

2016 -2017 Classification Action

APPENDIX B

Response to Public Comment
on the
Draft Supplemental Environmental Impact
Statement
of
October 14, 2016

2016 - 2017 Classification Action

Appendix B:

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Introduction

The Adirondack Park Agency (APA or Agency) issued the Draft Supplemental Environmental Impact Statement (DSEIS) for the Boreas Ponds tract in October of 2016. The public had an opportunity to provide oral comments on all of the tracts at eight public hearings, and to submit written comments throughout the comment period. Approximately 1,215 people attended these hearings and 462 spoke publically at the hearings. The Agency received over 11,000 letters and emails and 3 petitions (27,852 signatures) during the public comment period, which ended on December 30, 2016. Many of the comments expressed a preference or opinion as to the value of different land classifications or activities. These comments were considered carefully by the Agency and staff. Public comments are set out below in italics, followed by the Agency responses.

The response to comments on the tracts listed in Appendix A appears first. The response to comments on the Boreas Ponds tract (ES- 20) follows.

East Branch Ausable (ES-09)

In agreement with the proposed classification. Criticized inconsistency with similar action in HM-06 and 07.

ES-09 is proposed to be classified as Wilderness with a Primitive corridor. The Primitive corridor is for a privately-owned power line Right-of-Way (ROW). Power lines are a non-conforming use in Wilderness.

MacIntyre West Tract (ES-16)

MacIntyre West should be all Wild Forest because of the road network.

In agreement with the chosen alternative, a combination of Wilderness and Primitive.

The Primitive Area is for a ROW for a road that exists within the tract. The remainder of the tract does contain a historic road network; however, those roads do not have retained rights. The physical and biological characteristics of the tract, in addition to its location adjacent to existing Forest Preserve classified as Wilderness, lead staff to recommend the remainder of the tract be classified as Wilderness. Roads existed on the majority of State lands prior to being added to the Forest Preserve, regardless of how the land was classified. Roads can remain in areas classified as Wild Forest, Intensive Use, Historic, and State Administrative in an approved UMP. The speed and degree of rehabilitation for

abandoned roads is dependent on a number of variables including soils, slopes, original construction design, maintenance, resources, age and degree of use of the original road, in addition to work conducted to enhance the rehabilitation (i.e. removal of culverts).

MacIntyre East Tract (ES-17)

MacIntyre East should be all Wild Forest because of the road network.

In agreement with the alternative chosen, a combination of Wilderness, Primitive and Wild Forest.

The wetlands in the area proposed to be classified as Wild Forest are very significant and should be classified as Wilderness or Primitive.

The tract should be classified as Wilderness.

The Primitive Area is for a ROW for a road that exists within the tract. The remainder of the tract does contain a historic road network; however, those roads do not have retained rights. The physical and biological characteristics of the tract, in addition to its location adjacent to existing Forest Preserve classified as Wilderness, lead staff to recommend the northern section of the tract be classified as Wilderness. The historic road network is not considered to be an established facility as that term is used in the Master Plan.

The wetlands in the southern section of the tract are significant. Staff considered alternative classification of this section as Wilderness or Primitive, but determined that the area does not provide a sense of remoteness or degree of wildness associated with these classification categories due to the proximity of County Route 25, the Saratoga & North Creek Railway and uses on nearby private lands, including those classified as Industrial Use.

Hudson River Hyslop (ES-18)

In agreement with the proposed classification. Criticism with lack of discussion on natural resource impacts and considerations with wetlands in the vicinity.

Noted.

Casey Brook (ES-19)

In agreement with the proposed classification of Wilderness.

Noted.

Palmer Pond (ES-26)

The majority of this tract should be classified as Wilderness.

Staff have determined that the close proximity to the Blue Ridge Road (a County Road) and the Northway (I-87), along with an existing ROW, warrants classification as Wild Forest.

Niagara Brook (ES-27)

Niagara Brook should have a Wilderness buffer. Criticism with lack of analysis.

Niagara Brook was used as the boundary line between Wild Forest and Wilderness because it is easily identified on the ground.

Belfry Mountain (ES-29)

Why wasn't Historic considered?

Fire Towers are conforming structures in Wild Forest, allowing the Department the ability to retain the structure if they so choose. This fire tower does not currently meet all of the criteria necessary for the area to be classified as Historic. Should those criteria be met at a later date, it would be possible, but not necessary, to reclassify the area as Historic.

Benson Road Tract (FL-01, HM-10)

In agreement with Benson Road Tract being classified as Wild Forest.

Benson as Wild Forest for snowmobiling.

Supports West Stony Creek Wilderness.

Benson Road tract should be classified as both Wild Forest and Wilderness. The Wild Forest can accommodate the snowmobile trail and the northern section can be, in conjunction with reclassifying sections of Shaker Mountain Wild Forest, a new Wilderness Area.

Staff considered an alternative which involved classifying a southern portion of the land Wild Forest and a northern portion as Wilderness, along with reclassifying existing Wild Forest to Wilderness, creating a new Wilderness Area.

Evaluation of the four criteria identified for determining classification, particularly the physical and biological characteristics, leads to a determination that Wild Forest is the appropriate classification for the newly acquired tract. This tract does not have shallow, sensitive soils, steep slopes, high elevations, extensive wetlands or unique natural communities.

Long Pond Mountain (FR-02)

This tract should be classified as Primitive.

The tract contains a ROW for access and does not contain the sensitive ecosystem associated with the adjacent Deer River Primitive Area, which requires Wilderness Management.

Township 33 Tract (HM- 02)

In agreement with Township 33 (HM-03) tract being classified as Wilderness.

Noted.

Cedar Ridge Tract (HM- 03)

There should be a 50 foot wide Wild Forest Buffer between the Cedar River Road and the existing Blue Ridge Wilderness to enable road maintenance.

In agreement with the proposed classification of this tract as Wilderness.

Having a 50-foot Wild Forest buffer would not resolve the problem of maintaining roads that abut Forest Preserve.

Good Luck Tract (HM -05)

This entire parcel should be classified as Wild Forest. There is no valid reason for a Wilderness classification on the lands north of Stoneystep Pond to Big Bad Luck Lake.

Staff considered Wilderness classification for the entire parcel due to the sensitive resources, however staff determined that by reclassifying the land to the west this action would subject adjacent private lands along Stoney Step Hill Road to additional Agency jurisdiction (as critical environmental areas). Staff

considered these impacts to adjacent private lands in this classification determination and limited the Wilderness classification to a portion of the tract.

Hudson Gorge (HM-06)

This parcel should be classified as a combination of Wilderness and Primitive.

There are errors and confusion with either how this tract is mapped, described or both.

This parcel abuts existing Forest Preserve land in the Hudson Gorge Wilderness. The parcel is divided by privately owned land which contains a power line. The lands northeast of the power line, which abut the Wilderness, are proposed to be classified as Wilderness and added to that unit. The State land south of the power line and north of State Route 28 are proposed to be classified as Wild Forest. Those lands would be added to the Vanderwhacker Mountain Wild Forest.

Raquette Brook (HM-07)

This tract should be classified as a combination of Wilderness and Primitive.

This parcel abuts existing Forest Preserve land in the Hudson Gorge Wilderness. The parcel is divided by privately owned land which contains a power line. The lands northeast of the power line, which abut the Wilderness, are proposed to be classified as Wilderness and added to that unit. The State land south of the power line and north of State Route 28 are proposed to be classified as Wild Forest. Those lands would be added to the Vanderwhacker Mountain Wild Forest.

Lake Pleasant (HM-08)

In agreement with the proposed classification.

Noted.

Bear Creek (ON-01)

In agreement with the proposed classification.

Noted.

Lake Ozonia (SL-01)

The DSEIS lists this parcel as being in the Debar Mountain Wild Forest, but actually it is in the White Hill Wild Forest.

Noted and corrected.

Thousand Acre Swamp (SR-03)

In agreement with Thousand Acre Swamp being classified as Wild Forest.

Noted.

Ice Meadows (WR-03)

In agreement with the proposed classification.

Noted.

Cat Mountain (WR-06)

In agreement with the proposed classification.

Noted.

Berry Pond (WR-08)

In agreement with the proposed classification.

Noted.

Sentinal Mountain Wilderness (RC-01, RC-02)

In agreement with the proposed classification.

Noted.

Cathead Mountain Tract (RC-06)

Cathead Mountain Primitive Area should not be reclassified as Wilderness. The existing Primitive Classification will provide accessibility to Cathead Mountain for emergency communications to southern Hamilton County.

Cathead Mountain should be classified as Wild Forest for access to the tower.

The Area Description for Cathead Mountain Primitive Area states:

This area consists of the Great Lot (121) in the Town of Benson, Hamilton County, a telephone line for the state operated fire tower on Cathead Mountain, lying within an inholding. Should this inholding be acquired by the State, two options are available depending upon the need then for the Cathead Mountain fire tower: (i) either the fire tower and the telephone line could be removed and the whole area be added to the Silver Lake Wilderness Area, or, (ii) the fire tower and telephone line to the tower, if found to be necessary, could remain and the primitive area be enlarged to include an appropriate, small acreage surrounding the Cathead Mountain tower, until such time as the tower is no longer needed, at which time the area should be added to the Silver Lake Wilderness. (APSLMP, pp 87-89)

The State has not acquired the inholding. During the Public Comment period many stated that the fire tower needs to remain for emergency communications. Although the Primitive Area no longer has non-conforming structures or uses and could be reclassified as Wilderness, the Agency has decided not to reclassify this parcel at this time and has withdrawn RC-06 from the FSEIS. This withdrawal will not answer the underlying inability to reach the private land or fire tower by land through Forest Preserve. Classification of this tract does not affect, guarantee or address the fire tower.

Boreas Ponds Tract (ES-20)

APSLMP CLASSIFICATION CRITERIA

The following comments address the Boreas Ponds Tract. The comments have been organized to follow the classification criteria. Some comments include figures and values that cannot be easily verified.

PHYSICAL CHARACTERISTICS

According to the Adirondack Park State Land Master Plan (APSLMP or Master Plan) one fundamental determinant of land classification is the **physical characteristics** of the land or water which have a direct bearing upon the capacity of the land to accept human use. Soil, slope, elevation and water are the primary elements of these physical characteristics. These characteristics affect the carrying capacity of the land or water both from the standpoint of the construction of facilities and the amount of human use the land or water itself can absorb. These factors highlight the essential fragility of significant portions of the State lands including most lands above 2,500 feet in altitude, as well as low-lying areas such as swamps, marshes and other wetlands. In addition, rivers, streams, lakes and ponds and their environs often present special physical limitations. (APSLMP, pages 14-15.)

The following comments and responses pertain to the physical characteristics of the land being classified.

The geology of the tract is similar to the High Peaks region, and has 4 peaks of 2000 feet, 8 water bodies and 7 streams with moderate to high gradient.

Noted.

The high elevation, erodible and wetland soils presents physical recreational restraints on human use, especially motorized uses.

The Agency has provided a basic soil type map and vague language in the DSEIS regarding the characteristics of these soils. The Agency should provide additional maps in the FSEIS that show soil erosion hazard and suitability for roads and trails. Portions of the road were completely saturated and the road surface was soft enough that a hiker would sink approximately 2-3 inches. Maintenance of these roads for public motor vehicle use will require continued and regular maintenance that may lead to increased erosion and habitat degradation.

The FSEIS has been supplemented with additional information regarding soil erosion.

There are not steep slopes - the steepest portion of the road at the base of Moose Mountain is a 6 - 9% grade.

The steep slopes in the DSEIS referred to the mountains located on the tract, not the roads.

BIOLOGICAL CONSIDERATIONS

The APSLMP states that **Biological considerations** play an important role in the structuring of the classification system. Many of these considerations are associated with the physical limitations related to wetland ecosystems, habitats of rare, threatened or endangered species and sensitive wildlife habitats. These considerations are relevant to the characteristics of the land and sometimes determine whether a particular kind of human use should be encouraged or prohibited. (APSLMP, page 15.) The following comments and responses pertain to the biological characteristics of the land being classified.

General Ecology

Wilderness protection will protect water quality.

The preferred alternative places the Boreas Ponds and several wetlands in Wilderness.

There are many nesting birds that are at risk and will be threatened if there is not a wilderness buffer around the ponds, including the gray jay, white-throated sparrow, wood thrush, hermit thrush, and the boreal chickadee.

There are over 30 terrestrial habitats within 13 macrogroups, dominated by northern Classification of Boreas Ponds Tract with hardwood and conifer-boreal upland forest and northern swamp, and outcrop and summit shrub. The Boreas tract is exceptional to other state units for ecological processes and biodiversity.

Wilderness protection will prevent degradation of habitat for species such as the Common Loon and the Black-throated Warbler.

The tract provides a significant area of temperate deciduous forest, including a high elevation peat bog area called Marcy Swamp, 3 rare, threatened or endangered species, 3 significant natural communities, special late spawning sucker fish, and 9 boreal bird species.

Noted.

Wilderness will help wildlife recover from climate change.

Wildlife Conservation Society study shows that Wilderness will better allow wildlife to travel to adjoining wetlands and will make the surrounding areas more biologically rich and diverse.

The Agency needs to consider the impact of the long-term maintenance of roads within this forest complex on biological resources. To do this there needs to be an understanding of how and where a variety of fauna are moving across the parcel.

Tract characteristics score high for resilience to climate change impacts and it is important to local and regional ecological connectivity.

The complex topography and connected land cover provides diverse wildlife habitat.

Adding the Boreas Ponds tract (and the MacIntyre East and West tracts) to the Forest Preserve connects lands in the Dix Mountain Wilderness, the High Peaks Wilderness, and sections of the Vanderhacker Mountain Wild Forest, increasing the ecological integrity of that forest matrix block.

Mammals aren't mentioned in the DSEIS. Moose and bear sign have been seen on visits, as well as seen otter, beaver, marten, deer, and snowshoe hare. The Agency should study these populations to understand where they are on the landscape and what habitat they are using.

The DSEIS did mention moose and other wildlife. The FSEIS contains additional information on wildlife.

Wetlands

The DSEIS states that these wetlands have experienced very little human disturbance over the last century. This statement is true but it also ignores the very significant disturbance the wetland complex experienced when the dam was built in the early-1900s.

Noted.

The impact on high-altitude wetlands has not been considered. High elevation wetlands should be more important.

Wetlands like those found on the Boreas Tract will lose their moose population if human intrusion increases.

In addition to the ponds themselves the wetland complex is one of the primary natural features of the Boreas Ponds Tract. As stated in the DSEIS there are five value 1 wetlands. The Agency should not choose a classification that puts all, or nearly all, of these wetlands in a Wild Forest classification, especially since there is an expectation that in many cases there would be motorized use through and around the wetlands.

The lands and waters of the Boreas Tract proposed to be classified as Wilderness include Value 1 wetlands.

Can't keep roads without filling wetlands.

Isn't the Agency required to provide the strongest protection for Marcy Swamp category 1 wetland?

Motor vehicle use will threaten the protection of the natural resources on the tract, principally the large value 1 wetland that surrounds the ponds.

The preferred alternative would allow the Department to provide for motorized access for persons with disabilities to a parking area one-tenth mile from the dam. The Department could have motorized access to the dam in an approved UMP. The largest value 1 wetland, (Marcy Swamp) is included in the area proposed to be classified as Wilderness, preventing motor vehicle access (with the exception of emergency situations). The Boreas Ponds themselves are also proposed to be classified as Wilderness, preventing motorized use.

Invasive Species

Aquatic Invasives

By allowing motorized vehicles down to the ponds, they will be opened up to issues that hurt both the environment and the communities around it. This will invite invasive species and potentially destroy the resource by overcrowding.

95% of native trout have been lost from Adirondack waters; we do not want to see the same threat to native trout in the Boreas Ponds as occurred in Little Tupper Lake.

Wilderness classification of the ponds, its water and shoreline will prevent the spread of invasive species, noise and pollution from motors.

Wilderness classification does not prevent invasive species.

Limiting motor vehicles in and around Boreas Ponds and the other ponds will help prevent introduction of invasive species.

A buffer zone of wilderness around the ponds will help prevent invasive species.

The Boreas Ponds are being classified as Wilderness, thus preventing motors. Wilderness classification does not prevent the introduction of invasive species, however it does lessen introduction by the primary source, motorized vehicles.

Terrestrial Invasives

Roads increase the likelihood of invasive species. Once infected, they are infested forever.

Terrestrial invasive species are often found along roads, as documented by the Adirondack Park Invasive Plant Program (APIPP). Eradicating invasive species is possible in certain situations, but is typically a long and expensive process.

The matter of managing invasive species is a red herring more appropriately addressed by means other than restricting usage of and access to state lands.

The impact of invasive species on the ecology of species and natural communities is well documented. Species are lost and natural communities are degraded. There is also documentation on the economic impacts of invasive species, particularly on tourism associated with lakes. Invasive species are a real threat.

Aquatic Resources

The Agency must consider the impact of the dams and culverts on the fish populations. A classification that will likely result in an area being opened to motorized use will result in the long-term fragmentation of these aquatic communities (Warren & Pardew 1998). It is imperative that we understand the effects of these decisions before they are made.

Dams and culverts fragment habitat and are bad for trout.

Let the fish travel freely, not the people.

The DEIS did not discuss the impacts of maintaining or removal of the two existing dams. The four classification options all assume the dams will be maintained in the long term. There is a need for more physical information on the bathymetry and physical characteristics of the four connected ponds, and analysis of the impacts of retaining or removal of the dams and associated roads for maintenance vehicle access for the same. Based on communication with Brendan Wiltse and review of an early 1900 pre- dam topographic map, a significant portion of the three ponds contain water depths of 5 feet or less. Given the likely gradual gradient and the widely scattered

existing streams, there is a potential that if the dam was removed or naturally breached, further diverse wetlands would develop around small ponds but the ponds would still be connected.

The Boreas Ponds and LaBier Flow dams currently serve no functional purpose besides providing greater recreational opportunities for paddlers. There is a growing body of knowledge on the impact of dams on aquatic ecosystems and the potential benefits of removal (Bednarek 2001; Hart et al. 2002). If the APA is going to assume a need to maintain the dams, then the Agency needs to provide a rational justification for that need.

There is a strong presumption in the DSEIS for a need to maintain the dams at both LaBier Flow and Boreas Ponds. All four alternatives would allow DEC administrative use of the roads up to both dams. The Agency should analyze the impact of the dams on the aquatic community, as well as the impact of allowing it to deteriorate or be removed.

The DEC and APA must do a better job of understanding the value of the ponds and the need for the dam in protecting the natural resources of the Boreas Ponds tract.

Existing dams do not need maintenance and Mother Nature should be able to restore a natural balance.

Ponds will not disappear without the dam.

As has happened with Marcy Dam, situated within a Wilderness area, the natural degradation and removal of this dam fits with the Wilderness designation and should absolutely be considered in the planning for Boreas. However, the APA should perform an analysis of retention of the Boreas Ponds dam to assess long-term management, ecological, and recreational issues. There should be public disclosure of the ramifications of retention and removal of this dam.

Existing dams at Boreas and LaBier Flow are conforming structures and may be maintained in Wilderness, or any other classification. Classifying lands on which the dams are located as Wilderness would allow the use of motorized equipment or aircraft, but not motor vehicles, for maintenance. By classifying the dam at Boreas as Primitive and the dam at LaBier as Wild Forest, the Department may use motor vehicles for maintenance.

It is the Department's decision to keep or remove dams. The Department has guidance for this determination in the Forest Preserve Policy Manual. For areas classified Wilderness, Primitive or Canoe:

Generally, dams other than fish barrier dams should be removed from Wilderness, Primitive and Canoe Areas when they become unsafe or are

otherwise in need of replacement, reconstruction and/or rehabilitation. However, the reconstruction or rehabilitation of such dams with natural materials/whenever possible is permissible in Wilderness, Primitive and Canoe Areas if in accordance with a unit management plan for such Area involved. The decision to reconstruct or rehabilitate such dams must be based on the following factors:

- *Need to maintain water frontage on and/or water levels along upstream lands;*
- *Need to maintain upstream wetlands;*
- *Need to maintain fishery and wildlife habitats and resources;*
- *Need to preserve aquatic recreation areas;*
- *Need to maintain public waterway navigation;*
- *Need to protect vistas and other aesthetic values;*
- *Need to control downstream degradation such as erosion, siltation, flooding or release of pollutants;*
- *cost of removal of the dam;*
- *cost of reconstruction or rehabilitation of the dam;*
- *dam safety including the potential impact downstream should the dam fail if needed maintenance is not provided.*

Should the Department decide not to maintain the dam, the Primitive Area created for Dam maintenance purposes would be reclassified Wilderness.

INTANGIBLE CONSIDERATIONS

The APSLMP states that another significant determinant of land classification involves certain **intangible considerations** that have an inevitable impact on the character of land. Some of these are social or psychological, such as the sense of remoteness and degree of wildness. (APSLMP, page 15.)

The following comments and responses pertain to intangible considerations of the land being classified.

Social and Psychological

I saw 43 people who hiked in 3.5 miles on a weekday. If you don't keep the parking out the place will be overrun with people like Marcy Dam.

Keeping the seven-mile Gulf Brook Road closed to motorized traffic is not going to keep hikers from enjoying the Boreas Ponds Tract. It may even help cut down foot traffic on the currently existing trails that are suffering from overuse.

Given the public pressure on the High Peaks region, the Boreas Tract should be considered as buffer to the High Peaks wilderness.

People need Wilderness to regain elements that make them balanced, human, and in many ways connected to the very planet from which they sprung.

The peacefulness and serenity of these areas is vital and they need to be classified as Wilderness.

With the High Peaks currently experiencing damaging, excessive human use, addition of significant acreage to adjacent lands such as Boreas Ponds Tract would spread out and enhance wilderness experiences for current and future generations.

Wilderness is not just about scenery. It is about reconnecting with humanity's primeval past, about parking your car and venturing into a place that humbles us with its vast scale, inspires us to seek new challenges, awes us with its sensuous beauty. In a world of artificiality, humans crave the genuine, the natural, because wilderness is where our species began. Many of us will always heed the call to return.

Every wilderness area in the park I have visited bears marks of past logging and other human activity, including exceptionally remote locations in West Canada Lakes, the Five Ponds, and the western High Peaks wilderness areas.

*Mechanization leads to a loss of the sensation of wilderness.
We need wilderness to take our breath away.*

*Wilderness has an indescribable quality, like how much you love your children.
There are few silent ponds for healing PTSD.*

Wilderness has health benefits.

Wilderness has many indirect benefits including the bequest value (knowing the land is protected for future generations), existence values (knowing the area is protected if a person never plans to visit), and option values (simply knowing one can go, regardless of whether or not they actually do so).

The natural environment, regardless of classification, offers everyone peace of mind, which is why veterans have found it to be ideal for healing. Exposure to the outdoors has been known to reduce stress. Research also suggests that outdoor recreation may enhance treatment for post-traumatic stress disorder. There are also numerous mental health and counseling programs for adolescents and teenagers based on wilderness experiences.

The land has exceptional scenic characteristics. The view from Boreas Ponds is breathtaking, but spectacular and varied scenery characterizes all parts of the tract and adjacent lands. Other scenic features of the tract include Wolf Pond, Andrew Brook, Marcy Swamp, White Lily Pond, and Ragged Mountain. Existing logging roads, gravel

pits, and gaps in forest diminish these characteristics now, but they will fade into the landscape if allowed to return to primitive condition or maintained as narrower foot trails.

Noted.

Remoteness and Degree of Wildness

APA Chairman Sherman Craig's words are better than my own. Interviewed for the November-December Adirondac magazine of the Adirondack Mountain Club, he said, "Ultimately, it is the sense of remoteness or the opportunity to reestablish remoteness along with the presence of critical natural resources that drives the determination between Wilderness and Wild Forest. With an ever-expanding population, opportunities for a wilderness experience are diminishing." The "sense of remoteness" mentioned by Mr. Craig makes a strong argument for ending road and motorized access at least one mile from the Boreas Ponds, and for classifying the remaining approach to the ponds and their shorelines as Wilderness. A non-Wilderness corridor to the ponds is an intrusion into the Wilderness, stealing the very remoteness that is intrinsic to its nature. We must look to the long term; given sufficient time, the forest will take over the road and restore the ponds' remoteness.

The tract offers rare and exceptional opportunity for remoteness, some of the best not just in the Adirondack Park but in the entire Eastern United States. The presence of high value wetlands right off the county highway at the south end could be the start of an immensely rewarding hike in.

With so much of the Adirondacks easily accessible by road it would be tragic to lose one of the few remaining places with a remote feeling as in Boreas.

Remoteness can be measured and is a significant determinant of the ability to experience solitude.

The quality of wilderness both biologically and in terms of recreational experience improves tremendously when you are a few miles in. The remoteness of Marcy Swamp and Panther Gorge is essential to their value as a recreational resource. Any proposal that brings a road near Boreas Ponds threatens not only the potential remoteness of the ponds themselves, but also the already designated Wilderness in Panther Gorge.

Remoteness is especially important because of the tract's unique proximity to the Northway. The tract is an exceptionally easy day trip from the Capital District, much easier than trailheads further north.

What we see is that under a full Wilderness classification some portions of the parcel would be greater than five miles from public motorized use.

Remoteness can be measured, but remains a subjective consideration.

Additional factors include the size of the area, the type and density of the forest cover, the ruggedness of the terrain and the views.

The following comments include figures and values that cannot be easily verified, largely because the authors do not define what criterion was used for “road.”

It is 5% of the Adirondacks that is greater than 3 miles from a snowmobile trail or public road.

Only 4% of NYS is Wilderness, which means that 96% of the state is accessible with a MV

Only 5% of Adirondacks is over 3 miles from a road.

80% of the Park is within 1 mile of a road.

92 out of 100 largest lakes are motorized.

In 2007 APA staff analyzed road data in an effort to determine remote areas in the Adirondack Park. Based on this analysis, the preliminary estimate of areas greater than 3 miles from most motorized uses (roads and snowmobile trails) and 2 miles from waters where motorboats are permitted equaled less than 3% of the Park's total 6 million acres.

It is estimated that if the Gulf Brook Road were to be closed, approximately half of the Boreas Ponds tract would remain within three miles of a motorized road (Blue Ridge Road).

The value of silence in a Wilderness setting is huge.

Noise at the ponds will echo into the mountains.

You never know how great the Adirondacks are until you leave, then you really appreciate the quiet of Wilderness.

Motor vehicles take away from the serenity of this area. I drive 3 hours to escape this hectic world and have quiet.

There are 301 acres of roads and historic use by forest management machines and vehicles associated with hunting and fishing leases. Reduction of motorized vehicles would significantly limit noise and enhance the intangible values of wild forest character. As a blind person, it would be nice to be able to go to the Ponds and hear Wilderness.

Sound can be measured and is dependent upon, but not limited to, such factors as weather, topography, and surface substrate. A person's perception of and

reaction to sound is subjective, however, and this characteristic's effect on outdoor experience varies between individuals. There will be no public motorized uses on or to the Boreas Ponds, which should enhance the sense of wildness and serenity on those waters.

ESTABLISHED FACILITIES

The classification system takes into account the established facilities on the land. These criteria were developed when the Master Plan was being written to address the need to place existing facilities such as campgrounds and ski areas into their appropriate category (Intensive Use) and State highways into their appropriate category (Travel Corridors). (APSLMP, page 15.)

The criterion of established facilities was not developed to suggest that infrastructure such as logging roads mandate a specific classification category.

The following comments and responses pertain to the established facilities on the land being classified.

Structures and Improvements

The map should show the roads and private (lease) access points.

A map showing these features has been added to the FSEIS.

The existing logging roads do not preclude wilderness classification.

It is great that infrastructure was abandoned in areas classified as Wilderness in the past.

The Adirondacks are one gigantic restoration project.

There have been many new state land purchases in the last twenty years, and many of these have become fine additions to the Wilderness Areas of the Adirondack Park. But Boreas Ponds is different because of the sheer size of the tract, and the fact that it is crossed by no public highways. Although it was once bisected by a powerline, that feature has long since been removed. The northern boundary backs up to the High Peaks, making portions of this property as remote as anyplace in New York—or any eastern state, for that matter.

This tract is similar to the Silver Lake Wilderness, which had highways and farms on it, but it has been restored to Wilderness.

Blue Ridge, McKenzie and Siamese Ponds are all wilderness areas that were heavily logged before acquisition by the state.

The Agency is more concerned with preserving the tract's roads, gravel pits and dams than it is in the fragility of the Boreas Ecosystem. This area will never reach its full potential if motor vehicles are easily accessible. The vast majority of this tract should be Wilderness.

Roads existed on the majority of State lands prior to being added to the Forest Preserve and classified. Roads can remain in areas classified as Wild Forest, Intensive Use, Historic, and State Administrative in an approved UMP. The speed and degree of rehabilitation for abandoned roads is dependent on a number of variables including soils, slopes, original construction design, maintenance, resources, age and degree of use of the original road, in addition to work conducted to enhance the rehabilitation (e.g. removal of culverts).

There are too many nonconforming uses for Wilderness: leased camps until September 2018, dams, culverts, bridges, and huge gravel pits.

The SLMP allows three years for non-conforming structures to be removed. The dams and bridges are allowed to remain in any classification. The gravel pits will not be in a Wilderness classification. Culverts can be removed from areas classified as Wilderness, and if on a trail approved in a UMP, can be replaced with bridges as necessary to protect the resources.

The 1979 Final Programmatic EIS Guidelines for Amending the APSLMP point out:

When the Master Plan was adopted in 1972, only one of the 15 Wilderness areas met wilderness standards due to the existence of non-conforming uses. The Plan should therefore be recognized as an attempt to restore and rehabilitate these lands so that they meet such standards. As of November 1978, eleven of the fifteen wilderness areas completely comply with the required standards.

1979 FPEIS at 16.

Dams

Reconnect ecosystems, undam rivers.

The agency has demonstrated more concern for the dams at Boreas Ponds and LaBier Flow than it has for protecting a rare and wild resource. These dams are being used as the pretext for retaining Gulf Brook Road all the way into the heart of the property—not to mention the two interior gravel pits the state plans to use for maintaining the road. Here we have the largest, wildest, remotest new acquisition we may ever see—a place

that the State Land Master Plan would clearly define as Wilderness. And yet our public officials are preoccupied with roads, gravel pits, and dams!

Existing dams at Boreas and LaBier Flow are conforming structures and may be maintained in Wilderness, or any other classification, at the Department's discretion.

The existing leases and easement do not obligate the State to classify the land in a particular category. The leases are renewable to existing lessees until September 30, 2018. The one acre parcels associated with the leases may occur in any classification category. Should the land be classified as Wilderness, the gravel pits would not be accessible using motor vehicles.

Buildings

Save the Lessee log cabin built in the 1890s.

The log cabin can be retained in an approved UMP.

Retained Rights (leases and easements)

Town easements should not trump Wilderness classification.

The State may classify Boreas as Wilderness and forego the State Administrative Areas.

No history of public use exists in this area, including public motorized use. The DSEIS does not suggest that any existing leases or easements oblige the state to provide motorized access. The land contains no private inholdings that would require motorized access.

The leases provide motorized access for the lessees until September 30, 2018 and for TNC with respect to removal of camp structures through October 1, 2020. The easement does not obligate motorized access.

CLASSIFICATION ALTERNATIVES

Alternative 1

A Wilderness designation will eliminate any possibility of designating bicycle trails. Under the current classification proposals 10 miles of roads will be closed in the East MacIntyre Tract, another 7 miles in the West MacIntyre Tract, and up to 20 miles in the Boreas Tract. These roads were built for heavy trucks and have been used by motor vehicles for decades, but now that they are in public ownership, people will not be

allowed to ride a bicycle on them. This is a shame since most any type of bicycle could be used on these wide, durable surfaces and nearly anyone could handle the gentle terrain. Many people are using bicycles to get to the Boreas Dam and most would prefer to continue around the ponds – a 7.5 mile loop from the 4 corners intersection. This is why I strongly urge the APA to recommend Alternative 1 for the Boreas Tract.

I support Alternative 1; it is in the best interest for the people of NY State.

Every town affected by the classification support Alternative 1. Listen to local residents.

Alternative 1 for Boreas should be to create a new biking destination using roads to and around Ponds. This would provide the new economic and recreational opportunities the Governor promised.

The preferred alternative would enable bicycle trails in areas classified Wild Forest and on State Administrative Roads in areas classified Primitive, in an approved UMP. With the preferred alternative, it is possible that bikes could be ridden to the Boreas Ponds Dam.

Moose River Plains and Essex Chain were examples of good compromises. Alternative 1 is also a good compromise allowing access for sportsmen.

Alternative 1 provides for 2/3 (more than 20,000 acres) Wilderness to add to High Peaks and Dix Wilderness Areas and only allows use of 17 miles of existing roads.

Alternative 1 offers more protection than Wilderness because Wild Forest will attract less people than Wilderness. The high level of use of the High Peaks Wilderness has led to a loss of rare and endangered plants.

We (12 counties) support Alternative 1 without motorized use on the Ponds or ATVs on the unit.

Noted.

Alternative 2

Alternative 2 best suits a multi-use plan for this tract.

Alternative 2 is a fair compromise.

Prefer Alternative 2, but with a closer access point.

Noted. Comments submitted were evaluated and Alternative 2B was developed, a combination of Alternatives 2 and 4.

Alternative 3

Corridors are spot zoning.

Options 3 and 4 propose the “Wild Forest Corridor” concept, Wild Forest “island” concept, and Primitive “island” concept. Spot-zoning is an unsound, non-viable planning practice, and should not be allowed here (or anywhere on public or private lands in the Park). In the name of the SLMP and all the great minds who had a hand in developing it, this practice that the Agency has been adopting more and more frequently must end!

I support Protect the Adirondacks contention that the 9-mile long Wild Forest Corridor running through Wilderness is inappropriate and is simply a means to allow motorized use. Areas should be big blocks of wilderness or primitive or wild forest. There should not be a classification design that has Wild Forest corridors simply to allow motorized use. Of course the higher and less accessible ground is left wilderness and primitive, but the motorized use in the corridor completely changes the experience.

The preferred alternative is based on the requirements of the APSLMP, which look first at the physical, biological and intangible characteristics of the area and then consider the level of human activity that can be supported. The preferred alternative creates a Primitive Area around the Boreas Dam enabling the use of motorized equipment for maintenance.

Alt 3 is best with trail to and around ponds.

Noted.

Alternative 4

Alternative 4 would force the Ponds to become an overnight destination. This would put greater strain on the Ponds than would simple day use without overnight camping.

Support Alternative 4; we cannot have too much Wilderness in the Park.

Noted. Comments submitted were evaluated and Alternative 2B was developed, a combination of Alternatives 2 and 4.

The road between Four Corners (intersection west of the LaBier Flow dam) and the Boreas Ponds Dam should be classified “Primitive.” Roads located within this Primitive Area should prohibit bicycles and all motor vehicles except those needed for the purpose of emergencies or repairing the Boreas Ponds Dam.

In the preferred alternative a road is included in the area classified as Wild Forest and Primitive. The use of bicycles and motor vehicles will be determined in a UMP.

Modifications to Alternative 4

Alternative 4 provided that the snowmobile trail runs parallel to the Blue Ridge Road and parking isn't any closer than it is now in the interim access plan.

Alternative 4, but the Primitive Area should be 50 ft wide. Roads beyond the dam should be abandoned. Public motor vehicle use limited to current parking area, those who enjoy quiet should not be penalized by hearing those who have not maintained their health and want to drive there.

Support Alternative 4 with the following modifications: Do not have the Primitive Area from the road to the dam. Dams should not be maintained in Wilderness Areas.

Staff reviewed the classification criteria identified in the APSLMP and the guidance in the FPEIS and determined that the boundary between Wilderness and Wild Forest should be located north of the area considered in Alternative 4.

Additional Specific Classification Recommendations

Boreas Ponds and 1 mile Buffer as Wilderness

Support TNC's suggested classification, keeping the ponds in Wilderness with a one mile buffer.

The spur Road from the Boreas and Gulf Brook roads leading to the dam should be closed. Maintenance of this dam can be accomplished by pedestrian access along the spur road, converted to a disabled access trail with any heavy materials needed in such maintenance operations supplied by air. There is no reason to jeopardize the integrity of the wilderness area by a road sufficient to carry vehicular traffic.

The Boreas Ponds tract should be wholly classified as Wilderness north of Gulf Brook Road. On the broadest level, from a Regional-planning perspective, because the tract is nestled among the High Peaks and Dix Mountain Wildernesses and the Wilderness-style, pristine private easement lands around the Ausable Lakes and Elk Lake, the area north of the Gulf Brook Road must be fully classified as Wilderness. It would detrimentally affect these neighboring Wilderness and "Private Wilderness" areas were it given a Wild Forest designation on even a portion of the land. The entire shoreline of the Boreas Ponds should be Wilderness, including access points and public use. This means that no motorized use should be allowed on these waters.

The watershed of the Boreas Ponds needs to be protected as Wilderness within at least one mile to the south.

There should be a 3 mile (minimum) Wilderness buffer.

The Agency's preferred alternative classifies the majority of the Boreas Ponds watershed and the Ponds themselves as Wilderness. This classification provides the greatest protection for the most sensitive lands on and around the Boreas Ponds. A small portion of the watershed is being classified as Primitive to enable administrative motor vehicle access to the dam for maintenance. A portion of the Boreas Ponds Road is being classified as Wild Forest, which would allow the Department, pursuant to an approved UMP, to provide access for persons with disabilities to within one-tenth mile of the dam.

Boreas Ponds and Boreas River as Wilderness

The Boreas River south to the Blue Ridge Highway must also be provided Wilderness protection.

The Boreas River also deserves Wilderness protection.

Provide Wilderness protection for the Boreas River south to the Blue Ridge Highway. This includes the Boreas Ponds, the watershed around and above the ponds and a minimum one-mile buffer to the south.

A one-mile buffer protects the ponds and provides many people the amazing opportunity to see the High Peaks from the south.

Staff considered expanding the Wilderness boundary to include all or part of the Boreas River from LaBier Flow south to the Blue Ridge Road. The lands south of LaBier Flow are generally less sensitive and have a greater capacity to withstand use than the lands above LaBier Flow, so a Wild Forest classification was determined appropriate.

All Wilderness

The entire tract should be classified as Wilderness.

All or most of the tract should be classified as Wilderness.

There has always been a presumption that the Boreas Ponds Tract would be mostly or all wilderness.

If Wilderness is a roadless area, as is generally understood, one might wonder how the boundary of the designated wilderness can be anywhere south of Boreas Ponds Road and Gulf Brook Road, thus incorporating these roads into the Wilderness.

The tract borders two large, eased properties that are maintained largely as wilderness (Adirondack Mountain Reserve and Elk Lake resort).

Staff reviewed the classification criteria identified in the APSLMP and the guidance in the FPEIS. Staff determined the Boreas Ponds Tract should be classified as a combination of Wilderness, Wild Forest, and Primitive in accordance with the capacity of the land and water to withstand use.

All Wild Forest

The entire tract should be classified as Wild Forest.

The preferred alternative classifies 9,118 acres of the tract as Wild Forest. The area classified as Wilderness has more sensitive natural resources which require Wilderness management.

Intensive Use

Classify area bordered by the Gulf Brook Road, the Boreas Road, and LaBier Flow as Intensive Use for a campground or operation of number of yurts and/or cabins to provide lodging for the public.

Intensive Use was not proposed for the Boreas Ponds Tract because of the interior location and the fragile natural resources. No "existing campground or ski area required the classification of intensive use." (APSLMP at 15.) Regarding Intensive Use, the FPEIS provides that "the resource characteristics must be unusually capable of withstanding such intensive use with little or no degradation in natural or scenic resource quality." (FPEIS at 25.) Also, there are existing public and private campgrounds in the Towns of Newcomb and North Hudson.

Other

The Boreas Ponds area and White Lily Pond have been developed to the point of being accessible by mountain bikes with absolutely no further impact necessary. The road network is extensive and well developed, providing a recreational opportunity that is scarce in the Adirondack Park. Classify the Boreas and surrounding roadways as Canoe Area, and the remainder Wilderness.

Canoe classification for the Boreas tract was not proposed. Staff believe the definition for Canoe, an area where the watercourses or the number and proximity of lakes and ponds make possible a remote and unconfined type of water-oriented recreation in an essentially wilderness setting, is not met.

Assuming the dams remain, the Wilderness classification could contain the narrow exception for limited vehicle access only for the purposes of government use to maintain the two existing gravel pits and the two dams.

The historic log cabin and surrounding meadow could be held as a historic property and interpretive site, similar to Santanoni, and perhaps also used as an interior outpost, like at Lake Colden. National Parks offer many different viewpoints and historic sites, and this could be modeled after that.

The log cabin at the Four Corners area does not currently meet the requirements identified in the APSLMP for an area to be classified as Historic. Should these requirements be met at a later date, it would be possible to reclassify the cabin as Historic.

The Department can retain the cabin as a Ranger Station in an approved UMP.

Classify the perimeter of the Pond as Primitive or Wild Forest to allow non-motorized recreation, specifically cross-country skiing and bicycling.

The preferred alternative classifies the Boreas Ponds perimeter as Wilderness and Primitive. Cross country skiing is a recreational activity allowed in all classification categories. Bicycling would be allowed in an area classified Primitive, on a State Administrative Road, in an approved UMP. Bicycling would not be allowed in an area classified Wilderness.

Include an alternative for disabled vets.

All classification categories are available to Veterans. The preferred alternative provides opportunities for access subject to an approved UMP.

The tract is well-suited to paddling. Their limited size and lack of connectivity to any other flatwater paddling limits the range of paddling opportunities. The pond's shoreline appears to be thickly forested and lacking features that appeal to flatwater paddlers like sandy beaches and rocks to jump off.

The ponds do not work as an overnight paddling destination. Numerous easy-access paddling destinations are present nearby, including 9 ADA-accessible boat launches in Essex County alone. Some include Harris Lake, Rich Lake, Long Lake, and Cascade Lakes. Wolf Pond and Harrison Lake are also easy to reach from the road and could be made more accessible with appropriate designed trails.

Noted.

General Wilderness Alternative Comments

Wilderness brings young visitors.

People are drawn to the Adirondacks because of the Wilderness.

Knowing wilderness is there is important even if you don't go there.

Outdoorsmen are moved not just by the destination, but also by the journey.

Noted.

Lands above 3,000 feet should be classified as Wilderness, below should be classified as Wild Forest.

As directed by the APSLMP, elevation is considered when determining the appropriate classification for Forest Preserve lands, but it is not the sole factor.

Make the tract wilderness for future generations.

It would be nice for our younger generation to experience true Wilderness and to understand the meaning of conservation.

We owe it to future generations to keep this place pristine. Having parking close will ruin the Ponds and the area will become trashed like other High Peaks with easy access.

Due to arthritis I can no longer make deep walks into the wilderness, but my memories of those wonderful times make me insist that it be preserved as Wilderness.

11,412 acres of the Boreas Ponds tract, in addition to other parcels, would be classified Wilderness and added to the High Peaks Wilderness Area, creating one of the largest Wilderness Areas east of the Mississippi.

We'll never have another chance to add land to the High Peaks Wilderness. Boreas is the last option to classify Wilderness ponds.

Changes made now are irreversible. Further changes will add to the creeping violation of wilderness. In 100 years we shouldn't have people saying "what a shame they let this place become a parking lot".

Once you ruin Wilderness you can never get it back.

There may be opportunities in the future to add to the High Peaks Wilderness either by the classification or reclassification of State land.

It is possible to reclassify land to a more restrictive category in the future if warranted.

Wilderness bordered by intensive snowmobile use and a parking lot is a Wilderness destined to fail.

Why do humans feel they are entitled to drive without thought to how it will impact those (animals) that live there. Allow nature to be natural.

Should be Wilderness, the SLMP guidance strongly leans towards this classification. The value of the property should speak for itself, much as the character it is destined and deserves to be. Revert to natural state; there are plenty of other areas in the Park for access.

The cons of recreational vehicles to access this land greatly outweigh the pros. Classifying these lands as Wild Forest would greatly degrade the sanctity of these lands. These lands NEED to be classified as Wilderness.

We need to advocate for our land rather than promoting tourism.

Don't allow motors to dominate the Adirondacks.

Noted.

The people who enjoy the wilderness experience are not an elite few!!

Wilderness can offer recreational opportunities to a wide variety of people.

Are there other Wild Forest areas within 60 miles (or even 30) that could accommodate motorized recreation so as not to sacrifice Boreas?

Vanderwhacker Mountain Wild Forest abuts the Boreas Ponds Tract.

Essex County has 2 times more Wilderness than Wild Forest. Less than 3% of the lower 48 is protected as wilderness.

There are already 6,970 miles of roads in the Adirondacks – we don't need more roads or snowmobile trails.

Noted.

SLMP requires that Wilderness be untrammelled by man in the present tense. This tract is trammelled by virtue of the hardened roads.

"Untrammelled" is defined by Dawson and Hendee¹ as "Not subject to human controls and manipulations that hamper the free play of natural forces. A word describing desired wilderness conditions use in the Wilderness Act". The presence of roads is not determinative of whether an area is untrammelled.

The APSLMP provides "[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." APSLMP at 22 (emphasis added). Inclusion of the term "restore" encompasses the possibility that lands previously exploited for mining or logging could be restored to a wilderness state. In fact, that has been the case in most of the wilderness areas in the Adirondack Park.

John S. Apperson, Jr., an early champion of the New York Forest Preserve, would have wanted all state land to remain under the wilderness provisions of the NY Constitution, which means, no roads, parking lots or hotels, etc.

Noted.

General Wild Forest Alternative Comments

Boreas should be classified as Wild Forest. The State has shifted its goals from conservation to preservation. The lands should be easily accessible to all.

Wants the entire tract classified as Wild Forest.

Wild Forest for mountain biking.

Wild Forest for snowmobiling.

NYS taxpayers purchased the land and should have (motorized) access to it.

A portion (9,118 acres) of the Boreas Ponds Tract is being classified as Wild Forest. It is possible to have public motor vehicle access, snowmobile trails and mountain biking in those areas, subject to an approved UMP.

Lands should be classified as Wild Forest now and can eventually be classified as Wilderness when it has recovered.

¹ Dawson, Chad P. and Hendee, John C. (2009). Wilderness Management (Fourth Edition): Stewardship and Protection of Resources and Values.

The Agency determines the classification category based on multiple criteria, not on the current condition of the land. It is possible to reclassify land to a more restrictive category in the future if warranted.

STATE ENVIRONMENTAL QUALITY REVIEW (SEQR) COMMENTS

Process

No decision should be made without more analysis that includes climate change.

There is not enough information to make an informed decision at this time.

The classification decision should be made based on facts and science.

Keep the Interim Access Plan for 1-2 more years until we learn more.

Agency staff drafted the DSEIS (October 2016) using information available to them at that time. The FSEIS has additional materials. The Agency is expected to make a decision in a timely fashion with the available resources.

Requested additional public hearings: Syracuse, Saratoga Springs, Buffalo, Long Island and NYC.

Request additional hearing in Mohawk Valley region.

The APSLMP states that revisions to the Master Plan “will be made by the Agency, in consultation with the Department of Environmental Conservation, and will be the subject of public hearings within and without the Park.” (APSLMP, page 9) The Agency hosted eight Public Hearings for this action, four within the Park and four outside. The hearing held in Ray Brook was webcast and video recorded so that people who could not attend any of the scheduled hearings would be able to see one. The audio for all eight hearings is public record and made available through the Agency web page.

The process is completely flawed and should be revised: First, public awareness for Forest Preserve issues including land purchases, classification and ultimately management, are generally not well known despite the media attention this classification debate has received. The general public has little or no voice in land purchase decisions, and more importantly have very little awareness that these transactions even take place. Secondly, rather than 8 public “comment hearings,” there should have been 8 public “open houses,” staffed by the APA & DEC...The public

should have been invited in for a tour so that people would have had a chance to see what they bought.

SLMP and SEQR regulations provide for hearings. Lands were open to the public in May 2016.

DSEIS did not follow SEQRA mandates.

There is no "proposed action," or preferred alternative for the public to review and comment on pursuant to SEQRA.

SEQRA does not mandate that a preferred alternative be included in a draft EIS. By not choosing a preferred alternative, the Agency hoped to receive comments on the range of reasonable alternatives.

In each Alternative, we ask that the APA reissue the DSEIS amending the four alternatives to clearly state which alternatives will allow snowmobiles, and where the snowmobile trail would be located in the Boreas tract, given each Alternative classification option.

Snowmobile trails are located through the UMP process and individual work plans, taking into account the APSLMP Guidelines, the 2009 Snowmobile Guidance and other Department policies, and the location of wetlands and other resources. The classification action alone will not determine the location of a snowmobile trail.

APA must consider additional alternatives that include not only an expanded Wilderness boundary, but also the maintenance of Gulf Brook Road and the dams at Boreas Ponds and LaBier Flow in accordance with Wilderness guidelines. This means that the roads should be treated as trails, and the dams should be treated no differently than other existing dams in Wilderness Areas throughout the Adirondack Park.

DSEIS is not sufficient and should have included an all Wilderness alternative.

The DSEIS considered a reasonable range of alternatives. There is no requirement that every conceivable alternative be considered. The APSLMP identifies multiple classification categories and guides the designation based upon four criteria. Staff evaluated the alternative of the Boreas Pond Tract as entirely Wilderness as well as entirely Wild Forest, but did not identify these alternatives as reasonable alternatives based on the APSLMP criteria. Therefore, these alternatives were not included in the DSEIS.

APA has presented the public four classification proposals for the Boreas Ponds Tract that range from bad to unacceptable. All four do include some token amount of

Wilderness, but none imagine the place as a wild landscape, solitary and secluded. Please create additional alternatives in the DSEIS that satisfy the public's desire and need for more Wilderness.

Each of the original four alternatives, as well as the preferred alternative, includes Wilderness classification. Staff analysis of the four criteria used to determine classification resulted in a determination that Wild Forest and Wilderness are appropriate for different sections of this large tract.

This is not a decision simply weighing the views of those interests advocating now. It is a decision that will affect and be viewed by New Yorkers generations hence. The Agency, as an arm of the state of New York must represent that view in making this decision. Simply put, the Agency must follow in the tradition of the great New York Conservationists on whose shoulders the Agency now stands. This decision represents an action that will be judged by history.

Noted.

Economics

It will be cheaper to maintain wilderness.

DOT estimates the cost to maintain gravel roads at \$7,000 a mile per year, making the cost to maintain 53 miles of roads \$352,000 a year.

The price of infrastructure and maintenance for any unit of Forest Preserve land is contingent upon the facilities proposed in a NYS Department of Environmental Conservation Unit Management Plan (UMP).

Clarkson University study (2015) shows that people will pay up to 25% more for private property near Wilderness, providing new economic opportunities for the area.

Noted.

There is an assumption that greater diversity of recreational use will result in greater use, and therefore greater economic benefit to local communities. This assumption ignores the well documented fact that some forms of recreational use are incompatible and result in user conflicts. For instance, cross-country skiers report negative experiences when encountering snowmobilers, hikers are negatively impacted by motor vehicles, and bicycles and motor vehicles can scare horses (Vaske et al. 2007; Vittersø et al. 2004). Diversity is necessary, but it needs to happen at a landscape level, not parcel level.

Every land classification provides for diverse recreation opportunities pursuant to a UMP. The management of user conflicts between user groups is taken into account during the UMP planning process.

The desire to push recreation down a seven-mile dead end dirt road ignores the economic benefits of siting many forms of recreation close to communities. As an example, the most successful mountain biking trail systems in the country are located adjacent to and start in communities. Mountain bikers want to ride from their hotel and to bars and restaurants, they would prefer not to travel out of town to ride. Wilderness recreation on the other hand necessitates trailheads being on the periphery of communities. The impact of various proposals on the remoteness of the Boreas Ponds tract and adjacent High Peaks Wilderness not only eliminates the sense of solitude that Wilderness recreational enthusiasts seek, it also pushes them farther away from community centers.

Noted.

It is not APA's job to find economic benefits from classification.

SEQRA regulations require that an EIS describe the social and economic considerations of a proposed action. Therefore, economic benefits and costs may be discussed as factors in deciding on a preferred alternative.

Land classification is not a silver bullet; the Towns need additional infrastructure to thrive.

Visitors are attracted by a number of factors including outdoor recreation, shopping and dining, relaxation, public facilities, and specific recreation assets. These newly acquired lands provide additional recreation amenities that communities, local businesses, and the State can market and program to attract new visitors to their respective jurisdictions.

Taxes are not collected once the land is owned by the state.

New York State is statutorily required to pay taxes on Forest Preserve lands in the Adirondack and Catskill Parks. Additionally, these taxes are often paid at a rate higher than they would be for lands under forestry management. The State's 480-a exemption may provide private landowners of parcels greater than 50 acres in size and managed under a "sound forest management program" with reduced property tax payments to local and county governments. As lands owned by a government entity, State Forest Preserve lands are not eligible to receive 480-a exemptions and are therefore likely to provide local governments with increased revenues compared to lands owned by private entities and eligible for the 480-a exemption.

The property tax payments to local and county governments from Forest Preserve lands are not impacted by classification.

Money for land acquisitions comes from the Environmental Protection Fund, funded by real estate transfer taxes, not from personal income taxes.

The Environmental Protection Fund is primarily financed through a dedicated portion of real estate transfer taxes.

The West's popular national parks, monuments, wilderness areas, and other public lands offer its growing high-tech and services industries a competitive advantage, which is a major reason why the western economy has outperformed the rest of the U.S. economy in key measures of growth.

The recent Forest Preserve additions subject to this classification process inherently increase the amount of public land and recreation opportunities in New York State.

Adirondacks Wilderness Advocates proposes a High Peaks South Gateway in the Town of North Hudson to provide visitor infrastructure and bring people into the High Peaks.

On January 23, 2017, Governor Cuomo announced a master plan to establish a "Gateway to the Adirondacks" at Exit 29 of the Northway in the town of North Hudson. On January 11, 2018 the Agency Board unanimously approved a permit to develop the Frontier Town Campground, Equestrian and Day Use Area.

There are other economic benefits of Wilderness to New York State residents outside of direct impacts to local communities. Very few people live in the Park but there are over 19 million New York State residents who all helped pay for this land.

Courts and economists have consistently recognized indirect benefits of wilderness including bequest values, existence values, and option values in evaluations of wilderness benefits. It is understood that many stakeholders find value in the knowledge that the wilderness will be around for their descendants to enjoy while others will find pleasure in knowing that wild places and areas protected in perpetuity exist. Still more will be satisfied in having the option to visit such a wild place. These benefits are considered in this classification package.

More people will come to the local communities if the land is classified Wild Forest.

Wilderness attracts more people than other classifications.

Every land classification provides for recreation opportunities pursuant to a UMP. The economic impact resulting from a classified unit is dependent upon

the total use of that unit. A variety of factors influence the use of a unit including the appeal of the natural resources, available recreation infrastructure (including trails, camping sites, etc.), proximity to population centers and accommodations, access points, local event programming, and the marketing of the resource. While the FSEIS includes an economic impacts analysis, further study, including market analysis, would be required to make quantitative predictions of impacts from different recreation activities. This would be outside the scope of this action.

Cumulative Impacts

The APA should do a better job of placing each of these land classification decisions into a matrix of other Adirondack and eastern lands of similar classification. Just how many wilderness or primitive areas are like Boreas Pond unit in the Adirondacks? In the northeast? Are the rest all developed or so accessible that there are houses around them? People say we have enough wilderness. What is enough? How does it compare to wildland or private land that is similar?

The EIS needs a cumulative impacts analysis.

The SEQR regulations require an EIS to evaluate "potential significant adverse impacts" and to discuss cumulative impacts "only where applicable and significant." There will be positive environmental impacts from the classification of 11,412 acres as wilderness proposed in Alternative 2B.

The FPEIS includes an analysis of potential significant adverse impacts including, the compatibility of adjacent land uses and classifications and eastern wilderness opportunities (roadless areas).

NON APSLMP COMMENTS

UNIT MANAGEMENT PLANNING

Classification versus management: Many of the comments addressed issues pertaining to Unit Management Plans, a process that follows classification, as opposed to the classification criteria guidelines in the APSLMP.

General

Need to combine classification and management (UMP) processes simultaneously.

The APSLMP has separated these two processes and assigned Lead Agency status to two different State agencies. Although they are separate processes, they are linked. Classification and UMPs take into account the basic guidelines

developed for each category. It would be very difficult to combine these processes.

The High Peaks and Wilderness's of the Adirondack Park need to be preserved for future generations. One way to aid in this endeavor would be implementing a permit system for wilderness access to limit the number of visitors. Along with a permit system making 'Wilderness Survival Skills and Conservation' classes mandatory to secure a permit would lessen the burden on these areas. The State currently requires classes for hunting permits to ensure safe and lawful hunting, why not enact a similar system for wilderness access.

Noted.

People are more concerned that the land is managed properly than with what the final classification is. That can't happen unless the Department can hire.

There are so many people doing the high peaks now, and so few Rangers and DEC & ADK personnel to enforce regulations and to work on trails that many of the footpaths are in a deplorable condition.

Noted.

Keep the roads open for fire control.

The APSLMP allows motorized access in all classifications including Wilderness to respond to forest fires. The Wilderness Guideline provides: "motor vehicles, motorized equipment and aircraft will be permitted, by or under the supervision of appropriate officials, in cases of sudden, actual and ongoing emergencies involving the protection or preservation of human life or intrinsic resource values -- for example, search and rescue operations, forest fires, or oil spills or similar, large-scale contamination of water bodies."

Electric motors should not be allowed on the Ponds.

DEC should not miss the opportunity to create an alternate route to Mount Marcy. If the Boreas Ponds is added to the High Peaks Wilderness, do not establish new lean-tos. Lean-tos in the park have a certain amount of junk/trash near or inside the structures. Given the number of dead end logging roads radiating from the ponds, designated camping tent areas can be established on these trails and nearby brooks thereby allowing for a more enhanced wilderness visit.

The logging road network should be used for non-motorized recreation. The ski up to Panther Gorge is a wonderful experience descending into the Marcy Swamp area. The grading of Gulf Brook Rd is ideal for cross-country skiing. As part of a wilderness, it could offer a special experience comparable to or even superior to the Jackrabbit trail

on the other side of the High Peaks. Cross-country skiing has the same popularity (key draw for 8.7% per ROOST) in the park as snowmobiling (key draw for 7.7%), but the extent of suitable trails is much smaller.

The presence of bicycles, and possibly snowmobiles, on the road network around the ponds at the level of use envisioned for that area would be a significant disturbance to these species. Recent work has shown that all forms of human recreational use have significant negative effects on wildlife (Larson et al. 2016). Therefore, it is necessary for us to consider limiting use in certain areas to minimize disturbance to wildlife.

Boreas should be more like Lake Colden than Marcy Dam, with a long hike in.

Close Gulf Brook Road.

The road between Four Corners and Gulf Brook Road Upper Parking Area (P8 on the attached Access and Recreational Trail Map) should be restricted, as it is presently. Bicycles and hand or bike carried boat trailers should be permitted.

Well-managed recreation can absolutely be achieved on those areas of these parcels that have the capacity to sustain use (specifically the road network) through well-developed Unit Management Plans. We have an opportunity to create well-reasoned, graduated access that meets all of the core aspirations for these lands. We should not pass this opportunity up. Well-managed recreation can absolutely be achieved on those areas of these parcels that have the capacity to sustain use (specifically the road network) through well-developed Unit Management Plans.

These management items and issues can be identified in the Unit Management Planning process. The public will have an opportunity to review proposed management activities and comment on them at that time.

Snowmobiles

Snowmobiling should be allowed around the Boreas Ponds.

Want a snowmobile trail from Newcomb to North Hudson trail. Use existing roads for snowmobile trails instead of cutting trees for new trails.

There are many snowmobile trails in the Adirondacks and since our snow cover will be disappearing for good because of climate change, we should not build major bridges to support heavy snowmachines. What will happen as snowmobiles disappear from the Adirondacks is that the users will press to keep these same trails open for ATVs, causing serious environmental damage. Snowmobiles, at least, because of the snow cover, are considerably less ecologically detrimental than ATVs.

Local communities want connector snowmobile trails and it looks as if the Governor has

so promised this use. If this is true, a new connector trail should be designed that avoids the Boreas Pond tract or is at least south of the Gulf Brook Road. In any case, it should not be through the Boreas Tract.

Snowmobiles smell disgusting and are insanely loud (especially on pristine lakes in the winter). They largely use fossil fuels and emit emissions greenhouse gas and acid-rain causing emissions into the air. With acid rain killing off the fish in our beautiful lakes, barring of motorized vehicle recreation on state land should be a no-brainer. Snowmobiles should be permitted on Gulf Brook Road between Blue Ridge Road and Four Corners. Snowmobiles should be permitted west of Four Corners on Boreas Ponds Road to the western boundary of the Boreas Ponds Tract.

Snowmobiles should be permitted to travel south of the Boreas Ponds Road on a new connector trail. Please refer to; Community Connector Trail Plan, Final Supplemental Environmental Impact Statement, River Area Management Plan for the Boreas River dated 7/29/15. Map on page 81, titled; Section 3 Alternatives.

Support skiing to the Ponds without snowmobiles.

Please let us ride our snowmobiles in the Boreas Ponds area.

Snowmobiles have no negative impact on the environment. The wildlife doesn't care. Snowmobiles have a low impact because they ride on the snow and only have a 3½ month season.

The placement of snowmobile trails will be identified in the Unit Management Planning process. The public will have an opportunity to review proposed management activities and comment on them at that time. Snowmobile trails are allowed in lands classified Wild Forest, Intensive Use, Historic and Travel Corridor, and, in limited instances on a site specific basis, within 500 feet from a public highway ROW.

Horses

Horses are great until they poop in the water.

Wants recreational facilities for horsemen similar to Otter Creek.

The use of horses anywhere is far more damaging than bikes, so anywhere horses are allowed bikes should be allowed.

The placement of horse trails will be identified in the Unit Management Planning process. The public will have an opportunity to review proposed management activities and comment on them at that time. Horse trails are allowed in all classification categories.

Wilderness guidelines allow horse and wagon as well as motorized wheelchairs.

Motorized wheelchairs are also allowed in all classification categories.

Bicycles

For generations now, the road leading to and around the ponds has been used year-round by 50-ton logging trucks, as well as the cars and trucks of the foresters and recreational lessees who used the property, with minimal environmental impact. There is no reason why bicycling would not be allowed there.

If an area is classified as Primitive it should have no new activity allowed that would weaken its chance to become Wilderness, including bicycles. Once any mechanized or motorized use is allowed, it will be virtually impossible for the APA to close such a use in the future.

Some commenters suggested motorized and mechanized access will provide needed recreation opportunities for families with young children. Towing a toddler all the way to the ponds in a bicycle trailer is not easy or appealing. The ponds are not a great destination for bicycling or recreation with young children.

No bikes around ponds, but electric motors in Ponds would be OK.

Bikes on hardened roads would be OK.

Prefer Wilderness even though it doesn't allow bicycles.

The Boreas tract is not suitable for family biking.

Motor vehicle access will ruin the experience. The concept of bikes is better than the actual experience.

The placement of bicycle trails on land classified as Wild Forest will be identified in the Unit Management Planning process. The public will have an opportunity to review proposed management activities and comment on them during the Department's UMP process. Bicycle trails may be allowed in lands classified Wild Forest, Intensive Use, Historic and Travel Corridor, and on Administrative Roads in Primitive Areas.

Support mountain biking throughout the entire road system surrounding the ponds. The hardened roads are in excellent condition and as such conducive to biking. Unlike snowmobiles and ATV's, bikes are not loud therefore noise pollution will be kept at an absolute minimum. Mountain bikes would allow access without undue pressure. A wild forest classification would certainly threaten the entire region with over use. Certainly

ATV use should be banned as well as snowmobile use during the winter. Noise pollution, as well as exhaust pollution will certainly detract from the wilderness experience.

Bicycling and snowmobiling are not allowed in Wilderness (with the exception that, in limited instances on a site specific basis, snowmobile trails may be within 500 feet of a public highway ROW where a wilderness boundary abuts a public highway).

ACCESS COMMENTS

General Access

Everybody has access; we are discussing degrees of access.

Access is a subjective term and we can all find ways and places to do something we love.

Not all of the Park has to be accessible to all of the people.

Please make the property available for all folks, so not restrict it in any way.

Well-managed recreation can be achieved on the road network through well-developed Unit Management Plans. We have an opportunity to create graduated access that meets all of the core aspirations for these lands.

Motorized access will invite overcrowding.

If it is easy to get to the dams, people will just come once and not return.

Please retain some land to share with animals and plants. We do not need motorized access or a parking lot.

Wilderness closes me out of the parcel.

Unfettered access to all land is unnecessary; keep it pristine for others.

Motorized access beyond current (interim) parking lot only for persons with disabilities, administrative use, and shuttle service.

Age or ability should not be given privilege.

Comments on access often overlook that much of tract is readily accessible from existing public highways. Many scenic resources, including Wolf Pond, Ragged

Mountain, the Boreas River and vast wetlands similar in quality to those deeper could be a short hike from existing public highways.

Many comments in favor of wild forest designation for a large part of the tract focused on the potential use of logging roads in the tract for motorized access. These roads are not suitable for significant, public vehicular traffic. A poorly maintained road may also become a barrier to access by those who lack access to all-wheel drive vehicles with high wheelbases.

The state made many compromises to allow motorized access to the Essex Chain Lakes. Lean the other way for Boreas Ponds.

There are 2-lane hard-pack backwoods superhighways on the tract. Cannot have too much access.

Making access to the High Peaks easier will be a disaster.

Roads for access to the Ponds is as ridiculous as an elevator up Mount Marcy.

The Boreas Ponds tract of land was opened to the public in 2016, providing access to the Public. The types and placement of access will be determined in a UMP following the classification action. The classification categories assigned to the tract do reflect the land and waters capacity to withstand use, therefor affecting some uses.

First responders need to get to the people. Average age of first responder in Hamilton County is over 60 years old.

The APSLMP allows the use of motor vehicles in all classifications of land to respond to sudden and ongoing emergencies.

Access for Individuals with Disabilities

Wild Forest for the disabled.

All classification categories are available to persons with disabilities.

No one is wheeling in a chair for 7 ½ miles.

Parking for persons with disabilities will be possible close to the dam (0.1 mile), in an approved UMP.

State buildings must be accessible to persons with disabilities- why not lands?

Motorized wheelchairs are allowed in all classification categories.

There is already access to the edge of Wilderness, disabled people are looking for access to the interior. There are no ADA trails in Wilderness.

Providing motorized access denies all New Yorkers the tract's exceptional opportunity for remoteness, including those with disabilities who also seek such recreational opportunities.

Access for persons with disabilities can legally be accomplished in a Wilderness classification. Wilderness does not prevent access in a wheelchair, but needs level paths.

Support allowing motorized access a mile or more from the Boreas Ponds to provide a limited parking area and an accessible trail for people with disabilities.

The DEC can maintain the logging roads at sufficient widths or modifying them as trails over time in ways that accommodate wheelchair access. The road network itself could provide accessible recreation opportunities. Adaptive reuse of roads would be one way to provide extensive new opportunities for disabled visitors who wish to experience some of the best remoteness the park has to offer.

The current road to the dam at the ponds could be maintained enough to allow handicapped access under supervision via permit or requested permission.

Access advocates have made a big deal out of "disabled" access, arguing that it is "unfair" to restrict access to people who presumably cannot hike. Wilderness classification does not exclude the differently-abled. By law wheelchair access is a right, including motorized wheelchairs; as a hiking and equestrian trail Gulf Brook Road is an excellent fit for such use. Guiding services, horses and wagons and other resources can supplement access for people of all ranges of ability.

Professional service providers for disabled people do not envision as much usage of a vehicle-accessible trail on the Boreas tract by the disabled as by nondisabled and inebriated people. The APA is using the handicapped-accessible banner as more of a marketing strategy than a plan that respects the Boreas tract.

The placement of a parking area and trail accessible for persons with disabilities would be determined in an approved UMP.

There should be parking for persons with disabilities at the Boreas dam.

The preferred alternative enables a parking area for persons with disabilities to be located one-tenth mile from the Boreas Ponds dam, pursuant to an approved UMP.

Some commenters suggested that snowmobile access should be favored because it would enable disabled people to visit the area.

The Interim Use Plan did not provide any explicit accommodation for persons with disabilities to Boreas Ponds. It should be no surprise if the record is devoid of comments from individuals with disabilities because there was no opportunity for independent access to the land.

Noted.

The signed legislature for the Boreas Pond tract mandates handicap access to the main pond parking area.

There is no legislation requiring access for persons with disabilities specifically to Boreas Ponds. However, the preferred alternative enables a parking area for persons with disabilities to be located one-tenth mile from the Boreas Ponds dam, pursuant to an approved UMP.

Parking

A parking lot that is built must be at least a mile away from the Boreas Ponds in order for them to be protected. An accessible trail to the ponds for people with disabilities could easily be provided.

Wants a 1 mile carry from parking to Ponds.

Parking should be at the current (interim) location and no motor vehicles should be allowed past that gate.

We owe it to future generations to keep this place pristine. Having parking close will ruin the Ponds and the area will become trashed like other High Peaks with easy access.

Classify Boreas as Wilderness with parking farther out to prevent another overcrowding scene as is found at the ADK LOJ.

Wants a parking area at the dam and motorized access to the dam.

The placement of a parking area would be determined in an approved UMP.

ARTICLE XIV OF NYS CONSTITUTION

The law should be changed to allow for selective logging.

Article XIV prohibits timber on Forest Preserve lands to be sold, removed or destroyed.

OTHER

Balance

It is not unreasonable to set aside a certain amount of land as wilderness, but there needs to be limits set and consideration given to all segments of the population – not just those few whose span of interest is limited and narrowly focused. The spending of state monies must take into consideration all the population not just those of a limited special interest group.

Some commentators at the hearings called for “balance.” The classification of the neighboring Essex Chain Lake Tract resulted in a variety of recreational activities including mountain biking, snowmobiling, and canoeing with reasonable access to put-ins. So, different user groups have been accommodated in this region of the southern High Peaks. Do not gerrymandered the classification configuration in the Boreas Tract.

It is not possible to “balance” motorized use with solitude. Snowmobile engine noise carries for more than two miles, as does noise from boat motors. Motorized use and a wilderness solitude experience are not compatible. The “balance” argument is a false argument.

As in all of these deliberations we need to balance our desire for recreational access to these public lands while preserving as much as possible of the very important “Natural Capital” (ecological services that we gain from those least disturbed forests and wetlands that we are fortunate to possess.)

The Agency is required to follow the guidelines developed in the FPEIS and the criteria established in the APSLMP to determine the appropriate classification category for State lands according to the capacity of the land and water to withstand use. Human use is encouraged by the APSLMP where it does not degrade resources.