

# Adirondack Park State Land Master Plan Amendment Summary of Public Comments January 2015

In October of 2014, the Adirondack Park Agency announced the beginning of a public process to consider amendments to the Adirondack Park State Land Master Plan (APSLMP), including amendments associated with the Essex Chain of Lakes. Four listening sessions were held and public comment was accepted. The listening sessions were held on October 29 in Ray Brook, November 3 in Newcomb, November 17 in Albany, and November 24 in Old Forge.

One hundred fifty eight people registered at the four public meetings. As of the end of December we had received 1,186 emails, letters, faxes or resolutions. These comments have been compiled into this summary document. This document has comments organized by topics whenever possible. The first two topics listed are those pertaining to the Agency's 2013 resolution which included two specific areas for consideration:

- The Use of All-Terrain Bicycles in the Primitive Areas of the Unit
- Consideration of Guidelines to Allow for the Use of Non-Natural Materials For Bridge Construction on the Cedar River

Over the next couple of months, the Agency will host a review session with Park leaders and stakeholders. The session will be organized as a roundtable at the Agency and will allow for Agency staff to provide an overview of the public commentary, identify APSLMP topics that may be considered for change, and receive additional input.

Once the topics are identified, the Agency will draft a Supplemental Environmental Impact Statement and proceed to Public Hearing, enabling the public an opportunity to comment on proposed actions and changes to the APSLMP. We appreciate the comments we have received and look forward to continued public engagement.

# Outline of Public Comment

## I. ISSUES IDENTIFIED IN DECEMBER 2013 RESOLUTION

### A. Mountain Bikes

#### 1. Allow in all or selected Primitive

- Allow biking on primitive land logging roads.
- Propose the Plan be updated (Page 23) to allow all terrain (mountain) bicycles on trails in Wilderness areas. The regulations for Primitive areas (Page 28) and for Canoe areas (Page 30) are based on the Wilderness regulations, and therefore would also be changed as proposed.
- Mountain biking should be allowed on existing roads (including substantial logging roads) in Primitive areas where biking would not conflict with resource preservation, but not in Wilderness.
- Support mountain bikes in Primitive corridor in Essex Chain and throughout the Park in appropriate areas.
- Flexibility in Primitive Area classification to allow Mountain bikes – good compromise.
- Support All Terrain Bikes (ATB) in Essex on Primitive, should be extended Park-wide in specific locations to connect communities that have ATB trail networks established on Wild Forest.
- No need to change Primitive to allow mountain biking and create a Wilderness-like Primitive area.
- ATB bikes supported in Essex Chain should be allowed Park-wide on Primitive – for community connectors.
- Inequitable to allow ATB's in Essex Chain Primitive Area and not in other Primitive Areas.
- Require standards for planning, design and construction of ATB trails.
- Support the limited use of mountain bicycles on marked routes that do not damage natural resources in those Primitive Areas where it is extremely unlikely or impossible to reclassify such areas to Wilderness in the future.
- Outside Essex Chain, only allow ATB's in Primitive areas under current APSLMP definitions and guidelines, on a case-by-case basis.
- Grant access to bicycles on Forest Preserve Lands. The newly acquired state lands and ones under consideration could be major tourist draws when cycling is added.

#### 2. Allow in Essex Chain

- Allow use of All-Terrain Bicycles on all-season roads only on Essex Chain tract west of Hudson River. No motorized use of the roads.
- Allow mountain bikes in Essex Chain Primitive Area.
- ATB on existing roads in Essex Chain.

- Bicycles should be allowed on Cedar River Bridge and south of the Cedar River.
- No off-road cycling in Essex Chain, but allow on roads and create campsites.
- Approve construction of a trail connecting Camp 6 Road to Chain Lake Road North to create a loop.
- The APSLMP guidelines for Primitive Areas should be revised to allow for the use of All-Terrain Bicycles on appropriate all-season roads able to withstand such use on the Essex Chain Lakes Tract west of the Hudson River that could otherwise be designated as truck trails were they to be used by the DEC to reach and maintain structures and improvements within the unit. The truck trails selected should be done on a case-by-case basis.
- Allow in Essex Chain as described in Classification Resolution – but no other Wilderness, Primitive, or Canoe.
- Would like additional mountain bike opportunities, particularly Essex Chain Primitive Area.
- Mountain bikes just in Chain Lakes roads.
- Mountain bikes and snowmobiles in Essex Chain.
- How do you limit actual bicycle use in Essex Chain?

### 3. Allow in Wilderness (or parkwide)

- Supports the use of All Terrain Bicycles on the old access roads of the Essex Chain Lakes Tract which are able to withstand such use. Supports using ATBs in suitable areas of the Forest Preserve, including Wilderness and Primitive Areas on certain roads, where use would not otherwise materially harm the resource.
- Supports bicycles in Wilderness. The APSLMP wording should be changed to allow mechanized, but not motorized.
- Support for mountain biking in the Adirondack Park.
- Create bike trails to connect communities.
- Allow bikes on road around Like Lila and on truck trail from South Meadow to Marcy Dam.
- Recognition of mountain biking and the value of trails in the State Land Master Plan.
- Want changes to come that will allow for utility of existing road systems with a practical maintenance program insured. Seasonal vehicle use should be allowed where practical.
- Distinguish between mechanical and motorized transport – former should be allowed in wilderness.
- Allow ATB on horse trails, snowmobile trails, and roads, where the ATB use will not result in overuse or otherwise harm the resource.
- ATBs would enhance tourism park-wide- not a lot of areas where we can enhance economic development.
- Want access to trails that would satisfy our needs as stated in NY's Statewide Comprehensive Outdoor Recreation Plan (SCORP) in areas that are appropriate on sustainable trails and we will help design, build and maintain them for the life of the trail. The NY State SCORP in chapter 5 recommends that conflicts on the trails are best resolved through education, which will develop tolerance towards each user group. As trail users become more diverse, the dominant user group needs to adjust their attitude towards other trail user groups and become more accepting of these new people on "their" trails.

- The best solution is to create a new designation: "WILDERNESS B" = WILDERNESS WITH BICYCLES.
- Regarding mountain bikes, allow them at Whitney Wilderness too as proposed here at Essex Chain.
- Buffers (Wild Forest) along roads in Wilderness would allow for bike corridors to connect communities. Would be great benefit.
- Area between road and Wilderness could be used for biking/snowmobiles.

#### **4. Do not expand mountain biking**

- On the question on mountain bikes in Primitive areas, there should be no changes to the Primitive classification. This classification should be used to protect future Wilderness lands and to provide a wilderness setting for lands with long-term non-conforming features, such as a private road, railroad, etc.
- I'd also like to say that I'm strongly against mountain biking in Wilderness Areas. I think mountain biking should be confined to Wild Forest or Primitive Corridors on a case by case basis.
- Supports prohibition of mountain bikes in Wilderness.
- Don't support bicycles in Primitive that may be reclassified as Wilderness in the future.
- Bringing mountain bikes into Primitive defeats priority of APSLMP to make area into Wilderness.
- The APSLMP change to allow all terrain bicycles in Primitive areas is a dire threat to the creation of expansion of future Wilderness areas. If the APA does undertake such a revision this will change the classification system in the APSLMP. This means that the APA will be creating a third Primitive area classification – permanent Primitive areas based on recreational management objectives. The APA should perform an analysis of how this revision will affect Primitive areas across the Adirondack Park.

#### **5. Create a Primitive Bicycle corridor classification for trails in Wilderness similar to the Catskill Forest Preserve.**

- This option will create more support for Wilderness among bicyclists.
- Classification of Primitive Bike Corridors in the Essex Chain of Lakes Complex.
- Classification of Primitive Bike Corridors in other areas of the Adirondack Park.
- Bicycle corridors through Wilderness and Primitive areas.

#### **6. Other**

- Towns such as Inlet are ready to maintain DEC biking trails.
- Mountain biking provides opportunities for a variety of people.
- With maintenance, mountain biking can be sustainable.
- Mountain bikes are motor free.
- Create bike trails in Wilmington, Saranac Lake, North Hudson and Fish Creek areas.

- Allow for long mountain biking routes, e.g. Santanoni to Raquette River.
- Mountain biking should be restricted during mud season.
- Road impacts (noise) are more than bike impacts.
- Desire for more mountain biking opportunities – single track emphasis (e.g. Hardy Road).

## **B. Natural Materials**

### **1. Support Amendment allowing non-natural materials and/or support bridge over Cedar River**

- On Page 20 and Page 43, propose that the description of bridges be changed to allow that new bridges be constructed of stronger, lower-profile steel materials to allow it to span longer distances and be less obtrusive visually. New bridges are currently required to be constructed of natural materials. Long-span bridges that use steel, such as the existing bridge at Whitehouse on the Northville-Placid Trail, have a lower profile than a natural material bridge and therefore are less likely to stand out in the wilderness as manmade.
- The use of non-natural materials for bridge construction should be considered as long as there are no chemicals leaching into waterways. Decking made from recycled plastics is durable and relatively maintenance free.
- Allow man-made materials park-wide to allow lower profiles.
- Allow non-natural materials for bridge over Cedar River.
- Allow cable-deck bridges.
- Bridge over Cedar River that can carry snowmobiles is key to connection between Indian Lake, Minerva, and Newcomb. Many people also ride horses, and bridge needs to be 12 feet wide to accommodate horses and wagons. Steel bridge would be wider, with lower profile.
- Bridge over Cedar will replace one that was there for decades.
- Use composite materials for Cedar River bridge.
- Think of cost. Greater flexibility should be allowed for administration of Forest Preserve (i.e., use of former gravel pits and use of non-natural materials).
- Bridges made of non-natural materials may be considered in Primitive that are not likely to meet Wilderness conditions.
- Evaluate durability, costs, aesthetics, environmental impacts, term of useful life.
- Wild Forest does not need to use only natural materials only for bridge construction.
- Support Cedar River and Polaris bridge crossings, allow man-made materials.
- Conduct boundary line adjustment to facilitate bridge location at narrowest crossing.
- Use of non-natural materials for bridge construction on Cedar; limit to Essex in first round; consider Park-wide but not in first round.
- Maintaining bridge provides opportunities to cross the rivers that are almost impossible to replace.
- APSLMP to allow construction of bridge over Cedar River.

- Urge the APA to recognize that the use of steel cables should be acceptable under the definition of Natural Materials in the APSLMP (page 17). On the question of changing the requirement for use of natural materials for bridges in Wild Forest areas, the APA should work with the DEC and undertake a study of the current status of bridges on the Forest Preserve. This study should detail the effectiveness and APSLMP compliance of a variety of existing bridge designs on the Forest Preserve.

## **2. Oppose Amendment allowing non-natural materials or amendment not necessary**

- Do not incorporate changes which will encourage motorized use.
- Do not support bridge over Cedar for snowmobiles- do not revise master plan to allow for construction of bridge.
- Use only natural materials.
- Bridge over Cedar River for motorized vehicles would mock the “Forever Wild” intent of the Constitution.
- Should blend the bridge with the surroundings.
- Native natural materials preferred in Wilderness – in Wild Forest, try first before alternative.

## **3. Wild, Scenic, Recreational Rivers Act Issues**

- A bridge over the Cedar River (a scenic river) is not in compliance with the Wild, Scenic, and Recreational Rivers Act (WSRRA), 6 NYCRR 666. The best course of action may be to simply use the Western Cornell Road community connector snowmobile route which is the superior fall back route for a snowmobile trail, does not require a problematic bridge crossing, and already connects Indian Lake to Newcomb.
- Support non-native materials to be used for bridge over Cedar River but only with regulatory change to WSRRA to accommodate this single bridge. Also support a map amendment to accommodate a more appropriate crossing point, provided there is no net loss of motor-free acres.
- WSRRA prohibits construction of bridge- amend Act and then consider APSLMP provision.
- Concerned about any bridge over Cedar regardless of materials.
- Clean Up Non-Conforming Uses on Wild, Scenic & Recreational Rivers. Eliminate navigational buoys for motorboats on rivers enrolled in the Wild, Scenic and Recreational Rivers System, including the Raquette River, and set a date by which the Polaris Bridge from the Hudson River south of Newcomb will be removed.

## **4. Need More Specific Information**

- Can not endorse an amendment of the APSLMP to allow for the use of non-natural materials for the proposed snowmobile bridge over the Cedar River because DEC has

not provided a design or description for this bridge, including the materials necessary for construction.

- A comparative analysis should be made before allowing non-natural materials.
- The APA should work with the Department of Environmental Conservation (DEC) and undertake a study of the current status of bridges on the Forest Preserve. This study should detail the effectiveness and APSLMP compliance of a variety of existing bridge designs on the Forest Preserve as well as the utility of a variety of potential new bridge designs that could be used made of natural materials and non-natural materials. Do not believe that the APA has enough information to make a sound decision at this point in time. The short and long-term implications have not been properly scrutinized.
- Natural materials are more expensive, but am reserving judgment pending review of proposed design.
- Would consider supporting the use of steel or other-than-natural materials in the construction or reconstruction of allowed bridges on a case-by-case basis only in those Primitive Areas where a future Wilderness reclassification is impossible or extremely unlikely.
- Consider how this change will impact the forest preserve. APSLMP and Article XIV do not contemplate the Polaris Bridge or a 130' bridge over Cedar river.
- Access across Cedar could be in a different location.

## II. ISSUES BEYOND DECEMBER 2013 RESOLUTION

### C. Scope of Action

- Limit to Essex Chain Tract amendments to avoid bogging down with controversial unrelated amendments.
- Apply mountain biking revision state –wide.
- Changes (Mountain biking and non-natural materials) should be made to apply park-wide.

### D. Access

- Open up the lands to plane access, mt. bike use, four wheeler access so some handicap folks and wounded vets could access some of our beautiful back woods.
- Support continuing and expanding the protection of water and wildlife by limiting access to public lands for use by motorized vehicles or any other detrimental human activities. In particular I support the APA's commitment to protect the Hudson Gorge Wilderness and Essex Chain of Lakes Primitive Areas from these activities.
- Expand recreational opportunities for everyone, especially elders, veterans, families and those with disabilities.
- All taxpayers should have access to Essex Chain. Allow mountain bikes and snowmobiles to ride through area, from Newcomb to Indian Lake.
- Camp 6 Road should be open seasonally for hunters. Taking out deer need motorized assistance.
- Access should be provided for all people at historical sites.



- There should be more roads so that people other than the wealthy and state employees can experience the Park.
- Access trails should be imbedded within approved UMP's.
- Support the CP-3 and limited parking permit proposal. Allow people to unload gear at ponds or lakes, then park elsewhere.
- Have CP-3 access to tube via Chain Lakes Road North, so paddlers walking from Deer Pond to the tube do not have to encounter motor vehicles.
- Equine access should be allowed on all roads that can support this activity.

## E. All Terrain Vehicles (ATV's)

- Codify the prohibition of off-road or trail use of motorized vehicles.
- Strongly opposes any amendment to the APSLMP which would authorize the public use of all terrain vehicles on any road or trail that is part of the Adirondack Forest Preserve.
- Open public trails to ATV's in the park. It's not fair that snowmobiles are allowed in the park, but not ATV's.
- ATV's should be allowed on truck roads...speed limits should be 20 mph to encourage responsible usage...this will aid in road / trail maintenance and emergency access for both injury and forest fires.
- Assign trails to local rescue squads to maintain for when they need ATV access.
- Carefully consider the recommendations of Karasin (2003) in any decisions related to ATV use on state lands – This report represents, to our knowledge, the most comprehensive review of issues and options related to all-terrain vehicles in the Adirondacks. Given the controversial nature of these vehicles and their documented environmental impacts, we recommend revisiting the suggestions herein in any consideration of APSLMP issues related to ATV's.
- State needs ATV policy in APSLMP- prohibit ATV use on state land except on roads (defined) marked as open to ATV's.
- The Wild Forest motor vehicle - motorized equipment Guidelines should be amended to prohibit all public use of ATV's from the Forest Preserve (except legal CP3 permit access), including their use on Forest Preserve roads since that use cannot be limited to the roads and results in off-road impacts. This prohibition should be incorporated into Section 814 Regulations.

## F. Conservation Easements

- The APSLMP should be revised to include management of state-owned conservation easement lands. This will ensure that these state lands enjoy a checks-and-balances management between state agencies and greater public oversight and involvement. Currently, management over state-held conservation easements is unilaterally controlled by the DEC. There is no public deliberation and decision making for major policy issues.
- Update list of conservation easement lands, including acreage and date acquired.
- Easement lands should be available for access (access to Madawaska Flow blocked since state purchased easement).
- DEC should build and maintain trails for snowmobiles and ATV's on easement lands as promised.



- Define and incorporate appropriate natural resource guidelines for current and future Conservation Easement lands.
- Easements should only be granted when the public will be given complete access.
- State Conservation Easements Land Management: conservation easement lands enjoy no such checks-and-balances between state agencies, see far less opportunity for public oversight and involvement, and see management decisions made behind closed doors.

## G. Definitions

### 1. Mountaineering

- APSLMP Mountaineering Definition Proposal: Mountaineering is the collective term for all of the activities associated with climbing and descending mountains, cliffs, slides, boulders, stream beds and waterfalls. It includes technical activities, such as rock and ice climbing, that typically employ specialized safety equipment, as well as activities, such as slide climbing and bouldering, that may or may not employ specialized safety equipment.
- Support a more current and inclusive definition of the term *mountaineering*: one that includes rock climbing, ice climbing, slide climbing and bouldering , ski mountaineering, camping, ski touring, hiking.
- A clearer definition would help the DEC to monitor activities and implement appropriate conservation strategies to climbing sites throughout the park. Climbing is a sport that is rapidly growing in popularity and identifying climbers as a specific user-group would help make them more responsible to the sites that they use and especially to the sites that they develop.
- The expansion of the definition of mountaineering will also help to preserve access for users that engage in these activities. It should help to unify climbers as a more visible user group - one that does indeed wish to participate in preserving and managing our outdoor resources.
  - By highlighting the specific activities, managers could identify mountaineering resources in the park. Mountaineering involves or includes a number of other activities - in some of which the area management often plays an important role - both facilitating and regulating the activities.  
"Other activities" include: Route planning and land navigation, Camping and Bivouacs, Base camps, High camps, Bivouacs, Backpacking and Equipment Transport, Avalanche awareness and preparation, Descent, Waste management.
- The current language and implied definition of mountaineering is sufficient and does not need further sub-categories of rock climbing, ice climbing and slide climbing. All of those activities were recognized and ongoing in the Park in 1972.
- Management facilities and recommendations can alleviate the difficulties and preserve the environment.

### 2. Define a mountain bike as a “mountain bicycle” which is human-powered and non-motorized. Current ATB term confuses people.

## H. Enforcement

- The APSLMP should be revised to include a Forest Preserve Violations section to enumerate a public process for resolution of violations of APSLMP management.
- Timberlands with Conservation Easements tied to a “sustainable forestry” condition should be inspected to determine if that agreement is being followed. Several tracts recently logged indicate that agreement is meaningless.
- Enforcement of Forest Preserve Violations: A new Forest Preserve Violations chapter should be added in the Introduction section.

## I. Float Planes/Sea Planes

### 1. Pro

- Request that no more restrictions be placed on seaplane operations in your system and that you expand usage for seaplane activities.
- Designate additional areas in the Adirondacks for float plane usage.
- Seaplanes provide a means of transportation to these lakes for physically impaired nature lovers, without the long journey sitting in an automobile. And of course, we don't pollute the ground air with exhaust and leave no footprint on the environment due to our visit to the lakes. Noise generated by seaplanes is often less than that from Personal Water Craft, and lasts only a short time, primarily during the departure. Our members are VERY environmentally conscious and have taken significant actions to minimize their impact on the environment. We would be happy to provide the results of noise studies performed on seaplane operations.
- Do not lump seaplanes and seaplane operations with other forms of motorized water operations in the Adirondack Park region. Seaplane operations are neither intrusive nor environmentally stressful and provide access to otherwise inaccessible areas for ourdoorsmen and women including the handicapped.
- DEC promised to designate additional lakes for float plane access when Lows Lake was closed to float planes, which has not occurred.
- We lost Third Lake in Essex Chains as well as Lows.
- Want access to Friends Lake and other lakes recently withdrawn from the Access List.
- The entire park should be opened to aviation.
- Float planes are a way of life in Alaska. The APSLMP treats planes like the plague.
- Distinguish between motorized access and seaplanes. Sea planes have a minimal wake and are not continuously operated for propulsion once visitors have landed.
- Expand floatplane access, but no floatplanes in Wilderness.
- Open Round Pond, Queer Lake, Whitney in West Canada Wilderness and Lows Lake to floatplanes.

### 2. Con

- Concerned that float planes will bring in invasive species.
- Strongly opposes changes to the APSLMP that would permit floatplanes to land and take off from lakes and ponds in Wilderness, Primitive, and Canoe Areas.

## J. Guidelines for Management and Use

### 1. Wilderness

- If there could be an improvement to the APSLMP's guidelines for Wilderness, it might be to rephrase the current list of "shall not's" to a somewhat more positive listing of allowable uses.
- Mechanical recreation: This class of public recreation, including all-terrain bicycles, should in no way be given special considerations in the APSLMP. Mechanical recreation is NOT primitive recreation, and the state should refrain from allowing mechanical recreation in Wilderness areas, or expanding its use in Primitive areas.
- If the rules on wilderness and canoe areas were modified (updated) with a small change from no "mechanized" vehicles to no "motorized" vehicles we could expand our off road cycling to DEC approved trails through the woods.
- Support protecting and expanding principles of Wilderness to protect water quality and wildlife, provide for solitude and unique recreational opportunities and to support sustainable tourism and vibrant communities.
- Keep the Adirondack Park as "wilderness", forever wild and motor-free.
- Leave the Park alone. Leave it Wild and unchanged permanently.
- Expand and strengthen protection of Wilderness.
- Wilderness and Canoe areas: There should be no weakening of definitions or guidelines, including those prohibiting public motorized or mechanized uses.
- Recommend the APA State Lands Committee should review these issues publicly and the APSLMP be amended appropriately to clearly define group competitive recreational events and incorporate appropriate management guidelines that also have the effect of prohibiting inappropriate group event activities in designated Wilderness in favor of better located uses in Wild Forest and Intensive Use areas.
- APSLMP Consideration for Rock and Ice Climbing - Belay station metal chains should be prohibited and bolting should be very minimal, while UMP evaluation should seek to assess routes and areas where bolting should be denied or removed in favor of natural clean climbing route. Bouldering should be evaluated.

### 2. Primitive

- Amend APSLMP to allow electric motors for hand launch boats in Primitive Areas.

### 3. Canoe

- Canoe guidelines: This APSLMP classification has had extremely limited success in the Adirondacks, and should be discontinued and replaced with a new classification with more broadly applicable guidelines.

### 4. Wild Forest

- Wild Forest guidelines: No substantive changes should be made to the guidelines. However, the current Wild Forest definition provides very little vision for the management of these areas, and so it may be worthwhile to consider providing a clearer definition.

## 5. Intensive Use

- Add electricity to campgrounds using solar panels.

## 6. Other

- Woodland management is needed for grouse populations and should be placed on a high priority.
- Clustering of campsites – We have noted in numerous public comment letters to the Agency that ecological effects of human structures and activities exceed their physical footprint in terms of area impacted. This phenomenon does not relate solely to residential structures, but also pertains to camping in that areas of habitat are impacted not only from actual physical changes, but also from disturbance associated with human activity and presence in backcountry settings. The restriction of a 500ft required distance between primitive campsites in Wilderness spreads these impacts to a larger area than necessary. We believe it is possible to locate campsites at a more proximal distance while still maintaining a sense of solitude for users.
- On Page 49, Propose updating the Plan (under Roadside aesthetics, section 4) to authorize the state Department of Transportation to install guiderails that are necessary to maximize safety, rather than requiring the weak post cable system throughout the Adirondacks as is currently required.

## K. Historic Areas

- Add Santanoni, St. Regis and Hurricane Mountain to section on Historic Areas at page 42.

## L. Invasives

- Boat Launching Sites: call on the state DEC to create stations at boat launching sites (or, alternately, at major Adirondack entry points) where boat inspections would be required and washing stations would be provided.
- To ensure the Plan reflects the need to control the introduction of terrestrial invasive species introduced via firewood and other sources, we propose adding a provision in the Wild Forest and Intensive Use sections of the Plan that requires DEC to develop detection and treatment programs for these pests. We further propose that state campgrounds establish inspection stations for carried-in firewood, and that penalties be imposed for importing wood beyond the 50-mile limitation.

- Open and aggressive stance should be taken to control both aquatic and land-based invasive species.
- Inspect at boat launches.
- Plan favors recreational use and access which threatens the forest preserve and private lands by increasing introduction of invasive species.
- Not sure whether provisions for boat inspection and washing stations for the prevention of the spread of aquatic invasive species (AIS) require an amendment of the APSLMP, but would support an amendment, if necessary, to authorize or facilitate the creation of trailered boat inspection and washing stations on major road routes.
- Fully address the impacts of climate change and invasive species on Forest Preserve resources within the Master Plan.

## M. Motorized Uses (general)

- There should be a APSLMP amendment to provide proper benchmarks so that material increase in motorized uses is clearly distinguishable, capped and enforceable. These should be incorporated directly into the Section 814 Regulations.
- Provide a mechanism and process that would allow for currently undefined passive, non-motorized recreational uses to be incorporated into the Master Plan with confidence that changes are consistent with the "Forever Wild" clause (Article XIV) of the NYS Constitution.
- Keep Essex Chain and Hudson River Gorge motor free.

## N. Process

- I want to express my disappointment that the recent public hearings on potential changes to the State Land Master Plan were only held in the Adirondack and Capitol areas, and not downstate (NYC, its suburbs, or Long Island) or in central or western New York. The Adirondack State Park belongs to all New Yorkers, and all of us should have input on changes there.
- Publish ideas from listening sessions.
- APSLMP has a statewide constituency- not limited to 3 meeting sites.

## O. Purpose of APSLMP

### 1. Balance with Economics

- Any meaningful change to the State Land Master Plan must begin with its “unifying theme,” which has been at odds with other key elements of Adirondack Park policy since its inception. We propose that the second paragraph of the State Land Master Plan be

changed to reflect the need for sensible balance as follows: "If there is a unifying theme to the master plan, it is that the protection and preservation of the natural resources of the state lands must be undertaken in sensible balance with the needs of the park's permanent, seasonal and transient populations for growth and service areas, employment, and a strong economic base."

- Update APA policies to promote and facilitate multi-use.
- Policy decisions should be reworked to make the Adirondack region more amenable to the future of the local population and to treat recreationists of all pursuits equally, in accord with considerations that the land can handle with proper ENGINEERING of access. For instance, the design, construction and maintenance of trails should treat various users equally, from snowmobiles to skiers and should add access for four wheelers.
- APSLMP should prohibit DEC from closing down camping areas, closing Town Highways, acquiring private land that it is currently productive forest land, and acquiring any hunting/fishing cabins or clubs.
- APSLMP should require that the state evaluate all historic sites that could be considered or might be demolished be evaluated professionally at the expense of the State of New York, using independent professional consultants. Private citizens should not have to pay for evaluation of the sites to be acquired.
- It is quite possible to generate economic benefit by operating within the confines of the rules intended to preserve the wild character of the park.

## 2. Natural Resource protection paramount

- Natural resource protection must continue to be the guiding principle and "unifying theme" of the APSLMP for management of the Forest Preserve.
- Maintain and strengthen "protection of natural resources is paramount."
- Need stronger not weaker APSLMP.
- Oppose any effort to weaken protection, to allow increased motorized "recreation."
- Do not think the plan is outdated or lacking in any substantial way.
- The APSLMP already has a strong enough bent towards science that to establish ecological integrity as the fundamental driver for policy does not require more than a few additions, new wording and some thoughtful tweaking.
- Current science should guide any revision and implementation of the APSLMP.
- Need indices of ecological change to meet purpose to protect natural resources.
- Enhance and prioritize ecological restoration and wildlife management.

## 3. Other

- APSLMP to specifically advocate for a more consistent educational message regarding the use of the Forest Preserve. The APSLMP should support a park-wide effort modeled on the Adirondack Forest Preserve Education Partnership (AFPEP) initiated by the DEC, Adirondack Mountain Club, and The Wildlife Conservation Society.
- Require true ecosystem management analysis including recognition of the benefits of carnivores including restored wolves, mountain lions and other carnivores - and clear

strategies and actions to support them. APSLMP can be one of the most progressive wildlife management policies in the world by proactively restoring native carnivores (mainly wolves and cougars) and not relying on the federal government to intervene with their own recovery plans.

- Would like to see the APSLMP and any revisions therein to specifically support the community-based trails and lodging concept by:
  - a. Allowing community-based trail development on the Forest Preserve
  - b. Defining the TRP policy to allow for the placement of removeable hut-type lodging (yurts and wall tents, for example) on Wild Forest lands.
  - c. Supporting the concept of connector trails from existing trails to communities (e.g., a Northville-LP Trail spur to the Village of Long Lake)
  - d. Supporting bridge developments for appropriate recreational uses over select rivers and not require that all bridges be made of “natural” materials.

## P. (Re)Classification

- Advocate for the greater integration of the Recreational Opportunity Spectrum (ROS) philosophy *within* these various land classifications, especially Wilderness and Wild Forest.
- Study all Primitive areas for potential reclassification to wilderness.
- Consider a new set of classification definitions, most importantly dividing wilderness into 2 classes to deal with more heavily used areas differently, attract people to lesser used zones and provide for 2 differing approaches to responding to climate change.
  - a.) A new wilderness classification (1w) would be for areas left completely untouched.
  - b.) Another wilderness classification (2w) for areas where only human foot paths are allowed but these may be heavily used and intensively managed.
  - c.) Canoe Area: as currently defined with policies similar to the heavily used wilderness.
  - d.) Treat roads as human use corridors, Within 200 feet (or x feet) of the center line allow space for parking, car camping, clearing for roadside vistas, signage and the like. Allow bike paths. Aim to slowly put utilities underground when possible if they exist. There could be different rules for different classes of roads (State, County, back country, etc).
  - e.) Allow for restoration of historic sites like the fire towers, Santatoni and other historic areas as they arise.
  - f.) Wild Forest Classification would remain. No ATV's would be permitted on Forest Preserve anywhere.
  - g.) Primitive Classification would be eliminated.
  - h.) Lakes would be classified using a similar scheme.
- If plane and gravel pit permits were not renewed, a Wilderness classification for the Essex Chain Lakes would become possible and should not be foreclosed by any APSLMP or UMP amendments.
- Recommend that the APSLMP be updated to succinctly list those primitive areas destined, given the right conditions, to be classified wilderness.
- Primitive should remain “wilderness in waiting.”



- The Canoe classification should be replaced with a new semi-primitive non-motorized category called Backcountry.
- No new “back-country” classification.
- Essex Chain Lakes & Pine Lake Primitive Areas were incorrectly classified as Primitive, if the main focus of its management is to be recreation. To accommodate floatplanes, snowmobiles, canoes, trucks, and mountain bikes, reclassify these areas as Wild Forest. To modify the Primitive guidelines in any way to permit increased opportunities for mechanical access would be to strip a level of distinctiveness from the Primitive classification.
- Consider reclassification to allow bridge over narrower section of Cedar River in current wilderness, to minimize environmental impact.
- A broad open review of our land classification scheme. What models have been used in other parts of the world? Can we learn anything useful from their efforts? We should be open minded about this learning opportunity. For a small effort, we can leverage the learned experience of the rest of the world.
- Reclassify Essex Chain to Wild Forest.
- Remind APA that APA Act requires state lands be classified according “to their capacity to withstand use.”
- APA dropped the ball when classifying the Whitney lands as Wilderness despite network of roads ideal for biking or snowmobiling. Don’t make the same mistake with Essex Chain- -reclassify a snowmobile and bike corridor.
- Wilderness should not be classified next to roads.
- There should be a classification that provides access for persons with limited mobility not just persons with a legal disability.
- Require that the Forest Rangers are fully included in classification determinations. They are the ones who are actually on the ground and able to observe the ways in which management decisions impact the public and the resource; they warrant full inclusion in the process.
- Forest Preserve lands must be restricted to those lands above 3,000 feet elevation. All Forest Preserve lands must be Wild Forest, as required by Article XIV. No other classification is legal, and violates Article XIV. All state owned lands below 3,000 feet elevation must be fully compliant to the Americans with Disabilities Law, and open to all Disabled Veterans, Wounded Warriors, handicapped, and all others less than physically fit. All 250 plus roads, all fire truck roads, log roads, rail-road beds, 2,000 miles of Snowmobile trails, etc. must be reopened immediately, and in condition for wheel-chair and motorized access.
- Should the APSLMP be revised to approve roads and trails on conducive use criteria rather than classification criteria, I am very concerned about maintenance. Roads designated for specific uses such as mountain biking and equine use, but have no occasional administrative motor vehicle use could deteriorate to the point that they are no longer practical for such uses. How will wash outs, and general deterioration be addressed in these areas so the roads will remain usable for mountain biking, saddle riding, and horse drawn wagon access? Some concessions on equipment use in these areas must be made so the roads will remain usable.
- Lows Lake Primitive area should be reclassified as Wilderness.
- Establish criterion to distinguish permanent primitive from transitional primitive.
- Create a lake classification system.

## Q. Scenic Vistas

- Propose that the Travel Corridors section of the State Land Master Plan (Page 48) be updated to allow the restoration and maintenance of these vistas (listed in the State Land Master Plan on page 117-118) by the state Department of Environmental Conservation or Town or Village Highway Departments through the trimming or cutting of vegetative growth that blocks the view from the vistas.
- A provision to allow for reasonable trimming should be included in the APSLMP.
- Maintain vistas along hiking trails as well.
- Special management considerations are particularly needed for scenic vistas, ecologically significant areas and primitive lakes. APA should study and make conservation recommendations for the wildest of our Park's lakes.

## R. Skiing

### 1. Back-country skiing

- Adirondack Park should be a multiple-use recreational area (not just for hikers) with backcountry skiing recognized as an activity appropriate to a wild forest setting, e.g. in Intensive Use areas. If managed appropriately with sensitivity to the ecosystem, it can be a compatible land use.
- Do not have a problem with skiers moving down and dead trees around a bit to avoid hitting them when buried by snow, I do not think the cutting of any live plants can be justified other than to maintain already existing trails. If skiers are not willing to accept the inconvenience of unmaintained glades they should avail themselves of the maintained ones at established commercial ski areas rather than trying to alter the wilderness.
- APSLMP as currently written does address developed alpine (downhill) ski centers and cross country ski centers, and while to some extent, it recognizes cross country skiing on various relatively flat hiking trails in winter, it does not recognize backcountry skiing in the Forest Preserve. Backcountry ski trails may be differentiated from ordinary cross country ski trails by the presence of hills, even steep pitches, where good ski control is required, where properly laid out ski trails are required. This DOES NOT MEAN clear-cutting wide ski trails through the woods--we are not talking about wide-open, alpine-style ski runs. Most importantly, they need to be self-concealing from above and elsewhere; secondly, they ought not require tree-cutting (as defined by a NYS AG in 1930); thirdly, they ought to minimize soil erosion.
- Support the call by the Adirondack Powder Skier Association (APSA) to update the Wilderness and Wild Forest sections of the Plan to allow the creation each winter of low-impact ski touring trails.
- Article XIV was designed to protect timber and water and remedy the despoliation of the Adirondacks in the 19th century by mining and timber harvesting. It was not intended to prevent clearing small trees and witch hobble to facilitate use of the Preserve. The access trail to the Tamarack Glade is almost impassable after a few years of non-use. Please find a way to allow glade skiing and boarding.

- There is already a framework in place for developing, designating and maintaining approach trails (ie. "skin tracks") to provide access to existing backcountry ski zones in the High Peaks. I would advocate for the ability of DEC staff and volunteers to develop and maintain formalized ski trails to some of the more popular slides in the High Peaks, which I believe could be accomplished without amending the High Peaks UMP or the APSLMP. I also support the planning and development of a "demonstration project" on Forest Preserve and/or conservation easements lands that would allow the DEC and other stakeholders to study the environmental, social and other impacts associated with the management and enhancement of "glade skiing" improvements on Mountainous State Lands in the Adirondack Park.
- Approve back country skiing like glade skiing in specific areas, also x-country ski trails. For balance, perhaps some of the less used of our 2300 miles of foot trails could be abandoned.
- Allow volunteer crews to trim brush and branches for ski trails- example is that Wright Peak Ski Trail has not been maintained to a high standard.
- Article 14 allows for selective, supervised and minimal management of vegetative growth, a few hazardous trees and lateral growth so long as it does not occur to a material degree.
- Economic benefits.
- It is not often understood the impact that hikers have on a wilderness area, but there are still many trails for hikers to enjoy the wilderness. What skiers are asking for is the ability to enjoy the woods as well, with less impact.
- Create low-impact ski-touring trails.
- The Essex Chain Lakes region is logical candidate for backcountry ski trail development.
- Expand in High Peaks.
- On the topic of allowing backcountry trails to be cut and used will only increase the potential for inexperienced and experienced injuries that will require evacuation. I see a lot of excitement to cut the trails and maintain them but are these same people going to patrol and assist injured skiers. I am not a proponent for allowing this to happen unless a plan is put forth committing to that effort.
- Do not ban or restrict skiing in the Adirondacks.
- This will also help out the local University with their BA and MA program in Plattsburgh.
- US Forest service has made an amendment to their unit management plan to allow for maintained glades and is working with Dartmouth to monitor how these glades are effecting fauna and flora.
- Some hiking trails are ok for skiing but it is not safe on mountainous terrain to ski a hiking trail, both for the skiers who need a wider trail to make a turn, but also to the hiker/snowshoer who may be in the trail when a skier is coming down.
- Low (or no) impact. Good for towns. Even better for skiers. Powder to the People! The catch—make sure there are no loopholes, and manage this right. As a scientist and someone very concerned about preserving natural lands, I know how sensitive the Adirondacks are. Don't let them lose their Forever Wildness!
- If a legal exception is made to allow cutting of glades for skiers or other violations of current restrictions in the High Peaks Wilderness Area for snow mobile access. Snowmobilers are far more numerous and organized than skiers AND spend a lot more money helping the local economy Allow glades in Wilderness, Primitive and Wild Forest.
- Regulated trails also provide a better alternative to the illegal & unregulated cutting of such terrain currently in practice around the Adirondack region & beyond.
- While there is currently an abundance of very challenging and expert-level backcountry skiing and riding in the Adirondacks, there is a relative lack of terrain suitable for the

learning or average backcountry skier and rider seeking to earn their turns. This amendment could also help to create safer options for skiers and riders who might otherwise venture into terrain and snow conditions that are beyond their abilities.

- Allowing maintenance of specific natural glades (or a "bank of a certain acreage for this purpose) for back-country skiing in Wild Forest areas.
- Allow development of glade skiing on Wild Forest but not Wilderness.
- Leave the wilderness alone! Back country skiers have plenty of challenging places to ski if they look for them. This is the thin end of the wedge. Before you know it, the snowmobilers will want their trails, too, and the mountains will no longer be wild. Designated wilderness is meaningless when later on, agencies bow to pressure from special groups. I am a hiker and XC skier who is about to start skiing back country.
- Glade skiing is appropriate in Wilderness- less intrusive than hiking or canoeing.
- Glades will provide a better experience for backcountry skiers and open geotourism opportunities.
- Supports the Adirondack Park Agency and the NYS-DEC collaborating with stakeholder groups to evaluate and implement highly limited ski trail vegetation management in high mountain terrain based on proper environmental review under the normal UMP planning process or amendments. Supports backcountry skiing in a way that does not cause undue harm to the Forest Preserve. Further recognize that there is a need for additional opportunities to meet the growing interest and practice of backcountry skiing in the public-at-large. (Doesn't support the APSA proposal of October 1, 2014)
- The word "glade" cannot be applied in the same way here, and probably shouldn't even be used in the discussion. Backcountry skiing is all about being with nature, not against it.
- There is already a lot of illegal cutting of glades in the Adirondacks and unless a legal means is granted it will only get worse like in Vermont where there is a great deal of illegal trimming.
- Glades have less impact than trails.
- It would be difficult to refute their argument for increased access. There are plenty of current venues for snowmobilers AND plenty of opportunity in the northeast for skiing cleared glades.
- Believe existing ski trails should be properly maintained, but I see no need for improvements to make them easier to ski than they are now. Their difficulty is in keeping with the special character of Adirondack backcountry skiing. Additional ski trails would be nice, so long as they don't introduce unintended degradation of the wilderness experience, especially in designated Wilderness Areas. In my opinion, 'wilderness skiing' should not include mechanical enhancements like grooming. Regarding the creation of gladed runs and skier access trails to steeper terrain, I have grave concerns about how these proposed improvements for skiing might be implemented. Any such improvements must be done in full accordance with the spirit of the state constitution's guidelines for preserving the Adirondack forest. I'm particularly concerned about possible human disturbance of first growth or so-called 'virgin forest' or 'old growth' tracts. Wouldn't it make sense to limit the creation of gladed runs and ski trails to Wild Forest areas, where recreational uses are accepted as being more important?
- Backcountry skiing is rapidly growing in popularity. I work in retail and it has seen a 40 % rise in sales since 2012. We need more plowed parking areas, ski maps, avalanche reports and trail work to attract more skiers.

## 2. Grooming

- Do not allow grooming of cross-country ski trails in Wild Forest areas.
- Propose that grooming of cross-country ski trails also be allowed in Wild Forest areas.
- Some trails should allow groomers, but not all.
- Opposes any proposal for amendment of the APSLMP to permit mechanized grooming of hiking and cross country ski trails. Concerned that such a proposal might result in efforts to expand the widths of the ski trails so a motorized groomer could track set for both Nordic and skating ski techniques.

## S. Snowmobiles

- Propose changing the language in the definitions (on Page 18) and throughout so that the updated Plan defines snowmobile trails as having essentially the same character as a horse trail, not a foot trail.
- On Page 32, in the Wild Forest section, propose updating Section 4 under basic guidelines to reflect the recent agreements on snowmobiles (noted above) as well as the current mileage of snowmobile trails, which has been updated since 1972.
- On Page 33, in conjunction with the definition addition above, propose adding language that clarifies that administrative personnel referenced in the section that describes appropriate use of motor vehicles that personnel who are allowed to use motorized vehicles include municipal employees and members of snowmobile clubs authorized by DEC to groom snowmobile trails.
- Opposes any proposed amendment of the APSLMP to provide that *snowmobile trails shall have the character of snowmobile trails*.
- Opposes any amendment to the mileage cap for snowmobile trails.
- Snowmobiles should never have been allowed on "Forever Wild" Forest Preserve lands, and the environmental community was asleep at the wheel when they were first allowed by DEC and APA.
- Revise and update the current Snowmobile Management Guidelines to codify within the Master
- Plan clear and protective guidelines on snowmobile trails.
- The restriction on snowmobile trails in Wild Forest areas should be modified so that any of these trails within one mile of a paved state or county highway can be a bit smoother and wider and no longer need to have "essentially the same character as a foot trail."
- Snowmobile trail definition should be changed to have the same character of a horse trail instead of a foot trail.
- Do not change definition of snowmobile trail.
- Want snowmobiling in Essex Chain.
- Snowmobiling in Essex Chain may have a deleterious effect on economy as increased noise, air and water pollution discourages other visitors.
- The APSLMP should ban the practice of building community connector snowmobile trails in the heart of wild areas such as the one constructed through the Moose River plains

wild forest and the one proposed through the Essex chain. These snowmobile trails do not meet the "character of a foot trail" requirement. They are essentially roads that are being constructed illegally with the removal of hundreds of trees. This practice should be halted immediately.

- Snowmobiles should not be allowed on W or WF lands.
- Increase the snowmobile mileage cap to reflect increased public lands acquired.
- Give up more snowmobile trails.
- Trail construction and grooming should reflect changes in snowmobile design.
- Define administrative personnel to include municipal employees and snowmobile club members for purposes of grooming snowmobile trails and using motorized equipment.
- Update mileage of snowmobile trails.
- Not happy that snowmobiles have to pay registration to maintain trails while others do not.
- Using current Geographic Information System mapping and data, analyze and update the inventory of all snowmobile trails and roads found on the Forest Preserve.
- Incorporate recent agreements on snowmobile trails into Wild Forest Guidelines, Section 4.
- Would love to ride NY trails but the trails in our opinion are POORLY groomed.
- As tens of thousands of acres have been added to the Forest Preserve through outright fee title acquisition or conservation easements, the snowmobile mileage cap of 800 + or - miles has remained the same. There needs to be a correlation which should be retroactive.
- Please listen to what the nyssa has to say about what should be done with the plans for trails. Rip up the tracks from beaver north. A linear Adirondack trail would benefit everyone.
- Snowmobiles out of all the recreational machines do not leave a foot print in our forests, if we use these trails with adequate snow cover. Dates have to be established to open and close the snowmobile season, when the snow is either adequate for riding or not. This will eliminate the ground cover from being damaged due to skis or tracks coming into contact with the bare ground.
- Businesses will benefit and the plagued economy of New York's North Country will benefit if riding and new trails are allowed in our forests.
- New standard for snowmobile trail construction should be created. Trees should be allowed to be cut and soils moved around. Earthmoving equipment should be allowed in the construction of snowmobile trails, particularly those that are main community connector trails.
- Need wider SM trail from Indian Lake towards Blue Mountain Lake.
- Do not support snowmobile bridges in wild forests.
- Limit snowmobiles and ATVs on existing trails- no more trails needed.
- How can snowmobiles be more intrusive than the float planes that are allowed on to land on First and Pine Lakes?
- Snowmobiling is an \$868 million business in NYS. Economic opportunity will never be realized under current definition of snowmobile trail in APSLMP. The requirement that snowmobile trails have the "character of a foot path" does not serve Adirondack economy. Seventh Lake Mountain Trail is too winding, requiring slow speeds and advanced skill and is unattractive alternative to "running the lakes or taking more enjoyable alternative routes." Character of the trail should be dictated by the surrounding forest and trail opportunities inherent in the land, able to support reasonable speeds and with the average snowmobiler's ability in mind.

- Need wider paths, deeper snow pack and wider turns.
- The APSLMP at the very least needs to back off of the illegal use of tracked groomers, slow the machines to a walking pace and so dial the decibels and exhaust down, and prepare for even shorter, milder winters in the near future.

## T. Trail Guidance

- A second recommendation would be for the inclusion of maximum total trail miles, of all recreation types, ski, hiking, mtn biking, etc. per area permitted in any Management area.
- Multi-use trails of some kinds are certainly banned by the APSLMP. On page 33 of the APSLMP, #5.
- Currently, the APSLMP has no definition for “multi-use” trails and this concept should be abandoned.
- Forcing our “forever wild lands” to submit to excavators and grading; ATVs dragging treated lumber for miles; rock removal; tree and sapling cutting (and preventing regrowth forever—saplings are baby trees) by the thousands; “bench cutting” for the groomers; overbuilt, ugly, smelly bridges—all of this activity occurring this fall on the Stony Pond trail which would be part of the Minerva to Newcomb route—is oxymoronic.

## U. Travel Corridors

- Remove the rails.
- Propose amending the Travel Corridors section of the State Land Master Plan (starting on page 46) to allow for establishment of a Business Directional Sign program.
- Do not support the stance regarding the trail issue (removing the tracks) and believe that there are enough trails in that area of the Adirondacks to keep and maintain a viable snowmobile tourism industry.
- Build bike trail along side of RR.
- Allow guiderails necessary to maximize safety rather than weak post cable design or self-oxidizing rails.
- Retain status of Remsen-Lake Placid Travel Corridor as a unit regardless of existence of rails.
- Remsen-Lake Placid Travel Corridor is listed on historical register and is integral to history of communities. APA must protect integrity of the corridor and protect potential of corridor to serve as an energy efficient and cost effective transportation option.
- Support restoring the Adirondack Railway so that it will run from Utica to Lake Placid, known as the "Remsen/Lake Placid Travel Corridor".
- Update the description to clearly reflect the recreational theme of the management of the Rem-LP if the rail option fails to materialize.



## V. Unit Management Plans (UMP's)

- On Page 11, at the end of the Unit Management Plan section, we propose adding a list of UMP's adopted to date and those remaining to be adopted with target dates updated from the 1989/90 target date currently referenced in the section.
- Multiple suggestions specific to Essex Chain Lakes UMP which the people thought were APSLMP issues.
- The Town of Wilmington would like to offer support for an Amendment to the State Land Master Plan to allow additional development of recreational facilities at State owned "Intensive Use" areas. Namely Whiteface Mountain, times and recreational opportunities are constantly changing, as the process stands now a costly and exhaustive UMP Amendment must be created for each recreational purpose.
- In some areas, *make wildlife the prime attraction*. This would mean banning dogs, horses and other kept animals. No hunting would be allowed. Catch and release fishing, already in place in some parts, would be the rule in these 'wildlife zones'. Wildlife viewing spots could be sited.
- Make sure Up-to-date UMP Progress and Outcome reporting is done.
- UMP's will contain - contend the Agency needs to develop rule and regulations for such compliance under Section 816 of the APA Act.
- In light of the state's failure to complete UMP's, see little value in retaining the guideline that UMP's be revised every five years. Suggest that the APA consider a change to 10 years.
- APSLMP oversight of Recreational Management Plans (RMP's).

### 1. Regional planning

- Consolidate UMP's.
- APA and DEC need to extend multi-use trails that connect communities.
- Regional management planning: The state should consider replacing unit management planning requirements with regional management planning.
- Migrate the whole planning system to large landscape concepts. Differences between front and back country should be taken into account.
- Consolidate unit boundaries.
- Include language in the APSLMP that acknowledges the Adirondack Park as part of a network of connected lands – The Adirondack Park is a critical component of a network connected lands for species moving between other large forested areas (i.e. Tug Hill Plateau, Algonquin Park in Ontario, the Green Mountains in Vermont). We recommend that this asset be recognized in the planning and implementation of the APSLMP.
- 'Complex Planning' should be incorporated in an updated APSLMP. Incorporate ecosystem-base and adaptive management into the APSLMP.
- Formally define and incorporate "Complex Planning" for large landscape-scale management into the Master Plan, transitioning from 100 plus individual Unit Management Plans to a consolidated "Wildlands Complex" planning approach.
- Conservation of the region's biological diversity will require: Restoration of soils and waters degraded by decades of acid rain.
- Protection of large 'core wild areas' with functioning ecosystems that contain representative communities of native fauna and flora;

- Habitat 'connectivity', or natural corridors (e.g., free-flowing rivers, migratory pathways, etc.) among the wild cores;
- Habitat 'permeability' as nature intersects with suburban and exurban built landscapes;
- Mitigation of invasive insects and plants using a variety of approaches, including active removal efforts, forest management, and biological control agents, among others.

## W. Zoning- Spot zoning and linear corridors

- Misapplication of APSLMP Spot and Linear Corridor Classification Zoning It degrades the concept of Wilderness as well as Canoe Area status and should be retracted. We recommend that the APSLMP be amended to make this completely clear, to add to the current definition as follows: "and that are of a scale, character and location appropriate for designation as an historic area, and that are not located in Wilderness, Primitive or Canoe areas and the state has committed resources to manage such areas primarily for historic objectives."
- Sporting access and traditions need to be accommodated. Wild forest corridors in Wilderness and Primitive areas that provide access to hunting areas and lakes and streams for fishing and trapping are a reasonable approach and should be incorporated into APSLMP language.
- Prohibit spot-zoning around non-conforming uses. The recent classification of two Historic Areas to protect non-conforming structures that were identified within the Master Plan for removal did bring the structures into compliance with the Master Plan, but not as originally intended. This "back door" approach to compliance should be rare. The issues which lead to this should be expressly addressed within a comprehensive analysis of current non-conforming uses that still exist on the Forest Preserve and re-evaluation of their status, schedule for removal, and update of definitions.
- Requiring minimal size and configuration of classifications – The purpose of such a change in the APSLMP would be to expressly prevent the creation of corridors through lands classified differently (E.g., the Wild Forest Corridor running between the Essex Chain Lakes Primitive Area and the Hudson Gorge Wilderness). Creating such corridors represents an attempt at micro classification and results in a functional downgrading of the lands surrounding them. It also creates a near impossible-to-manage, let alone explain situation for the NYS Forest Rangers.
- The APSLMP should be modified to eliminate the practice of gerrymandering the forest preserve to allow non-conforming structures in primitive and wilderness areas such as the fire towers on Mt Adams, Hurricane Mt, and St Regis Mt.

## X. Other

- Propose that the State Land Master plan be updated to include current land ownership apportionment in the Park (which can be found in the 2014 Adirondack Park Regional Assessment), and that the Plan should be automatically updated with each new state purchase (in fee or easement) to ensure that the reality of the current situation in the Adirondacks always be reflected.

- On Pages 5-6, propose that the language in the Plan that discusses New York Constitutional amendments that refer to the Adirondacks include the latest New York Constitutional Amendments approved in 2013 on the Township 40 Settlement (Proposition 4) and the Adirondack Land Swap (Proposition 5).
- On Page 7, in the section titled “Acquisition Policy Recommendations,” propose that the Plan include a list of forestlands that were generally agreed to be productive forestlands that the state has acquired since the adoption of the APSLMP in 1972.
- On Page 15, propose a constitutional amendment be proposed – which is suggested in the APSLMP but was never followed through – to classify the state administrative areas, highways, utilities and historic use areas in the Adirondacks as non-forest land uses beyond any question, and further, as is also suggested in the Plan, developing a modest “land bank” that would permit future acquisitions of economically developable land.
- On Page 123, in Appendix II, propose bringing the list of state-held conservation easements up to date, including acreage, and adding the year that each easement was purchased by the state.
- John Brook Lodge from the Garden trailhead, prior to reaching the outpost on the left hand side of the trail may have a campfire and is not required to have a bear canister, while 300 ft away on the other side and within the Eastern High Peaks, s/he may not have a campfire and must have a canister. Conveying such a management scheme to recreational users is a challenge at best.
- Part 585 in the APA Rules and Regulations should be completed to promulgate official rules for the administration of the APSLMP. This section has been blank for decades.
- Update description of constitutional amendments to include reference to Township 40 and Lot 8.
- Permit process (for private land) is too cumbersome.
- Inventory Forest Preserve roads.
- Limit hiker (over)use by preventing illegal parking on Route 73 and Adirondack Loj Road.
- Connect and *expand* Wilderness Areas.
- Support the state’s commitment to the protection of the Hudson Gorge Wilderness and Essex Chain of Lakes Primitive Areas as motor-free.
- Support the master plan and would like to see some more oversight over the logging around paradox creek and surrounding areas.
- Work with DEC and others to promote the tradition of the outdoors.
- Get kids into the mountains.
- Staff members who work at the APA and DEC are forced to base there decisions and findings on antiquated regulation. When they try to use common sense in a determination, they are mowed down by lawsuits and badgered. Addressing the APSLMP to incorporate today's needs and technologies would give new energy and hope to these employees/staff members.
- Bridge over Cedar needs to be 12 feet wide.
- APA members and DEC require annual training on APSLMP implementation and interpretation.
- Most primitive lakes need special management area guidelines and protection management.
- APSLMP speaks to limiting motorized uses and not expanding beyond those existing in 1972- this is not being honored.
- Amend the signage policies.

- (Carrying Capacity) The notion that dispersing impact somehow reduces impact, and is therefore clearly desirable, has been suggested by some people. I would suggest that a reduction in impact happens only with a reduction in use, not simply by changing where that use happens. It is fair to say that the nature of impact may change when its location changes but spreading the same amount of use over a wider area does not, in any way, reduce the amount of that use. My problem with this kind of approach is that it employs the "out of sight, out of mind" type of thinking that ultimately proves to be shortsighted.
- Jurisdictional Boundaries need to be re-visited especially where parcels were grouped together because of one owner. The Snowmobile Trail from Utica to Lake Placid should be adjacent to the railroad corridor. It is a perfect path through the Adirondacks and would be a service to all communities. You need Two Satellite Offices for the APA; One located in Old Forge and one located in Lake George. It would make sense to have local people in those offices help to make local decisions. The people in these offices would have a better understanding of the land in these areas. They would be able to help people with questions and help with filling out the lengthy permit process. Ray Brook is a long way for many people to travel. I am suggesting a small office in each and maybe relocate present personnel from Ray Brook. Re-visit all the restrictions that keep the Adirondacks from being in touch with the "times". The restrictions that have discouraged economic and recreational opportunities that make it very hard for our young people to stay here and make a living.
- Refine and amend the APSLMP "Land Exchange" (pg. 8) to enable the Forest Preserve to 'flex in and flex out' on a very limited basis to accommodate adaptations which will be needed in human communities within the Adirondacks as the effects of climate change increase.
- Plan fails to address impact to climate change through carbon accounting and sequestration.
- Use Gooley Club (Inner) as Interior Ranger station. Moving rangers off the land has led to deterioration of trails. Third Lake can be a wind tunnel and dangerous to paddlers.
- Keep Polaris Bridge as a footbridge.
- State Land Master Plan should undertake a study and public policy process to identify, set new policies according to the need, threats and impacts to safeguard trail-less wild lands and motor-free lakes and river corridors for optimal conservation and preservation.
- Propose similar recognition of environmental justice be included by the APA in the process and documentation to review and amend the APSLMP, particularly reflecting the needs for involvement from the entire spectrum of New Yorkers. However we urge the APA to go beyond the wording found in the Open Space Conservation Plan (OSCP), to include all classes of discriminated groups and to address equal access.
- Rules and Regulations: The APA has steadfastly refused to draft official Rules and Regulations for the APSLMP. The APA Rules & Regulations currently has a blank section 585 reserved for rules for the APSLMP. This has led to numerous management failures with differences in interpretation between state agencies or differences in interpretation over time by various administrations of the APA. The APA and DEC have sought to fill the void created by the blank page in the APA official rules and regulations by drafting numerous policies, management guidance and a memorandum of understanding. Management of the Forest Preserve, and administration of the APSLMP, would be vastly improved by promulgation and codification of official rules and regulations. The APA should set out to draft these rules.
- Capping the mileage and area impacted by trails in all classifications – In our observation, the balance of consideration in terms of resource protection vs recreational access has overwhelmingly favored recreation via the creation of new trails of all types

in recent years. For reasons stated above, we know these trails and their associated activities are not without impact. The continual addition of new trails will result in an accumulation of impacts over time unless an equivalent mileage of alternate trails are abandoned and restored each time a new trail is constructed.

- Cutting restrictions are preventing alternative energy solutions.

## Y. Constitutional or Legislative Issues

### 1. Land Acquisition

- Include list of productive forestlands acquired by the state in Acquisition Policy Recommendations.
- Sell (or give to the Town) small parcels of state land suitable for small tourist businesses, such as a lodge or marina.
- APSLMP provides: bulk acreage purchases in fee shall not be made where highly productive forest land is involved, unless such land is threatened with development that would curtail its use for forestry purposes or its value for the preservation of open space or of wildlife habitat.
- The state should not be investing in more land, regardless if it is in fee or easement, if they don't have the manpower and resources to take care of it.
- Checkerboard pattern of acquisition of forest lands for forest preserve has placed a significant portion of private lands within the "highest priority" for acquisition in the APSLMP, because private land in the checkerboard "could adversely affect the integrity of vital tracts of state land." Modify the acquisition priority. Restrict acquisitions to lands under imminent threat of conversion.
- If the State acquires resource management lands, they should be managed as resource management lands. This is a very important industry, both economically and environmentally.
- Third party (TNC) circumvents acquisition policy in APSLMP.
- Acquisition Policy Recommendations: The Acquisition Policy Recommendations section is out of date given state laws for the Environmental Protection Fund and the NYS Open Space Conservation Plan. The focus of the APSLMP should be on preservation, protection and management of the Forest Preserve and not land acquisition.

### 2. Land Banks

- Allow maintenance of specific scenic vistas (or a "bank" of certain acreage for this purpose) in Wild Forest areas.
- Allow maintenance of specific natural glades (or a "bank of certain acreage for this purpose) for back-country skiing in Wild Forest areas.
- Allow a bank of certain acreage of Forest Preserve land for local community infrastructure needs.
- Support a land bank exchange promoted by Common Ground Alliance to allow for underground infrastructure in forest preserve.

- Enact a constitutional amendment for existing state administrative areas, highways, utilities and historic use areas and develop a land bank for economically developable land.
- Land Exchange: The APSLMP recommends the creation of a land bank after the Constitutional Amendment to create a land bank for the Department of Transportation for highway maintenance in the Adirondack Park. This type of recommended action for the Forest Preserve is beyond the scope of the APSLMP and this chapter should be deleted.

### **3. Miscellaneous**

- The ban on fracking in NY must be upheld in order to keep your water pure.
- Consider elimination of article 14 in the constitution.