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Ms. Colleen Parker  
Environmental Program Specialist 3  
Adirondack Park Agency  
P.O. Box 99  
Raybrook, NY 12977

Re: A2013-0065 Loon Lake Golf Club & Resort

Dear Ms. Parker,

I am a resident of Loon Lake, Franklin County. I have reviewed the March 27, 2013 conceptual plans submitted to the APA by Loon Gulf, Inc. regarding the above project and have several preliminary comments and concerns.

First, I am not opposed to sensible and appropriate development associated with revitalization of the Loon Lake Golf Course. This property has unfortunately deteriorated over the last decade through a policy of benign neglect, practiced by the absentee owners.

That being said, I have significant concerns regarding the scope of development for the Loon Lake Golf Club & Resort, as proposed. Realizing the plans are only conceptual, I thought it would be useful to articulate some of these preliminary concerns now, so they could be considered as this project is revised during the course of review.

Of paramount concern is maintaining the pristine, invasive-species free quality of Loon Lake itself. The owners of property surrounding the lake have guarded and protected its quality and are concerned regarding the impact associated with increase access and use. The water quality and access are both closely monitored; in fact, the general water quality has demonstrably increased over the last 15 or so years.

Any development must also preserve the current and existing use, open space, remote character and quality of Loon Lake and its environs. Preserving the pristine nature of the shoreline is one essential element to preserving the character of this area.

The conceptual layout density is alarming and raises significant concerns regarding impacts associated with intensity of use. From a constructability standpoint, it ignores the steep slopes and drainage throughout the Loon Lake area. This is also true in the vicinity of the North Branch of the Saranac River.

There has been no outreach by Loon Gulf to the residents of Loon Lake regarding this conceptual plan.

I am confident that, given the scope of the conceptual plan, a Positive Declaration under SEQRA would be issued and an Environmental Impact Statement would be prepared addressing all aspects of the proposed Loon Lake Golf Club and Resort. Upon an initial review of the concept plan, the following issues would need to be studied as part of that process:

- Water Quality Impacts
- Visual Impacts
- Project Density and intensity of use
- Existing character and quality of the project area
- Steep Slopes
- Stormwater Pollution Protection Plan
- Traffic impacts
- Recreational use
- Noise Impacts
- Construction –related impacts
- Sewer, water and infrastructure requirements.
- Fish and Wildlife impacts (including new baseline surveys)
- Historic and Cultural Resource impacts
- Potential impacts to Wild, Scenic and Recreational Rivers
- Impact to Utility, Local Government and School Services.

I would appreciate the opportunity to review the scopes for the visual impact, wildlife, Rare, Threatened and Endangered Species, fisheries, noise, recreation , traffic, socioeconomic and steep slope stability analysis studies in draft. In my experience, early input on study scoping is more efficient, reduces the need for additional supplementary studies, and can reduce issues during the adjudicatory hearing phase.

Oversight by the APA is essential on this project. I have no confidence that the Town of Franklin has the resources, capability or desire to conduct a thorough and unbiased review of this project, given the current Town Administration's action in repealing the Town's Subdivision Law and abolishment of its Planning Board.

Please share this letter with the Commissioners and other Project Review Staff. As this project is literally surrounds me at the Lake, I would appreciate being kept apprised of its status.

Best regards,



Keith Silliman, Esq.