

August 23, 2022

Olympic Regional Development Authority (ORDA)
Attn: Emma Lamy
Sustainability & Environmental Compliance Officer
2634 Main Street
Lake Placid, NY 12946

RE: Draft Amendment to the 2015 Belleayre Mountain Ski Center Unit Management Plan

Via email to: ORDAUMP@orda.org

Dear NYS Olympic Regional Development Authority officials:

For 53 years, the Catskill Center has worked to protect and foster the environmental, cultural, and economic well-being of the Catskill Region, serving portions of Delaware, Greene, Orange, Otsego, Ulster, Sullivan, Schoharie, and Albany Counties. We appreciate the opportunity to comment on the Draft Amendment to the Belleayre Mountain Ski Center Unit Management Plan.

The Catskill Center supports the 11 management actions proposed in the Draft Amendment as necessary and important improvements for the Ski Center to remain an attractive recreation destination year round. A strong Belleayre Ski Center will serve as a regional hub for outdoor recreational tourism and as an economic driver in the Catskill region. Much of the management unit is already developed. The proposed infrastructure improvements, such as for lifts and building upgrades, are necessary for the Ski Center to stay competitive and, in most cases, will add little additional impact to the land.

While the Catskill Center strongly supports the development of hiking and mountain biking trails that connect to the Shandaken Wild Forest and the developing Ulster County Rail Trail, we underscore the critical need for utmost care in guarding against erosion and other degradation of natural resources. It is essential that the construction of the eight new hiking trails and 10 new mountain biking trails be designed in such a way as to discourage the creation of informal “social” trails and that trail construction utilize sustainable best management practices. We rely on the statement in the proposed amendment that, “... no trail construction will occur until NYSDEC has finalized the comprehensive review of applicable trail construction policies” to ensure that this occurs.

Similarly, for Nordic trail modifications, we generally support the creation of a 1.6-mile loop on Raccoon Ridge, and we understand that this will require some trail-widening

to accommodate the installation and use of snowmaking infrastructure. However, we strongly urge consideration of the least clearing possible for these trails. As with hiking and mountain biking trails, we expect trail design, expansion, and construction to be completed in such a way as to safeguard against erosion and other adverse impacts on the landscape.

The Catskill Center also supports the relocation of a previously approved snowmaking reservoir that would have required the construction of a NYSDEC Dam Safety regulated Class “C” High Hazard Dam. We strongly encourage ORDA to avoid or reduce any potential impacts to streams and wetlands, including the nearby Class B and B(T) streams shown on “Figure 11. Mapped Wetlands and Surface Water Resources.”

We strongly support Belleayre’s proposal for the installation of electric vehicle charging stations. It’s a critical part of expanding access to charging stations across the State, which dovetails with green infrastructure plans statewide, and aids with the State’s ambitious Climate Action Plan. We also support including additional charging stations on the site to provide more coverage, as we anticipate the increasing adoption and use of electric vehicles. In addition, we strongly encourage the Ski Center to consider other ways to reduce carbon emissions and combat climate change, including onsite renewable energy generation.

With wise investments and management, the Belleayre Mountain Ski Center can follow an economically- and environmentally-positive path into the future for a vibrant, world-class Ski Center.

Sincerely,



Jeff Senterman
Executive Director