

CONSTRUCTION OF NEW OFFICE BUILDING AND VISITORS INTERPRETIVE CENTER AMENDMENT

to the

1981 Lake George Beach and Battlefield Park
Unit Management Plan

Warren County

June 2018

Andrew M. Cuomo, Governor

Basil Seggos, Commissioner

NYS DEC, Region 5, Division of Operations

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MEMORANDUM

TO: The Record

FROM: Basil Seggos

SUBJECT: Lake George Beach and Battlefield Park Unit Management Plan Amendment

The Amendment to the 1981 Lake George Beach and Battlefield Park Unit Management Plan has been completed. The Adirondack Park Agency has found the Amendment to be in conformance with the Adirondack Park State Land Master Plan.

The Amendment is consistent with Environmental Conservation Law, and Department Rules, Regulations and Policies and is hereby approved and adopted.



Basil Seggos

Commissioner

New York State Department of Environmental Conservation

Date: JUNE 20, 2018

UMP AMENDMENT #1

INTRODUCTION

The DEC Operations site at historic Lake George Battlefield Park (LG Battlefield Park) contains an old farmhouse building located at 75 Fort George Road that has housed varying occupants ranging from an APA satellite office to the Lake George Association in the 1970's and early 1980's. In 1988, the Lake George Park Commission (Commission) moved its newly formed agency operations into this farmhouse building, and has remained in this facility ever since. The use and occupancy of this DEC-owned building is managed through a Memorandum of Understanding (MOU) between the DEC and the Commission, last updated in 1997. The Commission has historically paid the cost of utilities associated with the administrative structure, and it is responsible for routine maintenance to the structure (ie. fixtures, heating/cooling). By this UMP Amendment, the 19th century administrative structure will be replaced with a new dual-use structure to serve as both the Commission administrative office and a new visitor interpretative center that highlights the historical importance of the LG Battlefield Park grounds.



This farmhouse, also known as the “Ramsey House (or “Dowling House” historically), is approximately 140 years old and has several limitations and issues that preclude it from being an efficient agency office facility. Specifically, the current issues with this facility are as follows:

1. Age and efficiency: This facility was built more than 100 years ago, and is highly space and energy inefficient. The building also has several structural issues and many cosmetic ones, which give it an extremely run-down appearance that is not welcoming to the public. In terms of energy efficiency, there is little in the way of insulation, which leads to excessive energy use and highly fluctuating temperatures in summer and winter. Temperature differences vary widely throughout the office depending upon location.
2. Space limitations: This building was designed as a house, not an office facility, and the current staffing requirements of the Commission are up to 12 individuals in the spring, summer and fall. This makes for cramped conditions and close working quarters for several of the staff, with doubling of staffing in three offices. This building also has a very small conference room, which can host only six people comfortably, which precludes hosting many meetings for Commission business. As such, the Commission often hosts meetings offsite at local nonprofit organizations and municipal facilities, which is less than ideal.
3. Parking: The facility's parking lot is always overcrowded during the summer months, with little

room for customers to park, which can lead to dangerous conditions for individuals and their vehicles.

Commission and DEC Regional leadership both agree that there is little merit in putting significant financial resources into this existing building due to its advanced age and condition. It is proposed that this existing structure be demolished and replaced with a modern modularly-constructed office building which will also house a Lake George Battlefield Park Visitors Interpretive Center (LGVIC). The new building and property would remain in DEC ownership, and the Commission would use and occupy the building through a new MOU.

Environment and History Meet

During initial discussions about the concept of a new facility, the idea arose about coupling a new LGPC office with the creation of a LGVIC. In fact, the authorizing legislation that created the Commission (NYS ECL Article 43 Section 107 “Powers”) notes that the Commission shall have the power to “Promote the study of the history, historical significance, natural science, and lore of Lake George and the area within the Lake George Park and to preserve the historical relics found in or near Lake George”. As the current Commission office is sited near the center of the LG Battlefield Park, there seems to be tremendous merit in pursuing such an opportunity from all perspectives.

The idea of a LGVIC has been around for over a century, with greatly renewed vigor and interest in the past two decades. A nonprofit group known as the “Lake George Battlefield Park (Fort George) Alliance” (Alliance) was formed in the 1990’s with the sole mission of increasing public awareness of the importance of the historic nature of the Lake George area, with a specific purpose of creating a visitors interpretive center to inform and educate the public and honor our past. The Alliance currently cooperates with DEC by providing interpretive work for the public about the LG Battlefield Park. This effort could be expanded to include the use of the LGVIC by the Alliance through an agreement between the DEC, the Commission and the Alliance.

This group has held many meetings over the years to gain interest and traction towards this concept, but has struggled to secure funding for such an endeavor. There is terrific value in coupling the needs of a new Commission office facility with the creation of a new LGVIC, in a way that is highly cost-effective and a perfect fit for all involved parties. The Lake George area being a historic region, the tourism opportunities for this facility are very high, incorporating the aspect of local economic development into this effort as well.

The Structure: Making it Work

The current proposed construction model for the new facility leans towards ‘modular’ construction, which essentially is a building that is constructed offsite at a manufacturing facility and delivered to the project site. This allows for a more cost-effective product, as the unit can be purchased as a commodity and is therefore not subject to the typical costs of on-site construction. This model was used successfully for the recent new Warren County Soil and Water Conservation District Office in Warrensburg, resulting in a cost savings of almost 40% over stick-built construction estimates. Local labor and prevailing wages are paid for the skilled trades required for onsite final seaming and finishing of the building, which brings benefits to both the manufacturing industry and the local trades industry.

The property that the current Commission building lies on has a modest slope towards the north, facing the LG Battlefield Park itself. The new office facility will be built on a full foundation that would likely simply be used for storage and mechanicals. With this slope gradient, there is a tremendous opportunity to create a walk-out basement with one exposed wall (to the north), and that entire basement could be created as a new LGVIC. With the proposed footprint of approximately 2,000 square feet, this basement can be finished with 9-foot-high walls, an open floor plan, and large windows to create a very inviting atmosphere for visitors.

The new building is proposed to be located only a few feet away from the current Ramsey House building on the same property, keeping its central location within the LG Battlefield Park. The building is a very short walk to the many large statues, historic structures, and original Fort within the park. It is also directly adjacent to one of the DEC's busiest campgrounds in the Adirondack Park. The overall plan includes pathways and connectivity between the LGVIC and the rest of the Park's historic interpretive features, promising to the VIC a hub of regional historic tourism for visitors. Discussions with leadership of the LG Battlefield Park Alliance about this concept plan have been overwhelmingly supportive. The Commission believes that most of the cost of creating the inside displays could be offset by local nonprofit organizations, Warren County Tourism, and many other entities. In short, under this plan, adding a significant new tourist attraction such as this will have almost no cost associated with it.

MANAGEMENT ALTERNATIVES AND SELECTION OF PREFERRED ALTERNATIVE

Alternative 1 - No Action Alternative

This would result in ongoing challenges with the building, its parking, and its long-term utility as a viable office space. This alternative would also neglect a significant component of the desired outcome, which is the creation of a new LGVIC for the LG Battlefield Park. This dual use construction opportunity is unlikely to happen again at any point in the foreseeable future. Continuation of Commission operations in the existing facility, even with minor aesthetic upgrades, does not meet the needs for office space, parking, and a Visitor Center.

Alternative 2 – Rehabilitate the Existing Building

This building is a 'contributing resource' to the LG Battlefield Park Historic District. This Historic District was created to honor the Battle of Lake George and the French and Indian war history in the Lake George area. This building was built more than 100 years after the historic battles in the area, as a private farmhouse with no direct known connection the historic battles commemorated in the Historic District.

According to historical records, this building was built in approximately 1870, and is a contributing resource to the Lake George Battlefield Park. It is noted the building from both architectural and structural standpoints has been modified extensively since original construction. The building back in the 1930's, was structurally significantly different from the current structure. The 1930's building included a two-story section on the south side of the building that does not exist today. It also has a full wrap-around porch, giving it the 'farmhouse' look. This also is not present today. The general structure of the building is still intact, although there were many more architectural accouterments that do not exist today.

To discuss renovations as a viable alternative and to meet the program needs, several factors need to be weighed and considered. The interior would require substantial reconfiguration to meet project goals plus an addition of approximately 1,000 feet just to create the space needed for Commission operations. An additional 2,300 square feet of space would be required for the VIC. This existing building cannot accommodate a new LGVIC, which would greatly supplement the ‘essential form and integrity of the historic property and its environment’ as noted above and would thus not meet the project goals.

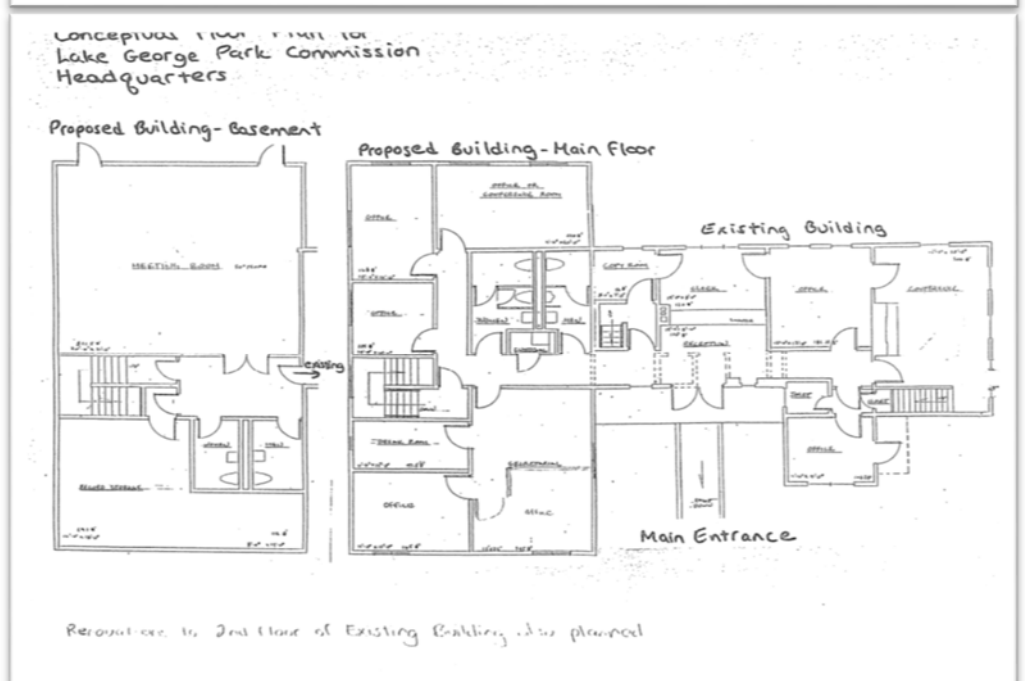
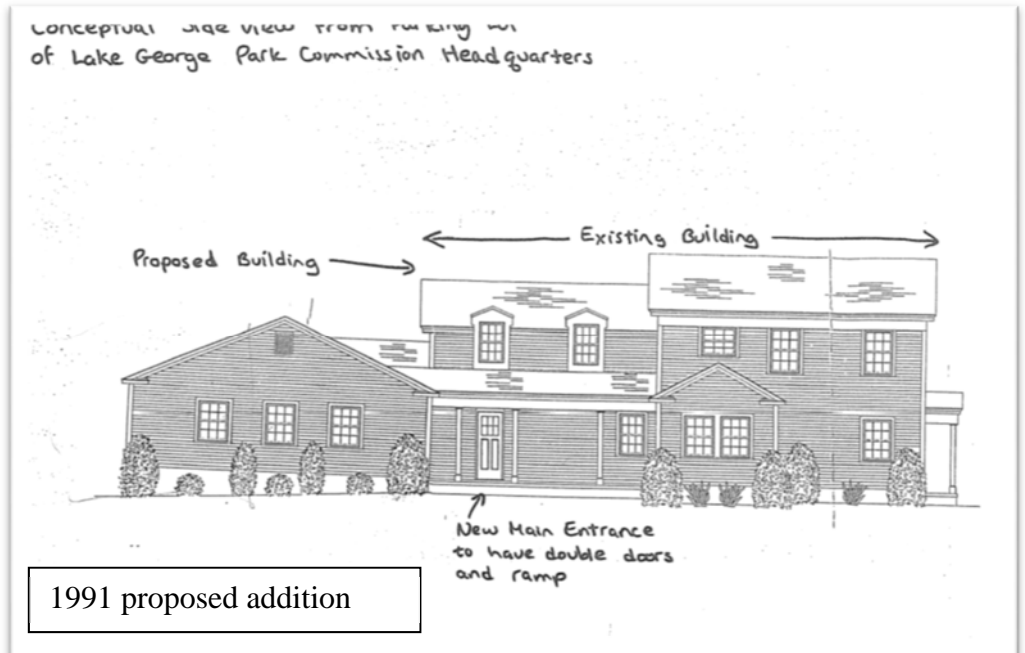
Alternative 3: Rehabilitation and Additions

Over the years, efforts were undertaken by the Commission in its tenure in the Ramsey House to address the Commission’s needs:

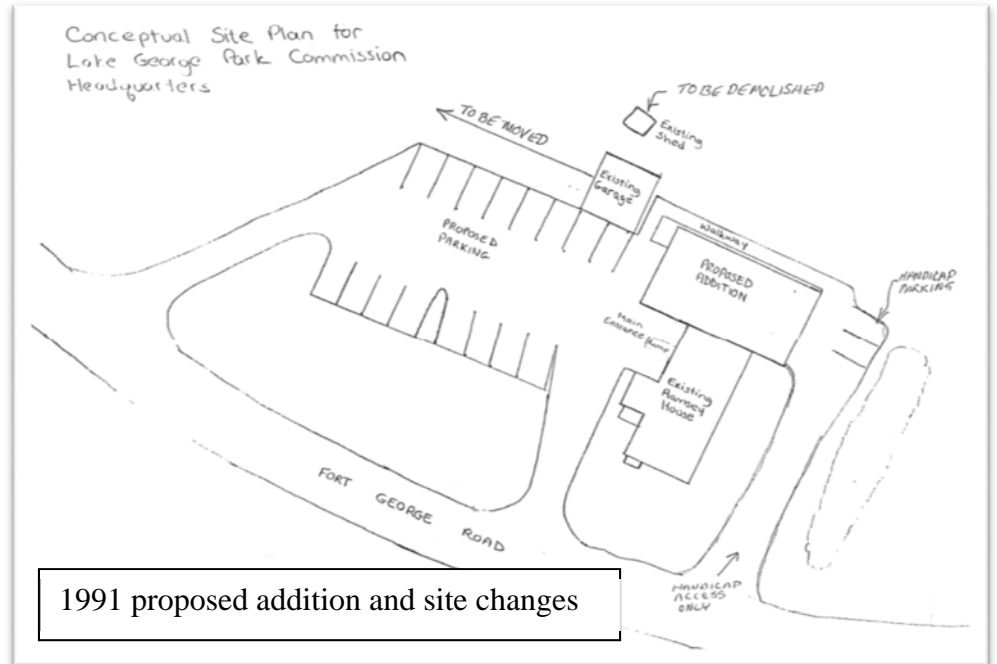
Ramsey House Renovation and Addition Project (1991)

The Commission moved into the Ramsey House building in 1989, shortly after being created as a new NYS agency. The Adirondack Park Agency had just closed its satellite office in Lake George which operated out of this facility. The building’s space challenges were identified early on in the Commission’s occupation of the building, and plans were advanced to address these issues in a joint proposed effort between the Commission and the DEC.

This proposal, 27 years ago, noted that the existing facility was lacking in many of the same ways as it does currently, including efficiency, space and parking limitations. The outlined solution at that time shows an addition to the current Ramsey House of another 1,800 square feet, including a full walk-out basement for meeting space. It included additional ground disturbance for the proposed



addition, a handicap access lane, and for additional parking. The project budget for this initiative in 1991 was determined to be \$575,000. This project was never undertaken due to cost and financing limitations. Translated to 2018 dollars, this figure becomes \$1,059,426 (www.dollartimes.com). This project intended to use the new basement primarily as meeting and document storage space, plus requisite bathrooms. The design is less than optimal, with the meeting space in the basement which becomes problematic for access and for persons with disabilities and general daily use. This design also does not include any space for a new LGVIC which is a primary goal of this effort. From an archaeological perspective, the ground disturbance for this design puts the project into the identified 'precontact' area, which is seen as a significant impact. Lastly, the cost of this alternative is significantly more than the preferred alternative. Given these factors, this alternative is not preferred.



Alternative 4 – Move Offsite into Existing Commercial Office Space.

The Commission's current location on NYS owned property adjacent to the DEC Operations facility has multiple benefits, including:

1. No annual cost for rental of property
2. Extensive storage for equipment and materials including agency vehicles and operational materials such as those used for invasive species management (such as benthic mats, rebar, and sandbag).
3. The current facility includes a heated storage garage which contains 30 years of historical documents which are accessed on a daily basis.
4. Easy and well known access for visitors, many of whom have trailered boats on their way to the largest launch on Lake George, which is only ½ mile away.

The option of moving to existing, available commercial office space in the southern Lake George region has been explored. Commercial real estate websites including LoopNet, Century 21, and RealtyUSA came up with zero available properties in the Towns of Lake George and Bolton that met the operating needs of the Commission. The closest was on NYS Route 149 (Town of Queensbury, south of Lake George) which is a property with 2,400 square feet available for \$11.50 per square foot not including utilities (equating to more than \$30,000 per year). This does not include the space required for storage that is on the existing property utilized by the Commission.

To continue the search, phone contacts with three different real estate companies in the region also yielded limited results for available commercial properties that would meet the space and parking needs of the agency's operations. The two sites that were identified by local realtors are:

1. The commercial space attached to the Trust Co Bank on NYS Route 9L in the Town of Lake George. This rental space is 3,600 square feet, single floor, total square footage, and could be built out with movable dividers to accommodate quarters for staff and a meeting space. However, the site has poor accessibility by vehicles towing boats, there is not enough combined space for office operations and storage, and it would not meet the project goal of creating a LGVIC on the Battlefield Park Property. The cost of this space is \$5,193 per month, equating to \$62,316 per year. At this cost, it would take only 11 years to use up the \$700,000 NYS funding available for this project, and the annual costs would be highly unsustainable on an annual basis.
2. A commercial property on Route 9L in the Town of Lake George adjacent to the Exit 22 off-ramp that did not have the requisite space available (1,500 square feet) and limited parking. This is a small retail space.

Due to extremely limited available properties, high lease costs, and these proposed alternative sites not being able to meet the project goals, the option of moving into commercial rental space was rejected because it was not a viable alternative.

Alternative 5 – New office building located elsewhere on state owned property.

This option proposed the construction of a new office building on state land in the southern Lake George area, leaving the Ramsey House as it stands today. Moving offsite to a different state property would not meet the stated goal of a LGVIC, as the structure would no longer be on the property it is meant to enhance.

A thorough review of NYS-owned property in the southern Lake George basin identified several tracts of land, but the vast majority of such property is highly protected through the State Land Master Plan and does not allow new structures on them. The only legally viable sites for new construction include properties listed as either “Intensive Use” or “Administrative Use”. Two properties exist in the southern Lake George basin that are classified accordingly: the existing Battlefield Park property and the Prospect Mountain Tract.

Prospect Mountain Tract:

This property is classified as intensive use, primarily because it has a seven-mile long memorial highway leading to a summit which overlooks Lake George. This property is controlled by DEC via a seasonal toll road for most of the year, closed in winter, and is unmaintained. This property likely has a viable section at the base which could be utilized for a new administrative use structure to house the Commission. However, it comes with the following challenges:

- This property is dedicated to a scenic highway, and putting a new administrative use building on it would likely engender considerable public backlash from both Veterans groups (it’s a memorial highway) and the general public.
- The Prospect Mountain Intensive Use Area Unit Management Plan would need to be amended, which would require considerably more time and public hearings, as that property has many stakeholders that would likely be opposed to such an undertaking.
- There would be no LGVIC incorporated into the Battlefield Park as the Prospect Mountain Tract is not part of a historic battlefield area.
- Winter maintenance and access would have to occur, including plowing and salting of at least the first ½ mile of the memorial highway, and the seasonal gate at the entrance to the highway would have to remain open year-round.

Battlefield Park Property – Alternate Locations:

The proposed structure could be placed elsewhere on the LG Battlefield Park property as a possible alternative. The preferred site would have an elevation differential from the front to the back of the property such that a

walk-out basement could be created for the LGVIC as is currently proposed. The primary location to do so involves a site located approximately 100 yards north of the existing Ramsey House Building in the open area of the park adjacent to Fort George Road. However, this option would include significantly more ground disturbance in a highly sensitive archaeological area.

To avoid additional archaeological impacts, the building could also be placed down in the field portion of the state property, which has been historically disturbed by railroad yard and a sawmill. However, this property is flat (no slope for a walk-out basement), and has a very high water table as discovered through extensive test pits and soil borings related to other projects in the immediate area. Lastly, putting a new office facility and parking area in the main portion of this heavily used park setting would be a significant, adverse visual impact and would substantially disrupt the current recreational use associated with this area. This alternative would likely not survive scrutiny from permitting agencies and the general public.

Both of these options would retain Ramsey House as is. However, the end result would be two administrative structures on this property as opposed to one. Through discussions with DEC and APA, this option is not considered to be a reasonably viable option within the Unit Management Plan and State Land Master Plan. Also, both of these options would result in an operation that is much more visible from both Lake George and the LG Battlefield Park in general, as there is no large grove of existing trees to screen the building in that location as there exists for the current structure and proposed structure in the preferred alternative. This would be seen as a detriment to the overall aesthetic of the LG Battlefield Park, because no buildings are currently visible from the northern portions of the Park, Beach Road and the lake itself.

Alternative 6 – Construct a New Administrative Building and Historical Visitors Interpretive Center in the same location as the Ramey House

This option within the LG Battlefield Park would be to place the proposed structure over the footprint of the existing office. While this would appear to reduce potential land disturbance and excavation through use of the existing building footprint and basement, the walk-out design and associated grading requirements of the office/LGVIC structure would necessitate that grading be extended well to the north in order to be functional, thus increasing overall disturbance limits in this regard and potentially impacting archeological resources for which the park has historic significance. In addition, the existing parking area would need to be significantly extended to the south in order to accommodate the parking demand of the facility. This again would increase disturbance limits, and also potentially place construction into a concentrated drainage channel. This option is not selected due to the potential negative impacts to Archeological deposits.

Alternative 7 (Preferred) – Construct a New Administrative Building and Historical Visitors Interpretive Center to replace existing Ramsey House, directly adjacent to current structure

This alternative describes the proposed construction of a new administrative office and LGVIC located only a few feet away from the current Ramsey House, followed by the demolition of the existing building. This alternative would consist of a slightly larger structure than the Ramsey House (18%) in footprint, located approximately 20 feet to the north of the location of the existing building (plans attached).

The current plans propose the building be relocated out of the ‘pre-contact’ archaeological area, and the current site plan addresses this recommendation. The current proposed building is planned to be of modular construction with a full walk-out basement which will be solely dedicated to the LGVIC and meet the project

goals for the LGVIC. The new LGVIC will occupy the entire basement floor of the new building, with a walk-out basement style separate entrance facing the Park's fields, ultimately with dedicated pathways to the Park's major attractions such as the Father St. Jogues monument and the statues across Fort George Road a very short walk to the east. The LGVIC will utilize educational displays, panels and artifacts to tell the story of the history of LG Battlefield Park and related historic events in the Lake George region. All parties agree that this alternative is the best concept to meet the stated goals of the project.

Alternatives Analysis Conclusion

This alternatives assessment evaluated the feasibility of all known potential opportunities to achieve the stated project goals of adequate modern office space coupled with a new LGVIC, as follows:

Alternative 1 – No Action Alternative

Alternative 2 – Rehabilitate the Existing Building

Alternative 3 - Rehabilitation and Additions

Alternative 4 – Move Offsite into Existing Commercial Office Space

Alternative 5 – New office building located elsewhere on state owned property

Alternative 6 – Construct a New Administrative Building and LGVIC in the same location as the Ramsey House

Alternative 7 (Preferred) – Construct a New Administrative Building and LGVIC to replace existing Ramsey House, directly adjacent to current structure

The preferred alternative was selected on the basis of several factors, including:

- Effectiveness of achieving all stated project goals
- Minimizing impact to known archaeological resources
- Minimized impact upon Commission operations
- Cost-effectiveness of achieving stated goals
- Achievement of dual-use facility including new historical center

When considered together, Alternative 7 results in the best outcome for this project. This alternative is the only one identified that creates the desired office environment for the Commission while including a new LGVIC, at very little cost to the overall project. These two long-standing goals can be achieved with the implementation of Alternative 7, and is therefore recommended as the preferred option for this initiative.

FACILITIES DEVELOPMENT AND MAINTENANCE

1. Conduct archeological survey of new grounds to be disturbed by clearing and construction activity.
2. Cut down and properly remove nineteen trees to clear the area for construction. All trees removed from the construction site shall be disposed of on NYS Forest Preserve Land as required.
 - a. The tree removal tally for site construction is as follows:

DBH/Species	White Cedar	Sugar Maple	Totals
8-12"	0	1	1
12 – 20"	18	0	18
Totals	18	1	19

3. Construct new “modular construction” office facility as per attached specifications and plans, including full walk-out basement.
4. Demolish and remove existing Ramsey House structure
5. Construct new parking lot, with full stormwater controls and handicap parking.
6. Construct new handicap access ramp for main entrance of office facility.
7. Complete finished grading, revegetate site, and install plantings as per approved plans

Attachment A. Maps, Photographs, and Site Plans
UMP Amendment #1 – 1981 Lake George Battlefield Park Management Plan



Figure 1. Orthoimagery location and facilities map for the Ramsey House site at the DEC Battlefield Park; Town of Lake George in Warren County, New York.



Figure 2. Photos of existing 140 year old “Ramsey House” building, which houses the NYS Lake George Park Commission headquarters



Figure 3. Proposed site plan layout for new facility. Previous proposed location shown outlined. “Pre-contact” archaeological fragments identified to the northwest of proposed building. Project will not impact this area.

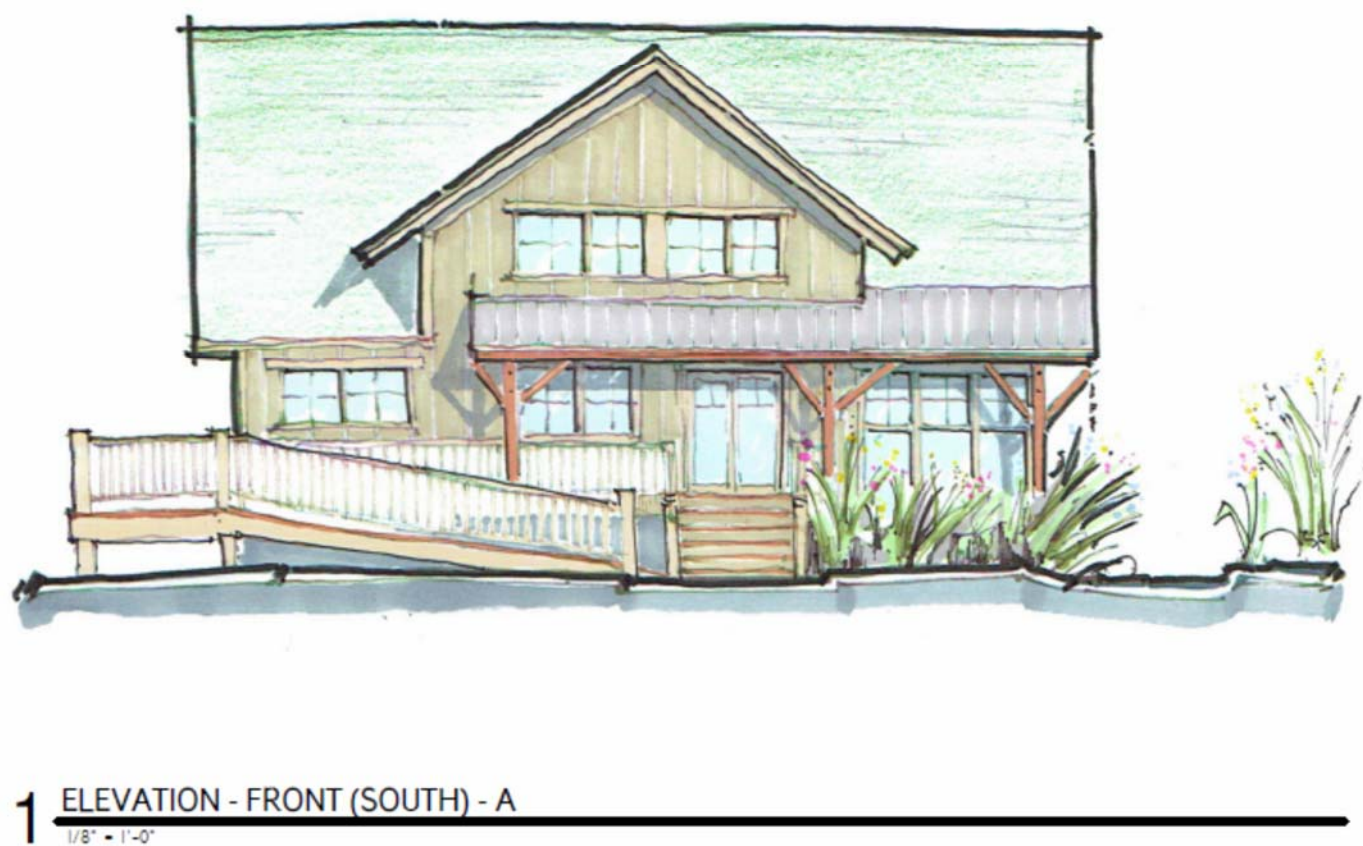


Figure 5. Proposed Building site profile: front, facing south



LAKE GEORGE PARK COMMISSION
OFFICES AND INTERPRETIVE CENTER - CONCEPT DESIGN

Figure 6. Proposed building site profile: facing north , VIC main entrance

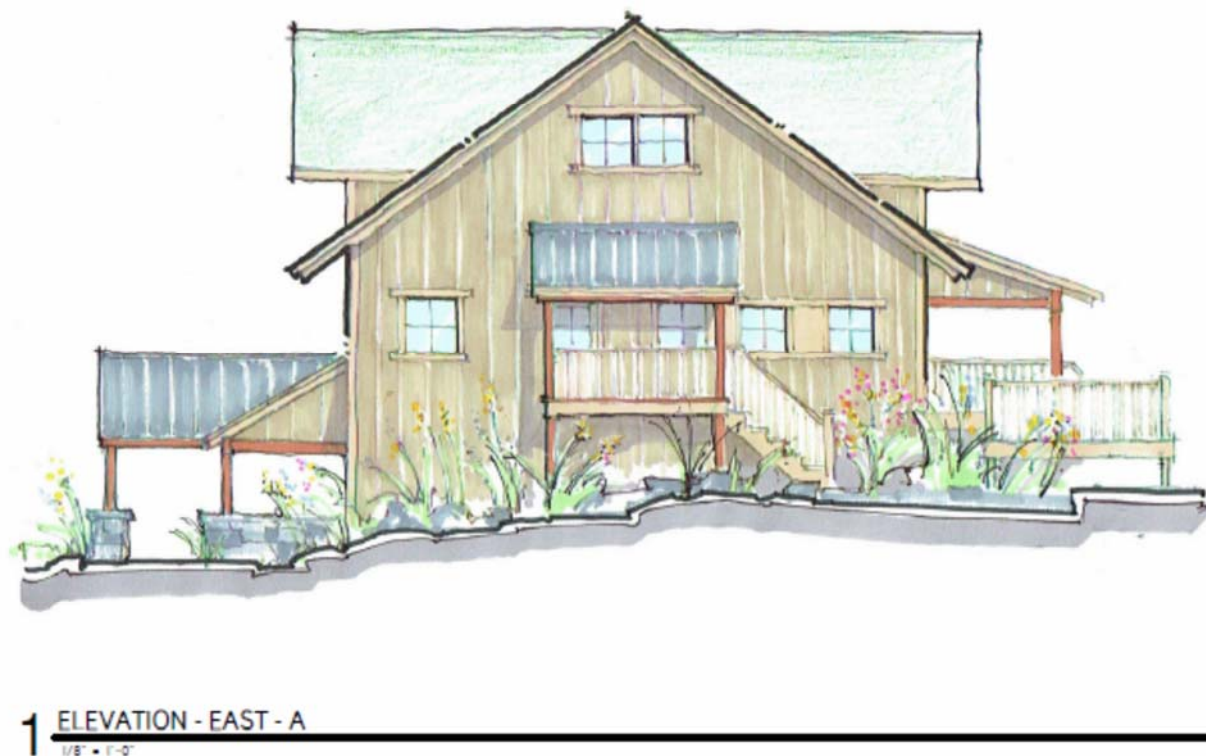


Figure 7. Proposed building site profile: side

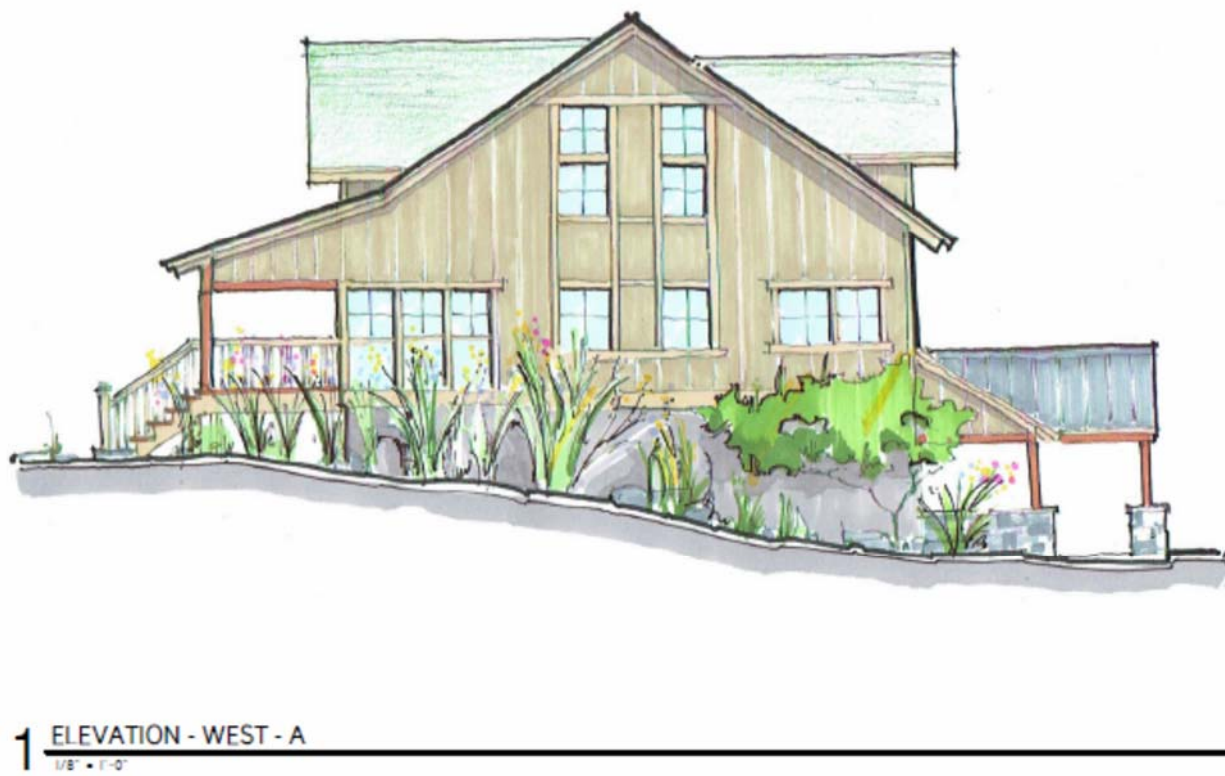


Figure 8. Proposed building site profile: side

Public Comment on Draft UMP Amendment for LG Battlefield Park

The LGPC/DEC provided the UMP Amendment for public comment on April 18, 2018. Below is a summary of the comments that were received, with LGPC/DEC/APA response.

COMMENT: The UMP Amendment fails to recognize that the so-called Battleground Park is part of the state Forest Preserve and is protected by Article 14, Section 1 of the Constitution. See ECL Section 9-0101.

RESPONSE: *Pursuant to an opinion of the Attorney General in 1912, the Battlefield has not been classified as Forest Preserve land and has not been managed as Forest Preserve land. There has been no legal challenge to this opinion in the 104 years since its issuance. However, even if the Opinion were to be incorrect and this land is in fact part of the Forest Preserve, the building will not violate Article 14, Section 1 of the Constitution. The LGPC was established in part for the conservation and protection of state land in the Forest Preserve and areas adjacent thereto within the Lake George Park. . The State is allowed to locate buildings on Forest Preserve land where such buildings assist the State in fulfilling its care, custody and control responsibilities for the Forest Preserve. There are numerous examples of such administrative buildings throughout the Forest Preserve, such as the DEC Regional Headquarters in Ray Brook and the DEC subregional office in Warrensburg. Without such buildings, the State would be unable to properly exercise its custodial responsibilities over the Forest Preserve.*

COMMENT: The UMP Amendment does not analyze the plan's compliance with the Adirondack Park State Land Master Plan ("APSLMP"). UMP amendments are subject to the same requirements as new UMPs.

RESPONSE: *Counsel for the DEC, the Park Commission and the APA have already discussed the legal ramifications and details identified herein regarding this matter. This was presented to the APA at its April 12, 2018, meeting, at which time a presentation was made by the Park Commission. The APA sent it out for public comment for compliance with APSLMP. During the course of drafting the Amendment, the Park Commission worked in conjunction with DEC and the APA, along with various other agencies to make certain all avenues and concerns were met.*

COMMENT: The UMP Amendment is devoid of any discussion of the APA's role in approving UMPs for the Adirondack Forest Preserve. In fact, so far as I can tell, this proposed amendment has not been submitted to APA for its review and approval.

RESPONSE: *The proposed Amendment was presented to the APA at its April 12, 2018, meeting, at which time a presentation was made by the Park Commission. At the end of the meeting, the APA noted that it would be reviewing a resolution for APSLMP compliance at the June 7, 2018, meeting.*

- COMMENT:** The UMP Amendment does not apply DEC Policy LF-91-2, “Cutting, Removal or Destruction of Trees and Endangered, Threatened or Rare Plants on Forest Preserve Lands.”
- RESPONSE:** *DEC Policy LF-91-2 will be followed. Consistent with the policy, this UMP serves as conceptual approval for the project, and its adoption will be followed by a detailed work plan to be published in the ENB. All substantive and procedural requirements of the policy will be followed.*
- COMMENT:** The UMP Amendment proposes to “remove” 18 trees from the site. This would violate both Article 14 and DEC Policy LF-91-2. Any trees which are cut must be disposed of nearby on the Forest Preserve.
- RESPONSE:** *According to case law, Article 14, Section 1 of the Constitution is not a complete and total ban on the cutting of trees within the Forest Preserve. Where there is an immaterial amount of trees to be cut for an appropriate purpose, the cutting of those trees is not violative of the Constitution. (Association for Protection of Adirondacks v. MacDonald, 253 N.Y. 234 [1930]; Balsam Lake Anglers Club v. Department of Env'tl. Conservation, 199 A.D.2d 852 [3d Dept. 1993].*
- COMMENT:** The UMP Amendment vaguely discusses aesthetic impacts, but does not include a proper visual impact analysis to determine way to avoid or minimize the visual impacts of the action on the battlefield and the lake. See DEC Policy DEP-00-2 (“Assessing and Mitigating Visual Impacts”)
- RESPONSE:** *DEC Policy DEP-00-2 is an internal program policy, which “provides direction to Department staff for evaluating visual and aesthetic impacts generated from proposed facilities.” The Park Commission is not required to use or adhere to the policy. Further, the Park Commission undertook aesthetic and visual analysis in its design of the new building. Specifically, Park Commission staff and its consultant walked the site several times, viewing it from multiple angles. Since aesthetic resources surround the site, it is generally within the line of site from all resources. With that knowledge, the Park Commission and consultant worked in conjunction with various agencies, including DEC and OPRPH to minimize any aesthetic or visual impact to the surrounding resources. In minimizing the aesthetic and visual impacts, the Park Commission has sited the building within approximately 20 feet of the current building; has proposed a more architecturally benign design and color scheme than the current white house; has agreed to the retention of trees to screen the building from Lake George; retained and worked with a consultant to conduct a Phase 2 Archaeological Survey and has indicated specific native planting and vegetation on the property. Moreover, the new building will be 1,300 feet from Lake George, which would have no undue visual impact to either the Battlefield Park or the Lake.*
- COMMENT:** The UMP Amendment vaguely discusses archeological and historic impacts, but does not include an analysis under Section 14.09 of the Parks, Recreation and Historic Preservation Law. Nor is there any indication that the SHPO was consulted, as required by law.

RESPONSE: *The Park Commission has been in constant consultation with the Office of Parks, Recreation and Historic Preservation as required by the NYS Historic Preservation Action. Through this consultation, alternatives have been evaluated and measures to mitigate the impact of the proposed building demolition are being developed. OPRHP and the Park Commission have fully explored all feasible and prudent alternatives and given due consideration to feasible and prudent plans which avoid or mitigate adverse impacts. OPRHP was consulted at an early stage, fully reviewed the UMP Amendment and was involved in the substance and language, and discussed and reviewed alternative and mitigating factors. By letter dated March 5, 2018, OPRHP identified potential alternatives to the demolition of the building and found them to be lacking. In addition, OPRHP identified options to be explored and developed as appropriate mitigation, which the Park Commission is diligently pursuing*

COMMENT: The UMP Amendment is not in the usual format of a combined draft UMP Amendment and draft SEQR EIS.

RESPONSE: *The Park Commission has gone through the SEQR process, identifying the project as a Type I, acting as Lead Agency in a coordinated review, and working in conjunction with all interested and involved agencies, including the Department of Environmental Conservation, the Adirondack Park Agency, the Office of Parks, Recreation, and Historic Preservation, and the Town of Lake George. After identifying the relevant areas of environmental concern, on April 24, 2018, the Park Commission took a hard look and made a reasoned elaboration for the basis of its determination to issue a Negative Declaration and adopt a Resolution, which identified that the project will have no significant impact. There was not a determination that the project would require an Environmental Impact Statement. The involved parties agreed that the Park Commission's SEQR determination would apply to the project as a whole, including the UMP Amendment portion.*

COMMENT: I do not understand how the Lake George Park Commission can logically find no significant environmental impact under SEQRA which was reported in the newspaper article when, as noted in the draft management plan, the selected alternative requires the demolition of a 140 year old building which is a contributing resource to the Lake George Battlefield Park historic district. It seems that by definition there would be a significant environmental impact from the demolition of this structure. I would therefore request that this aspect of the determination process be reconsidered and further, that this matter be referred to and reviewed by the NYS Office of Parks, Recreation, and Historic Preservation for their input and thinking.

Additionally, none of the described alternatives in the draft management plan consider the alternative of appropriately renovating the existing historic building as well as constructing a new building of appropriate design and form adjacent and to the north of the existing structure such that the two resulting spaces would provide the needed space for the Lake George Park Commission Offices and the Visitor Interpretive Center. Such an alternative or alternatives should be considered before any final decision is made.

Another alternative that should be considered is adding to the existing building such as to provide the needed space for the proposed project. Any resulting structure should be

designed in a fashion that does not affect the form and integrity of the existing structure and should be designed so as to complement and harmonize with the form and integrity of the existing structure. The NYS Office of Parks, Recreation and Historic Preservation should be consulted to determine the extent to which such an alternative is feasible. If it is, such an alternative should be considered before any final decision is made.

Further, the draft management plan references the Lake George Battlefield Park Historic district. However, the draft management plan provides no description of the elements of, and the historic resources within (other than that the building to be demolished is a contributing resource to that historic district) that historic district. The draft management plan's discussion of the proposed action and its alternatives should include a description of the elements of, and historic resources within, the Lake George Battlefield Park historic district and a discussion of what impacts (including visual and aesthetic) each considered alternative would have on the Lake George Battlefield Park historic district.

RESPONSE:

The UMP Amendment specifically addresses these concerns (pages 4 through 9). Further, the Park Commission has been in consultation with the Office of Parks, Recreation and Historic Preservation as required by the NYS Historic Preservation Action. Through this consultation, alternatives have been evaluated and measures to mitigate the impact of the proposed building demolition are being developed. By letter dated March 5, 2018, OPRHP identified potential alternatives to the demolition of the building and found them to be lacking. In addition, OPRHP identified options to be explored and developed as appropriate mitigation, which the Park Commission is diligently pursuing.