



W H I T E F A C E

**2017 Amendment to the 2004 Whiteface Mountain
Unit Management Plan
and
Draft Generic Environmental Impact Statement
(Public Draft)**



**Olympic Regional
Development Authority**

January 2018

Lead Agency and Prepared by:

The Olympic Regional Development Authority
2634 Main Street, Lake Placid, New York 12946
(518) 302-5332

Contact: Robert W. Hammond
and

Whiteface Mountain Ski Center
Route 86 Wilmington, New York 12997
(518) 946-4201

Contact: Aaron Kellett

In cooperation with:

The NYS Department of Environmental Conservation

and in consultation with:

The Adirondack Park Agency
Ray Brook, New York 12977

Private Consultants:

The LA Group, Landscape Architecture and Engineering, P.C.
40 Long Alley, Saratoga Springs, New York 12866
(518) 587-8100

Contact: Kevin Franke

Date of Acceptance of DGEIS: January 3, 2018

Date of Public Hearing: January 25, 2018

Date of Close of Comment Period: February 9, 2018

Date of Acceptance of FGEIS: _____

Submitted: December 8, 2017

EXECUTIVE SUMMARY

I. INTRODUCTION

This 2017 Unit Management Plan (UMP) Draft Amendment for Whiteface Mountain Intensive Use Area has been prepared in accordance with the Adirondack Park State Land Master Plan (APSLMP or SLMP), addresses changes to the 1996 UMP Update and the 2004 UMP Update and Amendment thereto, and adds several new management actions. This 2017 UMP Draft Amendment reviews the status of the 1987, 1996 and 2004 management actions and identifies those management actions that have been completed, those that are pending, and those that are to be modified or abandoned through this 2017 UMP Amendment. Previous UMP documents are incorporated by reference into this document.

Section 816 of the Adirondack Park Agency Act directs the Department of Environmental Conservation (DEC) to develop, in consultation with the Adirondack Park Agency (APA), UMPs for each unit of land under its jurisdiction classified in the APSLMP. Concurrent with the development of UMPs is the preparation of a Generic Environmental Impact Statement (GEIS), which analyzes the significant impacts and alternatives related to each UMP. The Olympic Regional Development Authority (ORDA), pursuant to its enabling law and agreement with the NYSDEC for the management of Whiteface Ski Center, has prepared this UMP Draft Amendment in cooperation with DEC and in consultation with APA.

II. 2017 UMP AMENDMENT MANAGEMENT ACTIONS

New management actions are identified and analyzed in this 2017 UMP Draft Amendment. The potential environmental impacts and the attendant proposed mitigation measures for any new or modified management actions are also identified and discussed. The potential impacts and the identified mitigation measures for the previously approved UMP management actions remain in effect and will not be repeated here, but are incorporated by reference.

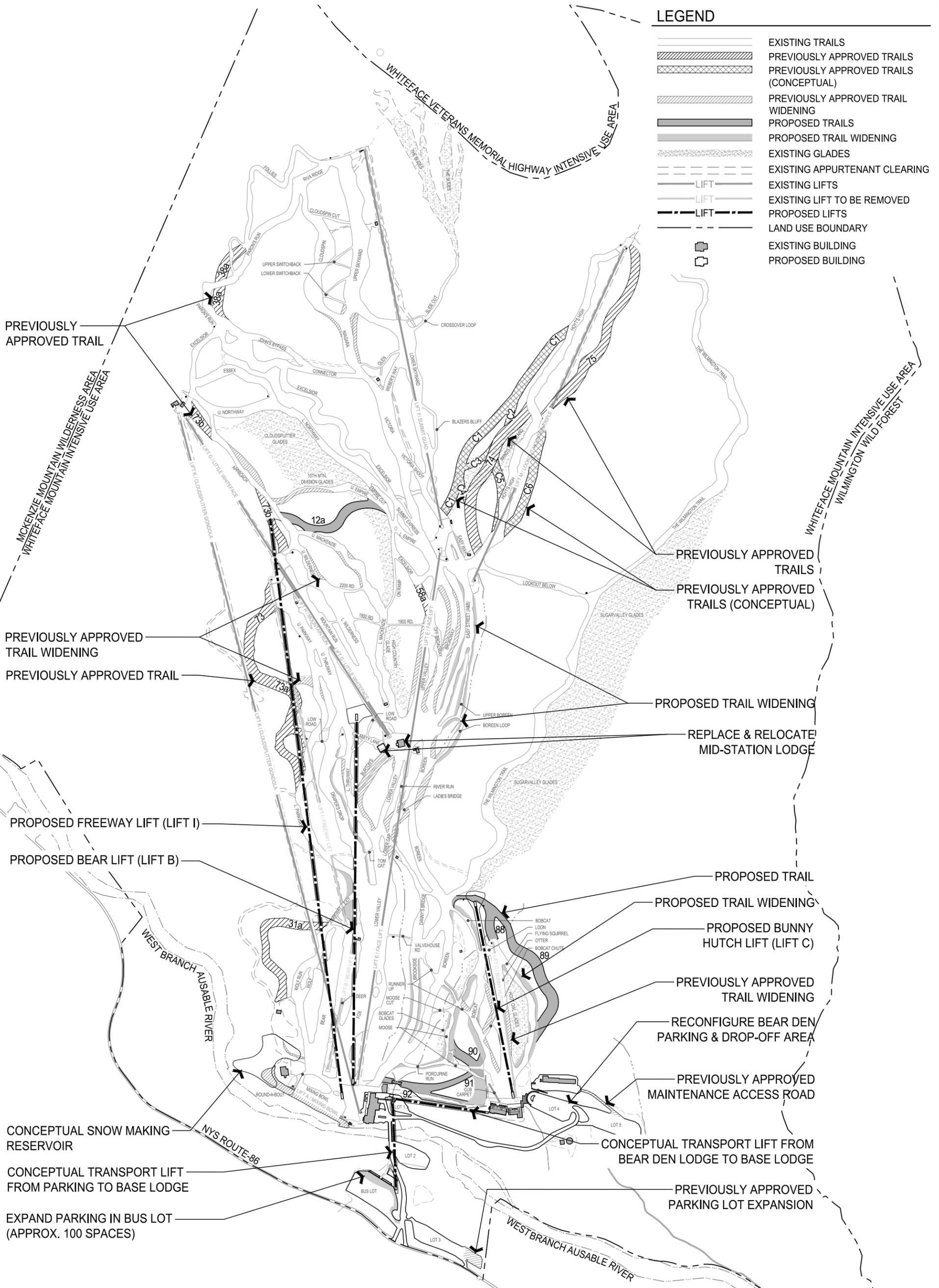
The following lists the New Management Actions that are the subject of this UMP Draft Amendment and that can be undertaken after the UMP Final Amendment is adopted. See **Figure ES-1, 2017 Master Plan – Proposed & Previously Approved Actions.**

New Downhill Trails and Lifts

- Extend Bear Den's lift (Bunny Hutch or Lift C), with related trail work
- Widen Easy Way
- Widen Brookside
- Widen Easy Street
- Widen Upper Boreen
- Widen Boreen Loop
- Widen Parkway Exit
- Widen Drapers Drop
- Construct New Intermediate Trail 12a on Little Whiteface

LEGEND

-  EXISTING TRAILS
-  PREVIOUSLY APPROVED TRAILS
-  PREVIOUSLY APPROVED TRAILS (CONCEPTUAL)
-  PREVIOUSLY APPROVED TRAIL WIDENING
-  PROPOSED TRAILS
-  PROPOSED TRAIL WIDENING
-  EXISTING GLADES
-  EXISTING APPURTENANT CLEARING
-  EXISTING LIFTS
-  EXISTING LIFT TO BE REMOVED
-  PROPOSED LIFTS
-  LAND USE BOUNDARY
-  EXISTING BUILDING
-  PROPOSED BUILDING



PREVIOUSLY APPROVED TRAIL

MCKENZIE MOUNTAIN WILDERNESS AREA
 WHITEFACE MOUNTAIN WILDERNESS AREA

PREVIOUSLY APPROVED TRAIL WIDENING
 PREVIOUSLY APPROVED TRAIL

PROPOSED FREEWAY LIFT (LIFT I)
 PROPOSED BEAR LIFT (LIFT B)

CONCEPTUAL SNOW MAKING RESERVOIR
 CONCEPTUAL TRANSPORT LIFT FROM PARKING TO BASE LODGE
 EXPAND PARKING IN BUS LOT (APPROX. 100 SPACES)

PREVIOUSLY APPROVED TRAILS
 PREVIOUSLY APPROVED TRAILS (CONCEPTUAL)

PROPOSED TRAIL WIDENING
 REPLACE & RELOCATE MID-STATION LODGE

PROPOSED TRAIL
 PROPOSED TRAIL WIDENING
 PROPOSED BUNNY HUTCH LIFT (LIFT C)

PREVIOUSLY APPROVED TRAIL WIDENING
 RECONFIGURE BEAR DEN PARKING & DROP-OFF AREA

PREVIOUSLY APPROVED MAINTENANCE ACCESS ROAD

CONCEPTUAL TRANSPORT LIFT FROM BEAR DEN LODGE TO BASE LODGE

PREVIOUSLY APPROVED PARKING LOT EXPANSION

The LA GROUP
 Landscape Architecture & Engineering P.C.
 People. Purpose. Place.
 40 Long Alley
 Saratoga Springs NY 12866
 518-587-8100
 518-587-0180
 www.thelagroup.com

Prepared for:

OLYMPIC REGIONAL DEVELOPMENT AUTHORITY
 Olympic Regional Development Authority
 2634 Main Street
 Lake Placid, New York 12946


WHITEFACE LAKE PLACID
 Project Title:
 Whiteface Mountain: 2017 Unit Management Plan Draft
 Amendment & Draft Generic Environmental Impact Statement

Drawing Title
 2017 Master Plan - Proposed & Previously Approved Actions



Date: November 29, 2017
 Scale:
 Design: MJT
 Drawn: KMK
 Ch'k'd: KJF
 Project No.: 201263
 Drawing No.:
Figure ES-1

- Extend and Replace the Bear Lift (Lift B)
- Replace and Realign Freeway Lift (Lift I)

Parking and Vehicular Circulation

- Create additional parking
- Create a formal drop-off area at Bear Den
- Construct a base area bridge behind NYSEF building to replace existing culverts

Pedestrian Circulation

- Install a People Mover between Parking and Base Lodge (Conceptual Action)
- Install a Base to Base transfer lift (Conceptual Action)

Snowmaking

Examine options for a snowmaking reservoir (Conceptual Action)

Off-Season

Add biking trails from mid-station

These management actions are discussed in the context of existing resources, facilities and use (Section 2) and ORDA's Management and Policy when it comes to the Whiteface Mountain Intensive Use Area (Section 3). The management actions themselves are described in detail in Section 4.

An introductory section (Section 1) first gives an overview of project purpose, a general facility description, the history of the ski area, a description of the UMP/GEIS process and a summary update of the status of actions contained in previous UMPs.

III. SEQRA PROCESS

ORDA, as the Agency responsible for undertaking the actions in this 2017 UMP Draft Amendment/DGEIS, completed a NY State Environmental Quality Review Act (SEQRA) Full Environmental Assessment Form (FEAF) Parts 1, 2, and 3. Based on the analysis in Part 3 of the FEAF, ORDA determined that the Project may result in one or more significant adverse impacts on the environment and this Environmental Impact Statement (EIS) must be prepared to further assess the impacts and possible mitigation and to explore alternatives to avoid or reduce these impacts.

The SEQRA aspects of this document are presented as a Generic Environmental Impact Statement (GEIS). A GEIS may be used to assess the environmental effects of a sequence of actions contemplated by a single agency or an entire program or plan having wide application (6NYCRR 617.10(a)(2) and (4)). They differ from a site specific EIS in that it applies to a group of common and related activities which have similar or related impacts. It is the intent of this GEIS to provide sufficient, site-specific information for all aspects of the UMP. In conformance with SEQRA, these related actions are being considered in this DGEIS. No

additional SEQRA analyses are anticipated to be required for any new management action in this UMP Amendment, provided that such actions are carried out in accordance with the recommendations of this document. Conceptual actions contained in this UMP Amendment will be subject to future SEQRA analyses should they be pursued in the future.

A preliminary version of this UMP Draft Amendment/DGEIS was provided to NYSDEC and to the APA for their review December 8, 2017. Comments from these agencies were received by ORDA, and ORDA revised the preliminary document accordingly. ORDA then declared this document to be complete for public review on January 3, 2018. This 2017 UMP Amendment/DGEIS is open for public comment until February 9, 2018 including a SEQRA public hearing scheduled for January 25, 2018 at 7:00 PM at the Base Lodge at Whiteface Mountain.

Notice of ORDA's acceptance of the DGEIS, establishment of the public comment period, and directions for accessing this document were published in the January 10, 2018 issue of the Environmental Notice Bulletin.

Part 3 of the FEA identified those topics for which additional information was required within the GEIS. Primary concerns include steep slope soil erosion and water quality, water quality impacts and potential impacts to the Bicknell's thrush, a species of special concern in New York State. Potential impacts and mitigation measures for these topics and a range of other topics are discussed in detail in Section 5 of this Draft UMP/GEIS.

Section 6 considers alternatives to the new management actions including alternative trail improvements, lift configurations, parking and circulation and appurtenances.

IV. CONFORMANCE WITH THE APSLMP

It is stated in Section I of the APSLMP that "In accordance with statutory mandate, all [unit management] plans will conform to the guidelines and criteria set forth in the master plan"

The following is from Intensive Use Area portion of Section II of the APSLMP, and includes descriptions of how this draft UMP amendment conforms to the stated guidelines.

Guidelines for Management and Use

Basic Guidelines

1. *The primary management guideline for Intensive Use Areas will be to provide the public opportunities for family group camping, developed swimming and boating, downhill skiing, cross country skiing under competitive or developed conditions on improved cross country ski trails, visitor information and similar outdoor recreational pursuits in a setting and on a scale that are in harmony with the relatively wild and undeveloped character of the Adirondack Park.*

The Whiteface Mountain Intensive Use Area will continue to provide opportunities for downhill skiing and similar outdoor recreational pursuits.

There are no new management actions in this Draft UMP Amendment that change the current setting or scale of the facilities at Whiteface Mountain. All new management actions are proposed for the interior of the existing ski area. Three existing ski lifts will be realigned and replaced, while another surface lift (Magic Carpet) will be added in the Bear Den learning area. Selective trail widening will occur on existing trails. Some limited new ski trails are proposed to be constructed in between existing ski trails in order to provide connections from the relocated/realigned lifts to existing trails.

2. *All intensive use facilities should be located, designed and managed so as to blend with the Adirondack environment and to have the minimum adverse impact possible on surrounding state lands and nearby private holdings. They will not be situated where they will aggravate problems on lands already subject to or threatened by overuse, such as the eastern portion of the High Peaks Wilderness, the Pharaoh Lake Wilderness or the St. Regis Canoe Area or where they will have a negative impact on competing private facilities. Such facilities will be adjacent to or serviceable from existing public road systems or water bodies open to motorboat use within the Park.*

All of the new management actions proposed in this UMP Amendment in the Bear Den area are located low on the mountain where they will not cause a visual impact (see UMP section V.C.I). Those improvements and structures proposed higher on the mountain, such as trail 12a, the previously approved, but not yet constructed trail 73a, and the tops of the realigned Freeway and Bear lifts will blend in with the existing on-mountain facilities. (See UMP section V.C.I, featuring a visual simulation of the built condition looking into the mountain from NYS Route 86 at the entrance driveway.)

All actions are located in the interior of the Intensive Use Area, removed from adjoining State and private lands. This UMP amendment is not proposing any significant enlargement of the ski area, so there is no potential for adversely affecting lands subject to or threatened by overuse or competing private facilities.

3. *Construction and development activities in Intensive Use Areas will:*

-- avoid material alteration of wetlands;

Impacts to wetlands have been avoided (see UMP section V.A.5).

-- minimize extensive topographic alterations;

No extensive topographic alterations are proposed (see UMP section V.A.3).

-- limit vegetative clearing;

Vegetative clearing will be limited and will be well within the limits established by Article XIV of the NYS Constitution (see UMP section V.B.1).

and,

-- preserve the scenic, natural and open space resources of the Intensive Use Area.

See items 1 and 2 above.

4. *Day use areas will not provide for overnight camping or other overnight accommodations for the public.*

No overnight accommodations, camping or otherwise, are proposed.

5. *Priority should be given to the rehabilitation and modernization of existing Intensive Use Areas and the complete development of partially developed existing Intensive Use Areas before the construction of new facilities is considered.*

The actions contained in this draft UMP amendment are for the improvement and modernization of the existing Whiteface Mountain Intensive Use Area.

6. *Additions to the intensive use category should come either from new acquisitions or from the reclassification of appropriate wild forest areas, and only in exceptional circumstances from wilderness, primitive or canoe areas.*

No such additions are contemplated in this UMP Amendment.

7. *Any request for classification of a new acquisition or reclassification of existing lands from another land use category to an Intensive Use Area will be accompanied by a draft unit management plan for the proposed Intensive Use Area that will demonstrate how the applicable guidelines will be respected.*

No such requests are contemplated in this UMP Amendment.

8. *No new structures or improvements at any Intensive Use Area will be constructed except in conformity with a final adopted unit management plan for such area. This guideline will not prevent the ordinary maintenance, rehabilitation or minor relocation of conforming structures or improvements.*

None of the new management actions proposed in this UMP Draft Amendment will be constructed unless and until they are included in the Final UMP Amendment adopted by NYSDEC.

9. *Since the concentrations of visitors at certain intensive use facilities often pose a threat of water pollution, the state should set an example for the private sector by installing modern sewage treatment systems with the objective of maintaining high water quality. Standards for the state should in no case be less than those for the private sector and in all cases any pit privy, leach field or seepage pit will be at least 150 feet from the mean high water mark of any lake, pond, river or stream.*

No new in-ground wastewater treatment is proposed.

10. *Any new, reconstructed or relocated buildings or structures located on shorelines of lakes, ponds, rivers or major streams, other than docks, primitive tent sites not a part of a campground (which will be governed by the general guidelines for such sites set forth elsewhere in this master plan) boat launching sites, fishing and waterway access sites, boathouses, and similar water related facilities, will be set back a minimum of 150 feet from the mean high water mark and will be located so as to be reasonably screened from the water body to avoid intruding on the natural character of the shoreline and the public enjoyment and use thereof.*

No new buildings or structures are proposed near any shorelines.

V. IMPACT ANALYSIS

A. Geology

Bedrock is at or near the ground surface in many locations in the Whiteface Mountain Intensive Use Area.

The intermediate trail (73), previously approved but not yet constructed between the relocated Freeway Lift and the Gondola, is in an area that is predominantly Hogback- Knob Lock complex soil series. Depth to bedrock is listed as 9-14 inches for this soil series. The proposed new intermediate trail (12a) that would connect Approach to the bottom of Upper Empire is in the same soil series as well as in the Ricker-Couchsachraga- Skylight complex with bedrock listed as 9 to 15 inches. The upper lift towers and the upper lift terminal for the relocated Freeway lift will be installed in these same soils. Blasting may be required during the construction of these trails and lift components.

The summit of Whiteface Mountain is characterized as a “Unique Geological Feature” and is described in the NYSDEC Environmental Resource Mapper as “cirques” and “aretes.” A cirque is an amphitheater-like valley formed by glacial erosion. Aretes are sharp created ridges in rugged mountains. No new management actions are proposed in proximity to the Whiteface Mountain summit, so there will be no impacts to this unique geological feature.

ORDA will employ the services of a professional, licensed and insured blasting company to perform any needed blasting. Blasters in New York State are required to possess a valid NY State Department of Labor issued Explosive License and Blaster Certificate of Competence. The Explosives License permits the licensee to purchase, own, possess or transport explosives. The Blaster Certificate of Competence permits the use of explosives.

If it is determined that blasting will be required, a written blasting plan will be developed and approved prior to the commencement of blasting. In general, the blast plan will contain information about the blasting methods to be employed, measures to be taken to protect the safety of the public, and how the applicable rules and regulations will be complied with. If,

during the evolution of the project, there are significant changes in the blast design, a new blast plan will be required.

See Section V.A.1 for a full description of all of the measures ORDA will implement to mitigate potential impacts from any blasting that may be required.

B. Soils

Erosion potentials for soils in the Intensive Use Area are provided in Section 2.A.1.b. Erosion potentials are slight, moderate or severe.

Activities in areas south of the FaceLift on the slopes of Little Whiteface are in soils with severe erosion potential. To the north of Freeway, and in all lower elevation areas, soils have mostly moderate erosion potentials. The C soils at the lowest elevations such as Monadnock and Adams have slight erosion potentials.

Disturbance of areas of steep slopes during construction for ski trails, lifts, etc., can lead to an increased vulnerability of the soils to erosion. Suitable measures must be implemented to first prevent soil erosion and then second to make sure that any soils that are eroded are contained and prevented from causing sedimentation in receiving waters.

ORDA is familiar with implementing proper erosion and sediment control practices when undertaking construction practices at their venues that oftentimes involve construction on steep slopes. These proper practices are set forth in the New York State Standards and Specifications for Erosion and Sediment Control (last updated November 2016). These standards and specifications will be used to develop Stormwater Pollution Prevention Plans (SWPPPs) for construction activities in accordance with NYSDEC's SPDES General Permit for Stormwater Discharge from Construction Activity GP-0-15-002.

SWPPPs will detail those measures that will be implemented during construction to mitigate potential soil erosion and surface water sedimentation. SWPPP content will include such things as construction sequencing and phasing, temporary and permanent stabilization, structural erosion control practices and vegetative control practices. SWPPs will include requirements for monitoring, inspections, data collection, and compliance documentation.

Section V.A.2 provides a lengthy and detailed description of mitigation measures that ORDA commonly and successfully employs during ski area construction activities that will be incorporated into pre-construction SWPPP plans and specifications, and installed, monitored and maintained during construction until soils become stabilized.

C. Topography and Slope

Very limited grading is required for new ski trails, trail widening or ski lifts. Trails are laid out to follow natural fall lines. Lift grading is limited to the upper and lower terminals and at the tower

foundations.

More significant grading will be required to create the additional 100 car parking spaces in the bus parking lot. Up to 15 feet of fill will be required to create the additional parking spaces on the west side of the lot. All of the graded area that is not actual parking lot surface will be revegetated.

Impacts associated with grading involve erosion and sediment control (see the previous section) and protection of water resources (see the following sections).

D. Water Resources

The stream crossing for Trail 89 will require installation of a bottomless arch culvert. Previously there was a culverted crossing at this location, but those culverts were removed when the former trail was abandoned.

Trail 88 will require the removal of the existing culverted stream crossing and the installation of a longer bottomless arch culvert.

The existing “culvert 2” in the base area, which is actually 3 individual culverts next to each other, will be removed and replaced with a bridge crossing.

A skier bridge will be constructed for Trail 92 just above the NYSEF building.

Expansion of the Bus Lot may require a slight re-route of the diversion ditch previously constructed by NYSDOT.

Mitigation Measures

- (1.) All efforts should be made to construct/reconstruct the Trail 88 and Trail 89 stream crossings when streams are not flowing.
- (2.) If natural streamflows don't allow for dry construction/reconstruction for Trails 88 and 89, then the crossings should be installed in the dry using temporary upstream damming (i.e. sandbags or similar) and a pump around.
- (3.) Any pump arounds shall be discharged to a stable streambed reach with minimal amounts of material that could become dislodged.
- (4.) If a mid-span abutment is still proposed in the construction drawings for the Trail 92 bridge, efforts shall be made to keep this (and all other bridge abutments) outside of the stream channels. Use of pre-cast abutments for bridges and arch culverts is preferred.
- (5.) No machinery shall operate from within the stream channel.

- (6.) Machinery should be regularly maintained and checked frequently for fluid leaks. Any machine found to have even a minor fluid leak shall be removed to a remote area for repairs.
- (7.) Machinery operating in the vicinity of streams shall be equipped with spill control materials including absorbent pads.
- (8.) Any concrete forms in proximity to surface waters shall be tightly sealed.
- (9.) Structural erosion controls shall be installed, inspected and maintained until areas of disturbance become fully stabilized with vegetation, stone or other materials.

E. Wetlands

No impacts to wetlands have been identified.

F. Climate and Air Quality

No new permanent sources of air emissions are proposed as part of this UMP.

Construction activities may result in localized increases in dust levels. However, areas of proposed construction are located within the interior of the intensive use areas, so no offsite areas are expected to be affected.

Many ORDA venues exist within the boundaries of State protected lands and the impact of climate change on our environment is recognized. ORDA will be a leader in environmental stewardship with consistent commitment to sustainability, responsible development practices, and continuous communication with DEC, APA, and other regulatory agencies to ensure we are taking the appropriate measures.

G. Vegetation

Essentially all of the new management actions proposed in this UMP Draft Amendment will occur in the Northern Hardwood community. No management actions are proposed in areas of Spruce-Fir communities.

In summary, the following acreages of wooded areas will be affected:

- New Downhill Trails: 10.6 acres
- Widen Existing Trails: 9.2 acres
- Realign/Extend Lifts: 6.4 acres

Total: 26.2 acres

A total of 22,049 trees will be cut. Of this total, 9,466 will be between 3 and 4 inches dbh, and 12,583 will be greater than 4 inches dbh.

Tree cutting is proposed on approximately 1% of the Intensive Use Area, and falls within the capacity of the resource to absorb the impact.

All tree cutting will be done in compliance with the DEC tree cutting policy LF-91-2.

No rare, threatened or endangered plant species will be impacted.

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.

Erosion control measures will be used on cleared areas with disturbed soils to avoid affecting adjacent vegetation by erosion or siltation.

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

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

H. Wildlife

The actions proposed in this UMP are expected to have minimal impacts on wildlife. Proposed management actions are interspersed within the landscape of the existing developed ski trails and lifts. For the most part, new management actions are proposed at low elevations on the mountain. (See Critical Habitat below for a discussion of activities above 2,800 feet elevation and Bicknell's thrush).

Almost all of the actions proposed in this UMP will occur in the Northern Hardwood community.

Trail widening projects, including the green trails in the Bear Den area, involve existing trails. This will result in the loss of some currently treed areas along the edge of existing ski trails and will move the forest edge slightly inward.

New Trails 88 and 89 are in areas that were previously disturbed with a lift and trail before the upper terminal for the Bunny Hutch lift was moved down the mountain.

The relocation/realignment of the Bear and Freeway lifts will take place in the area that is north of the gondola line and south of the Face Lift, an area already highly dissected by existing ski

trails and lift lines.

Additional parking at the bus parking lot is an expansion of the current parking lot.

The creation of the formal drop-off at Bear Den and the additional biking trails from Mid-Station do not involve any impacts to wildlife habitat.

I. Fisheries

ORDA will continue to comply with its MOU with DEC that regulates water withdrawals from the West Branch AuSable River that was developed to be protective of fisheries resources.

J. Unique Areas

There are no unique biological areas present in the Intensive Use Area.

K. Critical Habitat

The upper portion of the relocated Freeway Lift and the new trail 12a are proposed on lands 2,800 feet in elevation or higher. The upper portion of the previously approved, but not yet constructed, trail 73 is also located above 2,800 feet. None of these proposed improvements or related structures are located in spruce-fir habitat.

ORDA will continue to implement the comprehensive set of measures designed to mitigate impacts to Bicknell's thrush contained in section II.B of the 2006 UMP amendment. These mitigation measures include, but are not limited to, prohibiting tree cutting above elevation 2,800 feet between May 15 and August 1, limiting the width of new trails above 2,800 feet to 115 to 131 feet (35-40m), and maintaining trails and lifts with feathered vegetation on wind exposed sides.

L. Visual Resources

The Bear Den portion of Whiteface is blocked from view from surrounding areas by intervening landforms. None of the activities in the Bear Den area will be visible from offsite.

Higher elevation activities that include the realignments of the Bear and Freeway lifts, construction of the approved, but not yet constructed, Trail 73 and possibly the new Trail 12a may be visible from three locations. These three locations are: VP2, NYS Route 86 overlooking Beaver Brook Meadow; VP5, Fox Farm Road; and VP6 NY Route 86 at the entrance to Whiteface.

A visual simulation of the built condition was created for the "worst case" view which is looking into the ski area from the entrance on NYS Route 86 (VP6). The proposed components, with the exception of Trail 12a which is not visible, are visible within the context of the existing ski

area trails and lifts and do not cause a significant change in the character of the view.

M. Transportation

None of the proposed new management actions are intended to significantly increase the carrying capacity of Whiteface. The addition of 100 spaces to the bus lot only represents a 5% increase in the amount of available parking. The new proposed management actions will not result in significantly higher traffic generation over what currently exists.

N. Community Services

There will be some increase in demand for community services such as fire, EMS, police, rescue, solid waste and health care. However, Whiteface Ski Center presently makes very little demand on such services and the increase in such demand is anticipated to be minimal.

O. Local Land Use Plans

The actions in the UMP Draft Amendment are entirely consistent with local, regional and ORDA efforts to enhance an attractive year-round day use recreation area.

P. Historical and Archaeological Resources

On November 9, 2017 NYS Office of Parks Recreation and Historic Preservation issued a letter stating that the project will not impact historical or archeological resources.

VI. ALTERNATIVES ANALYSIS

Section 6 of the UMP contains an analysis of alternatives to the proposed management actions. Alternatives were examined for trail improvements, lift configurations, parking and circulation improvements, and the no-action alternative. Information is provided as to why the proposed management actions are the preferred alternatives from a ski area operations standpoint, while at the same the proposed actions have avoided significant adverse environmental impacts as compared to other alternatives considered.