



June 27, 2018

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Robert Ripp  
NYS Department of Environmental Conservation  
Region 5 Warrensburg Sub Office  
232 Golf Course Road  
Warrensburg, NY 12885

Kathy Regan  
NYS Adirondack Park Agency  
PO Box 99  
Ray Brook, NY 12977

**RE: Public Comment on draft High Peaks Wilderness Area Unit Management Plan Amendment**

Dear Rob Ripp and Kathy Regan,

The new High Peaks Wilderness Area Unit Management Plan (HPWUMP) contains a number of proposals for new facilities on the Adirondack Forest Preserve. The HPWA now includes over 270,000 acres and stretches from the Northway to Long Lake. The HPWUMP amendment is important because it contains a number of proposals that seek to improve management and try and meet the immense challenges posed by the major increase in public use. This amendment was cast narrowly by state officials and does not address the most pressing and important issues facing the High Peaks for wilderness management, overuse, public safety and natural resource protection.

Protect the Adirondacks has reviewed the HPWUMP and provides comments below on its proposals, scope, and conformance with the Adirondack Park State Land Master Plan and Forest Preserve policies.

New Trailless Area Designations

One positive proposal in the HPWUMP is the proposal to create three trailless areas. The new UMP states that these areas offer "unconfined wilderness experiences." These areas will not have trails or developed facilities, such as lean-tos or campsites. These three areas include the 27,000 acre Sawtooth Mountains Trailless Section, in the northwest part of the High Peaks Wilderness; the 26,000 acre Dix Trailless Section, which runs from, the McComb-Dix

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Mountain trailed areas to the Adirondack Northway. The third area is the 10,000 acre North River Mountains Trailless Section, which runs from the west shores of Boreas Ponds across the North River mountains.

### Carrying Capacity

The management of hiking trails in the Adirondack Forest Preserve has generally not been science-based for design, construction and maintenance. Most hiking trails are remnant 19<sup>th</sup> century trails that run straight up mountainsides or follow old logging roads. There are few modern, newly designed, and sustainably constructed hiking trails in the Adirondack Forest Preserve, such as the highly successful Moxham Mountain Trail or the rerouted new trail up Coney Mountain. DEC and APA have not made the sustainability of and the protection of natural resources within hiking trail corridors a priority in UMPs or UMP amendments.

For a number of years, the DEC has listed boilerplate language in various Unit Management Plans about its plans to implement some form of recreation ecology management program. This language called for a combination of Carrying Capacity analysis, Levels of Acceptable Change (LAC) analysis, and the Visitor Experience and Resource Protection (VERP) framework. DEC stated in these UMPs that these tools would somehow be blended together into a cohesive analytical framework. Though this blended analysis was listed in various UMPS, the DEC has never organized any kind of meaningful impact and management monitoring program for the Forest Preserve, often called recreation ecology management.

The new HPWUMP has taken a stab at a new “Wildlands Monitoring Plan” that commits the DEC to organizing and implementing a skeletal recreation ecology management program. Protect the Adirondacks congratulates the DEC on its decision to pursue a new wildland monitoring program. Unfortunately, the new “Recreational Resources and Human Uses” section in HPWUMP is poorly written and confused, fails to provide necessary information, and fails to enumerate a schedule for development and implementation that is publicly accountable.

There are a number of weaknesses with the state’s new approach and these are listed below.

**No Definition for Best Management Practices:** The DEC states that “the essentials for wildland management” are “planning, education and outreach, frontcountry infrastructure, backcountry infrastructure, limits on use when all else fails and resources both personnel and funding.” The DEC state’s further it will rely on six Best Management Practices (BMPs) that include “planning; education and outreach; frontcountry infrastructure; backcountry infrastructure; limits on use; and, financial resources for both personnel and programs.” While the DEC goes to great lengths to define some things in its new wildlands monitoring program, the BMPs are not adequately defined and as such are of limited value.

**Wildland Monitoring Plans Must be Public:** The DEC states in its “action steps” that it plans to develop a wildlands monitoring plan and program. How will this plan be made public? In what format and under what circumstances? Will the public get to comment on it while in draft form? The

HPWUMP does not address these issues.

**DEC Program Reinvents the Wheel:** There are many good recreation ecology programs being used across the U.S. and a number of practitioners and academics who implement and improve these programs. PROTECT does not see the benefit of the DEC developing its own program, when others are widely available.

**Selected Indicators are Vague, Highly Subjective:** The “biophysical,” “social,” “aesthetic,” and “ecosystem process” indicators that were selected for the Wildland Monitoring Plan appear highly subjective. We’re skeptical about they will be used in the field.

**How Will Results from Wildland Monitoring Plan be Provided to the Public?** How will the public be able to see and assess the results of the Wildlands Monitoring Plan? The HPWUMP does not address this issue.

**No Link between New Monitoring Plan and Management of Recreational Use:** The HPWUMP does not provide any information about how the monitoring plans will be used to improve Forest Preserve management. What is the link between data and management policy? What will the DEC and APA do once it has completed carrying capacity analysis? We note that the 1999 High Peaks Wilderness Area UMP had a requirement for an annual report, but these died away quickly. We have concerns about the ability of the DEC to undertake long-term and complex ecological monitoring on the Forest Preserve.

**No Timetable for Phases or Action Steps:** The HPWUMP does not set any timetables for when different phases or action steps will be completed. In this way, the new protocol does not appear to comply the requirements in the SLMP for an implementation schedule.

Required Natural Resource Inventory, Assessment, Analysis Information Not Included in UMP Amendment in Violation of SLMP

The “Unit Management Plan Development” section of the SLMP requires that the DEC organize a variety of assessments, inventories and analyses of the natural resources and facilities of a unit. If this information is not prepared, then the draft UMP or UMP amendment cannot conform to the SLMP. The SLMP calls for the following information:

an inventory of the types and extent of actual and projected public use of the area;

an assessment of the impact of actual and projected public use on the resources, ecosystems and public enjoyment of the area with particular attention to portions of the area threatened by overuse; and,

an assessment of the physical, biological and social carrying capacity of the area with particular attention to portions of the area threatened by overuse in light of its resource limitations and its classification under the master plan.

Each unit management plan will also set forth a statement of the management objectives for

the protection and rehabilitation of the area's resources and ecosystems and for public use of the area consistent with its carrying capacity. (p 27)

This information is vital for natural resource protection and recreational management planning. The SLMP says "Regardless of the criteria, the main objective is to appropriately provide sustainable and desirable facilities without exceeding the carrying capacity of the land on which they are located." PROTECT does not see how the HPWUMP conforms with these requirements in the SLMP.

#### Restoration and Rehabilitation of Natural Resources

The "Unit Management Plan Development" section of the SLMP includes a requirement that UMPs include planning for the "rehabilitation of such portions of the area as may suffer from overuse or resource degradation." PROTECT finds no such information in the HPWUMP. The SLMP states:

Each unit management plan will also set forth a statement of the management objectives for the protection and rehabilitation of the area's resources and ecosystems and for public use of the area consistent with its carrying capacity.

These management objectives will address, on a sitespecific basis as may be pertinent to the area, such issues as:

- actions to minimize adverse impacts on the resources of the area;
- the rehabilitation of such portions of the area as may suffer from overuse or resource degradation;
- the regulation or limitation of public use such that the carrying capacity of the area is not exceeded and the types of measures necessary to achieve that objective;

This assessment and planning is important given the land use history of this area of newly acquired lands and the number of leased camp locations, logging landings, roads, skid roads, forest clearcuts, forest shelterwood cuts, and other features, that will require proactive planning to ensure rehabilitation of these negatively impacted natural resources. Clearly, no such inventory has been done that identified areas of former industrial managed timberlands that require rehabilitation. PROTECT does not see how the HPWUMP conforms with these requirements in the SLMP.

#### Carrying Capacity Analysis Required for Boreas Ponds

The SLMP calls for carrying capacity for water bodies in the Forest Preserve. This is something routinely ignored in conformance reviews by the APA. Here is the relevant section of the SLMP:

A fundamental determinant of land classification is the physical characteristics of the land or water which have a direct bearing upon the capacity of the land to accept human use. Soil, slope, elevation and water are the primary elements of these physical characteristics and they are found in widely varied associations. For example, the fertility, erosiveness and depth of soil, the severity of slopes, the elevational characteristics reflected in microcli-

mates, the temperature, chemistry, volume and turnover rate of streams or lakes, all affect the carrying capacity of the land or water both from the standpoint of the construction of facilities and the amount of human use the land or water itself can absorb. (p 14-15)

The SLMP also explicit directs Forest Preserve managers not to exceed the carrying capacity of waterbodies:

the physical, biological and social carrying capacity of the lake, or a portion of the lake, or other water bodies accessible from the site will not be exceeded; (p 40)

PROTECT believes it would make more sense to complete the required carrying capacity analysis and then use this information to size the parking lot at the 4 Corners to an appropriate size. The SLMP requires that the carrying capacity of Boreas Ponds not be exceeded, yet we see no information in the HPWUMP amendment that addresses this issue. How can the APA find that this UMP amendment conforms with the SLMP without this necessary carrying capacity analysis?

### New Foot Trails

**Proposed New Trails:** The HPWUMP proposes a series of new trails designed to integrate newly acquired lands with the High Peaks. Trails from the Boreas Ponds will connect to White Lily Pond and Panther Gorge, and from Boreas Ponds to Calamity Brook. Other trails connect Henderson Lake to Newcomb Lake. PROTECT supports these new trails.

**Proposed New Campsites:** The HPWUMP calls for a number of new campsites at places like Lake Andrew, Bradley Pond, along the Adirondack Canoe Route, Lake Jimmy, Preston Pond, Henderson Lake, Boreas Ponds, White Lily Pond, and the Opalescent River, among other areas. The DEC is proposing the conduct a field analysis about the viability of campsites at these locations and develop a list of priority areas. The DEC will also determine campsites in the High Peaks that need to be closed in order to let the area around it recover. PROTECT supports these new campsites.

**New trail route and public parking for Cascade Mountain:** The DEC proposes a new trail router and new parking area for Cascade Mountain. This is the most popular High Peak and sees over 40,000 hikers annually. The parking lots on the shoulders of Route 73 are unsafe and often result in cars parked in a line for nearly 1 mile. Through this plan, parking will largely be moved from Route 73 to the Mountain Hoevenberg winter sports facility, which has ample parking in summer months. The new trail up Cascade Mountain will be longer though it will be designed to model standards. Hikers will also be able to access the hiking trail to Mount Van Hoevenberg, which may lessen the total number of hikers seeking to climb Cascade Mount

**More Rangers are Needed for High Peaks and Forest Preserve:** The number of Forest Rangers in New York has been stagnant for decades even as more land has been added to the Forest Preserve and protected through conservation easements. The Rangers are assigned to protect public safety on these lands, fight forest fires, mark boundaries, among many other responsibilities. Public use of the Forest Preserve is at an all-time high. More Rangers are needed as more time is

dedicated to search and rescue and public education.

On behalf of the Board of Directors of Protect the Adirondacks, please accept my gratitude for the opportunity to present our concerns on this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Bauer". The signature is fluid and cursive, with the first name "Peter" being more prominent than the last name "Bauer".

Peter Bauer,  
Executive Director