



**Lake Colby Association
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Ed Frantz
Environmental Specialist II
NYS Department of Transportation, Region 2
Utica State Office Building
Genesee St., Utica NY 13501

August 14, 2009

Dear Mr. Frantz:

According to newspaper reports, you are acting as the coordinator of the memo of understanding between the NYS DEC, NYS APA, and NYS DOT on the subject of unit management planning for the road system in the Park.

We at the Lake Colby Association have a special reason for being interested in this process. Our small (286 acre) lake is increasingly the victim of salt contamination, much of which can be traced to the over-salting of Route 86 in the winter. We believe our lake, which is in many places less than fifty feet from the highway and which is served by five culverts that carry runoff directly into the lake, is a model for the damage that can be done by the indiscriminate use of salt.

Road salt not only damages terrestrial flora but it also dramatically affects aquatic plants. In our case, the high chloride levels (39 ppm versus 1-10 ppm for normal Adirondack lakes) have reduced native aquatic plants and promoted the growth of Eurasian Watermilfoil, a plant that thrives in brackish waters. In effect, the State's road maintenance policies are working to increase the milfoil population at the same time the State is issuing us grants for its removal. We think there is a better way.

We do not dispute the need for safe roads in the winter. However, numerous studies have shown that there are fully effective alternatives to the use of pure salt in environmentally sensitive areas. While alternatives to pure salt are expensive, if you factor in the loss of wildlife, soil erosion, water quality and corrosion, these alternatives start to look like a real bargain.

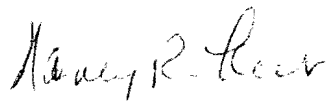
Your department requires a road-salt application rate of 225 pounds per lane-mile for light snow and 270 pounds per lane-mile for each application during a heavy snow storm. These applications are virtually useless at temperatures much below 20° F. and are, in fact, dangerous (by causing "black" ice). Training and adherence to guidelines may be a quick and cheap part of the solution. The City of Toronto reduced its salt use by 25% by educating staff on proper salting techniques. The resulting annual savings was approximately \$1.8 million. Quebec also reduced its salt usage, trained staff on proper salting and plowing techniques, and used pre-wetted salt. The result was a benefit-to-cost ratio of 2.8:1.

Our position is not a radical one: we believe the strict enforcement of application standards (especially at the lower temperatures that prevail for much of our winter), use of mixtures that reduce the chloride level without reducing effectiveness, and application of salt substitutes like magnesium chloride¹ along stretches of road that are clearly unsuitable for the application of pure salt (such as our lake frontage on Route 86) would go a long way towards reversing the damage already done at reasonable cost.

Anti-icing applies salt to the roads prior to a forecasted storm, preventing the formation of ice, which provides material and cost savings. Minnesota's Department of Transportation reported using 75% less salt with anti-icing compared to conventional salting practices. Agencies in Montana, Colorado, and Oregon also reported cost savings as high as 41, 52, and 75%, respectively. Pre-wetting salt has been shown to produce material and cost savings of as much as 53%.

We encourage you and the others copied on this letter to research these issues fully and to devise a plan that will stop the inexorable damage the current policies are causing.

Sincerely,



Nancy R. Keet
President

c.c.

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¹Study of magnesium chloride deicer by the Colorado DOT and the University of Colorado concluded that application of Mag chloride at current rates is highly unlikely to cause or contribute to environmental damage at distances greater than 20 yards from the roadway.