



**SHERMAN CRAIG**  
Chairman

**TERRY MARTINO**  
Executive Director

**MEMORANDUM**

TO: Terry Martino

FROM: Kathy Regan

DATE: July 5, 2018

RE: Final Draft Amendment to the 1999 High Peaks Wilderness Complex Unit Management Plan (UMP) and the 2004 Dix Mountain Wilderness Area UMP

Staff have completed review of the final draft amendment to the 1999 High Peaks Wilderness Complex (HPWC) UMP and the 2004 Dix Mountain Wilderness Area UMP. Staff believe the amendment to be in compliance with the guidelines and criteria of the Adirondack Park State Land Master Plan (APSLMP).

The HPWC includes the core connected lands classified as Wilderness and Primitive Areas mentioned in the 1999 HPWC UMP. In addition, the High Peaks Wilderness now encompasses the former Dix Mountain Wilderness area. Several Primitive Areas have been added to the 1999 HPWC UMP including:

- Tahawus Primitive Area is approximately 1.3 acres and includes Henderson Lake Dam, the access road and lands adjacent to the river.
- MacIntyre Primitive Area (west) is approximately 3 acres and includes a 50' Right of Way "jug handle" road that leaves the Conservation Easement Lands and then reenters it.
- MacIntyre Primitive Area (east) is approximately 8 acres and includes a right of way over the Conservation Easement Lands, connecting to a second conservation easement that is landlocked by Wilderness and the Opalescent River.

This proposed UMP Amendment also proposes management actions on portions of a hiking trail in the Mt. Van Hoevenberg Intensive Use Area. The trail will connect the parking area at Mt. Van Hoevenberg to the High Peaks Wilderness.

The proposed UMP Amendment's primary objective is to propose additional recreational opportunities and facilities on recently-classified wilderness lands in a manner that maximizes the protection of the wilderness resource and public enjoyment and

July 5, 2018

Memorandum to Terry Martino

From Kathy Regan

Re: Final Draft Amendment to the 1999 High Peaks Wilderness Complex Unit Management Plan (UMP) and the 2004 Dix Mountain Wilderness UMP

appreciation of the Forest Preserve. The amendment also contains several proposals related to access locations that have special safety and natural resource protection issues.

Management actions proposed include:

- Establishing hiking and skiing opportunities within the recently acquired tracts as well as providing connections to portions of the existing High Peaks Wilderness lands;
- Establishing rules and outreach efforts to effectively educate and inform the public about the High Peaks Wilderness and all the new lands added, including the former Dix Mountain Wilderness Area, so that both the natural resources and wilderness experience of the users can be protected;
- Providing access for persons with disabilities to hand carry launches and designated primitive campsites;
- Enhancing paddling opportunities, including providing a hand carry launch on Boreas Ponds, Henderson Lake and Chapel Pond; and
- Designating various primitive camping opportunities throughout the tract including roadside, backcountry, and water access.

The Department has made a significant effort to address carrying capacity and over-use in this popular region of the Park. As described on pages 43 and 44:

*This Unit Management Plan Amendment proposes the development of wildland recreational facilities in the High Peaks Wilderness Complex, working in concert with the Vanderhacker Mountain Wild Forest UMP Amendment. Each section below builds on the planning process as well as the recreational experience of the user. In addition to official documents, which inform the UMP process, the Planning Team applied principles and strategies that are currently considered norms in the field of wildland recreation management.*

*There are six best management practices that are identified as essential in successful wildland management. Essentials for Wildlands Management include:*

1. *Planning- Includes the UMP Process (with public participation), Work Planning, development of guidelines and other supportive materials and process and building partnerships with stakeholders.*

July 5, 2018

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Re: Final Draft Amendment to the 1999 High Peaks Wilderness Complex Unit Management Plan (UMP) and the 2004 Dix Mountain Wilderness UMP

2. *Education and Outreach- Includes providing effective education and outreach for visitors, local government and communities and partners. Utilizing all mediums available and covering topics from preparedness to stewardship.*
3. *Front country infrastructure- Includes roadside access points, human waste facilities, visitor information and other support facilities.*
4. *Backcountry infrastructure- Includes trails, campsites and support facilities appropriate to educate and protect the natural resource*
5. *Limits on use when all else fails- When education and outreach along with appropriate infrastructure improvements cannot support the carrying capacity, different methods of permits, limits on use or fees should be utilized*
6. *Resources both personnel and funding- Includes staff to facilitate management, maintenance and safety concerns and appropriate funds to maintain and educate and expand opportunities for partnerships.*

*As part of the comprehensive process of managing the High Peaks Wilderness Complex and adjacent units, many of the proposals in this amendment will follow a process of conditional implementation, which is done through a data-based phasing process. Where these conditional management actions are listed, the Department will evaluate current conditions as part of considering the implementation of these proposals. While authorization for these conditional proposals is being sought at this time, some may never move forward if the natural resource conditions or human use patterns don't support their implementation. The Department will adhere to the 6 Wildland Management BMPs and successfully build and manage recreation facilities that don't negatively impact the natural resources or wild experience of the user.*

The Agency would like to commend the Department on this significant addition to the planning process.

The Agency held a concurrent public comment period with the Department from May 10 through June 27, 2018. The Department conducted three public meetings to receive oral comments in Albany, Newcomb and Lake Placid. During this period, the public provided several thousand written comments, including a resolution from the Local Government Review Board. The majority of the comments received were concerning management actions proposed by the Department. Comments specifically addressing APSLMP conformance included:

- Process
- Overuse Issues
- Day Use Area Terminology
- Fixed Anchors

July 5, 2018

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### Process

Several comments were received stating that there was not enough time to respond to these amendments and that the Department and Agency should not have had concurrent public comment periods.

The Agency believes that the 45-day concurrent public comment period was appropriate. These amendments were made available to the public on May 4, 2018. The first public presentation of these amendments occurred on May 10, 2018 at the Agency's monthly meeting. Additionally, three public meetings were hosted by the Department where the public had these documents presented to them and could ask staff for additional clarification and provide comments. Finally, the Department has made responsive changes to the draft amendments after receiving public comment and the Agency has provided responses on conformance-related comments.

### Overuse Issues

As stated earlier in this memo, the amendment begins to address carrying capacity and overuse issues. The amendment does not purport to resolve these issues, but that developing a Wildland Management Plan is an important and significant step.

### Day Use Area Terminology

Some commenters objected to the use of the term "Day Use Area" in the UMP. In the proposed UMP, the term "day use area" is only used to clarify to the public that overnight uses will not be allowed. The term "day use area" is NOT used as it is defined in the APSLMP which identifies an area within an Intensive Use Area. No management actions are proposed in the UMP amendment which would be inconsistent with management and use guidelines. The Department believes this term is less confusing than "Special Management Area."

### Fixed Anchors

Past UMPs have stated that a working group will be formed to determine where or if fixed anchors can be used. Public comment criticized the Agency and the Department for not initiating this working group. The Department and the Agency have recommitted to move forward with this working group.

Agency staff have reviewed all the public comments concerning APSLMP conformance and believe that the UMP amendment complies with the guidelines and criteria of the APSLMP.