

SLMP_UMP_Comments@apa.ny.gov

From: robert Glennon <oseetahbob@yahoo.com>
Sent: Thursday, November 23, 2023 8:23 AM
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Proposed SLMP Classifications

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Dear Ms. Phillips,

First of all, Happy Thanksgiving (gobble gobble).

Second, disclosure: as you know, I worked for the Agency for 21 years, the last 8 or so as Executive Director, leaving in 1995 on the toe of George Pataki's boot. Needless to say, I was never "directly concerned" with, nor did I "personally participate[]" in this matter, thus Public Officers Law sec. 73(8)(a)(ii) is not an issue.

Third, while I am a Protect the Adirondacks! Board member and agree with its position on this matter, I speak only for myself here.

As you know, Protect recently released a study of the implications of the "30 by 30" legislation signed by Governor Hochul last December. It concluded that c. 3.2 million acres has to be conserved in the 8-year period 2023-2030. That's an average of 400,000 acres each year.

As you also know, at the Agency's November 1 public statement hearing, I asked the dates of the earliest and most recent acquisitions in the acquisitions listed. No one knew, nor did the DEC Real Property staff member to whom you referred me.

I was seeking to do the math to determine the average acreage added to the Forest Preserve per year over the period covered in the c. 6,000 acres listed. Whatever it is, it is plainly, painfully apparent that Forest Preserve was not added to contribute in any meaningful way to the 30 by 30 statutory target.

Section 801 of your organic act states that the Agency is the "forum reflecting statewide concern" for the Park, where the responsibility for developing long-range Park policy is focused.

You don't need a big tribute to the remarkable, historic Forest Preserve from me, and I realize there are legal reasons why you do not get involved in particular acquisitions. But I implore you in the strongest possible terms to do all you can, in partnership with DEC, to assure Forest Preserve acquisition is a major, major part of achieving 30 by 30.

Thank you for the opportunity to comment.

Sincerely and respectfully,

Robert C. Glennon

Adirondack Park Agency

APA Project ID:

SLMP-2023

APA contact:

Megan Phillips

APA email address for this project:

SLMP_UMP_Comments@apa.ny.gov

My name: (required)

Chris Hyde

enter your full name

My email: (required)

cdhyde1@gmail.com

a copy of your comments will be sent to this email

My address: (optional)

22 Via Maria Dr.

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12302

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The land classifications as described in items 29 and 30 (Rollins Pond) state that land can be classified based on existing use. This is the same argument that can be made regarding Eagle Lake Boat launch area. On the APA maps the boat launch area is specifically cut out of the surrounding land classification and needs to be added to the next round of classification changes to be modified from its current use as an intensive area. The proposed change of 89.7 Acres in Rollins pond is a massive change while the less than ½ acres in Eagle Lake is a very minor change. Your whimsical approach to the land classification needs to be scrutinized and standardized across the park.

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November 27, 2023

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Adirondack Park Agency

P.O. Box 99

Ray Brook, NY 12977

(via electronic transmission)

Re: State Land Classification Package 2023, SLMP-2023

Dear Deputy Director of Planning Megan Phillips,

Thank you for the opportunity to comment on SLMP-2023, the State Land Classification package for 2023. We would like to express support for the Agency's corrections of mapping errors and the intent to classify recently acquired lands within the Park through this classification package. The state's acquisition of 5,455-acres of land means that a wide swath of habitats, wildlife, and carbon are protected in perpetuity, amongst other tangible and intangible benefits. Such acquisitions also yield increased recreational opportunities and opportunity to experience remoteness for visitors near and far.

StoryMap: The creation of the Story Map for this 37-parcel package has been a deeply helpful resource in increasing public education and interaction for this effort. The Council hopes to see this level of transparency in future packages.

CLCPA and 30x30: With such a large acquisition, the Council hopes that the Agency is assessing how actions to classify, and the types of recreational activities that will be allowed on these lands as a result, align with the state's climate goals.

Chapter 19 of the Scoping Plan posits that "protection of forests, cropland, and wetlands is critical for natural carbon sequestration and improves the resilience of communities" and tasks New York with strategy Land Use 4, to protect and restore wetlands. In addition, the Scoping Plan notes that many of New York's wetlands are forested, yet "all wetlands are part of the natural infrastructure necessary for climate adaptation and resilience and collectively contribute to overall carbon storage and sequestration strategies."

Designations with higher protections will allow wetlands and forests to mature and to store more carbon aboveground in live and downed wood but also in its soils, which account for half of carbon in a forest system. It has also been found that mature forests are resilient to climatic influence on carbon stocks. For



these reasons, the Council will look to the highest level of protection for parcels with respect to their natural resources and species inventory.

Process Illuminates Need for Classification Upgrades: The land classification process is the ideal time to examine opportunities to upgrade units (or portions thereof) to Wilderness or Primitive. As some parcels are already undergoing review for reclassification, the Council advocates for higher levels protection where appropriate for the Park's, and New York's, finite natural resources. ES-4, SL-2, and WR-4 are such parcels that should be reviewed and assessed for reclassification to more protective designations, as detailed below.

Parcels: In reviewing the package, the Council supports the majority of the proposed changes. We would like to supply more in-depth comments on a number of key parcels below.

ES-1 (Champlain Valley Hills): The Council supports the classification of the Champlain Valley Hills parcel containing Mount Trembleau (ES-1), located in eastern Essex County, to Wild Forest given its recent logging history and the surrounding private land classifications which include Low and Moderate Intensity Use lands.

ES-4 (Tub Mill Pond): For the Tub Mill Pond parcel (ES-4), we recognize that adding it to the Hammond Pond Wild Forest (HPWF) is appropriate at this time, however, we encourage the Agency to consider reclassifying ES-4 and other portions of the 45,500 acre HPWF unit to Wilderness given its proximity or adjoining nature to the High Peaks Wilderness, Hoffman Notch Wilderness, and Pharaoh Lake Wilderness, along with SLMP-based natural resource characteristics. Portions of HPWF are far from roads, providing solitude and "recreational opportunities similar to those found in the Pharaoh Lake Wilderness" according to the State Land Master Plan (SLMP).

FR-3 (DEC Storage Area): The FR-3 parcel contains a capped landfill and 20 acres of mapped wetlands. The FO4, SS1, and SS3 wetlands present in and near the Two Bridge Brook tributary on the eastern side of the parcel merit higher levels of protection given the importance of wetlands ecologically and for our climate goals. The Council would like to see the 20 acres of wetlands classified as Wild Forest and added to the surrounding Saranac Lakes Wild Forest.

FR-6 (Rollins Pond Campground): For the Rollins Pond Campground reclassification (FR-6), it is unclear as to the need to reclassify the northerly parcel as Intensive Use rather than maintaining its current Wild Forest classification.

According to the June 2023 Draft Rollins Pond Campground Unit Management Plan (UMP), an accessible foot trail "to connect the Adirondack Rail Trail Corridor to the Northern end of Rollins Pond campground." (p. 28 of the Draft UMP). The proposed management action is to create a footpath, which does not exclude a Wild Forest designation, and improve the connection to the adjacent Saranac Lakes Wild Forest and to better serve as a nexus to both Floodwood Pond and the St. Regis Canoe Area.

As such, it is suggested that parcels FR-6 C and FR-6 D should remain Wild Forest, and FR-6 D boundary should be expanded to the creek connecting Rollins and Floodwood. In addition, there is beaver activity on this stream which is better protected under the Wild Forest designation.

The Council supports the addition of the 74.4 acres (FR-6 B) of Intensive Use to Wild Forest, but echo other comments calling for the boundary line to follow the contours of the landscape and to be moved west towards the campground road as there is no intent to add infrastructure in this area. There are FO4 wetlands in this area that merit protection given the *Sackett v. EPA* decision that has vastly undermined the Clean Water Act, lending an opportunity for state leadership in wetland protection during this reclassification.

SL-2 (Grass River Corridor): The Agency should assess reclassifying the Grass River Corridor parcel (SL-2), following the Grass River (a NYS designated Scenic River), to Primitive. Doing so would increase the protection of the naturally sustaining brook trout population, the wetlands along the river corridor, and support unconfined water-oriented recreation along the river.

In addition to the naturally sustaining brook trout, an endangered species found within the SL-2 tract is the Forked Three-awn Grass (*Aristida basiramea*) and species of concern include Rusty Blackbird (*Euphagus carolinus*) and Bridle Shiner (*Notropis bifrenatus*). Within the Grass River Wild Forest, the 2019 Unit Management Plan lists the following species within its inventory: Drummond's Rock-cress (*Boechera stricta*), endangered; Pod Grass (*Scheuchzeria palustris*), rare; Fir Clubmoss (*Huperzia selago*), endangered; Southern Twayblade (*Listera australis*), endangered; Extra Striped Snaketail (*Ophiogomphus anomalus*), special concern; Common Loon (*Gavia immer*), special conce; Spruce Grouse (*Falci pennis canadensis*), endangered. No exotic species of concern have been found within the unit.

In regards to wetlands, the Grass River supports emergent persistent (EM1), forested needle-leaved evergreen (FO4), scrub shrub broad-leaf deciduous (SS1), and scrub shrub needle-leaf evergreen (SS4) within the SL-2 tract.

Finally, the SLMP cites the Grass River as a "concentration of scenic and recreational water resources on Forest Preserve provide a unique outdoor recreational opportunity." The scenic and recreational resources provided by the Grass River deserve the highest level of protection that can be afforded.

For the reasons above, and given the natural resources and species present, this parcel meets the second definition of Primitive Area in the SLMP, reproduced here:

"2. of a size and character not meeting wilderness standards, but where **the fragility of the resource** or other factors require wilderness management."

WR-2 (Huckleberry Mountain - Johnsburg): For Huckleberry Mountain (WR-2), which is proposed to be added to the 125,000 acre Wilcox Wild Forest in the southern part of the park, the Council suggests that this could also be considered for an upgrade to Wilderness. The SLMP states that "In addition, and [in] contrast to [its] well-developed trail system, there is also a large trail-less section north of Wilcox Lake that provides an excellent opportunity for a remote experience."

The Council is supportive of most proposed classifications within this package and is pleased with the transparency awarded through the StoryMap. The corrections are a necessary step towards accuracy within mapping and jurisdictional purview of the State of New York. The acquisitions and reclassifications are generally in line with the SLMP, though again, we ask for the utmost consideration

to more protective classifications to protect both biotic and abiotic natural resources, wildlife habitat, and improve recreational experiences for all New Yorkers.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jackie Bowen". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

Jackie Bowen
Director of Conservation

SLMP_UMP_Comments@apa.ny.gov

From: Dave Greene <david.m.greene@gmail.com>
Sent: Monday, November 27, 2023 4:01 PM
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Comment on ~3000-acre combined Crane Mtn/Huckleberry parcel

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This was intended to be a short note before the public-comment period closes, but it turns out that it's not all that short... A suggestion from Protect! about the combined Crane Mountain/Huckleberry Mountain parcel is:

"We urge the APA to investigate a Wilderness classification of the new Huckleberry Mountain tracts in combination with the existing Crane Mountain tract. Together this could be a 3,000+ acre Crane Mountain Wilderness Area."

I'm very sympathetic to the aims of this suggestion. The combined parcel is unique, and very much worth protecting. I'm somewhat skeptical about actually *labeling* it as a "Wilderness Area", though -- even though classifying it or managing it as such might be just fine!

"Wilderness Area" seems like a bit of a misnomer. That 3,000-acre chunk isn't ever going to share a lot of similarities with other Adirondack Park wilderness areas. Some other special designation might be more appropriate.

There are still so many visible industrial and other remnants in the parcel -- stone dams; remnants of ceramic pipes and old hydro-power ditches; multiple foundations around the late-nineteenth-century Paint Bed Mine (which is a really interesting central part of that chunk of land); other mining signs; bulldozed lumber roads cut into slopes in the new property from OSI; telephone poles and wires still findable on multiple sides of the mountain, leading to long-gone ranger cabins; drilled-in foundations for the fire tower; a historical wagon road route leading up to near the pond; evidence of large-scale repeated, deliberate burning, etc.

These are all really interesting signs of Crane Mountain's long history of human use, but those parts don't exactly add up to "wilderness", no matter how wild-looking the views are from the top of the trailless and somewhat private-land-locked Huckleberry cliffs

Given how much Crane Mountain gets visited every year -- thousands of people on a small trail system in a few thousand acres -- there are many key parts of the parcel that are not going to start looking like "untrammelled wilderness" for the foreseeable future.

But the parcel would certainly benefit from more active management. For example, there are sections of the Crane Mountain trails that could use some significant anti-erosion work, channeling foot traffic to appropriate widths and improving the footing. Due to the high

traffic, some sections have expanded to twenty or thirty feet wide, with slippery raw dirt and mud that ends up being a hazard for some of the inexperienced hikers that find their way there.

It would also be wonderful to find some way to amicably solve the access problem with local landowners, to give clear direction to people trying to enter the Paint Bed valley from the north -- everyone from rock climbers headed for the Huckleberry cliffs, to local history buffs interested in the Paint Bed Mine, to bushwhackers headed for Crane Mountain Pond from the other side of the mountain.

Thanks for listening!

Dave Greene



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and Counsel**

Megan Phillips
Deputy Director, Planning
Adirondack Park Agency
P.O. Box 99
Ray Brook NY 12977

Re: Draft 2023 Forest Preserve Classification Package

Dear Megan:

Protect the Adirondacks has reviewed the draft Land Classification Package prepared by the Adirondack Park Agency (“APA”) for approximately 6,000 acres of Forest Preserve within the Adirondack Park. We note that the classifications of newly acquired lands account for only about 5,300 acres of new Forest Preserve. According to PROTECT’s special report “20% in 2023”¹, the State will need to protect some 3.2 million acres of land to reach the goal set forth in the 30 by 30 law signed by Governor Kathy Hochul in 2022. New additions to the Forest Preserve within the Adirondack Park will play a key role in achieving the goal of protecting 30% of the State’s lands and inland waters by 2030, and we urge the APA to gear up to work on implementing this critical legislation with the Governor’s office and the Department of Environmental Conservation.

We applaud APA for undertaking this process to classify newly acquired lands and to correct the classifications of existing Forest Preserve lands, including the 208.5 acre SUNY Cortland parcel in Long Lake used for Camp Pine Knot on Raquette Lake. We are pleased to see the designation of four new parcels as Wilderness lands, totaling 196.8 acres, including the 17.9 acre parcel on Thirteenth Lake in Johnsbury.

We also support the majority of the other proposed classifications as Wild Forest, State Administrative, and Intensive Use. We do have concerns about a few of the parcels, as described below.

¹ A copy of PROTECT’s “20% in 2023” report is available at <https://www.protectadks.org/new-special-report-20-in-2023-an-assessment-of-the-new-york-state-30-by-30-act/>.

1. Rollins Pond – Parcel FR-6-d

The small portion of land at the far northern end of the Rollins Pond campground is proposed for reclassification from Wild Forest to Intensive Use. However, that parcel does not contain any part of the Rollins Pond campground. The reclassification on the map appears to be related to the proposed foot trail to connect to the Adirondack Rail Trail Corridor described on page 28 of the draft Unit Management Plan (“UMP”) for Rollins Pond. We oppose any proposal to expand the footprint of the campground to the north, and we oppose the reclassification of that portion of land from Wild Forest to Intensive Use. The Saranac Lakes Wild Forest UMP already proposed a trail in that location and did not propose reclassification of the lands to Intensive Use. There is no justification to do so when the remainder of that area to the north is classified Wild Forest, with the exception of the Remsen Lake Placid Travel Corridor.

Rollins Pond Parcel FR-6-d should remain Wild Forest. Also, the Wild Forest classification should be expanded east to the edge of the water so that there is a natural boundary line between the classification for the land on the west side of the stream and the Intensive Use lands on the east side of the Rollins Pond outlet stream. Expanding the Wild Forest area to the east would not only create a natural boundary, rather than the current arbitrary straight boundary line, it would also assure that there is not a standalone piece of land with a classification different from the FR-6-d parcel.

2. Rollins Pond – Parcels FR-6-c and FR-6-b

The FR-6-c and FR-6-b parcels of land to the north/northeast of the campground should both be classified Wild Forest. The FR-6-b parcel that is currently proposed to be divided from the adjacent Wild Forest lands by “a new straight point to point boundary” should be expanded to the west so that the boundary line between the two land classifications hugs the edge of the existing campground footprint. A boundary line that follows the edge of the campground would be more natural than the straight-line boundary, which is contrary to Agency practice of following natural boundaries to divide land use classifications. We suggest that the boundary for the Wild Forest lands start 150 feet from the edge of the campground’s roads, structures and improvements. This distance is consistent with the setbacks provided by the Adirondack Park State Land Master Plan for Intensive Use areas.

3. Golden Beach – Parcel HA-6-d

We support reclassification of 31.1 acres from Intensive Use to Wild Forest as shown in Parcels HA-6-c and HA-6-d. In addition, APA should reclassify to Wild Forest all of the lands south of campsites 207 & 208 in the Golden Beach campground. These lakeshore lands are not appropriate for development and should be added to the adjacent Parcel HA-6-d to become part of the Sargent Pond Wild Forest. We suggest that the boundary for the Wild Forest lands start 150 feet from the edge of the campground’s southernmost campsites.

4. Marion River – Parcel HA-1 and Parcel HA-2

We support classification of the Marion River Parcel HA-2 to Wilderness since it adjoins the Blue Ridge Wilderness. We also support classification of the Marion River HA-1 parcel as Wild Forest. The parcel has significant wetlands and contains the Marion River, an important water connection between Raquette Lake and Blue Mountain Lake. The Marion River is classified Scenic pursuant to the State’s Wild, Scenic, and Recreational Rivers Act. The parcel provides scenic recreation for canoeists, but, at least at this time, due to prior and current human development on and near the parcel, it does not offer the kinds of solitude and opportunities for remote water-oriented recreation that might make it appropriate for classification as a Wilderness or Canoe area.

5. Crane Mountain/Huckleberry Mountain

Protect the Adirondacks respectfully suggests that APA consider a potential Wilderness classification for the Forest Preserve lands comprising Crane Mountain (Town of Johnsbury), which now includes the adjoining 1,276.2-acre Huckleberry Mountain parcel WR-2 that is part of this classification package. The Crane Mountain lands contain rugged, wilderness territory that meet the Adirondack Park State Land Master Plan’s definition of Wilderness (page 22):

an area where the earth and its community of life are untrammelled by man--where man himself is a visitor who does not remain. A wilderness area is further defined to mean an area of state land or water having a primeval character, without significant improvement or permanent human habitation, which is protected and managed so as to preserve, enhance and restore, where necessary, its natural conditions, and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least ten thousand acres of contiguous land and water or is of sufficient size and character as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological or other features of scientific, educational, scenic or historical value.

While the Crane Mountain/Huckleberry Mountain Forest Preserve lands are currently less than ten thousand acres in size, they could effectively be managed as wilderness as the “Crane Mountain Wilderness Area” covering an area of around 3,700 acres.

Conclusion

We appreciate the APA’s work to classify newly acquired Forest Preserve lands and to correct the classifications of existing Forest Preserve lands. As set forth above, we have only a few concerns about the proposed classifications.

On behalf of the Board of Directors of Protect the Adirondacks, please accept our gratitude for the opportunity to share our comments on the 2023 draft Land Classification proposal.

Sincerely,

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

Deputy Director