

**TESTIMONY of DANIEL R. PLUMLEY
Association for the Protection of the Adirondacks**

**NYS-DEC HEARING ON THE DRAFT RAQUETTE-BOREAL UNIT
MANAGEMENT PLAN
Colton Central School
Colton, New York
September 28, 2006**

Good evening. My name is Dan Plumley and I am from Keene in the High Peaks region of the Adirondacks and I represent the Association for the Protection of the Adirondacks. The Association was founded in 1901, has some 3,000 members across NY State with many landowners and full time residents within the park and is a non-profit organization dedicated to the protection of the Adirondack Park and the Forest Preserve.

We applaud the Department of Environmental Conservation for its efforts in completing the draft unit management plan (UMP) for the Raquette – Boreal units and we recognize the significant complexities surrounding these important primitive, wild forest and easement landscapes. Key to the recognition of that complexity is that the area will likely pose significant challenges to the department in management.

The DEC has their work cut out for them, and all of us here tonight – regardless of where we stand on the matter of motorized access or the proper use of the Forest Preserve – need to be united in our call to the Governor and the NY State Legislature to sufficiently fund the Department so that it can adequately manage and monitor this and other vital state land units. While I can't speak to Region 6, I understand that Region 5 of the DEC has lost as many as 50 staff positions during the Pataki Administration's tenure and we all have to recognize that our state lands can not be adequately managed, monitored or protected under such dire circumstances.

These lands of low-elevation boreal forests represent the very heart of one of our truly rarest and most sensitive natural resource ecosystems in New York State and the Northeast, in particular. These boreal river systems like the Jordan River, the boggy wetlands and spruce and fir forests include ecological features and rare species of regional as well as global significance, thus the protection of their biological significance ought to be one of our most critical considerations in this unit management planning effort.

Unfortunately, while the UMP expounds across several pages and no less than 16 different reviewed options for motorized use possibilities across the unit, it fails to give adequate emphasis on the Department's imperative to design a protective management strategy for the rare and endangered low elevation boreal resource.

We believe the DEC must turn this UMP on its head and invert their pyramid of priorities placing protection of the unique and threatened ecological integrity of these state land

units as first and primary to their mandated mission under the State Constitution and the ECL (Environmental Conservation Law).

As such, the Association believes it is paramount for the DEC to strengthen the UMP specifically to insure the primary goal of protecting the primitive area and wild forest's natural resources, especially the low elevation boreal systems – indeed without fail those lands east of Carry Falls Reservoir and the unique and wild Jordan River corridor from motorized uses and impacts that would degrade them or diminish them to the detriment of future generations of New Yorkers.

As to the oft-reported economic benefit of snowmobile and ATV rider's interests that some feel should hold sway in the management of this unit, I would urge equal recognition for the return from preserving truly unique, and wild natural systems. We have only to look down the road this year at the tremendous public and economic interest in the newly established Wild Center in Tupper Lake, as an example, where between 800 to 1600 visitors per day demonstrated an unparalleled interest – economically, culturally and environmentally, in our Adirondack natural resources and native wildness.

Where Tupper Lake's Wild Center benefits from one oxbow turn in the Raquette River, the Towns of Colton and Piercefield especially have the extensive central core and heart of the boreal ecosystem, its primitive wilderness and many miles of the wild Raquette and Jordan Rivers to build on.

It is the DEC's obligation, the local communities benefit and our responsibility as New York citizens to make the most of the Raquette – Boreal's truly wild and unique opportunity. To manage it for its wildness and its ecological integrity so that its natural systems, not its management alone, demonstrate its truly rich and greatest natural complexity and values.

I submit tonight our prior testimony on this important area's classification as well as our Association's perspective on "no material increase" in roads and snowmobile trail mileage as part of our official comments.

The Association will be providing more formal, detail comments on the entirety of the Raquette – Boreal unit management plan in advance of the Department's deadline.

Thank you for the opportunity to comment.