



January 26, 2016

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Hon. Andrew Cuomo
Governor
Executive Chamber
State Capitol
Albany, NY 12224

Hon. Basil Seggos
Acting Commissioner
NYS Department of Environmental Conservation
325 Broadway
Albany, NY 12233

RE: State Must Seize Major Opportunity to Expand Wilderness in the Adirondack Forest Preserve, while Accommodating a Range of Recreational Uses and Complying with State Law

Dear Governor Cuomo and Acting-Commissioner Seggos,

Protect the Adirondacks has released a proposal to expand Wilderness areas in the Adirondack Park by over 36,500 acres. This includes Wilderness classification for much of The Nature Conservancy/former Finch, Pruyn and Company lands that border the High Peaks Wilderness and the creation of a new West Stony Creek Wilderness area in the southern Adirondacks. This would be the biggest expansion of Wilderness in the Adirondacks since 2000 when Governor Pataki acted to classify over 41,000 acres of new Wilderness by creating the 20,000-acre William C. Whitney Wilderness area, which included upgrading the 7,500-acre Lake Lila Primitive Area to Wilderness, and expansion of both the Five Ponds Wilderness and Pepperbox Wilderness areas by over 21,000 acres.

PROTECT's proposal provides Wilderness classification and protection for the most important natural resource areas on these lands. It also aims to facilitate motorized access desired by area local governments and snowmobiling interests by designating key roads for public motor vehicle and snowmobile use. PROTECT is making a good faith effort to provide a workable and realistic classification and management program that complies with State law and meets the objectives of many different and often conflicting interests.

Protect the Adirondacks

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We encourage the Cuomo Administration to take a hard look at this proposal because it meets many of the objectives of various competing interests across the Adirondack Park.

It's also important to realize as you consider the classification of new Forest Preserve lands that across the 2.6 million acre Adirondack Forest Preserve, there are nearly 100,000 acres more Wild Forest lands, where motor vehicle use is allowed, than Wilderness lands, where motorized uses are prohibited.

The MacIntyre Tracts in the Town of Newcomb: 11,400 Acres Recommended for Wilderness and 1,700 Acres for Wild Forest

Last year, the State purchased the 5,800-acre MacIntyre West tract from The Nature Conservancy, which includes the flanks of Santanoni Mountain. PROTECT's classification proposal also includes a smaller 1,100-acre tract purchased by the State previously from Open Space Institute. Both tracts should be classified as Wilderness and added to the High Peaks Wilderness. There is very little controversy about this. These lands are largely high elevation and are not sought as places for motorized access. These lands will improve public access and consolidate a large wild area.

Also last year, the State purchased the 6,200-acre MacIntyre East tract. This tract includes seven miles of the beautiful and winding Opalescent River and five miles of the Hudson River. This tract is more complicated due to neighboring conservation easement lands and the Sanford Lake Railroad. PROTECT's proposal calls for Wilderness classification of 4,500 acres in the north, using the Opalescent River and LeClair Brook as the Wilderness boundaries. We call for 1,700 acres along the Hudson River to be classified as Wild Forest. On this tract, the Hudson River runs between the railroad and the Tahawus Road and is not practical for Wilderness classification. This purchase has provided terrific new public access for paddling on both the Opalescent and Hudson Rivers and greatly improved access to some of the High Peaks.

While we recognize that some local government leaders have called for the entirety of the MacIntyre lands to be classified as Wild Forest, we do not think this is appropriate for these lands. The areas we have specified for Wilderness are either high elevation or contain important natural resources, like wild rivers, and have no "non-conforming features" that prevent Wilderness classification. On the other hand, the lands along the Hudson River are clearly appropriate for Wild Forest classification. These lands are bordered by a major road and crisscrossed with a railroad.

Please see a map attached that details the recommendations for the MacIntyre tracts.

The Boreas Ponds Tract in the Town of North Hudson: 13,000 Acres Recommended for Wilderness and 8,500 Acres for Wild Forest

The State of New York will shortly complete its purchase of the 21,500-acre Boreas Ponds

tract in the Town of North Hudson, Essex County. This purchase creates a marvelous opportunity to create a new motorless camping and canoeing location, expand the High Peaks Wilderness, and provide public motorized access to a 12-mile-long Gulf Brook Road. Please see a map attached that shows these recommendations.

Classify the Boreas Ponds Wilderness: The Boreas Ponds tract has ranked near the top on the State's acquisition lists for decades. This tract includes the two Boreas Ponds, the dammed LeBiere Flow area, a corporate retreat compound, and other smaller ponds. This tract has more than 50 miles of dirt roads with the Gulf Brook Road being the main artery that runs east-west through the southern section of the tract and runs all the way to the Blue Ridge Road. These lands border the High Peaks Wilderness to the north and west and Wild Forest in the south. A large section also borders the Blue Ridge Road. The tract also borders the Elk Lake Reserve on the east, which is protected by conservation easement. The Elk Lake Reserve generously donated the Casey Brook tract to the State as part of its easement deal, and this tract is the land bridge that allows the High Peaks and Dix Mountain Wilderness areas to be combined.

PROTECT's position is that 13,000 acres around the Boreas Ponds should be classified as Wilderness and added to the High Peaks Wilderness. Boreas Ponds Wilderness lands will create a stunning new motorless canoeing opportunity. There are not many of these opportunities in the Adirondacks where one can escape for days and paddle deep into a wild area. These opportunities are rare today across New York or the Northeast USA. The sad reality in the Adirondacks is that there are relatively few motorless camping opportunities on a big lake or river. A Wilderness classification for the Boreas Ponds will create a new Wilderness experience that will be available to New Yorkers as a place they can count on for wild times visit after visit, year after year, decade after decade, generation after generation.

Retain and Open the Gulf Brook Road for Public Motor Vehicle Use and as a Snowmobile Trail: PROTECT supports classification of 8,300 acres along the Gulf Brook Road and the Blue Ridge Highway as Wild Forest. We have chosen to set the Wilderness boundary at the Gulf Brook Road for three reasons.

First, we envision a Lake Lila style access to the Boreas Ponds that starts at the LeBiere Flow and we support public motor vehicle use to a point within a close carry to a canoe launch on the Flow. PROTECT has long taken the position that public motor vehicle roads should be in Wild Forest areas where state law allows various motor vehicle use on the Forest Preserve.

Second, we're realists and know that the Adirondack Park Agency (APA) and Department of Environmental Conservation (DEC) are working to route a new community connector snowmobile trail from Newcomb/Minerva to North Hudson. Whereas there are conservation easement lands that could be utilized at the North Hudson end of this trail, the Newcomb end needs to cut through trailless Wild Forest areas or possibly even through the north end of the Hoffman Notch Wilderness. It would be far better for the Forest Preserve to route this major snowmobile trail largely along the Gulf Brook Road. The Gulf Brook Road provides the best

east-west route for a snowmobile trail at the least cost to the State and with the least impact to the Forest Preserve.

PROTECT seeks to mitigate the overall environmental impact by limiting the amount of tree cutting on the Forest Preserve. If the Gulf Brook Road is not used as a snowmobile trail, a Newcomb-to-North Hudson snowmobile trail will require cutting of many miles of new trails and cutting of thousands, if not tens of thousands, of trees. Class II community connector snowmobile trails are 9-12 feet wide and require extensive tree cutting, grading and leveling with heavy machinery and extensive bridge construction. It makes far more sense to utilize an existing road rather than built a new road-like snowmobile trail.

Third, we do not see the wisdom of classifying the Gulf Brook Road as a Primitive corridor. Primitive areas do not allow public motor vehicle use. Primitive areas are supposed to be managed as Wilderness areas and are not supposed to allow recreational uses prohibited in Wilderness areas. We think a Wild Forest classification is legal and appropriate. We support full access for the public to the Boreas Ponds. We want to ensure that the public will be able to drive within a short portage of LeBiere Flow and the Boreas Ponds, but believe this is best accomplished by classifying the Gulf Brook Road as Wild Forest and not as a Primitive corridor, which creates a major policy gerrymander.

The APA and DEC are currently seeking major changes to Primitive areas to allow bicycle use and maintenance with motor vehicles by the DEC. This is what a slippery slope looks like. The APA is expected to act in March to amend management of Primitive areas in the Adirondack Park State Land Master Plan, and it's highly likely that these changes will be made for all 39,000 acres of Primitive areas. Once DEC maintenance with motor vehicles is allowed, then it's a short slide downslope to public motor vehicle use in Primitive areas. Primitive lands are supposed to be managed as Wilderness, but we're all watching the transformation of 39,000 acres of Forest Preserve managed for the last 40 years as essentially Wilderness to Forest Preserve managed essentially as motorized Wild Forest.

We do not see the maintenance of the LeBiere Flow dam and the Boreas Ponds dam as a major issue. If the State wants to maintain these dams and incur those costs, we won't object. The LeBiere Flow dam needs work now. We have noted that three other dams in the High Peaks Wilderness area have all been allowed to breach in recent years: at Duck Hole, Flowed Lands, and Marcy Dam. The dams are irrelevant to protection of the important Boreas Ponds Brook Trout fishery.

Remove the Boreas Lodge and Reforest the Site: PROTECT calls for the removal of the Boreas Lodge. This compound has no historic, architectural or cultural value and detracts from what will evolve into a wild Boreas Ponds experience. The retreat and associated buildings should be removed and the grounds restored. Given the remote location and the vast costs for road, grounds and building maintenance there is no practical, viable use for these buildings.

Creation of a new West Stony Creek Wilderness Area: 12,000 Acres Recommended for Wilderness and 5,500 Acres in Wild Forest

The State also purchased another 8,500 acres of former Finch, Pruyn and Company lands from The Nature Conservancy two years ago. These are scattered mostly in small tracts across the lower half of the Adirondack Park. PROTECT has called for classification of 3,000 acres of newly purchased lands in the mountains above Northville as Wilderness and for reclassification of a trailless 9,000-acre tract in the Shaker Mountain Wild Forest area as Wilderness to create a new 12,000-acre West Stony Creek Wilderness area.

The Shaker Mountain Unit Management Plan describes the Wilderness atmosphere and characteristics of the trailless tract that surrounds the West Stony Creek river valley. The dominant recreational use is the new re-route of the Northville-Placid Trail (NPT). It will be a significant boost to the allure of the NPT to pass in its early stage through a new Wilderness area.

PROTECT supports classifications of the other 5,500 acres of scattered tracts as Wild Forest. Please see a map attached that details this proposal.

Conclusion: Stakeholders Attain Top Recreational and Natural Resource Protection Objectives and Comply with Existing State Law

PROTECT's proposal seeks to protect the most important natural resources on the lands in question, providing various interests with their most important objectives whether more Wilderness or a snowmobile trail, fully complies with existing laws without creating bad long-term precedents from bent and twisted laws or spot zoning. Here are the important components for a workable framework:

1. Classification of 13,000 acres around the Boreas Ponds as Wilderness and incorporation of these lands into the High Peaks Wilderness.
2. Classification of over 11,000 acres in the MacIntyre East and West tracts as Wilderness and incorporation of these lands into the High Peaks Wilderness.
3. Classification of 1,700 acres along the Hudson River where it parallels the Tahawus Road and Sanford Lake Railroad as Wild Forest.
4. Classification of the Gulf Brook Road as Wild Forest to provide Lake Lila-style public access to the Boreas Ponds, where the public can drive within a short portage of a canoe launch.
5. Classification of the Gulf Brook Road as Wild Forest to provide for its use as a vital link in a new snowmobile trail that connects Newcomb and North Hudson.
6. These classifications would keep public recreational motor vehicle use in Wild Forest areas where these uses are allowed. It is important for coherent and rational Forest Preserve management that motorized uses are kept in Wild Forest areas.

7. These classifications would allow for combining the High Peaks Wilderness and Dix Mountain Wilderness into one 275,000-acre Wilderness area by supporting Wilderness classification for the Casey Brook tract, which is the land bridge between the two areas.
8. These classifications would greatly minimize the amount of trees needed to be cut on the Forest Preserve for a new snowmobile trail connection from Newcomb/Minerva to North Hudson by thousands, if not tens of thousands.
9. These classifications would keep a new snowmobile trail out of the Hoffman Notch Wilderness area.
10. These classifications would create a new West Stony Creek Wilderness Area in the southern Adirondacks from a trailless part of the Shaker Mountain Wild Forest and newly purchased lands.

PROTECT's proposal is a pragmatic approach that balances a range of competing interests, accommodates a number of recreational uses with the minimum amount of terrain alteration and negative impacts, and protects the most important natural resource areas on the Forest Preserve.

We would be pleased with the opportunity to make our case in person with a meeting to further explore the details of this balanced proposal.

On behalf of the Board of Directors of Protect the Adirondacks, please let me express our gratitude for the opportunity to submit these comments.

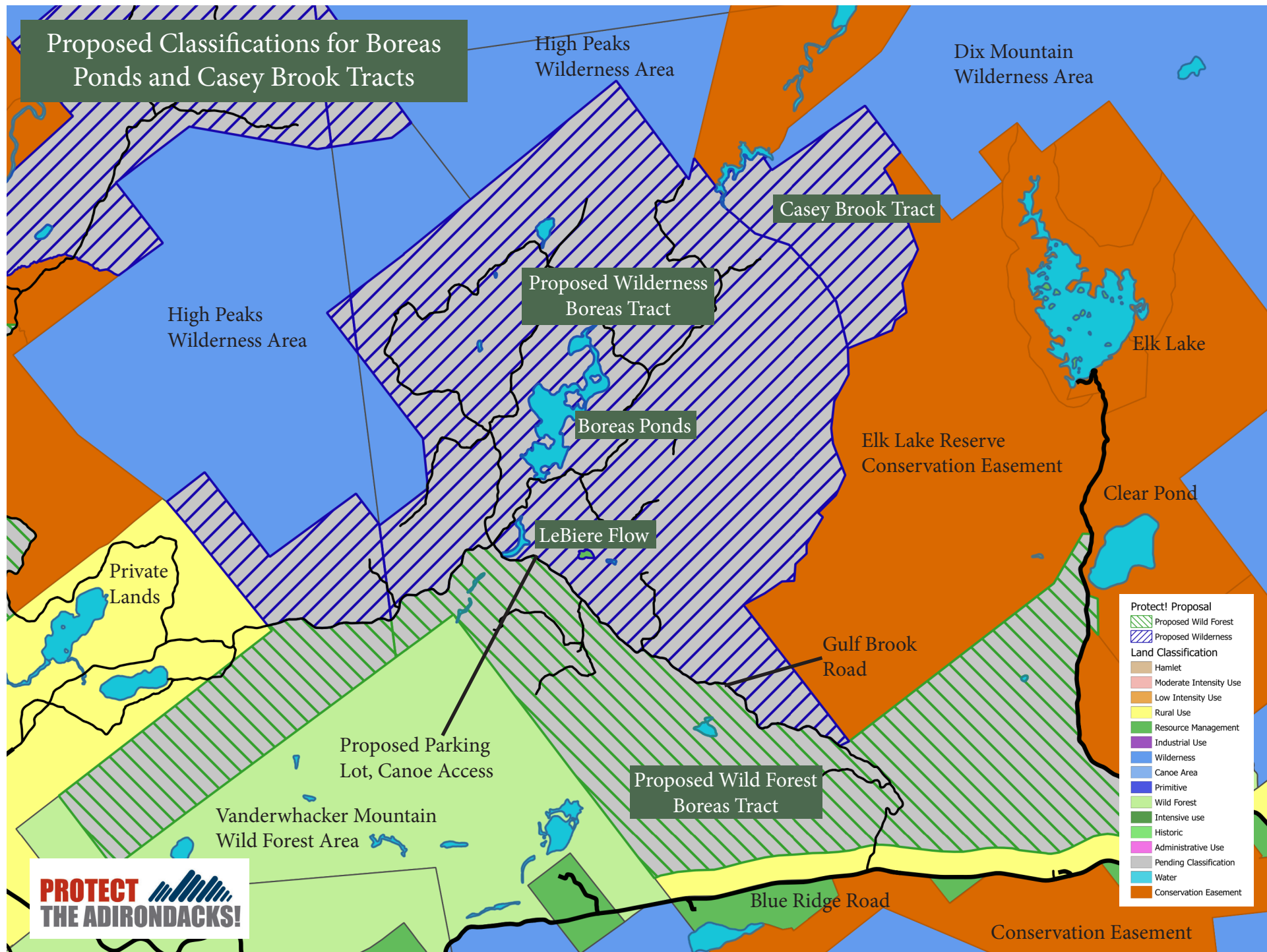
Sincerely,



Peter Bauer
Executive Director

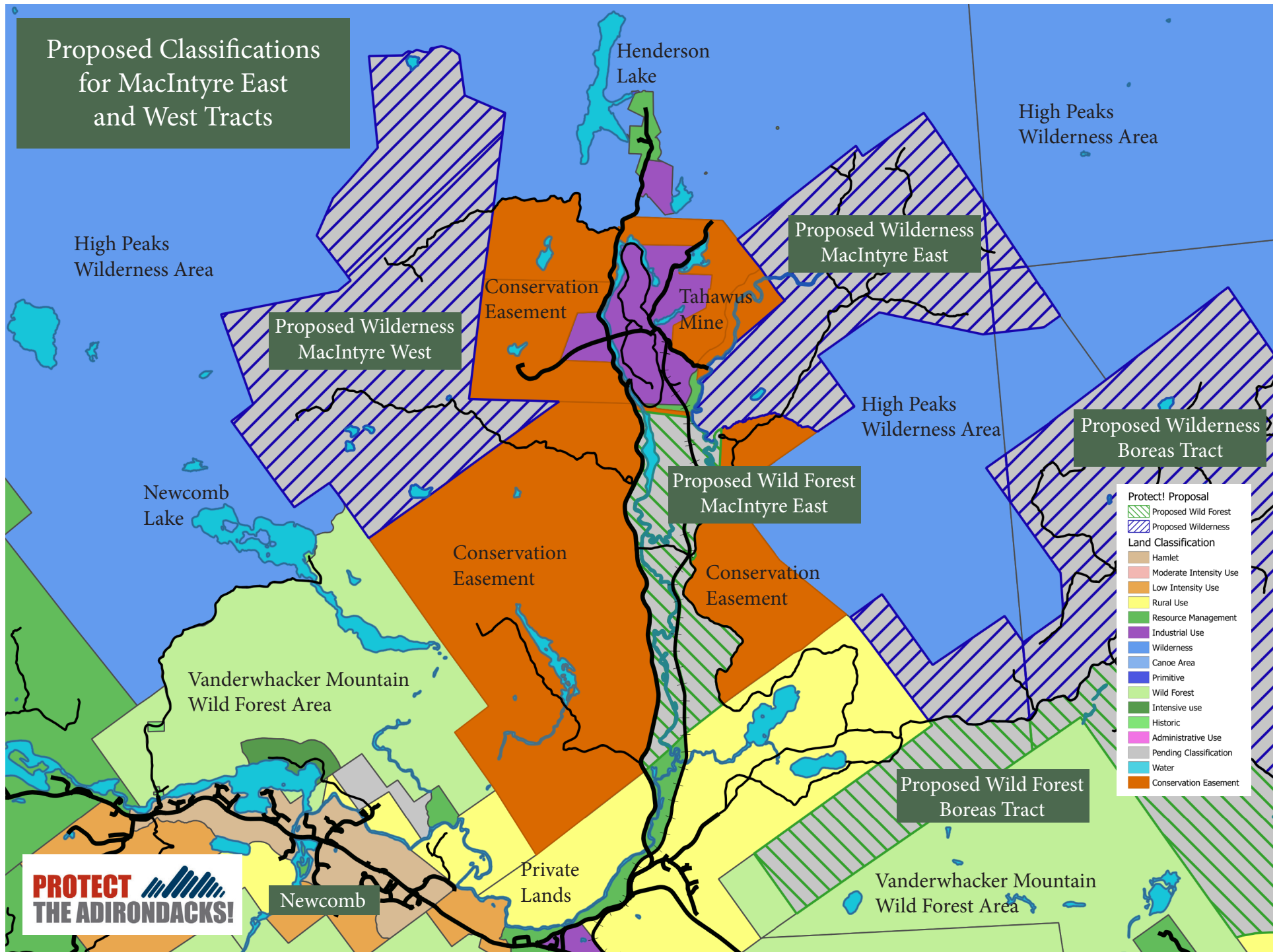
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Proposed Classifications for Boreas Ponds and Casey Brook Tracts



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Proposed Classifications for MacIntyre East and West Tracts



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