

PROTECT THE ADIRONDACKS!

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Peter Bauer
Executive Director

January 8, 2013

Hon. Lani Ulrich
NYS Adirondack Park Agency
PO Box 99
Ray Brook, NY 12977

RE: Need for DEC to Complete Inventories, Assessments and Studies Scheduled in Approved Unit Management Plans as more are Scheduled in Taylor Pond Wild Forest UMP

Dear Chairwoman Ulrich,

Protect the Adirondacks has been monitoring the development and implementation of Unit Management Plans (UMPs) for variously classified units of the Forest Preserve for quite some time. While PROTECT acknowledges that the overall quality of UMPs has been continuing to evolve and improve, we're concerned about the sheer number of studies, assessments, focus groups, and inventories scheduled for completion in approved UMPs that have not been completed. This issue has direct bearing on the final Taylor Pond Wild Forest UMP set for action by the Adirondack Park Agency (APA) in January 2013.

PROTECT supports the collection and analysis of a variety of data to assess the ecological health and public recreational use impacts on the natural resources of the Forest Preserve. Good science and good data lead to good public policy. The problem is that while excellent studies have been proposed by the Department of Environmental Conservation (DEC), and approved by the APA, they have not been completed. This is unfortunate because this data and analysis would be extremely useful in understanding current ecological conditions on the Forest Preserve as well as for various recreational use impacts.

This is also important for evaluation of new UMPs by the APA. A number of the incomplete assessments directly relate to planning in the Taylor Pond Wild Forest Area.

Taylor Pond Wild Forest UMP Schedules Important Assessments, But Will They Ever be Completed?

The new Final Taylor Pond Wild Forest UMP lists eight new “assessments,” or related efforts, to be implemented over the next five years, among a number of other activities. These are listed in the “Schedule for Implementation”:

- Monitor for Limits of Acceptable Change (LAC).
- Conduct inventory of invasive species and perform needed control work.
- Conduct biological and chemical surveys of selected unit waters to assess management needs.
- Complete Campsite Monitoring Inventory.
- Conduct needed original surveys on various lots, Cook Mountain, Strackville Road, Ore Bed Road, 16 acre lot near river etc.
- Complete inventory of all existing fixed climbing anchors in the unit.
- Convene with focus group, including Department and APA staff, members of the climbing community, environmental organizations and other interested parties to develop a policy on the management of fixed anchors on Forest Preserve lands.
- Re-inventory campsites.

While PROTECT finds that these are all worthy endeavors, we must point out that had similarly scheduled “assessments” been completed comparable data would be available to help planners and policymakers with this unit. For instance, a policy on fixed bolts for mountain climbing, as scheduled in the Giant and Dix Mountain UMPs, but not completed would be helpful. Or, a study on snowmobile and mountainbike impacts, as scheduled in the Jessup River, Wilmington, and Split Rock Mountain Wild Forest UMPs, but never completed would be useful as both recreational uses are being expanded in this unit. Or, the studies proposed here to evaluate and re-evaluate campsites in years 1 and 5 are similar to studies scheduled in the Vanderwhacker Wild Forest UMP, but never completed.

DEC needs to be realistic in what it proposes and the APA needs to be realistic about what it approves. A number of fine studies have been proposed, approved and scheduled, yet have not been completed.

Studies of High Importance for Public Understanding of the Ecological Condition and Recreational Impacts on the Forest Preserve that were Approved and Scheduled, but Never Completed

A variety of important studies have been approved (an incomplete, yet impressive list is included at the end of this letter), PROTECT has identified a dozen that had they been completed would be extremely helpful in overall Forest Preserve management and policy.

1. *Convene focus group to develop Adirondack Forest Preserve-wide policy on use of fixed climbing anchors (Dix Mountain Wilderness UMP, 2004).*

A focus group was convened by DEC in association with Paul Smiths College in December 2012, which PROTECT participated in. We believe that DEC and APA need to develop a policy for fixed bolts in the Forest Preserve. Hundreds of fixed bolts have been installed across the Forest Preserve and many are referenced in climbing guides, which are used by thousands of climbers annually. Moreover, new bolts are being installed by climbers each year. This policy and data would be helpful for other Forest Preserve units, especially in the southern Adirondacks where new climbing routes are being developed.

2. *Evaluate camp site conditions on Indian Lake and conduct camper survey on Indian Lake (Siamese Ponds Wilderness UMP, 2005) and conduct an annual evaluation of Indian Lake Islands Administrative Camping Area site conditions (Jessup River Wild Forest UMP 2006).*

The condition of island campsites is always an issue. Here, two UMPs highlight the importance of this information, yet this information has never been gathered. The experience of the campsites on the Indian Lake islands would be useful for other Forest Preserve units.

3. *Conduct survey for Bicknell's thrush (Siamese Ponds Wilderness UMP, 2005).*

While there is good data from Whiteface Mountain, it would be helpful to look at other types of habitat in the Forest Preserve. It's highly likely that the Bicknell thrush habitat in the Siamese Ponds Wilderness is more typical of such habitat across the Forest Preserve.

4. *Impacts to all terrain bike trail systems and conduct annual public use assessment (Wilmington Wild Forest UMP, 2005; Split Rock Mountain Wild Forest UMP, 2005).*

Mountain biking is being encouraged throughout Wild Forest areas. Trails are even being built in units without approved UMPs. It would be helpful to have good information about mountain biking impacts.

5. *Conduct assessment of use and use impacts on State-owned lands and waters at Pine Lake (Shaker Mountain Wild Forest UMP, 2006).*

This seems to be the most important study about impacts to state owned waters to date, yet it has not been completed.

6. *Baseline inventory of all established campsites/re-measure/monitor all established campsites (Vanderwhacker Wild Forest UMP, 2006).*

This type of study that establishes a baseline and measures impacts to campsites over time would be extremely useful to policymakers.

7. *Contract inventory of ecological communities, rare species and critical habitats (Blue Ridge Wilderness UMP, 2006).*

This analysis would be very helpful.

8. *Conduct surveys of moose, American marten, spruce grouse and spruce grouse habitat, boreal habitats and associated bird species such as Bicknell's thrush. Support statewide survey efforts, such as the Breeding Bird Atlas and New York Natural Heritage Program surveys. Inventory and map deer wintering areas (Blue Ridge Wilderness UMP, 2006).*

The wildlife data identified for study in the Blue Ridge Wilderness UMP would be very useful to planners and policymakers.

9. *Study on snowmobile use and impacts in Speculator/Piseco area (Jessup River Wild Forest UMP Amendment, 2010).*

This is a very important study. It should be a priority for the DEC.

10. *Conduct assessment of selected facilities using the Universal Trail Assessment Process/UTAP (Hurricane Mountain Primitive Area, 2010).*

This is important information for each unit.

11. *Conduct an assessment and compile a detailed trail log for all hiking, snowmobile, horse, ski and bicycle trails on the unit to identify maintenance needs (Moose River Plains Wild Forest UMP, 2011).*

A wide variety of public use data is important and would be very useful for planners and policymakers.

12. *Various wildlife, hunting and trapping studies (Hoffman Notch Wilderness UMP, 2012).*

This type of data has not been collected before.

The Taylor Pond Wild Forest UMP is an achievement at a time that the pace of UMP development and approval has slowed in recent years. PROTECT is concerned about the many worthy studies that are proposed, approved and scheduled in UMPs, but are never completed.

On behalf of the Board of Director of Protect the Adirondacks, please let me extend our gratitude for the opportunity to submit this comment letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Bauer". The signature is fluid and cursive, with a large initial "P" and "B".

Peter Bauer
Executive Director

CC: DEC Division of Lands and Forests
DEC Forest Preserve Bureau

List of Various Studies, Assessments, Inventories Pledged by DEC in Recent Approved UMPs

Aldrich Pond WF (1995)

- Monitor water quality of Long and Silver Dawn Lakes.

Jessup River Wild Forest UMP (2006)

- Investigate the possibility for future trails: Baldface Mountain (land route), Snowy and Pillsbury mountains ridge trail, Vly Lake Mountain, etc.
- Contract assessment of the Fawn Lake and Fall Lake trails using the Universal Trail Assessment Process. Provide information at trailheads.
- Contract inventory of ecological communities, rare species and critical habitats.
- Contract out comprehensive public use surveys.
- Conduct an annual evaluation of Indian Lake Islands Administrative Camping Area site conditions.

Jessup River Wild Forest (2010 Amendment)

- Conduct study on snowmobile use and impacts in Speculator/Piseco area

Shaker Mountain Wild Forest (2006)

- Develop LAC indicators and standards. Once LAC indicators and standards have been developed, monitor public use and visitor impacts to soils, vegetation, and trails to determine compliance with LAC standards. Take actions necessary to assure APSLMP compliance and to prevent standards from being exceeded.
- Conduct biological and chemical surveys of selected unit waters to assess management needs and to determine progress towards the objectives stated in this plan.
- Monitor water quality. Maintain database.
- Support inventory of historic/archaeological sites or research.
- Inventory of non-game, endangered, threatened and special concern species as well as significant habitats by Department staff or Natural Heritage program.
- Monitor baseline data to identify the effects of potential air pollutants.

- Monitor for invasive plant populations. If discovered, select an effective control option. Cost highly variable and dependent upon size of area/type of treatment.
- Legal research: Clarify inholder and adjoining landowner access rights. Clarify status of old town roads and public motor vehicle access rights.
- Conduct assessment of use and use impacts on State-owned lands and waters at Pine Lake.
- Contract assessment of the Pine Lake Inlet trail using the Universal Trail Assessment Process. Provide information at trailhead.

Watson's East Triangle Wild Forest (2010)

- Conduct biological and chemistry surveys of selected unit waters to assess management needs and to determine progress towards the objectives stated in this plan.
- Develop LAC indicators and standards for soil erosion.
- Develop LAC indicators and standards for condition of vegetation in camping areas.
- Assess all trails and roads on unit for maintenance needs.
- Reassess all designated campsites on the unit.

Wilmington Wild Forest Area (2005)

- Conduct biological examinations on Esther and Whiteface Mt. in cooperation with the Adirondack Nature Conservancy and the New York Natural Heritage Program.
- Conduct biological and chemical surveys of selected waters
- Monitor designated campsites.
- Assess status of invasive plants in the Unit and Develop necessary management objectives for control should they exist
- Schedule meeting with Operations and Forest Ranger staff to assess impacts to mountain bike trail systems and conduct annual public use assessment.

Vanderwhacker Wild Forest (2006)

- Conduct accessibility inventory
- Baseline inventory of all established campsites
- Remeasure/monitor all established campsites

Split Rock Wild Forest (2005)

- Prepare detailed inventory of all trails and former roads to identify areas requiring erosion control.
- Schedule meeting with Operations and Forest Ranger staff to assess impacts to all terrain bike trail systems and conduct annual public use assessment.
- LAC Inventory (Campsites and Trails).
- ADA Inventory of facilities.
- Conduct botanical examinations to improve inventory of Natural Heritage Program.
- Contact Lake Champlain Committee for campsite report on lake side campsites.

Moose River Plains Wild Forest UMP (2011)

- Conduct biological, chemical and/or physical surveys of selected unit waters to assess management needs and to determine progress toward the objectives stated in this plan.
- Work with APIPP to implement continuum of early detection invasive plant inventories focusing on all trails, parking areas, campsites, roads and water-bodies with public access. Take immediate and appropriate action to eradicate or contain all “easy to contain-low abundance” terrestrial and aquatic invasive plant infestations. Train Department staff and educate the public about invasive species identification, prevention and management.
- Once LAC indicators and standards have been developed, monitor public use and visitor impacts to water quality, soils, vegetation, wetlands, and recreational river corridors to determine compliance with LAC standards. Take actions necessary to assure APSLMP compliance and to prevent standards from being exceeded.
- Inventory and assess all roads, culverts and bridges on the unit.
- Prioritize maintenance concerns for all roads, culverts and bridges on the unit.

- Develop methods to monitor impacts associated with CP-3 use.
- Conduct an assessment and compile a detailed trail log for all snowmobile trails on the unit.
- Conduct an assessment and compile a detailed trail log for all hiking, snowmobile, horse, ski and bicycle trails on the unit to identify maintenance needs.
- Assess old roads on the unit for future designation as horse, ski and/or bicycle trails.

Dix Mountain Wilderness (2004)

- Conduct biological and chemical surveys of selected unit waters to assess fisheries management needs and to determine progress towards management objectives.
- Inventory of fixed expansion bolts in unit.
- Baseline inventory of all established campsites.
- Develop uniform method of collecting use data across the unit.
- Develop LAC guidelines and standards to monitor environmental and sociological conditions.
- Convene focus group to develop Adirondack Forest Preserve-wide policy on use of fixed climbing anchors.

Giant Mountain Wilderness UMP (2004)

- Conduct biological, chemical, and/or physical surveys of selected Unit waters to assess management needs and to determine progress towards the objectives stated in this plan.
- Inventory of fixed expansion bolts in unit.
- Convene focus group to develop Adirondack Forest Preserve-wide policy on use of fixed climbing anchors.
- Baseline inventory of all established campsites.

- Develop uniform method of collecting use data across the unit.
- Develop assessment process for disabled access. Identify potential disabled access possibilities in the unit.
- Develop LAC guidelines and standards to monitor environmental and sociological conditions.

Hurricane Mountain Primitive Area UMP (2010)

- Monitor public use and visitor impacts on natural resources and related facilities.
- Conduct biological and chemical surveys of selected waters to assess fisheries management needs, and to determine progress towards management objectives.
- Develop LAC indicators and standards for the condition of vegetation in campsites and lean-to locations.
- Collect baseline soil and vegetation data at site of new campsites for use in LAC process.
- Conduct assessment of selected facilities using the Universal Trail Assessment Process (UTAP).
- Collect baseline soil and vegetation data at site of trail relocations for use in LAC process.

Hoffman Notch Wilderness UMP (2012)

- Conduct biological, chemical and/or physical surveys of selected waters to assess management needs and to determine progress towards the stated objectives.
- Conduct targeted surveys for endangered, threatened, and special concern bird species that were documented in the first Breeding Bird Atlas Project, but not the second.
- Conduct surveys for bird species associated with lowland and high-elevation boreal forest. Priority should be placed on those species that were detected during the first Breeding Bird Atlas Project, but not the second and on those species that were not detected during either project.
- Develop a comprehensive MMS type bridge inventory with location maps, design sketches, and material construction details.

- Monitor existing radio-collared moose and continue to collar new individuals on an opportunistic basis.
- Conduct a survey of hunters and trappers that use the unit.
- Monitor use of deer wintering areas in the unit.
- Conduct surveys for Spruce Grouse and evaluate the distribution and quality of potential Spruce Grouse habitat. Based on results of the surveys and habitat assessment, consider reintroducing this species.

Jay Mountain Wilderness UMP (2010)

- Collect baseline soil and vegetation data at site of trail relocations for use in LAC process.
- Conduct assessment of Jay Mountain Trail using the Universal Trail Assessment Process (UTAP).

Siamese Ponds Wilderness Area (2005)

- Conduct assessment of facilities (designated campsites, trails parking areas, etc.) in the unit as part of LAC.
- Conduct biological and chemical surveys of selected unit waters to assess management needs and to determine progress towards the objectives stated in this plan.
- Monitor facilities (trails, campsites, parking areas, etc.) for LAC.
- Conduct assessment of facilities for compliance with ADAAG accessibility standards.
- Evaluate camp site conditions on Indian Lake.
- Conduct biological and chemical surveys of selected unit waters to assess management needs and to determine progress towards the objectives stated in this plan. No new funds requested.
- Conduct survey for Bicknell's thrush in the SPW UMP.
- Conduct camper survey on Indian Lake.

Blue Ridge Wilderness UMP (2006)

- Conduct surveys of moose, American marten, spruce grouse and spruce grouse habitat, boreal habitats and associated bird species such as Bicknell's thrush. Support statewide survey efforts, such as the Breeding Bird Atlas and New York Natural Heritage Program surveys. Inventory and map deer wintering areas.
- Develop LAC indicators and standards for trails, tent sites, lean-to sites and social conditions. Inventory selected indicators on marked trails.
- Contract inventory of ecological communities, rare species and critical habitats.
- Contract analysis of accessibility of Cascades, Sagamore Lake, Death Brook Falls and Sprague Pond trails.
- Contract with university to conduct visitor study, including an inventory of selected LAC indicators for social conditions in zones 1.
- Complete inventory of unmarked trails and primitive tent sites in zone 2. Inventory selected LAC indicators for unmarked trails and primitive tent sites in zone 2.

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