50 feet wide for most of their length, and would be less noticeable than the existing trails.

C. Conceptual Tree Island Pod

The potential visual impact of the conceptual Tree Island Pod was preliminarily evaluated as part of this FGEIS. Appendix W contains three Exhibits that are updated versions of UMP/DGEIS Exhibits II-5, II-6, and II-7. The original DGEIS Exhibits illustrated views of Whiteface Mountain from various locations in the vicinity of the mountain. In Appendix W the original Exhibits have been annotated and for each photograph it is noted whether or not the conceptual Tree Island Pod would be visible from each location (see new Exhibits V-1, V-2 and V-3 in Appendix W of this FGEIS). These Exhibits contain nine views of Whiteface Mountain. The ski trails in the conceptual Tree Island Pod would not be visible from six of the nine locations. For the three photographs where a view of the ski trails would be possible, the approximate location of the conceptual Tree Island Pod has been indicated on the photograph. For all three views, the conceptual new trails would be visible adjacent to the existing ski trails and would not result in a significant visual impact.

In addition to the new information provided in the revised graphics discussed above, more detailed preliminary visibility assessments were performed for the surrounding area.

Using USGS topography, a digital elevation model (DEM) was constructed using the conceptual Tree Island Pod as the target location. The USGS Land Cover Classification was then overlaid on the topography to account for vegetation (forest cover) view attenuation affects. A conservative tree height of 40 feet was assumed for areas of forest cover throughout the study area. The DEM confirmed the local limits of visibility determined previously from the windshield survey conducted from local roadways and other public places. Within five miles, views into the site are generally limited to the Fox Farm/Hardy Kilburn Road area and along NY Route 86 in the immediate vicinity of the ski area. These areas already have views of the existing trail system.

Based on the limits of visibility mapping produced with the DEM and land cover classification, and assuming a driving speed of 45 MPH, the duration of views are estimated to be relatively short and include existing features already on Whiteface Mountain. On Hardy Kilburn Road the view is to the west when traveling southwest and the view duration is approximately 85 seconds. When traveling west on Fox Farm Road views are somewhat more in line with the travel direction, which is to the northwest. The view duration is approximately 160 seconds and the direction of the view is approximately 30 degrees to the west of the direction of travel. Views from Route 86 are nearly perpendicular to the direction of travel and the durations for the views traveling northeast and southwest are approximately 40 seconds and 60

seconds respectively. All of the aforementioned views would also include existing ski trails and most of the duration of the views would also include the Slides area and/or the observatory on top of Whiteface Mountain. Examples of the landscape positioning and approximate extent were illustrated in the figures referenced in the previous paragraph (exhibits V-1, V-2, and V-3 in Appendix W).

Additionally, potential views of the conceptual Tree Island Pod ski trails were evaluated for nearby hiking trails in the Forest Preserve. The digital elevation model constructed for the area within five miles of the new proposed ski trails included a viewshed analysis for hiking trails. The viewshed analysis demonstrated that potential views into the conceptual Tree Island Pod from the trails around Owen Pond, Copperas Pond and Winch Pond would be blocked by topography.

The DEM viewshed analysis described above indicated that potential views into conceptual Tree Island Pod could be possible from the area around Lookout Mountain to the north. Lookout Mountain is within the same Intensive Use Area that contains the Ski Center. Field work was conducted in this area to investigate potential views. Views from the summit of Lookout include the Memorial Highway, the observatory, the upper portion of the Slides area, and the uppermost reaches of the existing ski trails. Views into the location of the proposed conceptual Tree Island Pod are mostly blocked by vegetation and intervening topography, particularly a southeast sweeping ridgeline that obscures the potential view to the conceptual ski trails. (See Exhibit V-4 in Appendix W). Based on topographic cross sections between the summit of Lookout Mountain and the conceptual Tree Island Pod, it is estimated that, at most, the upper $1/6^{th}$ of the new pod might be visible in a view that currently contains the other features listed above, including existing ski trails on Whiteface Mountain.

Views towards the mountain are also available from the Wilmington trail east of the summit of Lookout Mountain before the trail drops down a steep slope on the way to Marble Mountain (See Exhibits V-5 and V-6 in Appendix W). However, due to intervening topography and vegetation, the conceptual Tree Island Pod would not be visible from these locations.

Views into the conceptual Tree Island Pod would be possible from the summit of Whiteface Mountain itself. This view also encompasses the existing ski trails on the mountain in this Intensive Use Area.

D. Conceptual Cloudsplitter Lodge

Even though not proposed at this time, the potential impact of the Cloudsplitter Lodge on visual resources has been assessed. As envisioned, the lodge would be constructed of wood and would be located in proximity to the Cloudsplitter Gondola lift terminal. This represents a consolidation of visual elements. The structure would be approximately 39 feet in height. The lodge would not typically be lit at night because only very limited nighttime use of the facilities is anticipated. No significant adverse visual impact is anticipated as a result of the future construction of the new lodge.

The potential visual impact of the lodge envisioned to replace the existing Ski Patrol building on Little Whiteface is discussed in the 2002 DGEIS in Section V.A.2, as well as in the 1996 UMP. Refer to pages 289 through 293 of the 1996 UMP and to pages IV-66, Figures IV-9, IV-10, IV-11, and pages V-1 and V-2 of the 2002 UMP. Additional discussion is provided below.

The Little Whiteface Cloudsplitter Lodge is envisioned as a 13,500 square foot two-story structure. Overall building height is not anticipated to exceed 35 feet. The perspective sketches provided in 2002 DGEIS Figures IV-10 and IV-11 show a conceptual view of the lodge. Building colors would be earth tones with matte/non-reflective finishes. Natural building materials of stone and wood would be used in the construction of the lodge. Based upon a visual assessment of the anticipated structure utilizing massing dimensions and existing facilities which are currently visible from several vantage points, a visual assessment was completed. Refer to the Cloudsplitter Lodge Cross-Section, provided in Appendix S of this FGEIS. The location of the existing Ski Patrol building and the existing unloading stations for the two lifts are identified.

The potential visibility of the Cloudsplitter Lodge can be best described from two major vantage points, those areas of visibility from the east in the vicinity of the Hamlet of Wilmington, and those areas of visibility from the west in the Lake Placid vicinity. From the east the entire Ski Center is currently visible from several areas of public use such as NY Route 86, as shown in Exhibits II-4 through II-6. These vantage points to the east reveal the array of existing lift lines, lift towers, ASRC building and ski trails. The new lodge would not be visible, similar to the existing Ski Patrol building and the Little Whiteface Quad lift towers and the Quad and Gondola unloading stations. If visible at all, it would appear as another element in the consolidation of structures on Little Whiteface. Note that the Cloudsplitter Gondola lift towers are relatively more visible than the other existing structures and the envisioned lodge. As shown in the Cloudsplitter Lodge cross section, provided in

Appendix S, the new lodge is set back from the topographic edge of the summit, unlike the Cloudsplitter Gondola lift, which must by necessity cross the edge of the summit in order to access it. See Lodge Site Photographs 1 through 5 and Cloudsplitter Gondola Towers Photographs 6 and 7, provided in Appendix S of this FGEIS. The new lodge would be located to the west of the existing structures, away from the topographic edge.

Several existing facilities on the mountain such as the Memorial Highway and ASRC summit facilities are currently highly visible and are silhouetted against the horizon. From vantage points from the east, the ski trails are currently visible. The visibility extends for approximately 4.2 miles on NY Route 86 in the Town of Wilmington and the Town of Jay, and 0.3 miles on the Haselton Road in the Town of Wilmington. The areas east of the Hamlet of Wilmington are greater than five miles from the project site. The visual impact from vantage points to the west would be minimal, as shown in 2002 DGEIS Figures II-4 and II-7. Areas on NY Route 73 near the North Elba Horse Show Grounds and the ski jumps, and NY Route 86 west of Lake Placid are all greater than seven miles away. At distances greater than five miles, structures and lift lines are difficult to discern. The dominant visible structures on the mountain from the west are the Memorial Highway and ASRC summit facilities on Whiteface Mountain. When interpreted with the existing facilities on the mountain from the vantage points, the replacement of the Ski Patrol building with a lodge on Little Whiteface would not result in any significant increase in visibility as compared to the visibility of the Memorial Highway and Ski Center facilities.

E. Additional Studies

If and when the conceptual Tree Island Pod or the conceptual Cloudsplitter Lodge are proposed as New Actions, they will require UMP amendments and SEQRA reviews . These SEQRA reviews would include a complete visual impact assessment, including view simulations, should it be determined they may be visible from sensitive receptor locations.

Mitigation Measures

1. The improvements in the Whiteface UMP represent a consolidation of visual impacts, as they occur in an area historically, and currently, used for alpine skiing and other winter sports.

2. At this time, it is envisioned that the conceptual Cloudsplitter Lodge would be constructed of materials designed to minimize the contrast with the surrounding forested environment. The lodge would be rustic in character utilizing stone and timber building materials. Windows would be tinted, non-reflective glass and all surface materials would be finished with either their natural color or earth tone coloration. The roof would be a natural color to match the other structures and the wooded environment. Further mitigation would be provided by locating the proposed lodge adjacent to the gondola terminal, and the lodge would complement use of the new gondola. The structures would be consolidated in a single developed area, in the designated Whiteface Mountain Ski Center Intensive Use Area.

B. Biological Resources

1. Freshwater Wetlands and Surface Water Resources

Impacts

A. Wetlands

To the greatest extent possible, impacts to wetlands in the Whiteface Mountain Ski Center Intensive Use Area have been avoided in the planning and design of the proposed additions and expansion of facilities. There will be no impacts to the West Branch of the Ausable River and the wetlands that lie adjacent to it. The entrance and exit roadways that will serve parking lot #5 will cross a small seepy area with an intermittent stream. It will be necessary to deposit some fill and install culverts to carry drainage under the access to this parking area. The area of wetland impact is likely to be between 500 and 1000 square feet (0.01 to 0.02 acre).

Prior to beginning any construction it will be necessary to have qualified scientists examine the areas to be affected to determine whether wetlands are present, and to precisely delineate any wetland boundaries and stream channels. A licensed land surveyor will locate and map the delineated wetland boundaries and stream channels. Maps of the wetlands and streams will then be provided to the Adirondack Park Agency, the New York State Department of Environmental Conservation, and US

Army Corps of Engineers for the purposes of determining whether those agencies have jurisdiction over the proposed activities.

It appears that the proposed activities may require permits from the APA under Environmental Conservation Law Article 24 regulations governing activities within wetlands, and NYSDEC permits under Article 15 regulations governing disturbance of stream banks and beds

Also, the USACOE administers federal regulations under Section 404 of the Clean Water Act that govern the deposition of fill and placement of structures in wetlands and streams. The proposed projects are likely to involve impacts to less than 0.1 acre of wetlands and/or less than 300 linear feet of stream, which are the upper thresholds for the application of the nationwide permits. The nationwide permits are general permits that simplify the process of obtaining permission for impacts to wetlands.

B. Snowmaking Water

No new or increased water withdrawal beyond what was approved in the 1996 UMP is proposed in this 2004 UMP. Upgrades to the snowmaking system to increase Whiteface's ability to pump water within the system to various parts of the Mountain are proposed, but these upgrades do not affect snowmaking water withdrawal from the West Branch.

The withdrawal of water from the West Branch AuSable River was one of the management actions approved in the 1996 UMP process. Note that the withdrawal of water from the river for snowmaking has been ongoing since the 1962-1963 ski season. A Cooperative Agreement between DEC and ORDA is in place for the protection of the surface water resource of the West Branch of the AuSable River in relation to the water to be withdrawn for snowmaking operations at Whiteface. Minimum flow conditions to be maintained to protect aquatic life were decided during the preparation of the 1996 UMP. After construction of the stream flow monitoring device, river flow data was available and was used to verify the parameters for snowmaking water withdrawal established by the NYSDEC. A copy of the current Cooperative Agreement between NYSDEC and ORDA is provided in Appendix V.

Like the Cloudsplitter Lodge on Little Whiteface and the Tree Island Pod, a conceptual snowmaking reservoir is not proposed for construction as part of this UMP/GEIS. Plans for the reservoir are only conceptual at this time. Construction of the reservoir will first require a future update to this UMP, an associated SEQRA review, and necessary permitting from regulatory agencies such as NYSDEC (dam safety) and the US Army Corps of Engineers (waters of the United States, including wetlands), and potentially the APA (NYS freshwater wetlands).

The Snowmaking Water Analysis provided in the 2002 in Section IV stated that a reservoir with a capacity of 5 to 8 million gallons would be necessary at build-out to fully provide water for snowmaking during a dry year. This storage would provide the snowmaking system with water for 14 to 22 hours of continuous snowmaking at full pumping capacity without recharge. The recommended storage will also balance the conditions encountered during frazil ice (slush ice) production and low water flows.

Mitigation Measures

1. Construction Phase

The following measures will be employed to mitigate the potential impacts on streams and wetlands during construction of the improvements and operation of the ski center (See Section V.A for additional details):

1. Filter fabric fences and straw bale dikes will be installed in places where vegetation clearing is proposed to occur adjacent to wetlands and streams.
2. Soils disturbed by construction will be mulched and seeded with grasses as soon as practicable in order to minimize potential for erosion.
3. The measures outlined in the current Construction Pollution Prevention Plan (CPPP) for the Ski Center lands will be followed. The Construction Pollution Prevention Plan is appended to the existing SPDES general permit for work associated with construction activity.
4. After construction of the activities is complete the project will comply with NYSDEC's recently updated stormwater management design standards, including not increasing the rate of stormwater runoff (stormwater quantity) and, where necessary, providing stormwater treatment to improve stormwater quality.

2. Operational Phase

The effects of stormwater that may be expected as a result of the actions put forth in this GEIS for Whiteface Mountain have been assessed by use of the Simple Method and HydroCAD.

A. Ski Trails

The effects of runoff, as a result of ski trail construction, has been determined by the Simple Method, also known as the SCS Runoff Curve Number (CN) Method. The most important factors that determine CN are the hydrologic soil group (HSG), cover type, treatment, hydrologic condition, and antecedent runoff condition (ARC). In the area of ski trails, the predominant soil type is Typic Cryohumods (extremely bouldery). The general hydrologic soils group is considered C/D for this area and has subsequently been used to determine the pre and post Curve Numbers. Comparing the pre ("Woods") and post ("Meadow") CN for the proposed ski trail construction, as put forth in the SCS TR-55 Manual, there is no significant change in the amount of runoff from any subcatchments where ski trails will be constructed. Considering a C soil type and a "good" woods ecosystem as the existing condition, the CN may increase from 70 to 71 with the proposed ski slopes. Evaluating a D soil type and "good" wood cover, indicates a change in the CN from 77 to 78. Current assessment methodologies available for stormwater analyses cannot accurately differentiate changes in runoff with a CN change of one (1). Hence there is no expected change in runoff quantity, and operational phase stormwater quantity controls are not necessary.

B. Parking Lot #5

The proposed Parking Lot #5 will be constructed beyond the Easy Acres parking lot. The parking area will be approximately 2.7 acres in size. The parking surface will be gravel and the total land disturbance, including necessary grading outside the parking surface proper is estimated at four (4) acres.

Appendix P includes the Stormwater Management Report for Parking Lot #5. Stormwater computations for Parking Lot #5 were conducted using the USDA Soil Conservation Service Technical Release No. 20. The program used was the HydroCAD Stormwater Modeling System produced by Applied Microcomputer

Systems of Chocurua, New Hampshire. The design storms studied were the one (1) year event (Channel Protection, CP_v), ten (10) year event (Overbank Flood Control, QP), and one hundred (100) year event (Extreme Flood Control, QF). The 24 hour Type II storms produce a total rainfall of 2.1, 3.5 and 4.8 inches, respectively. Calculations were also completed for the treatment of the required Water Quality Volume (90% rainfall event, WQ_v) measuring 0.8 inches in northern Essex County.

The design intent of limiting the proposed runoff rate to a level less than the existing runoff rate has been met by directing stormwater into a detention basin and controlling the rate of release. The quality of the runoff is improved by allowing sediments to settle out in the stormwater management area before releasing it. The table below summarizes the results of the full study detailed in Appendix P

	Runoff For Storm Events			
	Pre-Construction	*Post-Construction*	*Difference*	
1-Year	1.46 cfs	1.48 cfs	+0.02 cfs	
10-Year	7.61 cfs	7.50 cfs	-0.01 cfs	
100-Year	15.38 cfs	15.16 cfs	-0.22 cfs	

In addition to attenuating these storms, the outlet of the detention basin has been set at an elevation so that the runoff from the water quality volume storm is captured and infiltrated.

Appendix P includes a grading plan for Parking Lot #5 and the proposed detention basin. The grading plan illustrates how runoff from undisturbed lands above the parking lot will be captured and routed around the parking lot where it will be dispersed into undisturbed areas using level spreaders. Similarly, treated water that is released from the detention basin will be directed to a wide level spreader that will disperse the water across the undisturbed slope some 1,100 feet uphill of the West Branch AuSable River.

2. Vegetation

Impacts

Impacts to vegetation at the Ski Center will result mainly from the expansion of existing ski trails and construction of new trails. In order to estimate these impacts, biologists of the LA Group, P.C. collected data on tree density in those places where work is proposed. Belt transects measuring 100 feet long by 10 feet wide were sampled at seventeen locations representative of the vegetation covertypes in which clearing would take place. In each transect, counts were made of all trees within two categories: (1) trees measuring 3 to 4 inches dbh[1] and (2) trees greater than 4 inches dbh. The tree counts are provided in Appendix K. If more than one transect came from a given vegetation covertype, the counts from all those transects were added together. These counts were then used to calculate the tree density in terms of number of trees per acre for each species encountered.

Estimates for the number of trees of each species to be cut during the construction or widening of each ski trail or other improvement were made by multiplying the acreage of proposed clearing by the measured tree density of the appropriate covertype. These estimates are listed in Table V-1.

The amount of tree clearing required for the actions proposed in this UMP has been reduced substantially due to the fact the Tree Island Pod and the snowmaking reservoir are now conceptual actions only, and not proposed as part of this UMP. The number of trees 3 inches dbh or larger to be cut for proposed actions has been reduced over 90% from 54,951 listed in the DGEIS to approximately 4,200. Table V-1, provides the revised tree clearing tally data for the actions proposed in this UMP, and some information about the size ranges of trees that are proposed for cutting.

Furthermore, as illustrated on Exhibit II-8, "Vegetation Covertype Map", and Exhibit IV-1, "Proposed Ski Center", none of the cutting for New 2004 UMP Actions, or even 2004 UMP Conceptual Actions would involve Alpine Krummholz, and no cutting would take place within 2,000 feet of the area mapped as Krummholz.

All tree cutting at Whiteface Mountain Ski Center will be in compliance with the DEC tree cutting policy. Trees lawfully cut cannot be removed from the premises in any manner but can be chipped or used on site by ORDA so long as such method is consistent with the guidelines of the State Land Master Plan, this UMP, and Article 8

[1] dbh = "diameter at breast height," which was measured on the tree trunk at a point 5 feet above the ground using a dbh tape, which is calibrated to convert circumference into diameter.

of the Environmental Conservation Law. Virtually all trees that are cut for ski trail construction and widening, and construction of lifts and other amenities will be chipped and used on-site for construction and erosion control projects. Access for the wood chipper on steeper terrain is limited, so some trees are buried for use as fill and erosion control.

Impacts to rare, threatened or endangered species of plants are extremely unlikely to occur as a result of the proposed actions. Information provided by the New York Natural Heritage Program indicates that only one species occurs at low elevations on the Ski Center, but it is found along the West Branch of the Ausable River, remote from any proposed action. All of the other known occurrences of such species on the Ski Center are limited to the uppermost parts of Whiteface Mountain, at elevations above the locations where trail construction and other projects will take place. No other action is as close, or closer, than 1,000 feet to the location of any of the rare, threatened, or endangered species.

Less than 1% of the mountain spruce-fir forest would be impacted. However, over 630 acres of this covertype would remain undisturbed within the Intensive Use area alone at Whiteface. This impact to the covertype will not be significant (99+% will remain undisturbed). An even smaller percentage of this covertype would be disturbed in relation to the whole mountain.

The new lodge being considered for some future time at the top of Little Whiteface would replace the existing Ski Patrol building and would be located in the existing clearing immediately adjacent to the existing Cloudsplitter Gondola and Little Whiteface Quad (Lift G) unloading stations. If and when the new lodge is proposed as part of a future UMP update, some very limited vegetation clearing may be necessary in order to construct the new lodge. Refer to Lodge Site Photographs 1, 2, 3, 4 and 5, provided in Appendix S.

Mitigation Measures

The following measures will be employed to mitigate the potential impacts on vegetation during construction:

1. Only areas absolutely necessary for construction of ski trails, ski lifts, and other proposed improvements will be cleared of vegetation. All other areas will be maintained in a natural state.

2. Erosion control measures (see Section V.A.) will be used on cleared areas with disturbed soils to avoid affecting adjacent vegetation by erosion or siltation. Erosion-control devices to be used will include filter fabric fences and staked straw bale filters.

3. Upon the completion of clearing of new ski trails and ski lift corridors, they will be seeded and mulched to promote rapid revegetation. Areas disturbed for any other improvements will also be landscaped and revegetated as soon as practicable.

4. Plants used to revegetate disturbed areas and planted as part of landscaping will be species which are indigenous to the region.

5. No clear-cutting of trees to develop panoramic views is proposed. Views will be framed or filtered by existing vegetation.

6. To some extent, vegetation losses due to new clearing will be compensated by the abandonment and revegetation of trail 52 and a section of trail 5. This will result in revegetation of approximately 0.96 acre within the area occupied by the spruce-fir vegetation covertype.

Table V-1
SUMMARY OF VEGETATION IMPACTS
2004 Tree Cutting Estimates for Proposed Trails and Trail Widening at Whiteface Mountain Ski Center

	Trail 2		Trail 3 (conceptual)		Trail 6a (conceptual)		Trail 12a (conceptual)		Trail 17	
Tree Species	**3-4" dbh**	**>4" dbh**	**3-4" dbh**	**>4" dbh**	**3-4" dbh**	**>4" dbh**	**3-4" dbh**	**>4" dbh**	**3-4" dbh**	**>4" dbh**
Balsam Fir	25	-	-	-	-	-	-	-	26	39
Striped Maple	51	76	-	-	-	-	-	-	-	-
Red Maple					-	-				
Sugar Maple	5	17	-	-	-	-	-	-	-	-
Yellow Birch	-	2	-	-	-	-	-	-	-	-
Mountain Paper Birch	-	76	-	-	-	-	-	-	8	40
Paper Birch	-	2	-	-	-	-	-	-	-	-
Beech	5	13	-	-	-	-	-	-	-	-
White Ash	-	1	-	-	-	-	-	-	-	-
Ironwood	1	-	-	-	-	-	-	-	-	-
Red Spruce	-	-	-	-	-	-	-	-	-	6
Red Pine	-	-	-	-	-	-	-	-	-	-
White Pine	-	-	-	-	-	-	-	-	-	-
Bigtooth Aspen	-	4	-	-	-	-	-	-	-	-
Pin Cherry	-	-	-	-	-	-	-	-	2	-
Mountain Ash	-	-	-	-	-	-	-	-	3	5
Northern White Cedar	-	-	-	-	-	-	-	-	-	-
Hemlock	-	2	-	-	-	-	-	-	-	-
Tree Clearing Totals	88	193	-	-	-	-	-	-	39	90
Clearing Acreage	0.70		0.00		0.00		0.00		0.11	

Table V-1
SUMMARY OF VEGETATION IMPACTS
2004 Tree Cutting Estimates for Proposed Trails and Trail Widening at Whiteface Mountain Ski Center

	Trail 25		Trails 29 & 49		Trail 31a		Trail 34		Trail 35	
Tree Species	**3-4" dbh**	**>4" dbh**	**3-4" dbh**	**>4" dbh**	**3-4" dbh**	**>4" dbh**	**3-4" dbh**	**>4" dbh**	**3-4" dbh**	**>4" dbh**
Balsam Fir	16	32	-	-	-	-	-	-	-	-
Striped Maple	-	-	-	-	-	-	-	-	-	-
Red Maple										
Sugar Maple	83	264	18	57	16	50	18	59	19	61
Yellow Birch	-	33	-	7	-	6	-	7	-	8
Mountain Paper Birch	-	-	-	-	-	-	-	-	-	-
Paper Birch	-	33	-	7	-	6	-	7	-	8
Beech	83	198	18	43	16	37	18	44	19	46
White Ash	-	17	-	4	-	3	-	4	-	4
Ironwood	17	-	4	-	3	-	4	-	4	-
Red Spruce	80	48	-	-	-	-	-	-	-	-
Red Pine	-	16	-	-	-	-	-	-	-	-
White Pine	-	48	-	-	-	-	-	-	-	-
Bigtooth Aspen	-	66	-	14	-	12	-	15	-	15
Pin Cherry	-	-	-	-	-	-	-	-	-	-
Mountain Ash	-	-	-	-	-	-	-	-	-	-
Northern White Cedar	-	64	-	-	-	-	-	-	-	-
Hemlock	-	49	-	7	-	6	-	7	-	8
Tree Clearing Totals	277	867	39	140	34	122	40	143	42	148
Clearing Acreage	2.63		0.41		0.36		0.42		0.44	

Table V-1
SUMMARY OF VEGETATION IMPACTS
2004 Tree Cutting Estimates for Proposed Trails and Trail Widening at Whiteface Mountain Ski Center

	Trail 37		Trail 73a		Conceptual Tree Island Pod (Trails 74 through 83)		Lift A Extension		New Snowmaking Reservoir (conceptual)	
Tree Species	**3-4" dbh**	**>4" dbh**	**3-4" dbh**	**>4" dbh**	**3-4" dbh**	**>4" dbh**	**3-4" dbh**	**>4" dbh**	**3-4" dbh**	**>4" dbh**
Balsam Fir	-	-	-	-	-	-	0	0	-	-
Striped Maple	-	-	-	-	-	-	-	-	-	-
Red Maple							-	76	-	-
Sugar Maple	10	32	94	300	-	-	4	12	-	-
Yellow Birch	-	4	-	37	-	-	-	78	-	-
Mountain Paper Birch	-	-	-	-	-	-	-	-	-	-
Paper Birch	-	4	-	37	-	-	-	1	-	-
Beech	10	24	94	225	-	-	4	9	-	-
White Ash	-	2	-	19	-	-	-	1	-	-
Ironwood	2	-	19	-	-	-	1	-	-	-
Red Spruce	-	-	-	-	-	-	-	-	-	-
Red Pine	-	-	-	-	-	-	-	-	-	-
White Pine	-	-	-	-	-	-	-	-	-	-
Bigtooth Aspen	-	8	-	75	-	-	-	3	-	-
Pin Cherry	-	-	-	-	-	-	-	-	-	-
Mountain Ash	-	-	-	-	-	-	-	-	-	-
Northern White Cedar	-	-	-	-	-	-	-	-	-	-
Hemlock	-	4	-	37	-	-	229	384	-	-
Tree Clearing Totals	22	77	206	730	-	-	238	564	-	-
Clearing Acreage	0.23		2.15		0.00		1.84		0.00	

Table V-1
SUMMARY OF VEGETATION IMPACTS
2004 Tree Cutting Estimates for Proposed Trails and Trail Widening at Whiteface Mountain Ski Center

	New NYSEF Building	Parking Lot 5	Expanded Maint.	TOTALS OF TREE CUTS FOR ALL AREAS		
Tree Species	**>3" dbh**	**>3" dbh**	**>3" dbh**	**3-4" dbh**	**>4" dbh**	**All trees ≥ 3"**
Balsam Fir	-		-	67	70	137
Striped Maple	-		-	51	76	126
Red Maple	7	21	-	-	76	104
Sugar Maple	-		-	266	851	1,117
Yellow Birch	-	8	-	-	183	191
Mountain Paper Birch	-		-	8	116	124
Paper Birch	3	12	-	-	106	121
Beech	10	9	-	266	638	923
White Ash	-	19	-	-	53	72
Ironwood	1		-	53	-	54
Red Spruce	-		-	80	54	134
Red Pine	-		-	-	16	16
White Pine	-	4	-	-	48	52
Bigtooth Aspen	-		-	-	213	213
Pin Cherry	-		-	2	-	2
Mountain Ash	-		-	3	5	8
Northern White Cedar	1		-	-	64	65
Hemlock	-		-	229	505	734
Tree Clearing Totals	22	73	0	1,025	3,075	4,194
Clearing Acreage	1.07	5.85	0.15		16.35	

3. Fish and Wildlife

Impacts

Activities proposed to occur at Whiteface Mountain Ski Center that are anticipated to have the greatest impact on resident and migratory wildlife that use the site include the construction of new trails through currently wooded areas and expansion of new trails. Construction of new trails and expansion of existing trails will remove portions of forest communities and replace them with communities dominated by grasses and broadleaved herbs. Localized habitat fragmentation and creation of habitat edge will occur where new trails are created.

Creation of new trails has the greatest potential for impacting wildlife populations. Opening the forest by trail construction will favor wildlife adapted to forest edges at the expense of forest interior species. The forest interior species most likely will emigrate to nearby suitable habitats. Depending on the population level and carrying capacity of those nearby habitats, individuals of the immigrant species will be subject to increased competition and selective compensatory mortality. Conversely, the newly created forest edge habitat will enable existing populations of forest-edge species and species of open fields to expand with the potential for a localized increase in biodiversity.

The 2004-2009 UMP identifies the potential for the presence of the Bicknell's Thrush on the Ski Center property. Bicknell's Thrush is not identified as an endangered or threatened species; however it is listed by the NYSDEC as a species of special concern.

The American Ornithologists Union officially recognized the Bicknell's Thrush in 1995 based on the 1993 work of Henri Ouellet. Until1995, Bicknell's Thrush was listed as a subspecies of the Gray-cheeked Thrush, which is listed in Appendix L. The copy of Appendix L provided in the August 2002 DGEIS was inadvertently miscopied. A complete copy of Appendix L is provided in this FGEIS.

Undertaking construction of the new trails proposed over an elevation of 2,800 feet under an amendment to the Whiteface Mountain UMP could potentially affect the

Bicknell's thrush if proper mitigation measures are not employed. The following is a detailed description of the extensive efforts have that been made by ORDA to avoid and minimize potential impacts to Bicknell's thrush.

Mitigation Measures

1. The timing of vegetation management already approved in the 1996 UMP Update, but not yet completed in areas of Bicknell's Thrush breeding habitat is important and will be delayed until after August 1st, when the majority of nesting activities are complete. Timing of cutting activities will be addressed in The VINS Study.

2. During the preparation of this FGEIS, and in response comments made on the August 2002 DGEIS, ORDA has made significant efforts to address concerns regarding the Bicknell's Thrush. These efforts included making the Tree Island Pod and other new projects requiring tree clearing above 2800 feet in elevation Conceptual Actions and not Proposed Actions, as well as postponing projects previously approved in the 1996 UMP update which involve tree clearing above 2800 feet until after more information on habitat use by Bicknell's Thrush is obtained, funding a Bicknell's Thrush study by the Vermont Institute of Natural Science, and agreeing to implement a multi-year field study of the Bicknell's Thrush on and around Whiteface Mountain through, at least, the year 2009.

The following is a description of the comprehensive assessment of the Bicknell's thrush that ORDA has committed to implementing before proposing construction of new ski trails above an elevation of 2,800 feet. On the following page is Exhibit V-1 "Timeline for Additional Assessment of Bicknell's Thrush", that outlines the various mitigation measure tasks and their time sequence.

1. The VINS Study

Whiteface management has entered into an agreement with the Vermont Institute of Natural Science (VINS), the northeast region's leading authority on Bicknell's thrush, to use its extensive data on Bicknell's thrush and their habitat to develop recommendations for design, mitigation, and management measures that will minimize both short- and long-term potential project impacts to Bicknell's thrush. The following describes in more detail the study being performed by VINS.

VINS has spearheaded ecological studies of Bicknell's Thrush in the Northeast since 1992. A key component of VINS' research has been focused investigations of the use

Exhibit V-1, Timeline for Additional Assessment of Bicknell's Thrush

TASKS	Jan. 2004	Feb. 2004	March 2004	Apr. 2004	May 2004	June 2004	July 2004	Aug. 2004	Sept. 2004	Oct. 2004	Nov. 2004	Dec. 2004	Jan. 2005	Feb. 2005	March 2005	Apr. 2005	May 2005	June 2005	July 2005	Aug. 2005	Sept. 2005	Oct. 2005	Nov. 2005	Win. 2006	Spr. 2006	Sum. 2006	Fall 2006	Spr. 2007	Sum. 2007	Fall 2007	Spr. 2008	Sum. 2008	Fall 2008	Spr. 2009	Sum. 2009	Fall 2009
1. VINS Completes Study/Report																																				
2. VINS Develops Field Study/Monitoring Protocols																																				
3. On-site Field Study Data Collection																																				
4. Analysis of On-site Data																																				
5. UMP Amendment Process																																				
6. On-site Field Monitoring Data Collection																																				
7. UMP Amendment Construction Below 2,800 Feet																																				
8. UMP Amendment Construction Above 2,800 Feet																																				
9. Previously Approved Actions Construction Below 2800 Feet																																				
10. Previously Approved Actions Construction Above 2800 Feet																																				

would be to confirm the effectiveness of the mitigation measures derived from The VINS Study and the on-site field studies. These studies would be underway before, during and after construction of the conceptual Tree Island Pod if approved through a future UMP amendment in accordance with the timeline in Figure XI-1.

3. Whiteface management has already implemented its "Whiteface Wildlife " interpretive program to increase awareness among users of Whiteface facilities of the values and benefits of the New York State Forest Preserve, including the State-designated Bird Conservation Area above 2,800 feet, and the wildlife at Whiteface Mountain. Components of the Whiteface Wildlife program include providing summertime lift riders with binoculars for use when riding the gondola. The gondola cars will also be equipped with literature and photographs to help identify wildlife, including Bicknell's thrush, while riders make their ascent and descent. Riders will then be able to record their observations on a checklist of observed wildlife that will be available in the lodge. So far, this program focuses on summertime, but it is likely that the Whiteface Wildlife program will be expanded to include additional wintertime activities to foster appreciation of the Forest Preserve and its wildlife inhabitants at Whiteface by skiers and non-skiers alike. Appendix R contains a copy of a brochure produced by ORDA in conjunction with NYSDEC and the APA entitled "Whiteface Wildlife, Nature and Animal Guide to Whiteface Mountain", that provides additional information on this program.

C. Human Resources

1. Transportation

Impacts

Future traffic volumes were estimated by Creighton-Manning Engineering (the UMP traffic consultant) by increasing the background traffic volumes on Route 86 and projecting future traffic growth from the mountain expansion. The Traffic Assessment is provided in Appendix I. It was assumed that the project can be completed in 2003. Therefore, a 1% growth rate was added to the existing traffic volumes observed at the entrance to the ski mountain. As a result of the management actions proposed in thDGEIS, the comfortable carrying capacity (CCC, the number of skiers that can be accommodated at any given time) was expected to increase from 5,070 to 5,640, an 11% increase. This increase was also applied to the traffic

by Bicknell's Thrush of two established Vermont ski areas - Stowe Mountain Resort (Mt. Mansfield) and Stratton Mountain. From 1995-2001, VINS conducted studies on three 10-20 hectare plots on Mt. Mansfield. One of these was in an area developed for skiing around the Octagon; the other two in areas are relatively undisturbed habitat on the Mansfield ridgeline and Ranch Brook watershed. On Stratton, VINS established two study plots in 1997 and has since then collected field data on each plot annually. One plot is on the developed north peak; the other plot is on the undeveloped south peak.

Field methods on both mountains have been standardized from year to year and have included: (1) constant-effort mist-netting and banding (including unique color banding of each individual thrush); (2) intensive resighting of color-marked individuals; (3) radio telemetry of adult males and females, and in 2001 on Mansfield of fledged juveniles; (4) videography at nests; (5) monitoring of nests and reproductive success; and (6) detailed characterization of vegetation and macrohabitat variables around nests. Each mountain thus provides a 7-year data base that can be used to examine within- and between-year variation in Bicknell's Thrush life history parameters on habitat blocks that are developed for skiing and on similar, undeveloped blocks. These data afford a valuable opportunity to address important questions, such as those posed by the conceptual Tree Island Pod project, relating to the potential impacts of ski area development on this species, including the potentially beneficial impacts associated with the creation of habitat that is favorable to nesting.

VINS is undertaking a detailed analysis of its 1995-2003 field data from Mt. Mansfield and Stratton Mountain. They will report their findings in a summary document that will specifically relate them, to the extent possible, to the conceptual Tree Island Pod project on Whiteface Mountain. VINS' analysis and evaluation will combine (1) site-specific information collected during a field visit by VINS Conservation Biology staff to the project area in the fall of 2003, (2) examination of GIS and other existing data from the proposed project, and (3) VINS' ecological and behavioral field data from Mt. Mansfield and Stratton Mountain. This approach will enable the generation of predictions about likely short-term (1-2 years post-construction) and medium-term (3-5 years) impacts of the Tree Island Pod project on breeding Bicknell's Thrushes. More importantly, VINS will use their data to construct a generally applicable model of how Bicknell's Thrushes use habitat within developed ski areas, and how new construction and ongoing management can minimize impacts to, and in some cases enhance breeding habitat for, Bicknell's Thrush on Whiteface Mountain.

VINS' analysis will consist of three primary components:

1. Analyze nest site selection by Bicknell's Thrush. VINS has monitored over 150 active nests on both mountains since 1995 on ski-area and non-ski area plots. At each nest, VINS has collected a detailed series of data on nest location, vegetation, landform characteristics, and other site-specific variables. Comparable data at randomly selected "non-use" sites at a distance of 30 meters from each nest for > 50% of the nests has also been collected. These data will be used to develop a model of Bicknell's Thrush nest site selection in ski-developed areas versus undeveloped habitats. Using GIS plotted vegetation data from Whiteface Mountain, this model will be applied to the conceptual Tree Island Pod project to generate predictions about the viability of the project area for Bicknell's Thrush nesting, both in its current condition and after the proposed development. Results are expected to yield insights about measures that can be adopted to mitigate proposed habitat alterations, and, ultimately, to enhance Bicknell's Thrush habitat on Whiteface, including in the conceptual Tree Island Pod area. More generally, a model of nest site selection relative to ski area development should help guide future planning and conservation efforts at Whiteface Mountain and throughout the Northeast. It will also help to establish a mechanism to inventory beneficial measures that are implemented to offset potentially adverse impacts associated with the other ski area development and activities.

2. Analyze movements and behavioral ecology of Bicknell's Thrush. VINS has an extensive data set on movements of adult male and female Bicknell's Thrushes in both ski area and undeveloped habitats. Using radio telemetry, VINS has recorded daily movements and locations of approximately 50 individual adults for 4-6 week periods. In 2000, VINS also monitored post-breeding movements and habitat use of adults and juveniles on Mt. Mansfield. Telemetry data will be plotted and analyzed on GIS maps of Mt. Mansfield and Stratton Mountain study areas, and related to various vegetation and terrain characteristics. Results will enable documentation of movements and home range characteristics relative to physical variables such as ski trail width, size and configuration of habitat islands, spacing and density of trails per unit area, and extent of gladed versus open trails. These results should provide valuable information about exactly how Bicknell's Thrushes use (or avoid) specific areas within ski areas. Findings from undeveloped habitats will provide a contextual baseline.

   As a complement to telemetry data on movements and habitat use, videographic data on adult thrushes are available to examine behavioral attributes of birds on ski areas versus natural forest habitats. From 1998-2000 on Mt. Mansfield and 1998-2002 on Stratton Mountain, VINS videotaped all known nests during the chick-feeding stage. Because nearly all adult Bicknell's Thrushes were uniquely color-banded on each study plot, VINS has a large data set on the behavioral ecology of individual birds

and nests. VINS' preliminary analysis of these data has shown that Bicknell's Thrush has a very unusual and complex mating system. Remarkably, most nests are attended by 2-4 males, and paternity is almost invariably mixed in such nests. An important and unanswered question relates to the role of habitat and landscape features in shaping this complex, variable system. VINS will analyze their videotape data to examine behavioral differences among breeding thrushes on ski area versus undeveloped habitats. This will enable documentation of factors such as nest attentiveness of females, numbers of male feeders, quantity and types of food delivered to nestlings, and reaction to auditory or visual disturbance. Results could indicate whether and how ski area fragmentation and activity influence adult behavior, and what variables may be most crucial determinants of any differences that exist. Again, findings could help mitigate proposed construction activities and suggest maintenance protocols that enhance habitat and/or minimize adverse impacts of nesting thrushes.

3. Analyze multi-year demographic data on Bicknell's Thrush. VINS has amassed an extensive data set on known-identity Bicknell's Thrushes, based on banding of adults and nestlings on Mansfield since 1995 and on Stratton since 1997. Using mark-recapture software, and incorporating data from original banding captures, within- and between-year recaptures, and resighting of color-banded individuals, VINS will construct a detailed species demographic profile. On both ski area and natural forest study plots, VINS will examine age- and sex-specific survivorship, reproductive success, site fidelity, population turnover, recruitment, and other key life history variables. Indices of individual health such as subcutaneous body fat, weight, feather wear, and mercury levels between the two habitat types will also be examined. Mark-recapture analyses will further yield statistically robust estimates of population density, which are otherwise difficult to obtain. Results will provide a powerful tool to evaluate the population viability of Bicknell's Thrushes on existing ski areas compared to nearby relatively undisturbed montane forest. Documenting habitat features that influence nest success may provide important insights into designing the Tree Island Pod project so as to minimize potentially adverse impacts and/or enhance habitat suitability for successful breeding.

   Using these analyses VINS will produce a detailed final report outlining its findings. This report is scheduled to be completed in April 2004. A key element of the VINS final report will be a section that presents specific recommendations for designing and implementing the conceptual Tree Island Pod project so as to minimize potential short- and long-term impacts to Bicknell's Thrush and, to the extent feasible, develop ski trails in a manner that actually benefits the species' habitat. Included will be guidelines for trail design and construction, the retention or creation of features that may enhance habitat or mitigate habitat loss/alteration elsewhere, the daily and seasonal timing of construction activities, post-construction habitat maintenance, opportunities for conservation education of visitors to Whiteface Mountain throughout the year, and general operational procedures. Where possible, VINS will reference specific sites within the conceptual Tree Island Pod project area, but many

of the recommendations are likely to apply more generally to the entire project area rather than to discrete locations within it. If it is determined that mitigation measures can be incorporated to benefit the species' habitat, the report will develop a mechanism to inventory improved habitat as a means to both document the benefits to the species and as a means to help assess the overall impact of other aspects of ski area development and management at elevations above 2,800 feet that may adversely affect the species.

2. On-site Field Studies

In addition to preparing the report described above, VINS is developing a study protocol for Bicknell's Thrush field work that will take place on and around Whiteface Mountain. This purpose of this multi-year field study is to apply the findings of the VINS Study analysis of data collected at Vermont ski areas directly to the Whiteface area. The study will collect data on the numbers of Bicknell's thrush on and around Whiteface Mountain, their distribution in relation to existing ski trails, overall habitat preferences, etc. The field study protocol being developed by VINS will be available so that collection of field data can begin in the spring of 2004.

Data collected in the Spring of 2004 will be analyzed in the Summer of 2004. Results of on-site data analysis will be combined with the earlier findings of The VINS Study, to develop measures to avoid and mitigate potential impacts to Bicknell's thrush as a result of construction of the conceptual Tree Island Pod or any other possible future work above 2,800 feet.

1. Integrate Mitigation Measures Into UMP Amendment for the Tree Island Pod

It is the intent of the management of Whiteface to prepare a future UMP Amendment proposing the development of the Tree Island Pod that would incorporate the mitigation measures that are developed from The VINS Study and the on-site field studies. This intent is based on an assumption that The VINS Study and the field study find that ski trail development can occur without unmitigated impacts to Bicknell's Thrush.

According to the timeline in the accompanying Figure XI-1, "Timeline for Additional Assessment of Bicknell's Thrush", this UMP Amendment could occur in the fall of 2004. This UMP Amendment would be subject to a separate SEQRA review, including opportunity for public comment on the proposed amendment.

2. Perform Additional Field Studies

Additional field studies would be performed in the spring of 2005, 2006, 2007, 2008 and 2009. The protocol for these studies will be included in the original study protocol developed by VINS in the spring of 2004. The purpose of these studies

volumes observed at the entrance to the ski mountain. The resulting future traffic forecasts represent an increase of approximately 12% in the traffic volumes observed on February 16, 2002. This 12% increase from the DGEIS will not occur because the projected CCC will not be realized due to a number of factors, foremost the Tree Island Pod no longer being proposed at this time.

Currently, the entrance to the Whiteface Ski mountain area operates at good levels of service during the AM and PM peak hours. With the increase in traffic volumes evaluated in the DGEIS, , skiers could experience longer delays during the PM peak hour. Several circulation conflicts exist between Route 86 and the base lodge. Most significant is the merge of the main entrances and the main access road and the loading area at the base lodge.

Mitigation Measures

Several alternatives are described in the Traffic Assessment (see Appendix I) which will improve circulation, and may be implemented in combination with others or as stand-alone projects. These include:

1. Provide proper signing and pavement markings at the two separate entrance points to the ski area. This will channelize traffic flow and improve operations to and from Route 86.

2. Add signing and intersection control to the merge point of the two entrances. Stop sign control should be installed on the westbound approach to this intersection from the north entrance due the lower traffic volumes on this leg.

3. Reconfigure the main entrance by reducing the median width between the north and south entrance, and create a standard entrance with one lane entering and two exit lanes on the eastbound approach to Route 86.

4. Provide means to allow buses (shuttle and coach) to turn around without turning out onto Route 86 and back into the site. This can be accomplished by installing a mini-roundabout at the entrance merge and parking lot intersections, or by some other means. This will improve the circulation on the main access road at the entrance and parking lot intersections.

5. Remove pedestrian conflicts along the main access road by providing a 10-foot wide sidewalk along one or both sides of the road.

6. Widen the access road (on the downhill side) from the base lodge to Easy Acres to provide approximately 30 feet from the edge of pavement and allow perpendicular parking on this side rather than parallel parking. This will increase the parking capacity along this access road and provide enough shoulder to allow pedestrians to walk and an area for vehicles to back out of a parking space without backing into the roadway completely.

7. Create a bus loading area and/or move the bus parking to lot #2. This will remove the need for buses to access the existing loading area next to the lodge but will require pedestrians to cross the bridge and will displace some vehicles currently using lot #2.

8. Minimize parking in the loading area to handicap vehicles only. This will create additional space for loading but will displace some employee vehicles.

9. Remove parking between the base lodge and the NYSEF building and modify the area to increase the size and performance of the current loading area. This will displace vehicles but could triple the loading area and improve traffic flow significantly.

It is recommended that when improvements occur to produce the CCC evaluated in the DGEIS, the configuration of the entrance to the mountain be modified to provide a single access point with separate left and right turn lanes exiting onto Route 86. Additionally, it may not be feasible to increase the available sight distance looking right from the site driveway. Therefore adding a supplemental distance sign is recommended to supplement existing warning of the conflict area ahead for approaching drivers.

Alternatives for bus access are being evaluated (none requiring new construction are proposed at this time) and include: designation of an area in Parking Lot #2 for buses (this would displace some private vehicles to other parking areas but would eliminate the need for buses to cross the bridge and access the existing unloading area) and/or

remove parking between the Base Lodge and the NYSEF building and modify the area to increase the size and performance of the current loading area (this would displace vehicles but could triple the loading area and improve traffic flow significantly). Under this alternative, buses could access the improved loading area and then park in the proposed Parking Lot #5 or in the designated Bus Lot located south of the main access road, adjacent to Route 86.

Additional alternatives to be considered are described in DGEIS Section IV.C.9, Section V.C.1, and Section VI.D, "Alternative Parking/Circulation Improvements." Creation of additional parking spaces along the access road between the Base Lodge and Easy Acres and creation of Parking Lot #5 would provide space for the displaced vehicles. A ski trail connection between Easy Acres and the Base Lodge would enable skiers to ski to the Base Lodge from the existing and proposed parking areas up in the Easy Acres vicinity. Providing a ten-foot wide sidewalk along one or both sides of the main access road would help remove pedestrian/vehicle conflicts.

Improvements to the loading area will have minimal environmental impacts when these improvements involve conversion of existing parking areas or roads to improve circulation and limited rock removal outside of the shoreline setback. For instance, rock removal will be necessary to reconfigure the NYSEF parking area for improved circulation and loading of buses and other vehicles. The alternatives discussed in the DGEIS of construction of a second bridge over the river or of creating a bus drop-off area on the right hand side of the access road ascending between the Base Lodge and Easy Acres will need additional analysis before implementation. This alternative was examined in the DGEIS but is not being proposed.

2. Economics

Impacts

There are several economic impacts that are directly related to the UMP. These include pre-construction spending for professional services such as planning, architectural, permitting, environmental and legal fees; construction spending related to labor and supplies for trail development, snowmaking installation and the building of lodges; spending by new skiers for lift tickets, ski lessons, equipment rental and meal purchases both on and off the mountain, lodging and entertainment; and payroll spending for new operations employees.

Construction materials will be sent out for bid and, whenever possible, will be purchased locally.

Most of the trail work and snowmaking elements will be handled by ORDA workers whereas lift installations and the construction of the lodge will be contracted to outside contractors.

The annual operating payroll is expected to increase proportionately due to the anticipated hiring of additional ski patrollers, ski school instructors, trail groomers, building maintenance personnel and service workers at the Base, Easy Acres and Cloudsplitter lodges. The new payroll will in turn generate new spending for rent, mortgages, groceries, gasoline, personal services, retail and recreation by new workers and their families throughout the primary and secondary area of impact.

Additional direct and long-term spending will come from the skiers themselves for ticket purchases, equipment rentals, ski lessons and on-site food purchases. The National Ski Areas Association reports that the average ski dollar buys the following goods and services: 54% on ski lift tickets; 7% on ski lessons; 13% on food and beverage; 5% on equipment and clothing; 4% on equipment rentals; 6% on summer services; 2% on real estate; and 9% on miscellaneous items (NSAA, 1993). Based upon an average of 1,525 potential new skiers per day, projected as a result of UMP actions, including conceptual actions, a season length of 135 days and an on-site spending per person average of $59, this new spending is projected at $13.16 million per year which represents an increase of about $4 million over existing skier spending. These revenues will primarily be used to improve overall economic conditions at Whiteface and ORDA plus support the new payroll requirements for the ski area. Some money may be contributed to fund continued completion of the UMP actions.

A multiplier effect will occur for revenues that are produced on the mountain and later spent off the mountain. This traditionally includes short-term (5 years) construction spending and long-term operational spending as well. Multipliers have been developed for all industries by the US Department of Commerce. They are used to predict the direct and indirect economic impacts generated by each spending sector. Direct economic impacts refer to additional revenues received from the ski area for construction and from the skiers themselves. Indirect impacts include the

additional purchases made by the ski industry from other businesses to satisfy the additional demand, and induced impacts are produced from the new spending of persons employed in the ski industry. Each new dollar that is spent actually "turns over" causing additional dollars to be spent to satisfy a new demand. Each category of industry (construction, recreation, lodging) has separate and unique impacts associated with its own business operation and production.

Generally, each dollar spent in the construction and operational phase generates an additional dollar of spending thereby effectively doubling the total economic impact.

Substantial direct off-site economic benefits will also occur as a result of the project. These include the spending that skiers do off the mountain for goods and services such as food and lodging along the way. It has been estimated through the user survey that $1.5 million is currently spent by skiers annually on lodging accommodations plus approximately $0.7 million on food purchases. A multiplier of approximately 6 can be applied to these figures resulting in a total of $13.2 million in total economic impact from off-site skier spending.

Off-season revenue sources are not considered significant and were not included in this analysis.

Mitigation Measures

No mitigation measures are required since the impacts on the economy are entirely positive.

3. Local Land-Use Plans

Impacts

The actions proposed in this UMP are compatible with the Adirondack Park State Land Master Plan (SLMP), particularly in that they involve the rehabilitation, modernization, and expansion of facilities within an existing Intensive Use Area. Directives of the SLMP include avoiding alteration of wetlands, minimizing topographic alterations, and limiting clearing of vegetation. As described above, creation of new ski trails, widening of existing trails and other proposed management actions will require a minimal amount of wetland disturbance, approximately 0.01 to

0.02 acre of wetland disturbance and 16.4 acres of vegetation clearing, which cannot be avoided and still accomplish the goal of ski area modernization.

Mitigation Measures

Mitigation measures for impacts to wetlands and vegetation are discussed in subsections above. All other aspects of the proposed actions are compatible with the Adirondack Park State Land Master Plan, and no additional mitigation measures are proposed.

VI. ALTERNATIVES

A. Alternative Lift Configurations

With only minor exceptions, the proposed lift configurations in this UMP Update are the same as the approved actions found in the 1996 UMP. The lift layout on Whiteface and Little Whiteface Mountains has evolved over a number of years whereby the lift terminals, loading areas, and uphill capacities follow the logic of good ski area design. Any alternatives for lift configurations would involve only minor fine-tuning of terminal placement which typically occurs during detailed lift design.

B. Alternative Trail Improvements

The trail improvements proposed in this UMP Update were selected due to the fact that the resultant skiable terrain will conform to the shape of the mountain and the breakdown of ability levels will be better balanced in terms of meeting current industry demand. As appropriate, trail designs were altered during the planning process as the environmental analysis for this UMP Update progressed.

The most significant of these alterations was the change in the status of the Tree Island Pod and new trails at elevations over 2,800 feet from New Actions originally proposed as part of this UMP update, to Conceptual Actions requiring future UMP amendment(s) and SEQRA review(s) if and when they are pursued following the extensive Bicknell's thrush study work being performed.

Furthermore, even within these currently conceptual areas, Trail 83 was originally designed as an extension of Trail 82, running along the crest of a ridge to the north and east of the conceptual Tree Island Pod. In its initial configuration, Trail 83 would have run through the center of a stand of red pine, rocky summit forest, which is a relatively unusual ecological community in the region. Impacts would have involved the clearing of approximately 20% of the 6.6-acre stand, including cutting of approximately 1100 trees at least 3 inches in diameter. In order to preserve the red pine forest community, the route of this conceptual trail was modified to swing northward to avoid it. This method of trail planning is an integral part of the UMP process. As much as possible, the natural contours of the terrain are preserved and terrain modification is minimized. Some of the

fine-tuning of trail design occurs during the field layout that is undertaken prior to construction.

C. Alternative Lodge Improvements

The 2002 UMP update proposes to renovate the existing Easy Acres Lodge (formerly Kid's Kampus Lodge) and construct a new facility adjacent to the lodge. Alternatives to this are:

1. Renovate and expand the existing lodge to accommodate all future spatial needs.
2. Demolish the existing lodge and construct a new, larger lodge to accommodate all future spatial needs.

At this time, renovation of the existing lodge facilities at Easy Acres, along with the construction of an additional facility, is the preferred alternative as it is the most cost effective.

D. Alternative Parking/Circulation Improvements

The following table summarizes the alternatives for parking/circulation improvements at Whiteface.

VI. OPTIONS	PROS	CONS
1. Funicular	• No buses in entry area • No buses on bridge • No using log footpath	• $-Construct • $-Operate • $-Maintain • Further crowding at base area
2. Bus drop-off by river	• Short walk to lodge	• Very steep • $-Construct • $-Maintain • Buses cross bridge • Buses in entry area • How do buses pick up? • Buses park in Lot 5?
3. Half ± of Lot 2 as bus lot	• No buses on bridge • No buses in entry area • Low cost-need flagman end of day to enable left turn out • Buses stay put for the day	• Relocation of car parking

4. 2nd Bridge over W. Branch	• 2nd way out	• Permitting difficult • Expensive to construct • Expensive to maintain
5. Passenger conveyor from existing bus lot to bridge (may be covered)	• No long walk	• Expensive

The above alternatives are among the measures under consideration for improving the traffic/pedestrian circulation at the entry and base area. The management at the Ski Center will be examining the above alternatives in more detail. The above alternatives will be considered in conjunction with the circulation improvement measures suggested by the traffic engineer. See Section IV.C.9. These alternatives are only being given consideration at this time and are not scheduled improvements at this time. If and when any of these alternatives become scheduled improvements they will be subject to future UMP/SEQRA review.

E. Alternative Building Locations

Alternative locations were considered for the relocation of the Lot 5 Pole Barn and for the relocation of the Don Straight Building. These facilities will be located adjacent to the existing vehicle maintenance garage and the new maintenance building expansion. These buildings can be accommodated within an existing cleared area. Alternative locations would involve additional clearing and disturbance, and would not provide for the beneficial consolidation of these maintenance and storage facilities, and are therefore not preferable.

NYSEF is working cooperatively with ORDA facilities to implement its training program at the ski center. There is no other alternative site within the ski center that is better suited for integration of the NYSEF programs with the ORDA as the one selected for the new NYSEF Training Center Building. The building is located in proximity to base lodge facilities and infrastructure and in an area of already existing disturbance. Based on power company requirements, the proposed building will be located a minimum of twenty (20) feet from the existing overhead electric lines.

F. The No-Action Alternative

If no action is taken and no improvements are made to the ski center, many skiers will continue to choose to ski at better maintained facilities which provide desired amenities. Equipment will continue to break down and further deter the skiing population. As the number of skier visits declines, revenue will be lost which could result in personnel layoffs and a continuing down spiral of the ski center until it becomes uneconomical for the facility to remain in operation.

The "No Action" alternative also implies that no "new" actions are taken (or approved) in the 2004 UMP. The 1996 UMP is approved and remains in effect and can continue to be implemented.

VII. SUMMARY OF UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS

Some environmental impacts of the proposed action can neither be prevented nor reasonably avoided. This section will describe the unavoidable impacts which may occur due to construction and implementation of the Whiteface Mountain Five-Year Plan.

Construction activities will result in dust, odors, fumes, noise and vibration. A small amount of traffic will be generated. Removal of vegetation, excavation and grading will be required to improve ski trail areas, and construct chair lift support structures and new chair lifts. Implementing sediment and erosion control Best Management Practices during construction and following construction will greatly reduce the possibility of any serious erosion problems. Final vegetative growth and grades will blend with the existing environmental setting.

Increased noise levels during construction of improved facilities cannot be avoided. The possibility exists for interference with wildlife breeding and nesting seasons, however, implementation of the recommendations of the VINS Study and other mitigation measures will ensure that the Bicknell's Thrush will not be negatively impacted. Related noise will have a significant short-term impact, but little long-term permanent impact is expected.

Operational activities will cause a minor increase in peak hour traffic and solid waste disposal needs.

There will be minimal demands on local government offices such as the assessor, tax collector, and building inspector. The need for fire, police and rescue services will continue. Medical emergencies will continue to occur, requiring service.

Minor amounts of air pollution and noise will be generated. Fuel will be used.

There will be an increase in surface water runoff due to increased impervious areas. Stormwater management practices designed in accordance with recently adopted Phase II regulations have been proposed to mitigate potential impacts as much as practicable.

All of these impacts are relatively minor and local in nature. Most do not require mitigation measures. Section V of this DEIS describes those mitigation measures which are required.

VIII. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

Expansion of recreational use of the land at Whiteface Mountain does not represent a significant or irretrievable commitment of resources. Should intensive use recreational facilities and programs ever be abandoned, the area would revert to natural vegetation and habitat characteristics which are representative of those in the Forest Preserve in the Adirondack Park.

Construction of the Whiteface Mountain Five-Year Plan will result in the permanent commitment of raw materials including concrete, steel, gravel, and wood for construction of the permanent structures, in addition to energy resources required to construct, operate and maintain the recreation area.

Site preparation for the proposed project will remove approximately 16.4 acres of existing vegetation and disturb soils on the site. Since no rare, threatened or endangered species are known to inhabit the site, the removal of this habitat is not viewed as significant. Measures are proposed to mitigate potential impacts to the Bicknell's thrush, a Special Concern species in New York State.

Operation of the proposed project will result in the permanent, irretrievable commitment of resources such as energy for heating, lighting and equipment operations, however, such commitment will be extremely minimal. Adverse impacts on air, water and socioeconomic resources will not be irreversible or significant.

IX. GROWTH INDUCING, SECONDARY AND CUMULATIVE IMPACTS

This section identifies the potential off-site impacts that may occur following improvements to the Whiteface Mountain facility. Growth inducing and secondary impacts relate to changes in population, land use patterns, and the creation of new businesses. Cumulative impacts relate to changes from the project plus changes from other projects in the region.

A review of the period since the 1996 UMP gives an excellent idea of what kind of economic impacts have occurred in the local region as a result of the recent improvements at Whiteface Mountain. As can be seen in Table 9-1, "Whiteface Mountain Ski Center Use Data," the total number of visitors per year has increased, as has the number of season passes sold each year. The increase has had an entirely positive impact on the local business community and outlying communities.

Table 9-1
Whiteface Mountain Ski Center Use Data

	Season Pass Sales	Total Annual Visitors
1996-97	489	132,052
1997-98	903	119,411
1998-99	3,888	128,305
1999-2000	2,366	111,746
2000-01	3,439	154,128
2001-02	4,049	231,357 *
2002-03	4,368	258,265 **

*** includes 48,154 gondola riders in summer 2002**

**** includes 52,168 gondola riders in summer 2003**

The additional business realized from more skiers translates into jobs for residents and compounds its value as it moves through the local economy. The salaries from this employment help stabilize the local economy by offsetting the summer seasonal employment then layoff syndrome that dominates the service industry in the North Country area.

Cumulative impacts are also considered a positive factor for the economy. Several new housing developments are under construction to meet the demand for second homes. Much of the demand for new housing can be attributed to new people being exposed to the area through skiing at Whiteface Mountain. The impacts from residential growth versus tourism growth tend to be more subjective in that they can be perceived as positive changes for some and negative changes from other points of view. For example, an overall increase in downtown business revenue most likely also means more traffic on local roads. Most roads in the North Country, however, are designed to handle the level generated by the high volume summer seasonal traffic. Winter business is always welcome and the increased traffic is generally accepted as a necessary side effect.

Whiteface Mountain has not reached all the goals set in the 1996 UMP document but is on its way there. The planned improvements set forth in this document will help the ski area attain the stated goal but will not necessarily cause there to be substantially more skiers, nor a significantly higher amount of impacts.

X. EFFECTS ON THE USE AND CONSERVATION OF ENERGY

The proposed actions will not cause a major increase in the use of energy, although the consumption of fossil fuels and power will be required by the project both during its construction and operational phases.

During construction, the primary expenditure of energy will be the consumption of fossil fuels to operate construction equipment and to transport construction workers and materials to the site. This activity will cause a temporary and unavoidable increase in energy use. Some of the activities involving fuel consumption during the various construction phases include clearing and grubbing, excavation, grading, and lift and building construction.

The operation of the facility will also require the consumption of fossil fuels and power. The use of electric and fossil fuels for improved chair lifts and snowmaking equipment cannot be avoided. Additionally, new and expanded lodge facilities and services will necessitate the use of more fuel for heating.

Various chair lifts will be replaced, upgraded or in some cases eliminated and other lifts will be added resulting in only nominal new chair lift energy requirements. In order to improve the snowmaking process and to conserve energy, an analysis of the options available and the system that makes the most sense for Whiteface, from an energy conservation and manpower utilization standpoint, was studied. This analysis is provided in Appendix K. The basic recommendations of the analysis are that Whiteface should invest in low energy technology where it applies, while focusing on diversity of technology that provides for rapid production rates and premium snow quality. The long-term development of a 5 to 8 million gallon storage reservoir is recommended in case of a dry winter. This recommendation is being given further consideration at this time, but is not a New Action proposed in this UMP update. At such time that a snowmaking reservoir becomes a scheduled improvement, it will be the subject of future UMP/SEQRA review. The pumping capacity at the on-mountain pumping facilities should be expanded to achieve production goals. The increased water capacity will increase production rates and improve snowmaking efficiency during colder temperatures. This reduces overall production hours and reduces operating costs because more snow can be made during optimal conditions.

At the Whiteface Mountain Ski Center, there is evidence of an exceptional valley wind resource, which may be suitable for a wind energy application. A preliminary assessment of the feasibility of a wind energy project appears favorable, therefore, an on-site wind measurement program is proposed to be instituted and operated for a minimum period of 6 months. The objective of this measurement program would be to verify the wind resource with the objective being possible development of an alternative energy source at the ski center which would result in a reduced need for conventional electric power consumption.

The improvements proposed for the Whiteface Mountain Ski Center are expected to result in an increase in the number of skiers traveling to the area. The resultant automobile traffic could contribute to the consumption of fossil fuels. Shuttle buses from local communities, overnight accommodations and schools are proposed to be included. Shuttles will serve to diminish parking and traffic congestion and will reduce the consumption of fossil fuels.

Normal day-to-day operation will contribute to increased power consumption on a long-term basis. This consumption, however, will predominantly be seasonal in nature.

Outside of the structures some outdoor lighting is expected, but will not result in a substantial use of electricity.

XI. RESPONSES TO COMMENTS

This section presents responses to comments made on the August 2002 DGEIS. Comments have been summarized from the original comment source listed with each comment. Copies of comment letters are included in Appendix AA.

A. Constitutional Limits

Comment 1 (by David H. Gibson, The Association for the Protection of the Adirondacks, letter dated September 16, 2002).

The Commentor states that page v of the DGEIS Executive Summary states that the proposed management actions will bring the total miles of downhill ski trails at Whiteface to 25.51, and that DGEIS page I-10 states this figure is 24.45 miles. The Commentor asks which figure is accurate, and says that it is important to be accurate because the constitutional limit for the length of downhill ski trails at Whiteface is 25 miles.

Response 1

Page v of the DGEIS Executive Summary states (incorrectly) that the proposed improvements will bring the total mileage of ski trails at Whiteface to 24.51 miles, not the 25.51 miles claimed by the Commentor. The figure of 24.45 miles provided on DGEIS page I-10 and Table IV-2 was the correct figure. Page v of the DGEIS Executive Summary should have read 24.45 miles and not 24.51 miles.

Because the status of the Tree Island Pod and other trails over 2,800 feet have been changed from Proposed Actions to Conceptual Actions, trails totaling 4.43 miles are no longer proposed as New Actions, and the total mileage of ski trails will be amended to be 20.02 miles.

Comment 2 (by David H. Gibson, The Association for the Protection of the Adirondacks, letter dated September 16, 2002).

The Commentor would like to know what the expansion plans are for the ski center for the next 10, 15, 25 or more years. The Commentor would like to see a UMP section entitled "Future Planning."

Response 2

Section IV.E, "Future Planning", has been added.

Although the content of any UMP is dictated by the Adirondack Park State Land Master Plan and it is not required to identify future projects and activities that are conceptual in nature, in a effort to forecast future projects, information concerning a number of projects that are conceptual in nature has been included in this UMP Update.

The inclusion and discussion of these conceptual actions, such as the snowmaking reservoir, the Cloudsplitter Lodge, and the Tree Island Pod as potential future actions to be covered by separate UMP amendments and accompanying SEQRA reviews, demonstrates ORDA's commitment to long range future planning.

As noted by the Commentor, the 1996 UMP for Whiteface called for creation of additional downhill trails. As can be seen in Section I.E., Table I-1, "Status of 1996 UMP Update and Amendment," much of this work remains to be completed and is incorporated into the 2004-2009 management actions. Similarly, the improvements proposed within the 2004 UMP will be realized over time, as time and budget constraints are prioritized.

Whiteface staff work hard to maintain the Ski Center and to provide some of the best ski terrain in the country, for recreational and ski racing teams, serving beginning through expert skiers and snowboarders. The economic benefits realized by the community as a result of patronage at Whiteface is due in large part to the quality experience enjoyed by skiers at Whiteface, and is based on much hard work and skilled management by ORDA's staff.

With regard to future planning, there are no plans to increase the constitutional limit on the total length of ski trails allowed at Whiteface. The long term goal is to improve the skier experience while not expanding the ski slopes beyond the allowable limit. Whiteface is unique in the northeast as the former site of two Olympics. The available terrain has challenged the best skiers in the world, and modifications since 1980 have made the mountain skiable for the recreational skier. Recent improvements to lifts, including the installation of the gondola, improve the capacity of the mountain while simultaneously improving the skier experience. These types of upgrades have been and will continue to be the focus of mountainside improvements.

This UMP represents the continuation of a planning process for Whiteface that takes into account the Adirondack Park State Land Master Plan and Article XIV of the NYS

Constitution, including the special provisions of Article XIV that authorize the construction and operation of ski facilities on Whiteface Mountain. Whiteface is quite unique because it is a designated Intensive Use Area within the Forest Preserve. As an Intensive Use Area, Whiteface's basic management guidelines include providing facilities for intensive forms of outdoor recreation by the public. At the same time, Whiteface is still required to blend with the Adirondack environment and have minimum adverse impacts on surrounding State lands.

Comment 3 (by John Caffry and Neil Woodworth, Adirondack Mountain Club, letter dated September 23, 2002)

The Commentors ask if all trails have been measured to ensure that they adhere to the constitutional limits on their width.

Response 3

Yes. As noted in Section II.B.2, 1.3 miles of existing trails exceed the 120 foot width, this is 3.7 miles less than the 5 mile maximum allowed in Article XIV of the NYS Constitution.

B. Tree Cutting

Comment 1 (by David H. Gibson, The Association for the Protection of the Adirondacks, letter dated September 16, 2002). Related comments, requesting clarification that no Krummholz would be cut and for age-class information regarding trees too be cut were made later by Peter Bauer, Residents Committee to Protect the Adirondacks, letter dated December 6, 2002

The Commentor feels that the vegetation cutting noted in the DGEIS is remarkable, even if done over a period of years, and feels that ORDA and DEC should conduct additional field work to verify that the tree cutting described is the minimum necessary to complete the management actions.

Similar Comment by Jaime Ethier, the Adirondack Council, letter dated September 23, 2002, and in newspaper articles dated September 23, 2002 and October 10, 2002.

Response 1

The amount of tree clearing required for the actions proposed in this UMP has been reduced substantially due primarily to the fact the Tree Island Pod and the snowmaking reservoir are now conceptual actions only, and not proposed as part of this UMP. The number of trees 3 inches dbh or larger to be cut for proposed actions has been reduced over 90% from 54,951 listed in the DGEIS to approximately 4,200. FGEIS Table V-1, "2004 Tree Cutting Estimates for Proposed Trails and Trail Widening at Whiteface Mountain Ski Center", provides the revised tree clearing tally data for the actions proposed in this UMP, and some information about the size ranges of trees that are proposed for cutting. Further, as illustrated on Exhibit II-8, "Vegetation Covertype Map", and Exhibit IV-1, "Proposed Ski Center", none of the cutting for New 2004 UMP Actions, or even 2004 UMP Conceptual Actions, would involve Alpine Krummholz and no cutting would take place within 2,000 feet of the area mapped as Krummholz.

The Adirondack Park State Land Master Plan designates Whiteface Mountain Ski Center as an Intensive Use Area. Article XIV of the New York State Constitution states that Whiteface can develop up to 25 miles in total length of ski trails. In order to construct ski trails it is necessary to cut trees on the designated Intensive Use Area that is Whiteface. The proposed ski trail work occurs contiguous to the existing ski trail network and complements the existing trails.

In order to identify the vegetation impacts, LA Group biologists collected data on tree density in those places where work is proposed. The methodology is fully described in Section V.B.2. and the vegetation sampling data is provided in Appendix J.

The Commentor is correct in noting that trail construction takes place over a period of many years. The current operating master plan for Whiteface Mountain Ski Center, the 1996 UMP, called for creation of additional downhill trails. The 2004-2009 UMP identifies the status of the 1996 UMP management actions. Much of this work remains to be completed and is incorporated into the 2004-2009 management actions. Similarly, the improvements proposed within the 2004 UMP will be realized over time, as time and budget constraints are prioritized. Refer to Section I.E., Table I-1, for tracking of 1996 UMP management actions that are still pending construction. Many of these actions have not been built to date and the same delay is likely to occur with the new proposed actions.

The new lodge being considered for some future time at the top of Little Whiteface would replace the existing Ski Patrol building and would be located in the existing clearing immediately adjacent to the existing Cloudsplitter Gondola and Little Whiteface Quad (Lift G) unloading stations. If and when the new lodge is proposed as part of a

future UMP update some very limited vegetation clearing may be necessary in order to construct the new lodge. Refer to Lodge Site Photographs 1, 2, 3, 4 and 5, provided in Appendix S.

C. Erosion Control

Comment 1 (by David H. Gibson, The Association for the Protection of the Adirondacks, letter dated September 16, 2002). A similar comment was made later by Peter Bauer, Residents Committee to Protect the Adirondacks, letter dated December 6, 2002

The Commentor asks if the proposed erosion control measures are the best possible available practices to avoid soil erosion.

Response 1

Whiteface personnel are experienced in ski trail and lift construction, including erosion control techniques. In June of 2003 Whiteface hosted an erosion and sediment control workshop that was taught by one of the region's leading experts. Personnel from Whiteface as well as the APA and DEC participated in this workshop that combined teaching sessions and on-mountain examinations of past and on-going erosion control measures at Whiteface.

As proposed, it is best to limit the areal exposure of soils as much as possible, and to install filter fabric fences, water bars and erosion control blankets and other best management practices as needed in order to minimize or eliminate the potential for erosion of exposed soils.

As noted in Section III.A., Whiteface has recently participated in the creation of the National Ski Areas Association Sustainable Slopes Charter, which outlines a series of best management practices related to the implementation of pro-active environmentally-friendly management actions. A copy of the Sustainable Slopes Charter is provided in Appendix T of this document.

A revised draft Construction Pollution Prevention Plan (CPPP) has been prepared and the draft CPPP identifies specific best management stabilization and erosion control measures to be taken during construction. See Appendix U. The CPPP includes details of specific best management practices produced by the USDA – Natural Resources Conservation Service as well as other practices and materials that have proven to be

effective in controlling erosion, particularly on steeper slopes. A discussion of specific erosion control products recently developed for the purpose of establishing vegetation on steep slopes is provided, as well as the specifications for their use.

In addition to the revised draft CPPP included in this FGEIS, expanded CPPPs for specific construction activities will be prepared in accordance with NYSDEC's Phase II stormwater requirements and will be reviewed by NYSDEC prior to being implemented during construction. The CPPP to be implemented during construction will also be submitted to the APA for review prior to the initiation of construction activities. As an example, this FGEIS (Appendix P) contains the CPPP prepared specifically for the construction of Lot #5 which is a proposed action in this UMP. This CPPP contains sufficient construction details and specifications necessary to ensure proper BMP implementation. It is also recommended that the construction manager for the project be equipped with a copy of "New York Contractors Erosion and Sediment Control Field Notebook" prepared by NYSDEC and the USDA-NRCS. This is a pocket sized document that provides contractors a quick handy guide for the installation and maintenance of erosion control practices.

Seed Mix for Slope Stabilization

Stabilizing the newly constructed ski slopes with vegetation was closely examined to determine what products and practices could be effectively implemented to provide rapid vegetation establishment and long term sediment and erosion control.

The seed mix proposed for stabilizing the majority of the constructed ski trails at Whiteface Mountain is known as an "Adirondack Mix" that is commercially available from local seed suppliers. The composition of this mix from one such supplier (components are the same, proportions may vary slightly) is as follows:

43.65% Boreal creeping red fescue
34.3% Perennial ryegrass
17% Kentucky bluegrass

The boreal red fescue is well suited to the climatic conditions on Whiteface Mountain while the perennial ryegrass will provide rapid germination (as soon as seven days). Kentucky bluegrass is a good general use low growing species that is capable of spreading in open areas via its rhizomes.

The Adirondack seed mix that is recommended in the draft CPPP for Whiteface has proven to be very effective when used to stabilize soils as part of ski slope construction in the Adirondacks. Recent trail construction at Gore Mountain for the Bear Mountain Pod utilized the Adirondack seed mix. Gore Mountain reported that the Adirondack Mix performed very well with good germination and good coverage providing effective post-

construction stabilization on their new ski slopes. The advanced trails at Gore Mountain on which the Adirondack Mix was used consisted of many areas where slopes were 40% or slightly steeper. The slopes, soil types and elevations where the Adirondack Mix was successfully used at Gore are similar to the conditions at Whiteface. The seed mix has also proven to be tolerant of the different microclimate created on ski trails caused by a deeper and longer lasting snow pack due to snowmaking operations.

A seed mix devised by NYSDOT for use on road construction projects involving steep slopes was considered as an alternative to the Adirondack Mix. This seed mix contains a number of wildflowers as well as sheep fescue and annual ryegrass. Components of this mix were chosen by NYSDOT because of their ability to produce a root system of varying root types, including fibrous shallower roots and deep tap roots.

Given the fact that the Adirondack Mix has proven to be effective for stabilizing ski trails constructed in the Adirondacks that are as steep and even steeper than those proposed at Whiteface Mountain, and given the fact that the Adirondack Seed Mix is more economical (some 30 times less expensive than the alternative NYSDOT mix) the Adirondack Seed Mix will be used to stabilize the majority of the trails constructed as part of the current UMP for Whiteface Mountain. The alternative NYSDOT seed mix will be used under those special conditions that may be most suitable, including steeper slopes (i.e. >15 to 20%), or wherever the Adirondack Mix does not become effectively established. Appendix U contains the Draft Construction Pollution Prevention Plan. This plan states that, including Conceptual Actions, approximately 29.8 acres would be affected by ski trail construction and identifies the vegetation practices used for erosion and sediment control.

Other BMPs

Other BMPs proposed to control erosion during construction of ski trails on Whiteface Mountain, including mulches, tackifiers, water bars, silt fences, etc. are discussed in detail in FGEIS Appendix U, Draft Construction Pollution Prevention Plan.

Seeded areas will be mulched with straw that will be secured in place physically or with a non-asphaltic tackifier. Alternatively, seeded areas may be hydromulched with wood cellulose mulch that may also include a non-asphaltic tackifier.

Water bars will be used extensively during construction to prevent erosion. This BMP has proven to be effective on sloped areas such as ski trails and has been found to be effective when constructing other ski trails at Whiteface in the past. The spacing interval between water bars will depend on the slope on which they are installed as per specifications included in the CPPP.

Silt fences will be installed to protect surface water resources that are in the vicinity of construction. Silt fences will be installed in accordance with the details included with the CPPP and will be inspected on a regular basis to make sure that they are functioning properly.

Inspections

Because the proposed construction activities are located within the Champlain watershed, which is a TMDL (total maximum daily load) watershed for phosphorus, site assessments and inspections during construction will be carried out by a qualified professional in accordance with the requirements of NYSDEC's General Permit GP-02-01. This qualified professional will be responsible for conducting site inspections prior to construction and then during construction once every 7 calendar days and within 24 hours of the end of a storm event of 0.5 inches or greater. Inspections will track the construction process and document the effectiveness of the appropriate erosion and sediment control practices. The qualified professional will also perform a site inspection following completion of construction to certify that the site has undergone final stabilization in accordance with the best management practices specified in the CPPP.

Comment 2 (by Kevin Prickett, The Association for the Protection of the Adirondacks, letter dated September 23, 2002) A similar comment was made later by Peter Bauer, Residents Committee to Protect the Adirondacks, letter dated December 6, 2002

The Commentor is concerned about siltation at the mountain and provides photographs of erosion at the mountain. The UMP needs to provide more detail on proposed erosion control measures.

Response 2

Construction Phase

Additional detail on the proposed erosion control measures for construction is provided in Appendix U, Draft Construction Pollution Prevention Plan. The use of various best management practices is specified.. Refer to Response 1 above. Additional information regarding ski trail construction process, construction sequencing, and erosion control ("Detail of Proposed Erosion and Sediment Control Plan") has been added to supplement the information included in the draft CPPP.

The Construction Pollution Prevention Plan (CPPP) presented in Appendix U is a draft and not intended to satisfy all of the requirements of either the old NYSDEC General Permit (GP-93-06) or the current version (GP-02-01) for stormwater discharges from construction activities. This draft version of the CPPP was prepared and included in the FGEIS to provide more general information on the practices that will be implemented on a site-wide basis during construction.

Specifics of the CPPP such as the "site specific plans" and "future schematic design phases" are required to be prepared and submitted to NYSDEC under their General Permit GP-02-01, "SPDES General Permit for Stormwater Discharges from Construction Activity" (January 8, 2003). In accordance with GP-02-01, these materials will be prepared by a licensed/certified professional and submitted to NYSDEC for review and approval prior to beginning construction. As required, this submission will contain stormwater quantity analyses, detailed plans, BMP installation details as well as construction specifications. Prior to beginning construction additional information, including any revisions and additions to the Draft CPPP in this EIS will also be provided to the Adirondack Park Agency for review and appropriate determination to ensure compliance with applicable regulations and Agency guidelines. As an example, this FGEIS (Appendix P) contains the CPPP prepared specifically for the construction of Lot #5 which is a proposed action in this UMP. This CPPP contains sufficient construction details and specifications necessary to ensure proper BMP implementation.

Operational Phase Stormwater

After construction of the activities is complete the project will comply with NYSDEC's recently updated stormwater management design standards, including not increasing the rate of stormwater runoff (stormwater quantity) and, where necessary, providing stormwater treatment to improve stormwater quality.

The effects of stormwater that may be expected as a result of the actions in this UMP update have been assessed by the use of the Simple Method and with the use of HydroCAD stormwater modeling.

Ski Trails

The effects of runoff, as a result of ski trail construction, has been determined by the Simple Method, also known as the SCS Runoff Curve Number (CN) Method. The most important factors that determine CN are the hydrologic soil group (HSG), cover type, treatment, hydrologic condition, and antecedent runoff condition (ARC). In the area of ski trails, the predominant soil type is Typic Cryohumods (extremely bouldery). The general hydrologic soils group is considered C/D for this area and has subsequently been used to determine the pre and post Curve Numbers. Comparing the pre ("Woods") and post ("Meadow") CN for the proposed ski trail construction, as put forth in the SCS TR-55 Manual, there is no significant change in the amount of runoff from any subcatchments where ski trails will be constructed. Considering a C soil type and a "good" woods ecosystem as the existing condition, the CN may increase from 70 to 71 with the proposed ski slopes. Evaluating a D soil type and "good" wood cover, indicates a change in the CN from 77 to 78. Current assessment methodologies available for stormwater analyses cannot accurately differentiate changes in runoff with a CN change of 1. Hence there is no expected change in runoff quantity and stormwater quantity controls are not necessary.

Parking Lot #5

The proposed Parking Lot #5 will be constructed beyond the Easy Acres parking lot. The parking area will be approximately 2.7 acres in size. The parking surface will be gravel and the total land disturbance due to grading outside the parking surface is estimated at four (4) acres.

Appendix P includes the Stormwater Management Report for Parking Lot #5. Stormwater computations for Parking Lot #5 were conducted using the USDA Soil Conservation Service Technical Release No. 20. The program used was the HydroCAD Stormwater Modeling System produced by Applied Microcomputer Systems of Chocurua, New Hampshire. The design storms studied were the one (1) year event (Channel Protection, CP_v), ten (10) year event (Overbank Flood Control, QP), and one hundred (100) year event (Extreme Flood Control, QF). The 24-hour Type II storms produce a total rainfall of 2.1, 3.5 and 4.8 inches respectively. Calculations were also completed for the treatment of the required Water Quality Volume (90% rainfall event, WQ_v) measuring 0.8 inches in northern Essex County.

The design intent of limiting the proposed runoff rate to a level less than the existing runoff rate has been met by directing stormwater into a detention basin and controlling the rate of release. The quality of the runoff is improved by allowing sediments to settle out in the stormwater management area before releasing it. The table below summarizes the results of the full study detailed in Appendix P

	Runoff For Storm Events			
	Pre-Construction	*Post-Construction*	*Difference*	
1-Year	1.46 cfs	1.48 cfs	+0.02 cfs	
10-Year	7.61 cfs	7.50 cfs	-0.01 cfs	
100-Year	15.38 cfs	15.16 cfs	-0.22 cfs	

In addition to attenuating these storms, the outlet of the detention basin has been set at an elevation so that the runoff from the water quality volume storm is captured and infiltrated.

Appendix P includes a grading plan for Parking Lot #5 and the proposed detention basin. The grading plan illustrates how runoff from undisturbed lands above the parking lot will be captured and routed around the parking lot where it will be dispersed into undisturbed areas using level spreaders. Similarly, water that is released from the detention basin will be directed to a wide level spreader that will disperse the water across the undisturbed slope some 1,100 feet uphill of the AuSable River.

D. Fish and Wildlife

Comment 1 (by David H. Gibson, The Association for the Protection of the Adirondacks, letter dated September 16, 2002). A similar comment was made later by Peter Bauer, Residents Committee to Protect the Adirondacks, letter dated December 6, 2002

The Commentor appreciates the attention paid to the discussion of the habitat of Bicknell's Thrush in the DGEIS on page V-14. The Commentor asks why this species is not listed in Appendix L. The Commentor feels that research on this species should be conducted at Whiteface.

Response 1

The American Ornithologists Union officially recognized the Bicknell's Thrush in 1995 based on the 1993 work of Henri Ouellet. Until1995, Bicknell's Thrush was listed as a subspecies of the Gray-cheeked Thrush, which is listed in Appendix L. A complete copy of Appendix L is provided in this FGEIS. The copy of Appendix L provided in the August 2002 DGEIS was inadvertently miscopied.

During the preparation of this FGEIS, and in response comments made on the August 2002 DGEIS, ORDA has made significant efforts to address concerns regarding the Bicknell's Thrush. These efforts included making the Tree Island Pod and other new projects requiring tree clearing above 2800 feet in elevation conceptual actions and not proposed actions, postponing projects previously approved in the 1996 UMP update which involve tree clearing above 2800 feet until after more information on habitat use by Bicknell's Thrush is obtained, funding a Bicknell's Thrush study by the Vermont Institute of Natural Science, and agreeing to implement a multi-year field study of the Bicknell's Thrush on and around Whiteface Mountain through, at least, the year 2009.

The following is a description of the comprehensive assessment of the Bicknell's thrush that the management of ORDA has committed to implementing before proposing construction of new ski trails above an elevation of 2,800 feet. Exhibit V-I, "Timeline for Additional Assessment of Bicknell's Thrush", outlines the various tasks and their sequence.

1. The VINS Study

Whiteface management has entered into an agreement with the Vermont Institute of Natural Science (VINS), the northeast region's leading authority on Bicknell's thrush, to use its extensive data on Bicknell's thrush and their habitat to develop recommendations for design, mitigation, and management measures that will minimize both short- and long-term potential project impacts to Bicknell's thrush. The following describes in more detail the study being performed by VINS.

VINS has spearheaded ecological studies of Bicknell's Thrush in the Northeast since 1992. A key component of VINS' research has been focused investigations of the use by Bicknell's Thrush of two established Vermont ski areas - Stowe Mountain Resort (Mt. Mansfield) and Stratton Mountain. From 1995-2001, VINS conducted studies on three 10-20 hectare plots on Mt. Mansfield. One of these was in an area developed for skiing around the Octagon; the other two in areas are relatively undisturbed habitat on the Mansfield ridgeline and Ranch Brook watershed. On Stratton, VINS established two study plots in 1997 and has since then collected field data on each plot annually. One plot is on the developed north peak; the other plot is on the undeveloped south peak.

Field methods on both mountains have been standardized from year to year and have included: (1) constant-effort mist-netting and banding (including unique color banding of each individual thrush); (2) intensive resighting of color-marked individuals; (3) radio telemetry of adult males and females, and in 2001 on Mansfield of fledged juveniles; (4) videography at nests; (5) monitoring of nests and reproductive success; and (6) detailed characterization of vegetation and macrohabitat variables around nests. Each mountain thus provides a 7-year data base that can be used to examine within- and between-year variation in Bicknell's Thrush life history parameters on habitat blocks that are developed for skiing and on similar, undeveloped blocks. These data afford a valuable opportunity to address important questions, such as those posed by the conceptual Tree Island Pod project, relating to the potential impacts of ski area development on this species, including the potentially beneficial impacts associated with the creation of habitat that is favorable to nesting.

VINS is undertaking a detailed analysis of its 1995-2003 field data from Mt. Mansfield and Stratton Mountain. They will report their findings in a summary document that will specifically relate them, to the extent possible, to the conceptual Tree Island Pod project on Whiteface Mountain. VINS' analysis and evaluation will combine (1) site-specific information collected during a field visit by VINS Conservation Biology staff to the project area in the fall of 2003, (2) examination of GIS and other existing data from the proposed project, and (3) VINS' ecological and behavioral field data from Mt. Mansfield

and Stratton Mountain. This approach will enable the generation of predictions about likely short-term (1-2 years post-construction) and medium-term (3-5 years) impacts of the Tree Island Pod project on breeding Bicknell's Thrushes. More importantly, VINS will use their data to construct a generally applicable model of how Bicknell's Thrushes use habitat within developed ski areas, and how new construction and ongoing management can minimize impacts to, and in some cases enhance breeding habitat for, Bicknell's Thrush on Whiteface Mountain.

VINS' analysis will consist of three primary components:

1. Analyze nest site selection by Bicknell's Thrush. VINS has monitored over 150 active nests on both mountains since 1995 on ski-area and non-ski area plots. At each nest, VINS has collected a detailed series of data on nest location, vegetation, landform characteristics, and other site-specific variables. Comparable data at randomly selected "non-use" sites at a distance of 30 meters from each nest for > 50% of the nests has also been collected. These data will be used to develop a model of Bicknell's Thrush nest site selection in ski-developed areas versus undeveloped habitats. Using GIS plotted vegetation data from Whiteface Mountain, this model will be applied to the conceptual Tree Island Pod project to generate predictions about the viability of the project area for Bicknell's Thrush nesting, both in its current condition and after the proposed development. Results are expected to yield insights about measures that can be adopted to mitigate proposed habitat alterations, and, ultimately, to enhance Bicknell's Thrush habitat on Whiteface, including in the conceptual Tree Island Pod area. More generally, a model of nest site selection relative to ski area development should help guide future planning and conservation efforts at Whiteface Mountain and throughout the Northeast. It will also help to establish a mechanism to inventory beneficial measures that are implemented to offset potentially adverse impacts associated with the other ski area development and activities.

2. Analyze movements and behavioral ecology of Bicknell's Thrush. VINS has an extensive data set on movements of adult male and female Bicknell's Thrushes in both ski area and undeveloped habitats. Using radio telemetry, VINS has recorded daily movements and locations of approximately 50 individual adults for 4-6 week periods. In 2000, VINS also monitored post-breeding movements and habitat use of adults and juveniles on Mt. Mansfield. Telemetry data will be plotted and analyzed on GIS maps of Mt. Mansfield and Stratton Mountain study areas, and related to various vegetation and terrain characteristics. Results will enable documentation of movements and home range characteristics relative to physical variables such as ski trail width, size and configuration of habitat islands, spacing and density of trails per unit area, and extent of gladed versus open trails. These results should provide valuable information about exactly how Bicknell's Thrushes use (or avoid) specific areas within ski areas. Findings from undeveloped habitats will provide a contextual baseline.

As a complement to telemetry data on movements and habitat use, videographic data on adult thrushes are available to examine behavioral attributes of birds on ski areas versus natural forest habitats. From 1998-2000 on Mt. Mansfield and 1998-2002 on Stratton Mountain, VINS videotaped all known nests during the chick-feeding stage. Because nearly all adult Bicknell's Thrushes were uniquely color-banded on each study plot, VINS has a large data set on the behavioral ecology of individual birds and nests. VINS' preliminary analysis of these data has shown that Bicknell's Thrush has a very unusual and complex mating system. Remarkably, most nests are attended by 2-4 males, and paternity is almost invariably mixed in such nests. An important and unanswered question relates to the role of habitat and landscape features in shaping this complex, variable system. VINS will analyze their videotape data to examine behavioral differences among breeding thrushes on ski area versus undeveloped habitats. This will enable documentation of factors such as nest attentiveness of females, numbers of male feeders, quantity and types of food delivered to nestlings, and reaction to auditory or visual disturbance. Results could indicate whether and how ski area fragmentation and activity influence adult behavior, and what variables may be most crucial determinants of any differences that exist. Again, findings could help mitigate proposed construction activities and suggest maintenance protocols that enhance habitat and/or minimize adverse impacts of nesting thrushes.

3. Analyze multi-year demographic data on Bicknell's Thrush. VINS has amassed an extensive data set on known-identity Bicknell's Thrushes, based on banding of adults and nestlings on Mansfield since 1995 and on Stratton since 1997. Using mark-recapture software, and incorporating data from original banding captures, within- and between-year recaptures, and resighting of color-banded individuals, VINS will construct a detailed species demographic profile. On both ski area and natural forest study plots, VINS will examine age- and sex-specific survivorship, reproductive success, site fidelity, population turnover, recruitment, and other key life history variables. Indices of individual health such as subcutaneous body fat, weight, feather wear, and mercury levels between the two habitat types will also be examined. Mark-recapture analyses will further yield statistically robust estimates of population density, which are otherwise difficult to obtain. Results will provide a powerful tool to evaluate the population viability of Bicknell's Thrushes on existing ski areas compared to nearby relatively undisturbed montane forest. Documenting habitat features that influence nest success may provide important insights into designing the Tree Island Pod project so as to minimize potentially adverse impacts and/or enhance habitat suitability for successful breeding.

Using these analyses VINS will produce a detailed final report outlining its findings. This report is scheduled to be completed in April 2004. A key element of the VINS final report will be a section that presents specific recommendations for designing and implementing the conceptual Tree Island Pod project so as to minimize potential short- and long-term impacts to Bicknell's Thrush and, to the extent feasible, develop ski trails

in a manner that actually benefits the species' habitat. Included will be guidelines for trail design and construction, the retention or creation of features that may enhance habitat or mitigate habitat loss/alteration elsewhere, the daily and seasonal timing of construction activities, post-construction habitat maintenance, opportunities for conservation education of visitors to Whiteface Mountain throughout the year, and general operational procedures. Where possible, VINS will reference specific sites within the conceptual Tree Island Pod project area, but many of the recommendations are likely to apply more generally to the entire project area rather than to discrete locations within it. If it is determined that mitigation measures can be incorporated to benefit the species' habitat, the report will develop a mechanism to inventory improved habitat as a means to both document the benefits to the species and as a means to help assess the overall impact of other aspects of ski area development and management at elevations above 2,800 feet that may adversely affect the species.

1. On-site Field Studies

In addition to preparing the report described above, VINS is developing a study protocol for Bicknell's Thrush field work that will take place on and around Whiteface Mountain. This purpose of this multi-year field study is to apply the findings of the VINS Study analysis of data collected at Vermont ski areas directly to the Whiteface area. The study will collect data on the numbers of Bicknell's thrush on and around Whiteface Mountain, their distribution in relation to existing ski trails, overall habitat preferences, etc. The field study protocol being developed by VINS will be available so that collection of field data can begin in the spring of 2004.

Data collected in the Spring of 2004 will be analyzed in the Summer of 2004. Results of on-site data analysis will be combined with the earlier findings of The VINS Study, to develop measures to avoid and mitigate potential impacts to Bicknell's thrush as a result of construction of the conceptual Tree Island Pod or any other possible future work above 2,800 feet.

2. Integrate Mitigation Measures Into UMP Amendment for the Tree Island Pod

It is the intent of the management of Whiteface to prepare a future UMP Amendment proposing the development of the Tree Island Pod that would incorporate the mitigation measures that are developed from The VINS Study and the on-site field studies. This intent is based on an assumption that The VINS Study and the field study find that ski trail development can occur without unmitigated impacts to Bicknell's Thrush.

According to the timeline in the accompanying Figure V-1, "Timeline for Additional Assessment of Bicknell's Thrush", this UMP Amendment could occur in the fall of 2004. This UMP Amendment would be subject to a separate SEQRA review, including opportunity for public comment on the proposed amendment.

3. Perform Additional Field Studies

Additional field studies would be performed in the spring of 2005, 2006, 2007, 2008 and 2009. The protocol for these studies will be included in the original study protocol developed by VINS in the spring of 2004. The purpose of these studies would be to confirm the effectiveness of the mitigation measures derived from The VINS Study and the on-site field studies. These studies would be underway before, during and after construction of the conceptual Tree Island Pod if approved through a future UMP amendment in accordance with the timeline in Figure V-1.

Comment 2 (by David H. Gibson, The Association for the Protection of the Adirondacks, letter dated September 16, 2002).

The Commentor feels that the list of small mammals in DGEIS Appendix L should include the yellow-nosed (rock) vole.

Response 2

The Appendix L provided in the August 2002 DGEIS was not a complete copy of the Wildlife Resource Description. It was copied incorrectly because it is a two-sided report. The yellow-nosed (rock) vole is included on the list. A complete copy of Appendix L is provided in this FGEIS.

Comment 3 (by Heidi Kretser, Wildlife Conservation Society, letter dated September 23, 2002)

The Commentor asks that Bicknell's Thrush be recognized in Section II and in Appendix L in the DGEIS. The Commentor asks that Whiteface management adopt some specific verbiage from "the Vermont draft" (Vermont Fish and Wildlife Department Draft Management Recommendations for Vermont Ski Areas, Bicknell's Thrush Vegetation Management Plan) regarding management of trees along ski trails and on islands. This draft was an attachment at the end of the letter that was submitted.

The Commentor supports the proposal within the 2002 UMP to work on trail construction which requires clear-cutting at and above 3,000 feet above mean sea level after August 1st

in order to protect young birds. The Commentor asks that Whiteface also propose to construct the Little Whiteface Lodge and the Tree Island Pod, and to perform any trail maintenance, only after August 1st.

Response 3

Section II and Appendix L have been revised to include a more thorough recognition of the presence of Bicknell's Thrush.

See Response 1 above that describes the significant measures ORDA has implemented to avoid impacting the Bicknell's Thrush.

VINS will very likely take into consideration the measures described in the Vegetation Management text appended to the Commentor's letter when preparing The VINS Study. Also, see response to Comment 1 that details those mitigation measures committed to by Whiteface management to avoid impacts to Bicknells Thrush.

Note that the Little Whiteface Cloudsplitter Lodge, if and when proposed, would replace the existing Ski Patrol building and would be located in the existing clearing immediately adjacent to the existing Cloudsplitter Gondola and Little Whiteface Quad (Lift G) unloading stations and would, therefore, have little likelihood of impacting any nesting sites. Very limited clearing of vegetation may be necessary in order to construct the lodge. Given the existing exposed nature of the lodge site, the presence of the existing Ski Patrol building and the two lift unloading stations, there is a lack of vegetative cover which would provide nesting habitat. Refer to Lodge Site Photographs 1, 2, 3, 4 and 5, provided in Appendix S. This topic and others will be addressed in a future UMP update that includes the Cloudsplitter Lodge on Little Whiteface. At this time, Whiteface management is not proposing to schedule construction of the Cloudsplitter Lodge during the time period covered by this UMP. That project will not be pursued until a future UMP update is proposed and an amendment is approved by the reviewing agencies.

Whiteface management will continue their ongoing cooperative efforts with the Wildlife Conservation Society and with other similar groups interested in the Bicknell's thrush on Whiteface Mountain. As noted by the Commentor, the group she represents conducts surveys for the Bicknell's Thrush on the Whiteface Mountain Ski Center property and on the Whiteface Mountain Veterans Memorial Highway property. ORDA cooperates with the Wildlife Conservation Society and other bird groups to support the on-going surveys. As noted by the Commentor, the easy access to Whiteface Mountain via the toll road, chair lifts, and ski trails, is a prime location that birders visit for a chance to hear or see Bicknell's Thrush in their natural habitat.

Whiteface management has already implemented its "Whiteface Wildlife " interpretive program to increase awareness among users of Whiteface facilities of the values and benefits of the New York State Forest Preserve, including the State-designated Bird Conservation Area above 2,800 feet, and the wildlife at Whiteface Mountain. Components of the Whiteface Wildlife program include providing summertime lift riders with binoculars for use when riding the gondola. Over 50,000 people took this ride in the summer of 2003. The gondola cars will also be equipped with literature and photographs to help identify wildlife, including Bicknell's thrush, while riders make their ascent and descent. Riders will then be able to record their observations on a checklist of observed wildlife that will be available in the lodge. So far, this program focuses on summertime, but it is likely that the Whiteface Wildlife program will be expanded to include additional wintertime activities to foster appreciation of the Forest Preserve and its wildlife inhabitants at Whiteface by skiers and non-skiers alike. Appendix R contains a copy of a brochure produced by ORDA in conjunction with NYSDEC and the APA entitled "Whiteface Wildlife, Nature and Animal Guide to Whiteface Mountain", that provides additional information on this program

Comment 4 (by John Caffry and Neil Woodworth, Adirondack Mountain Club, letter dated September 23, 2002)

The Commentors feel that the proposed management actions will destroy habitat for the Bicknell's Thrush and could reduce the number of nesting pairs and young that are able to survive on the mountain in the future.

Similar comment in newspaper articles dated September 23, 2002 and October 10, 2002.

Response 4

See response to substantively similar Comment 1 above that describes the significant efforts being made by ORDA to avoid impacts to the Bicknell's Thrush.

The 2004-2009 UMP identifies the potential for the presence of the Bicknell's Thrush on the Ski Center property. Bicknell's Thrush is not identified as an endangered or threatened species; however it *is* listed by the NYSDEC as a species of special concern.

The timing of vegetation management already approved in the 1996 UMP Update, but not yet completed in areas of Bicknell's Thrush breeding habitat is important and will be delayed until after August 1st, when the majority of nesting activities are complete. Timing of cutting activities will be addressed in The VINS Study..

Also, the compatibility of gladed ski trails and tree islands with Bicknell Thrush habitat will also be addressed in the VINS study.

Comment 5 (made later by Peter Bauer, Residents Committee to Protect the Adirondacks, letter dated December 6, 2002)

The Commentor asks why the quality of the West Branch Ausable fishery is lower than might be expected as stated in the DEIS, and asks if ski operations or stocking may be responsible for the low abundance of wild fish.

Response 5

The West Branch Ausable is an extremely popular trout fishing river. Angling in the Ausable River system generates an estimated $3.7 million in at-location expenditures annually; and in the DEC 1996 Statewide Angler Survey, the Ausable system received the highest satisfaction rating of waters in the state.

DEC staff electrofished stations upstream of the Whiteface Ski Center on the West Branch Ausable River during the week of July 21, 2003. The study was not designed to assess the impacts of Whiteface water withdrawals or compare fish population parameters above and below Whiteface. Instead, the objectives of the electrofishing survey were to evaluate the current status of the fish resources in the river and to evaluate the biological effects of the catch-and-release regulations affecting that stretch of river from the mouth of Holcomb Pond outlet downstream to the marked boundary 2.2 miles downstream of Monument Falls. The river had last been surveyed in the early 1990s prior to enacting the catch-and-release regulations. It is possible that results of the surveys in the 1990s led to the Commentor's statement that the fishery quality may be lower than expected.

Brown trout in the 2003 sample averaged substantially larger than the early 1990's. Considering yearling and larger trout, 41 percent were longer than 12 inches in 2003 compared to only 4 percent in the earlier period. The increased average size was observed in both the catch-and-release section and the areas where harvest is allowed. The largest brown trout collected was 19 inches long.

Overall, 23 percent of the yearling and older brown trout were wild, which was very similar to the 22 percent wild observed in the early 1990's. However, wild fingerling trout (young-of-the-year trout) were several times more abundant in 2003 than previously, which indicates increased natural reproduction. The increased abundance of wild

fingerlings occurred in both the catch-and-release and in the harvest allowed sections. Qualitative observations indicated that the abundance of fines (sand) in the substrate had decreased substantially since the early 1990's, which could explain the increased natural reproduction. Also, ice conditions on the river last winter were favorable for over winter survival of trout.

The overall abundance of trout longer than 12 inches, indicate a very desirable fishery resource (from Region 5 Inland Fisheries August 2003 Monthly Highlights).

E. Traffic

Comment 1 (by Douglas Wolfe, SEQRA Public Hearing dated September 12, 2002)

The Commentor feels that traffic wasn't addressed, particularly the conflict between pedestrians and vehicles.

Response 1

The Commentor is referred to Section II.D.3, "Roads and Parking," which states that bus access into the Base Lodge is a problem due to the limited maneuvering space. Bus traffic creates unsafe conditions in the existing drop-off area, especially for pedestrians.

Alternatives for bus access are being evaluated (none requiring new construction are proposed at this time) and include: designation of an area in Parking Lot #2 for buses (this would displace some private vehicles to other parking areas but would eliminate the need for buses to cross the bridge and access the existing unloading area) and/or remove parking between the Base Lodge and the NYSEF building and modify the area to increase the size and performance of the current loading area (this would displace vehicles but could triple the loading area and improve traffic flow significantly). Under this alternative, buses could access the improved loading area and then park in the proposed Parking Lot #5 or in the designated Bus Lot located south of the main access road, adjacent to Route 86.

Additional alternatives to be considered are described in Section IV.C.9, Section V.C.1, and Section VI.D, "Alternative Parking/Circulation Improvements." Creation of additional parking spaces along the access road between the Base Lodge and Easy Acres and creation of Parking Lot #5 would provide space for the displaced vehicles. A ski trail connection between Easy Acres and the Base Lodge would enable skiers to ski to the Base Lodge from the existing and proposed parking areas up in the Easy Acres vicinity.

Providing a ten-foot wide sidewalk along one or both sides of the main access road would help remove pedestrian/vehicle conflicts.

Improvements to the loading area will have minimal environmental impacts when these improvements involve conversion of existing parking areas or roads to improve circulation and limited rock removal outside of the shoreline setback. For instance, rock removal will be necessary to reconfigure the NYSEF parking area for improved circulation and loading of buses and other vehicles. The alternatives discussed in the DGEIS of construction of a second bridge over the river or of creating a bus drop-off area on the right hand side of the access road ascending between the Base Lodge and Easy Acres will need additional analysis before implementation. This alternative was examined in the DGEIS but is not being proposed.

F. Little Whiteface Cloudsplitter Lodge

Comment 1 (by Douglas Wolfe, SEQRA Public Hearing dated September 12, 2002)

The Commentor would like to see the new lodge incorporate a passive solar design, use energy efficient and water efficient fixtures, and utilize features such as orientation to the wind like the Mt. Washington observatory does.

Response 1

The Little Whiteface Cloudsplitter Lodge is not proposed for construction as part of this UMP/GEIS. Plans for this lodge are only conceptual at this time. Evaluation of this lodge will require a future amendment to this UMP with an associated SEQRA review.

Whiteface management concurs with the above building considerations. Given the location, exposure to elements, usage, durability and maintenance factors, it is envisioned that the structure will consist of cast-in-place footings and foundations with a steel structure and appropriate wood and native stone finishes for aesthetic purposes with extensive use of triple pane, low-e glass. Whiteface management anticipates building a low-maintenance, energy and water efficient structure. The structure would be oriented to take advantage of available solar energy and to prevent areas where wind would deposit excessive drifts.

Comment 2 (by Jaime Ethier, The Adirondack Council, letter dated September 23, 2002) A similar comment was made later by Peter Bauer, Residents Committee to Protect the Adirondacks, letter dated December 6, 2002

The Commentor feels that the new lodge will be a "light emitting beacon" and this will have a negative visual impact.

The Commentor asks what the source of water is for this lodge.

Response 2

Cloudsplitter Lodge Visual Assessment

The Little Whiteface Cloudsplitter Lodge is not proposed for construction as part of this UMP/GEIS. Plans for this lodge are only conceptual at this time. Evaluation of this lodge will require a future amendment to this UMP with an associated SEQRA review.

The analysis that has been conducted to date is contained in Section V, where it is stated that the lodge would not typically be lit at night because the nighttime use of this lodge is anticipated to be very limited. (The Commentor may be misinterpreting the "light-filled lodge" reference, which is meant to emphasize the use of natural light in the building.) While it is possible that the lodge could be used occasionally for special events, any use beyond the Ski Center usual closing time will utilize low level lighting for patrons. Because the lodge would not have a significant visual impact as described in Response C below, such use would not represent a significant adverse effect on visual resources. This analysis will be revisited when the lodge is actually proposed and a UMP amendment is processed relative to that action.

Cloudsplitter Lodge Water

Two alternative potential water sources for the conceptual Cloudsplitter Lodge are examined in Section IV.C.10., "Potable Water." The first is a drilled well, the second is treated surface water. Also refer to Appendix S, "Little Whiteface Cloudsplitter Lodge." These potential sources will be revisited when the lodge is actually proposed and a UMP amendment is processed relative to that action.

Comment 3 (by John Caffry and Neil Woodworth, Adirondack Mountain Club, letter dated September 23, 2002)

The Commentors are concerned about the potential visual impact of the lodge and want to see a complete visual impact assessment including a simulation of the proposed lodge. Sensitive receptors should be identified.

Response 3

The Little Whiteface Cloudsplitter Lodge is not proposed for construction as part of this UMP/GEIS. Plans for this lodge are only conceptual at this time. Construction of this lodge will require a future update to this UMP with an associated SEQRA review. This SEQRA review would include a complete visual impact assessment including view simulations of the lodge structure should it be determined it may be visible from sensitive receptor locations.

The potential visual impact of the lodge envisioned to replace the existing Ski Patrol building on Little Whiteface is discussed in the in Section V.A.2, as well as in the 1996 UMP. Refer to pages 289 through 293 of the 1996 UMP and to pages IV-78, Figures IV-13, IV-14, IV-15, and pages V-1 and V-2 of the 2004 UMP. Additional discussion is provided below.

The Little Whiteface Cloudsplitter Lodge is anticipated as a 13,500 square foot two-story structure. Overall building height is not anticipated to exceed 35 feet. The perspective sketches provided in Exhibits IV-14 and IV-15 show a conceptual view of the lodge. Building colors would be earth tones with matte/non-reflective finishes. Natural building materials of stone and wood would be used in the construction of the lodge. Based upon a visual assessment of the anticipated structure utilizing massing dimensions and existing facilities which are currently visible from several vantage points a visual assessment was completed. Refer to the Cloudsplitter Lodge Cross-Section, provided in Appendix S. The location of the existing Ski Patrol building and the existing unloading stations for the two lifts are identified.

The potential visibility of the Cloudsplitter Lodge can be best described from two major vantage points, those areas of visibility from the east in the vicinity of the Hamlet of Wilmington, and those areas of visibility from the west in the Lake Placid vicinity. From the east the entire Ski Center is currently visible from several areas of public use such as NY Route 86, as shown in the Exhibits II-4 through II-7. These vantage points to the east reveal the array of existing lift lines, lift towers, ASRC building and ski trails. The new lodge would not be visible, similar to the existing Ski Patrol building and the Little

Whiteface Quad lift towers and the Quad and Gondola unloading stations. If visible at all, it would appear as another element in the consolidation of structures on Little Whiteface. Note that the Cloudsplitter Gondola lift towers are relatively more visible than the other existing structures and the envisioned lodge. As shown in the Cloudsplitter Lodge Cross-Section, provided in Appendix S, the new lodge is set back from the topographic edge of the summit, unlike the Cloudsplitter Gondola lift, which must by necessity cross the edge of the summit in order to access it. See Lodge Site Photographs 1 through 5 and Cloudsplitter Gondola Towers Photographs 6 and 7, provided in Appendix S. The new lodge would be located to the west of the existing structures, away from the topographic edge.

Several existing facilities on the mountain such as the Memorial Highway and ASRC summit facilities are currently highly visible and are silhouetted against the horizon. From vantage points from the east, the ski trails are currently visible. The visibility extends for approximately 4.2 miles on NY Route 86 in the Town of Wilmington and the Town of Jay, and 0.3 miles on the Haselton Road in the Town of Wilmington. The areas east of the Hamlet of Wilmington are greater than five miles from the project site. The visual impact from vantage points to the west would be minimal, as shown in Exhibits II-4 and II-7. Areas on NY Route 73 near the North Elba Horse Show Grounds and the ski jumps, and NY Route 86 west of Lake Placid are all greater than seven miles away. At distances greater than five miles, structures and lift lines are difficult to discern. The dominant visible structures on the mountain from the west are the Memorial Highway and ASRC summit facilities on Whiteface Mountain. When interpreted with the existing facilities on the mountain from the vantage points, the replacement of the Ski Patrol building with a lodge on Little Whiteface would not result in any significant increase in visibility as compared to the visibility of the Memorial Highway and Ski Center facilities.

This analysis will be revisited when the lodge is actually proposed and a UMP amendment is processed relative to that action.

G. Surface Water Resources

Comment 1 (by Richard Roos-Collins, Natural Heritage Institute, letter dated September 25, 2002) Similar comments were made later by Peter Bauer, Residents Committee to Protect the Adirondacks, letter dated December 6, 2002

The Commentor believes that the 2002 UMP is proposing to increase the amount of water withdrawn from the West Branch of the AuSable River for the purposes of snowmaking.

Similar comment by Dan Kwasnowski, New York Rivers United, letter dated September 23, 2002, and John Caffry and Neil Woodworth, Adirondack Mountain Club, letter dated September 23, 2002.

Response 1

No new or increased water withdrawal beyond what was approved in the 1996 UMP is proposed in the 2004 UMP. Upgrades to the snowmaking system to increase Whiteface's ability to pump water within the system to various parts of the Mountain are proposed, but these upgrades do not affect snowmaking water withdrawal from the AuSable River.

The withdrawal of water from the West Branch of the AuSable River was one of the management actions approved in the 1996 UMP process. Note that the withdrawal of water from the river for snowmaking has been on-going since the 1962-1963 ski season. A Cooperative Agreement between DEC and ORDA is in place for the protection of the surface water resource of the West Branch of the AuSable River in relation to the water to be withdrawn for snowmaking operations at Whiteface. Minimum flow conditions to be maintained were decided during the preparation of the 1996 UMP. After construction of the stream flow monitoring device, river flow data was available and was used to verify the parameters for snowmaking water withdrawal established by the NYSDEC. A copy of the current Cooperative Agreement between NYSDEC and ORDA is provided in Appendix V.

Comment 2 (by Dan Kwasnowski, New York Rivers United, letter dated September 23, 2002)

The Commentor asks if there is technical data provided in the 2002 UMP/DGEIS for the proposed management actions, including the stream monitoring data.

Similar comment in newspaper articles dated September 23, 2002 and October 10, 2002.

Response 2

Refer to Comment and Response 1 above.

Also, the snowmaking system consulting engineer detailed the snowmaking water analysis in Section IV.C.7, "Snowmaking System Upgrading Plan." The analysis is used to size the possible future snowmaking reservoir, and to examine the electrical, air and water pump use at Whiteface in order to identify the most efficient and cost-effective

manner to meet snowmaking requirements. Section IV contains a discussion of water flows relative to the snowmaking water analysis.

There are several other examples of technical data collected and used in the UMP/DGEIS analysis and in the formulation of the proposed management actions, including vegetation sampling data (Appendix J) and the Whiteface Mountain Traffic Assessment (Appendix I), just to name a couple of other examples.

With regard to the existing lodge wastewater treatment systems, refer to Section II for a summary of the status of each of the four existing systems located at the Base Lodge, Mid-Station Lodge, Easy Acres and Maintenance Garage. A single current SPDES permit from the NYSDEC is in place for the Base Lodge, Mid-Station Lodge and Easy Acres. Details on the systems and their recent upgrades are provided. Refer to Exhibits II-19, II-20 and II-21. The total flow into the Maintenance Garage system is so low (less than 1,000 gallons per day) that a permit is not required. No violations of the permit have been reported by NYSDEC. As such, the existing systems are adequately treating the permitted daily flow rates of each facility. Upgrades required for expansion of the Easy Acres lodge are identified in Section IV. Also, refer to Exhibits IV-13 and IV-14. A management action proposed in Section IV of the UMP is the flow monitoring of the Base Lodge and Mid-Station Lodge wastewater treatment systems in order to determine their current loading volumes. For the Mid-Station Lodge an elapsed time meter for the present pumping units is recommended in the DGEIS to determine loading volume to the present system. After additional consultation between ORDA and NYSDEC it was agreed that metering the water flow into the building is preferred as the method to confirm loading volume to the present system.

With regard to the envisioned wastewater system for the Little Whiteface Cloudsplitter Lodge, refer to Section IV, as well as Exhibit IV-15, "Wastewater Disposal Cloudsplitter Lodge." Also refer to FGEIS Appendix S for soil test information for a potential wastewater treatment system location for the new lodge.

Comment 3 (by Dan Kwasnowski, New York Rivers United, letter dated September 23, 2002)

The Commentor believes that because the MOU between the DEC and ORDA is not provided in the DGEIS, that the MOU does not exist.

Response 3

A copy of the Cooperative Agreement between NYSDEC and ORDA, specifically written for the purpose of protecting the surface water resource of the West Branch of the AuSable River, is provided in Appendix V of this document.

Comment 4 (by Dan Kwasnowski, New York Rivers United, letter dated September 23, 2002)

The Commentor is concerned that the snowmaking reservoir proposed in the 2002 UMP was not included in the 1996 UMP.

The Commentor notes that a dam safety permit will be needed.

Response 4

Like the Cloudsplitter Lodge on Little Whiteface and the Tree Island Pod, the proposed snowmaking reservoir is not proposed for construction as part of this UMP/GEIS. Plans for the reservoir are only conceptual at this time. Construction of the reservoir will first require a future update to this UMP, an associated SEQRA review, and necessary permitting from regulatory agencies such as NYSDEC (dam safety) and the US Army Corps of Engineers (waters of the United States, including wetlands), and potentially the APA (NYS freshwater wetlands).

The concept of constructing a water storage pond was discussed briefly in the 1996 UMP, in Section IV.C.5, "Snowmaking System Upgrading Plan." The 1996 FGEIS also provided responses to comments received about the water storage reservoir. Refer to 1996 FGEIS Section 1.0, C. The 2004 UMP is consistent with the 1996 UMP because it complements the earlier plan, and builds on the 1996 actions. Note for the record that management actions proposed in the 2004 UMP are not required to be included in an earlier UMP.

Refer to Section V.B.1, where it is stated that when the specific location of the reservoir has been determined, further field work and mapping will occur. The text notes the potential need to obtain several permits, among these is listed the possible jurisdiction of regulations governing creation of impoundments.

Comment 5 (by John Caffry and Neil Woodworth, Adirondack Mountain Club, letter dated September 23, 2002)

The Commentors ask that ORDA consider the alternative of constructing a storage reservoir large enough to supply all of its snowmaking needs, and not just to meet peak demand. The reservoir could capture runoff on the mountain and potentially reduce or eliminate the need to withdraw water from the river.

The Commentors feel that the snowmaking analysis should also consider differences in water use and conservation among the various types.

Response 5

Like the Cloudsplitter Lodge on Little Whiteface and the Tree Island Pod, the proposed snowmaking reservoir is not proposed for construction as part of this UMP/GEIS. Plans for the reservoir are only conceptual at this time. Construction of the reservoir will first require a future update to this UMP, an associated SEQRA review, and necessary permitting from regulatory agencies such as NYSDEC and the US Army Corps of Engineers.

The Snowmaking Water Analysis provided in the in Section IV states that a reservoir with a capacity of 5 to 8 million gallons will be necessary at build-out to fully provide water for snowmaking during a dry year. This storage will provide the snowmaking system with water for 14 to 22 hours of continuous snowmaking at full pumping capacity without recharge. The recommended storage will also balance the conditions encountered during frazil ice (slush ice) production and low water flows.

Comment 6 (by Kevin Prickett, The Association for the Protection of the Adirondacks, letter dated September 23, 2002)

The Commentor asks for more detail on the proposed snowmaking reservoir.

Response 6

Like the Cloudsplitter Lodge on Little Whiteface and the Tree Island Pod, the proposed snowmaking reservoir is not proposed for construction as part of this UMP/GEIS. Plans for the reservoir are only conceptual at this time. Construction of the reservoir will first require a future update to this UMP, an associated SEQRA review, and necessary permitting from regulatory agencies such as NYSDEC and the US Army Corps of Engineers.

Refer to Responses 4 and 5 above. In the event that approval of a reservoir is sought, more detailed plans will be prepared.

Comment 7 (by Kevin Prickett, The Association for the Protection of the Adirondacks, letter dated September 23, 2002)

The Commentor asks for more detail on the new feed line from the river to pump house #1 discussed on page IV-48 of the August 2002 draft UMP.

Response 7

The feed line specified by the Commentor is part of a discussion of alternative ways to allow Whiteface to withdraw the 6,000 gpm from the river, as permitted. This discussion is conceptual at this point; no further detail is available. No permit for this feed line is being requested at this time.

Comment 8 (made later by Peter Bauer, Residents' Committee to Protect the Adirondacks, letter dated December 6, 2002)

The Commentor encourages ORDA to undertake a water quality analysis on the West Branch Ausable River to assess potential impacts from run-off and sedimentation from construction of new ski slopes as well as those from construction and operation of new parking lots.

Response 8

Compliance with the Draft Construction Pollution Prevention Plan (CPPP) prepared in accordance with DEC's State Pollution Discharge Elimination System general permit for storm water discharges from construction activities alleviates the need for such a study. A copy of the Draft CPPP is contained in Appendix U. A copy of the CPPP prepared specifically for Parking Lot 5 is contained in Appendix P.

H. Miscellaneous

Comment 1 (by Douglas Wolfe, SEQRA Public Hearing dated September 12, 2002) A similar comment was made later by Peter Bauer, Residents Committee to Protect the Adirondacks, letter dated December 6, 2002

The Commentor feels that public awareness of the educational aspect of the mountain should be one of the management objectives.

Response 1

During the time when this UMP was being prepared, Whiteface management has already implemented its "Whiteface Wildlife " interpretive program to increase awareness among users of Whiteface facilities of the values and benefits of the New York State Forest Preserve, including the State-designated Bird Conservation Area above 2,800 feet, and of the wildlife at Whiteface Mountain. Components of the Whiteface Wildlife program include providing summertime lift riders with binoculars for use when riding the gondola. The gondola cars will also be equipped with literature and photographs to help identify wildlife, including Bicknell's thrush, while riders make their ascent and descent. Riders will then be able to record their observations on a checklist of observed wildlife that will be available in the lodge. So far, this program focuses on summertime, but it is likely that the Wildlife at Whiteface program will be expanded to include additional wintertime activities to foster appreciation of the Forest Preserve and the wildlife at Whiteface by skiers and non-skiers alike. A brochure describing this program is included in Appendix R of this FGEIS.

ORDA also intends to take the opportunity to provide interpretive signage and displays to its patrons, as part of the adoption of the NSAA Sustainable Slopes Charter. Refer to FGEIS Appendix T. Also, the use of educational displays for the public was identified in the 1996 UMP and this action will be continued in the 2004 UMP. One of the important aspects of the Ski Center is the connection to the area via existing hiking trails. There are hiking trails from Whiteface Landing and Connery Pond from the west, through McKenzie Mountain Wild Forest, to the summit of Whiteface Mountain, and from the base of the former Marble Mountain Ski Center through the Wilmington Wild Forest from the east.

Comment 2 (by Douglas Wolfe, SEQRA Public Hearing dated September 12, 2002)

The Commentor feels that all facilities should be handicap accessible.

Response 2

The comment is noted. Whiteface staff concur, and note that the goal is to make all Whiteface facilities handicap accessible.

Comment 3 (by Jaime Ethier, The Adirondack Council, letter dated September 23, 2002)

The Commentor feels that the periodic UMP's completed for Whiteface "may well constitute segmentation of a larger project." The Commentor says the 2002 UMP "should disclose the full set of development proposals envisioned for the Whiteface Mountain site over the long term ...." The Commentor says that the DGEIS lacks discussion of the environmental impacts, mitigation measures and alternatives of and to the project.

Response 3

The project has not been segmented since the known or likely programs and construction projects have been disclosed in the UMP/GEIS. Therefore, SEQRA has not been avoided by dividing the UMP into smaller segments not subject to SEQRA. Further, the UMP/GEIS recognizes that further management actions will be subject to either a UMP update or a site specific EIS as may be required to adequately evaluate the potential environmental impacts. Critical to the success of an EIS is the availability of adequate factual information, plans, and reports in order to make as full as possible an evaluation of impacts. At this time that level of documentation is not available for substantive discussion of the Cloudsplitter Lodge, the snowmaking reservoir or the Tree Island pod, therefore, future analyses of these currently conceptual actions will be required. Refer to GEIS Section V for the discussion of the potential environmental impacts and mitigation measures and alternatives.

Comment 4 (by John Caffry and Neil Woodworth, Adirondack Mountain Club, letter dated September 23, 2002)

The Commentors ask about the "Slides Extreme Skiing Area" shown in Figure IV-1 and mentioned briefly on page iv of the Executive Summary. They ask how skiers will access this area, how many skiers in this area are anticipated, and if an assessment of potential impacts to alpine vegetation or krummholz vegetation has been completed.

Response 4

The "Slides" can be accessed via Lift F, the Summit Quad. The area is not groomed nor is snowmaking provided. As shown in Exhibit II-8, the alpine krummholz vegetation is located at elevations that are higher than the "Slides." Therefore, there is no impact on this vegetation from skiers at the "Slides." Note that the Slides are only open when ski conditions are absolutely perfect. The Slides are open about 7 to 12 days per season, depending on snow conditions. Similar to other trails, the entrance to the Slides is roped off when the Slides are closed. On the occasions when the Slides are open, the ski patrol sweep the trails (i.e., the patrol is the last to ski down the trail to make sure that there are no skiers left on the trail) prior to closing for the day.

Comment 5 (by Kevin Prickett, The Association for the Protection of the Adirondacks, letter dated September 23, 2002)

The UMP should describe the Porcupine Lodge structure.

Response 5

The Porcupine Lodge structure was built in 1933± and is not utilized currently. This lodge is not shown on the Whiteface ski trail map, the lodge is closed and in need of repair. No skier services are available here. Nothing is proposed here at this time. Any potential future actions relating to the Porcupine Lodge would be the subject of a future UMP update and SEQRA review.

Comment 6 (by Kevin Prickett, The Association for the Protection of the Adirondacks, letter dated September 23, 2002) . A similar comment was made later by Peter Bauer, Residents Committee to Protect the Adirondacks, letter dated December 6, 2002

The Commentor is concerned with the justification stated in the UMP for the Cloudsplitter Lodge and the Tree Island Pod. One cannot compare Whiteface, located in the constitutionally protected "forever wild" forest preserve, to competitive resorts such as Killington, Mont Tremblant, and big resorts in Colorado and Utah.

Response 6

This UMP represents the continuation of a planning process for Whiteface that takes into account the Adirondack Park State Land Master Plan and Article XIV of the NYS Constitution. Whiteface is very unique because it is a designated Intensive Use Area

within the Forest Preserve. As an Intensive Use Area, Whiteface's basic management guidelines include providing facilities for intensive forms of outdoor recreation by the public. At the same time, Whiteface is still required to blend with the Adirondack environment and have minimum adverse impacts on surrounding State lands

The 1996 UMP contained a discussion of the eventual construction of a lodge at the top of Little Whiteface in conjunction with the operation of the new gondola. The 2004 UMP update also discusses the Cloudsplitter Lodge, but the design for the lodge is only conceptual at this time and construction of the lodge is not proposed as part of this UMP. The new gondola has been constructed and has been well received by the patrons of Whiteface. It is logical to locate a lodge near the gondola unloading station in order to provide a pleasant, protective accommodation where skiers and snowboarders can get out of the wind, warm up and enjoy a meal, thus relieving some use at the Base Lodge.

The goal of planning for a ski center is to balance all of the components of the facility (including parking, ski terrain type and amount, lift capacity, lodge capacity and sewer and water services) in order to have a well run ski center that is easily accessed, that is utilized by its patrons comfortably and safely, and is able to be managed and maintained efficiently and cost-effectively. Most importantly at Whiteface these considerations must be developed with great sensitivity for the Forest Preserve. Planning for Whiteface will be consistent with the Adirondack Park State Land Master Plan and Article XIV of the NYS Constitution. As stated earlier in this document, a careful approach to enhancements at Whiteface will provide continued opportunity for the public to enjoy a unique experience, gain an appreciation for sensitive development, and expose large numbers of people to the special lands that comprise the Forest Preserve.

The background planning analysis for each component of the ski center, which is located in a designated Intensive Use Area, is described in detail in the Section IV.C., "Proposed Ski Center Upgrading Plan." With specific regard to the Little Whiteface Cloudsplitter Lodge, also Section IV.C. The 2002 UMP text specifically related to the Tree Island Pod is provided in Section IV.C.2.

Additional detail pertaining to the proposed Little Whiteface Cloudsplitter Lodge envisioned to be located immediately adjacent to the existing Cloudsplitter Gondola and Little Whiteface Quad (Lift G) unloading stations, is provided in Appendix S of this FGEIS. The existing Ski Patrol building on Little Whiteface would be removed. Construction of the Cloudsplitter Lodge will be the subject of a future UMP update and SEQRA review.

In order to remain competitive in the ski industry, and even to maintain its existing level of patronage, Whiteface needs to not only maintain current levels of service and product offerings, but also needs to invest in improvements on a level that corresponds with competing ski areas. Section IV.B., "Justification for Proposed Upgrading of Whiteface," provides a more detailed discussion of this topic.

The long term goal is to improve the skier experience. Whiteface is unique in the northeast as the former site of two Olympics. The available terrain has challenged the best skiers in the world, and modifications since 1980 have made the mountain skiable for the recreational skier. Recent improvements to lifts, including the installation of the gondola, improve the capacity of the mountain while simultaneously improving the skier experience. These types of upgrades have been and will continue to be the focus of mountainside improvements.

Comment 7 (by Dan Kwasnowski, New York Rivers United, letter dated September 23, 2002)

The Commentor says that he did not receive a copy of the UMP/DGEIS in time to review the document.

Response 7

All required SEQRA timeframes, public comment period requirements, and public noticing procedures detailed in 6NYCRR Part 617 have been very carefully followed. Copies of the document were made available for public review at nine locations around New York State. The Commentor's request for a personal copy of the document was received on September 19, 2002.

Comment 8 (made later by Peter Bauer, Residents Committee to Protect the Adirondacks, letter dated December 6, 2002)

The Commentor asks for more information about wetlands impacts from submergence, fill or other disturbances.

Response 8

As a GEIS, this document takes a hard look at all of the projects and activities contemplated by this GEIS. However, as individual actions are implemented, if permits or approvals are required, additional environmental review will occur to determine if any environmental impacts exist that have not been evaluated in this GEIS. A separate determination under SEQRA will be made for each such project or activity that requires a

permit or approval. In this matter any impacts to wetlands will be mitigated through consultation with APA staff.

XII. ERRATA

A. Corrections

This section summarizes the corrections made to the DGEIS and additional information provided in the FGEIS.

1. Executive Summary

Page i should read: "Generally, no additional SEQRA analyses are anticipated to be required for proposed new actions in this UMP, provided that such actions are carried out in accordance with the recommendations of this document. As a GEIS, the document takes a hard look at all of the projects and activities contemplated by this GEIS. However, as individual actions are implemented, if permits or approvals are required, additional environmental review will occur to determine if any environmental impacts exist that have not been evaluated in this GEIS. A separate determination under SEQRA will be made for each such project or activity that requires a permit or approval."

Page ii should read: "In addition to providing specific information on the proposed actions in this UMP, the UMP also discusses and provides information regarding actions that are being contemplated, but are not proposed at this time. These actions are considered "conceptual actions" for the purpose of this UMP. Conceptual actions will require separate SEQRA analyses as part of a UMP amendment or a UMP update. The purpose of including conceptual actions in this UMP is to provide insight into longer range planning and vision for Whiteface and to get preliminary public input which will assure adequate assessment if and when they are eventually proposed."

Page v of the DGEIS Executive Summary stated (incorrectly) that the proposed improvements will bring the total mileage of ski trails at Whiteface to 24.51 miles. The figure of 24.45 miles provided on DGEIS page I-10 and Table IV-2 was the correct figure. Page v of the DGEIS Executive Summary should have read 24.45 miles and not 24.51 miles. Because the status of the Tree Island Pod and other trails have been changed from proposed actions to conceptual actions, these trails including the Tree Island Pod, totaling 4.43 miles, are no longer proposed and the total mileage of ski trails will be amended to be 20.02 miles.

DGEIS page v of the Executive Summary should read "The above improvements will increase the amount of downhill ski trails on the mountain from approximately 18.06

miles of alpine ski trails to 20.02 miles, or a 1.96 mile increase (below the 25 miles as authorized by the New York State Constitution)."

DGEIS page viii should read: "...and sports-oriented destination resort."

2. Section 1

DGEIS page I-9 should read: "These areas provide...day use facilities for a significant number of visitors to the Park and often function as a base for use of wild forest, wilderness, primitive and canoe areas."

DGEIS page I-10 should read: "Under this plan, ski trail miles will be increased to 20.02 miles."

3. Section 2

DGEIS page II-2 should read: "Immediate mulching and seeding of exposed soil will therefore be necessary during the development of these areas as will implementation of other best management practices to control erosion, prevent sedimentation and control runoff. "

DGEIS page II-19 should be revised to state that Whiteface Mountain Ski Area (the Intensive Use Area) consists of 2,910 acres, and that approximately 7 % or 211.4 acres of this has been developed as the ski center proper.

DGEIS page II-25 should state "Included in Appendix L is a description of wildlife habitat types and additional information regarding the wildlife at Whiteface."

4. Section 4

DGEIS page IV-6 should read: "In addition, all of the aerial lifts should be equipped with restraining bars and all but the shortest lifts should also be equipped with foot rests."

DGEIS page IV-11 should read: "It is recommended that all of the new trail acreage be shaped to a fall line configuration and that it be graded to a smooth surface."

DGEIS page IV-12 should read: "...and the use of lime, fertilizer, suitable native seed mixture, and straw mulch to aid in the control of erosion."

DGEIS page IV-49 should read: *revised discussion of frazil ice.*

5. Section 5

Section V.C.1 will be amended to clarify that, with the exception of Parking Lot #5, other transportation mitigation measures are only conceptual at this time and that no new construction for transportation improvements are being proposed.

6. Appendices

DGEIS Appendix L needs to be reproduced correctly in order to show the complete list. A complete copy of Appendix L, reproduced from the 1996 UMP, is attached included in this FGEIS.

B. Additions

This section summarizes additional information contained in the FEIS.

1. Executive Summary

Page ii will include the following additional language, "The snowmaking reservoir, Cloudsplitter Lodge and the Tree Island pod are discussed in this GEIS because they are future actions being contemplated by ORDA, but are only conceptual in their design at this time. These actions are not proposed for SEQRA approval at this time, but will be addressed in more detail in future UMP updates which will require similar future compliance with SEQRA."

Table 1: Proposed Actions of the UMP will be added to the Executive Summary.

The Executive Summary under the heading "Vegetation" will clarify and quantify the very limited area of disturbance proposed for the Spruce-fir vegetation community (99%+ to remain undisturbed).

The Executive Summary under the heading "Water and Wetlands" will provide additional information regarding no new proposed snowmaking water withdrawals, the use of bridges as alternatives to culverts, maintaining vegetated buffers along streams, and monitoring wastewater loading at the Mid-Station Lodge.

use of bridges as alternatives to culverts, maintaining vegetated buffers along streams, and monitoring wastewater loading at the Mid-Station Lodge.

The Executive Summary under the heading "Soils" will provide additional information relating to the draft Construction Pollution Prevention Plan, including best management practices and construction inspections.

The Executive Summary under the heading "Visual Resources" will provide additional information regarding the lack of visual impacts on nearby State hiking trails.

The Executive Summary under the heading "Fish and Wildlife" will provide additional information regarding mitigating potential impacts to Bicknell's thrush.

2. Section 1

DGEIS Section I-9 should include a footnote following "Two types of intensive use areas are defined by this plan: campground and day use areas. The footnote should read: "Whiteface Mountain Ski Area is a day use area."

3. Section 2

Starting on page II-9 additional information is provided describing the visibility of the ski area from hiking trails on Forest Preserve lands within five miles of Whiteface Mountain.

DGEIS page II-22 includes additional information describing how the limits of the krummholz community was mapped using previous mapping, information from the New York Natural Heritage Program, aerial photograph interpretation and field inspections.

On page II-24 of the DGEIS Bicknell's thrush has been added to the northern raven and the Cooper's Hawk as special concern species that are probable breeders in the area that includes Whiteface Mountain.

4. Section 4

DGEIS Section IV.A.2 should include the following information about the preliminary visual impact assessment that was performed for the conceptual Tree Island Pod.

The potential visual impact of the conceptual Tree Island Pod was also preliminarily evaluated as part of this FGEIS. Appendix W contains three Exhibits that are updated

versions of UMP/DGEIS Exhibits II-5, II-6, and II-7. The original DGEIS Exhibits illustrated views of Whiteface Mountain from various locations in the vicinity of the mountain. In Appendix W the original Exhibits have been annotated and for each photograph it is noted whether or not the conceptual Tree Island Pod would be visible from each location (see new Exhibits V-1, V-2 and V-3 in Appendix W of this FGEIS). These Exhibits contain nine views of Whiteface Mountain. The ski trails in the conceptual Tree Island Pod will not be visible from six of the nine locations. For the three photographs where a view of the ski trails would be possible, the approximate location of the conceptual Tree Island Pod has been indicated on the photograph. For all three views, the conceptual new trails would be visible adjacent to the existing ski trails and would not result in a significant visual impact.

In addition to the new information provided in the revised graphics discussed above, more detailed preliminary visibility assessments were performed for the surrounding area. Using USGS topography a digital elevation model (DEM) was constructed using the conceptual Tree Island Pod as the target location. The USGS Land Cover Classification was then overlain on the topography to account for vegetation (forest cover) view attenuation affects. A conservative tree height of 40 feet was assumed for areas of forest cover throughout the study area. The DEM confirmed the local limits of visibility determined previously from the windshield survey conducted from local roadways and other public places. Within five miles, views into the site are generally limited to the Fox Farm/Hardy Kilburn Road area and along NY Route 86 in the immediate vicinity of the ski area. These areas already have views of the existing trail system.

Based on the limits of visibility mapping produced with the DEM and land cover classification, and assuming a driving speed of 45 MPH, the duration of views are estimated to be relatively short and include existing features already on Whiteface Mountain. On Hardy Kilburn Road the view is to the west when traveling southwest and the view duration is approximately 85 seconds. When traveling west on Fox Farm Road views are somewhat more in line with the travel direction, which is to the northwest. The view duration is approximately 160 seconds and the direction of the view is approximately 30 degrees to the west of the direction of travel. Views from Route 86 are nearly perpendicular to the direction of travel and the durations for the views traveling northeast and southwest are approximately 40 seconds and 60 seconds respectively. All of the aforementioned views will also include existing ski trails and most of the duration of the views will also include the Slides area and/or the observatory on top of Whiteface Mountain. Examples of the landscape positioning and approximate extent were

illustrated in the figures referenced in the previous paragraph (exhibits V-1, V-2, and V-3 in Appendix W).

Additionally, potential views of the conceptual Tree Island Pod ski trails were evaluated for nearby hiking trails in the Forest Preserve. The digital elevation model constructed for the area within five miles of the new proposed ski trails included a viewshed analysis for hiking trails. The viewshed analysis demonstrated that potential views into the conceptual Tree Island Pod from the trails around Owen Pond, Copperas Pond and Winch Pond would be blocked by topography.

The DEM viewshed analysis described above indicated that potential views into conceptual Tree Island Pod be could possible from the area around Lookout Mountain to the north. Lookout Mountain is within the same Intensive Use Area that contains the Ski Center. Field work was conducted in this area to investigate potential views. Views from the summit of Lookout include the Memorial Highway, the observatory, the upper portion of the Slides area, and the uppermost reaches of the existing ski trails. Views into the location of the proposed conceptual Tree Island Pod are mostly blocked by vegetation and intervening topography, a southeast sweeping ridgeline that obscures the potential view to the conceptual ski trails. (See Exhibit V-4 in Appendix W). Based on topographic cross sections between the Summit of Lookout Mountain and the conceptual Tree Island Pod, it is estimated that, at most the upper $1/6^{th}$ of the new pod might be visible in a view that currently contains the other features listed above, including existing ski trails on Whiteface Mountain.

Views towards the mountain are also available from the Wilmington trail east of the summit of Lookout Mountain before the trail drops down a steep slope on the way to Marble Mountain (See Exhibits V-5 and V-6 in Appendix W). However, due to intervening topography and vegetation, the conceptual Tree Island Pod would not be visible from these locations.

Views into the conceptual Tree Island Pod would be possible from the summit of Whiteface Mountain itself. This view also encompasses the existing ski trails on the mountain in this Intensive Use Area.

DGEIS page IV-66. The discussion about the Little Whiteface Cloudsplitter Lodge should begin: "The Little Whiteface Cloudsplitter Lodge is not proposed for construction as part of this UMP/GEIS. Plans for this lodge are only conceptual at this time. Construction of this lodge will require a future update to this UMP with an associated SEQRA review."

DGEIS page IV-82 should include: "These alternatives are not proposed for construction as part of this UMP/GEIS. Construction of any one of the alternatives will require a future update to this UMP with an associated SEQRA review."

DGEIS page IV-85 – The discussion of the Cloudsplitter Gondola should begin: "The Little Whiteface Cloudsplitter Lodge is not proposed for construction as part of this UMP/GEIS. Plans for this lodge are only conceptual at this time. Construction of this lodge will require a future update to this UMP with an associated SEQRA review."

In Section IV.C.8.a additional language is provided describing the proposed improvements to the existing Alpine Training Center (New York Ski Education Foundation (NYSEF) building).

In Section IV.C.10.a additional language is provided describing the potable water needs of the existing Alpine Training Center (NYSEF building).

In Section IV.C.11.a additional language is provided describing the sanitary wastewater needs of the existing Alpine Training Center (NYSEF building).

In Section IV.D.1.d additional language is provided describing the priorities phasing of the proposed improvements to the existing Alpine Training Center (NYSEF building).

In Section IV, Exhibit IV-1 (Proposed Ski Center) has been modified to include the proposed improvements of the existing Alpine Training Center (NYSEF building).

In Section IV, Exhibit IV-5 (Base Area Site Plan) has been modified to include the proposed improvements of the existing Alpine Training Center (NYSEF building).

In Section IV, Exhibit IV-9 (NYSEF Building; First Floor Plan) has been modified to include the proposed improvements of the existing Alpine Training Center (NYSEF building).

In Section IV, Exhibit IV-10 (NYSEF Building; Main Level Floor Plan) has been modified to include the proposed improvements of the existing Alpine Training Center (NYSEF building).

In Section IV, Exhibit IV-11 (NYSEF Building; Upper Level Floor Plan) has been modified to include the proposed improvements of the existing Alpine Training Center (NYSEF building).

In Section IV, Exhibit IV-12 (NYSEF Building; Proposed Elevation) has been modified to include the proposed improvements of the existing Alpine Training Center (NYSEF building).

In Section IV, Exhibit IV-16 (Potable Water Supply System: Base Lodge, Easy Acres, Maintenance Building) has been modified to include the proposed improvements of the existing Alpine Training Center (NYSEF building).

In Section IV, Exhibit IV-17 (Wastewater Disposal: Base Lodge and NYSEF Building) has been modified to include the proposed improvements of the existing Alpine Training Center (NYSEF building).

In Section IV, Exhibit IV-20 (Drainage System: Base Lodge) has been modified to include the proposed improvements of the existing Alpine Training Center (NYSEF building).

5. Section 5

In Section V.A.1 (pages V-2 through V-4) additional information is provided regarding proposed erosion control measures, including best management practices such as water bars, silt fences, seeding and mulching as well as erosion control inspection procedures.

In Section V.B additional information is provided regarding measures proposed to mitigate potential operational phase stormwater impacts from Parking Lot #5 and Tree Island Pod.

In Section V (pages V-8 and V-9) additional information is provided describing how once construction is complete, the new activities proposed as part of the UMP will conform with NYSDEC's stormwater management design requirements.

Three Exhibits have been added to Section V, Exhibits V-1 through V-3. These exhibits use the Viewshed photos in Exhibits II-5 through II-7 as the base information. Additional information is provided for each photo that includes if the new Tree Island Pod would be visible from the vantage point in the photo, and if the Tree Island Pod will be visible in a particular photo, then the location and approximate extent is illustrated on the photo.

Three additional exhibits have been added to Section V, Exhibits V-4 through V-6. These exhibits illustrate how the proposed Tree Island Pod will not be visible from the section of the Wilmington Trail on and around the summit of Lookout Mountain.

Section V.A.2 will contain additional language regarding the visibility (or lack thereof) of the proposed Tree Island Pod and Parking Lot #5 from State hiking trails and roadways.

Appendix O, Sketch plans FPB-1 and MS-1, showing the Fox Pole Barn Relocation and the Maintenance Area Expansion, has been added.

Appendix P, Stormwater Management Report Whiteface Mountain Parking Lot #5, has been added.

Appendix Q, VINS Study Work Scope, has been added.

Appendix R, Whiteface Wildlife Brochure, has been added.

Appendix S, Little Whiteface Cloudsplitter Lodge, has been added.

Appendix T, Sustainable Slopes Charter, has been added.

Appendix U, Draft Construction Stormwater Pollution Prevention Plan has been added.

Appendix V, Snowmaking Withdrawal Cooperative Agreement, contains a copy of the current agreement between NYSDEC and ORDA for snowmaking water withdrawals from the West Branch AuSable River.

Appendix W, Visual Impact Assessment Figures, containing additional visual assessment information for the Tree Island Pod has been added.

Appendix X, Ammonium Nitrate MSDS, has been added.

Appendix Z, NYSEF Building EAF, has been added.

Appendix AA, Comment Letters, containing comments received on the DGEIS has been added.