



**Board of Directors**

December 26, 2024

Charles Clusen  
**Chair**

Corrie Magee  
Adirondack Park Agency  
P.O. Box 99  
Ray Brook, NY 12977

Barbara Rottier  
James McMartin Long  
**Vice-Chairs**

Chris Walsh  
**Secretary**

Re: Lake Champlain Transportation Company; APA Project ID: 2024-0152

David Quinn  
**Treasurer**

Dear Ms. Magee:

Nancy Bernstein  
John Caffry  
Andy Coney  
Dean Cook  
James C. Dawson  
Lorraine Duvall  
Robert Glennon  
Roger Gray  
Evelyn Greene  
Sidney Haring  
Sheila Hutt  
Patricia Morrison  
John Nemjo  
Peter O'Shea  
Philip Terrie  
Michael Wilson

Protect the Adirondacks submits these comments regarding the proposed reconfiguration of an existing marina on Lake Champlain in the Town of Peru, Clinton County. According to the description in the Environmental Notice Bulletin dated December 11, 2024, the number of boat dock slips will increase by 68 (from 234 to 302) and the number of boat moorings will decrease by 44 (from 112 to 68), for a net increase of 24 spaces for docking motor boats at the marina on Lake Champlain.

**Staff**

Peter Bauer  
**Executive Director**

As we have indicated to the Agency previously, the Climate Leadership and Community Protect Act ("CLCPA") requires all state agencies, "in considering and issuing permits, licenses, and other administrative approvals and decisions," to determine whether such action "will be inconsistent with or will interfere with the attainment of the statewide greenhouse gas emission limits" established in regulations promulgated pursuant to Article 75 of the Environmental Conservation Law. Climate Leadership and Community Protection Act, Ch. 106, Laws of 2019, § 7(2).

Claudia K. Braymer  
**Deputy Director**

The proposed expansion of the marina on Lake Champlain will result in increased GHG emissions from additional motor boats docking at the marina and their operation on Lake Champlain. Protect the Adirondacks urges APA to either request that the applicant provide an analysis of the marina's direct and upstream GHG emissions or confirm that the Agency is conducting its own analysis of those emissions as required by the CLCPA.

Christopher Amato, Esq.  
**Conservation Director  
and Counsel**

We also urge the Agency to require that the marina provide electric boat and electric vehicle charging infrastructure at the marina. The marina should be required to at least ensure that there will be sufficient charging infrastructure to meet the needs of 24 additional boats being added to the marina site. Having the electric boat charging infrastructure will help to offset the GHG emissions of the motor boats as more boats at the marina transition to electric

**Protect the Adirondacks**

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battery power systems. Additionally, electric boats will reduce noise, odor, fuel and oil emissions at the marina site, reducing the risks of adverse impacts to Lake Champlain from these emissions. It will be far more cost effective to incorporate the electric boat charging infrastructure now, at the time of reconfiguration of the marina, than to install this infrastructure separately at a later time.

On behalf of the Board of Directors of Protect the Adirondacks, please accept our gratitude for the opportunity to share our comments on this proposed project.

Sincerely,

A handwritten signature in black ink that reads "Claudia K. Braymer". The signature is written in a cursive, flowing style.

Claudia Braymer  
Deputy Director