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**Executive Director**

April 25, 2013

James Connolly  
NYS Adirondack Park Agency  
PO Box 99  
Ray Brook, NY 12977

**RE: Hudson Headwaters Wilderness Alternative must be  
evaluated during APA Classification Hearings on Essex Chain  
Lakes and Hudson River Forest Preserve Lands**

Dear Mr. Connolly,

Protect the Adirondacks supports the creation of a new Hudson Headwaters Wilderness Area (see map attached). This new Wilderness area, roughly 40,000 acres in size, could be created during the upcoming Forest Preserve classification hearings that will be formally conducted this spring-fall by the Adirondack Park Agency (APA). PROTECT believes that the Wilderness Area option is the best fit for these lands and urges the APA to include the Wilderness alternative during the public hearings.

This new Wilderness Area will be created from roughly 20,000 acres of new Forest Preserve lands and roughly 20,000 acres of existing Forest Preserve lands currently classified as Wild Forest and Primitive. The new lands consist of the first tracts purchased as part of the state's acquisition of lands from The Nature Conservancy; the Essex Chain Lakes tract, OK Slip Falls tract, confluence of Hudson and Indian Rivers tract.

These lands include a total of 22 miles of the Hudson River, including the wild whitewaters of the Hudson Gorge, five miles of the Cedar River, three miles of the Indian River, and a dozen lakes and ponds in the Essex Chain Lakes. As part of this new Wilderness Area, PROTECT sees the opportunity to create a motorless waters recreation area on the Essex Chain Lakes similar to Lake Lila, Round Lake, Little Tupper Lake, and Lows Lake as well as preserve the Upper Hudson River, from just south of Route 28N in Newcomb to the Essex Chain Road, one of the great flatwater river stretches in the Adirondack Park.

**Protect the Adirondacks**

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## **Hudson Headwaters Wilderness Area: A Balanced Approach that Benefits Many User Groups**

PROTECT carefully drew its line to propose the new Hudson Headwaters Wilderness area to facilitate a wide variety of public uses and meet the needs of various user groups. In this way PROTECT's proposal is highly inclusive while at the same time provides protection of the area's natural resources. The wide variety of uses that PROTECT envisions in this proposal include:

- **Floatplane access continued on First and Pine Lakes:** PROTECT drew its Wilderness boundary around First and Pine lakes to preserve the existing floatplane use that occurs on these lakes in Wild Forest areas.
- **Road access for disabled use under DEC CP-3 Permits:** PROTECT envisions maintenance of the access road to Deer Pond from the Cornell Road, west of the Goodnow Flow. This access road will not only provide an entrance for paddlers to the Essex Chain, beginning at Deer Pond, but could also to be continued to a specially designed disabled access campsite (under the DEC CP-3 policy) on the north side of either Third or Fourth lake, whichever location is more practical. Lands north of this road would be classified as Wild Forest and the road would form the Wilderness-Wild Forest boundary. This will create a great opportunity to disabled access in a Wilderness setting.
- **Motorless waters access for the Essex Chain:** There are relatively few motorless waters opportunities that are easily accessible for the general public on large lakes and ponds in the Adirondack Park. Outside of the St. Regis Canoe Area, there is Little Tupper Lake-Round Lake, Lows Lake and Lake Lila. The overwhelming majority of large lakes and ponds in the Adirondack Park are open for all manner of motorized watercraft and floatplanes. Most of the motorless lakes and ponds in the Forest Preserve involve carrying one's boat a long distance. The general public deserves more easily accessible motorless waters opportunities in the Forest Preserve. Floatplane access on Third Lake will destroy this opportunity (as well as undermine the wilderness experience for CP-3 campers). A Wild Forest classification is wholly inappropriate for the Essex Chain Lakes.
- **Road access:** PROTECT'S proposal includes maintenance of Wild Forest or Primitive corridors to facilitate limited motor vehicle access to the eastern side of the Essex Chain Lakes tract, towards Cedar Mountain. We have been told that this would be useful during hunting season. PROTECT also supports corridors for the Chain Lakes Road to the area of the former Outer Gooley Club to facilitate canoe take-outs for flatwater paddlers before the

whitewaters of the Hudson Gorge as well as a Primitive Corridor for the road leading the OK Slip Pond, where hopefully a public parking area will be created near where the road becomes private for the children's camp. This parking area should serve as a staging area for hiking trails to OK Slip Falls and Blue Ledges as well as other ponds in this area. It would also be used during hunting season.

- **Take-out for Hudson River flatwater trip:** As mentioned above, PROTECT supports a take-out area on the Hudson River somewhere in vicinity of the Outer Gooley Club buildings. We support road access to this take out and a parking area.

These features in the Hudson Headwaters Wilderness proposal make it a balanced and reasonable approach to Forest Preserve management. Other wilderness proposals include municipal roads and private lands and cannot be accomplished during this classification review. Other proposals for Wild Forest involve special management areas that rely on unworkable management plans that create poor precedent and fail to protect the area's natural resources.

### **100,000 Acres More Lands Classified as Wild Forest/Intensive Use than Wilderness/Primitive/Canoe**

Today, in the Forest Preserve there are over 110,000 acres more of Wild Forest/Intensive Use areas, which allow all manner of motorized uses, than the more restrictive Wilderness/Primitive/Canoe Areas. Here are the most recent acreages provided on the APA website:

Wild Forest	1,293,721 acres
Intensive Use	22,705 acres
Wilderness	1,138,423 acres
Primitive	45,756
Canoe	17,646

There needs to be greater equality in the motorized and non-motorized areas of the Forest Preserve.

### **Scant Motorless Lakes Opportunities on 200 Biggest Lakes and Ponds in the Adirondack Park**

Across the Adirondack Park there are few genuine opportunities for motorless boating on a big lake or pond. In the top 100 biggest lakes in the Adirondack Park, just five lakes stand out as lakes without motorboats, jetskis, and floatplanes; Lows Lake, Little Tupper Lake, Round Lake, Lake Lila and St. Regis Pond. These lakes are all managed as motorless waterbodies as parts of the Forest Preserve. Two other lakes, Cedar Lake in the West Canada Lakes Wilderness Area and Newcomb Lake in

the High Peaks Wilderness are also motorless, but they are largely inaccessible for boating by the general public. They are great lakes to hike to, and beautiful places, but they are difficult to reach with a boat.

Of the 100 biggest lakes in the Adirondack Park, 77 are open for all manner of motorized boating and floatplanes. 14 lakes are privately owned and provide no public access, and just 7 are motorless. Two lakes in the top 100 are currently in process of being purchased by the State of New York (Third Lake, part of the Essex Chain Lakes, and Boreas Pond) for addition to the Forest Preserve, after which the type of allowable public use will be determined through the Forest Preserve classification process.

The reality though, is that more than 75% of the Park's grandest lakes are opened for a variety of motorized opportunities, but just 7% offer the motorless option, and really just 5% are easily accessible for a motorless experience.

For those who desire greater motorless opportunities, the numbers improve slightly in an analysis of the 200 biggest lakes in the Adirondack Park. 115 of Park's 200 biggest lakes are opened for motorized uses, whereas 55 are privately owned and 28 provide motorless opportunities. It's important to note that of the 28 lakes that are motorless, just 15 are easily accessible; the other 13 are challenging to reach with a boat.

Of the 200 biggest lakes and ponds, 57% are open for motorboating of all kinds, 28% are privately owned and closed for public use of any kind, and a mere 14% provide motorless opportunities. It's important to note that of the 200 biggest lakes and ponds in the Adirondacks, only 15, just 7.5%, provide easily accessible motorless boating opportunities that involve a short carry or less to launch one's boat.

When one considers the acreage of waters open for motorless opportunities compared with motorized opportunities the differences are stark. Excluding Lake Champlain, because it's partly in Vermont, and looking only at the 99 biggest waterbodies completely within the Blue Line, 90% of the water area is dedicated to motorized water uses. Just 5% is open for public motorless opportunities.

Clearly, the public deserves more motorless opportunities on the big lakes and ponds in the Adirondacks.

### **"No Material Increase" for Forest Preserve Roads Should be Taken Seriously**

PROTECT submitted a comment letter on March 13, 2013 to the APA and Department of Environmental Conservation (DEC) concerning the failure by the DEC to heed the requirement in the State Land Master Plan (SLMP) to conduct an assessment about the mileage of roads in the Forest Preserve. The state undertook such an effort for snowmobile trails. The APA must uphold the SLMP and complete

this analysis as part of the classification process for the Essex Chain Lakes and Hudson River area.

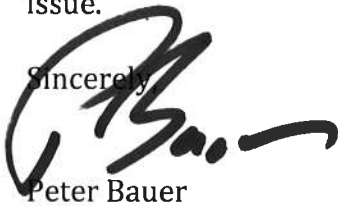
**Hudson Headwaters Wilderness is the Best Choice for the Essex Chain Lakes and the Hudson River**

Protect the Adirondacks believes that the creation of a new Hudson Headwaters Wilderness Area is the best choice for natural resource protection and for providing a full array of outdoor recreational opportunities. We encourage the APA to include this proposal as an alternative during the upcoming Forest Preserve classification hearings for the Essex Chain Lakes and Hudson River lands.

It will be a tremendous accomplishment by the State of New York in the year 2013 to create a new Wilderness area centered on 22 miles of the country's most historic river and well-known river.

On behalf of the Board of Directors of Protect the Adirondacks, please let me express our gratitude for the opportunity to provide these comments on this important issue.

Sincerely,



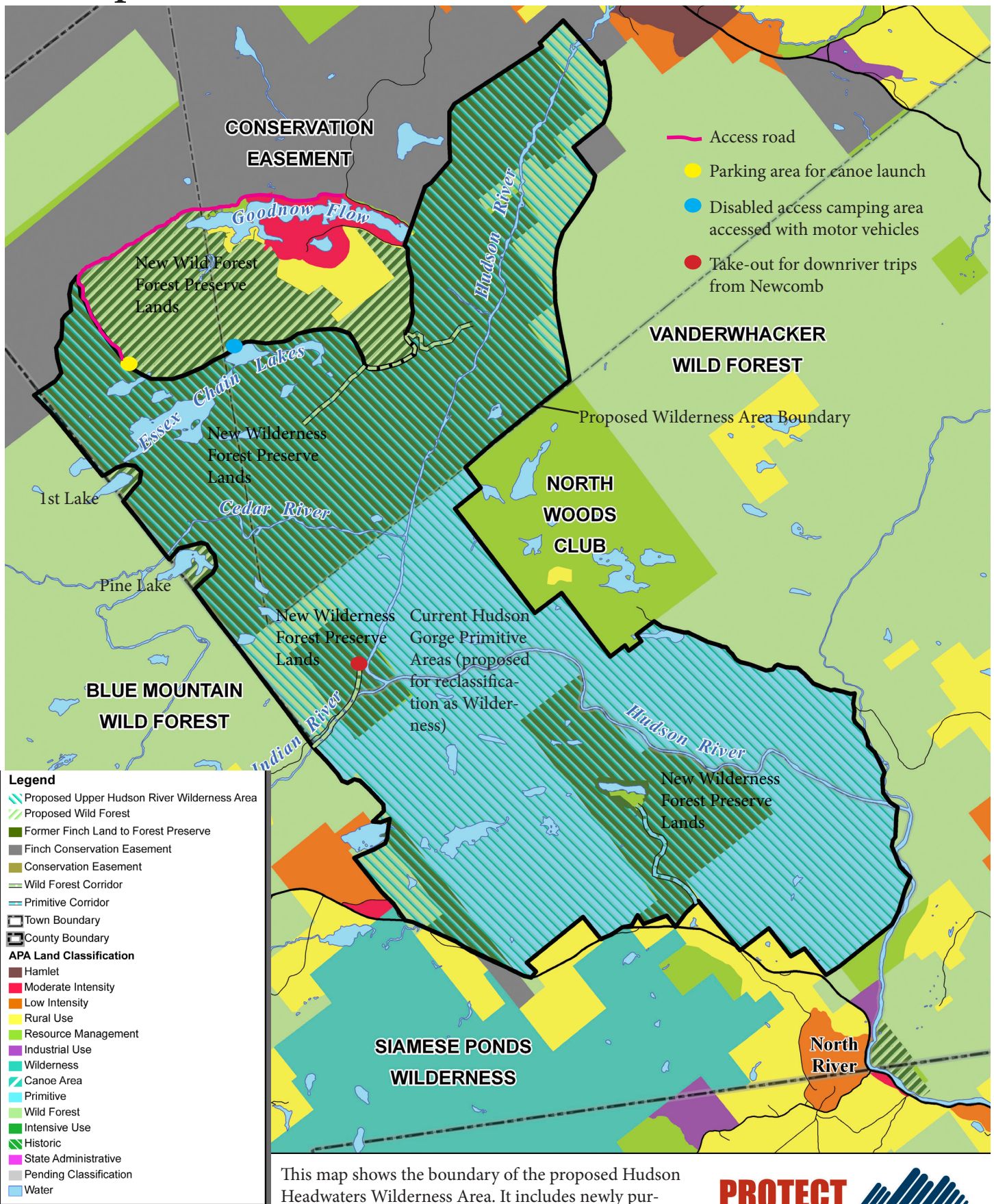
Peter Bauer  
Executive Director

CC    Hon. R. Duffy, Executive Chamber  
      H. Glaser, Executive Chamber  
      J. Malatras, Executive Chamber  
      B. Seggos, Executive Chamber  
      M. Gerstman, NYSDEC  
      R. Davies, NYSDEC  
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      K. Prickett, NYSAPA

      L. Schwartz, Executive Chamber  
      A. Zambelli, Executive Chamber  
      R. Rosenthal, Executive Chamber  
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      K. Moser, NYSDEC  
      K. Richards, NYSDEC  
      R. Steggeman, NYSDEC  
      Lani Ulrich, NYSAPA  
      J. Townsend  
      K. Regan, NYSAPA



# Proposed Hudson Headwaters Wilderness Area



This map shows the boundary of the proposed Hudson Headwaters Wilderness Area. It includes newly purchased lands and existing Forest Preserve lands that are reclassified as Wilderness.

**PROTECT THE ADIRONDACKS!**