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December 7, 2018

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**RE: Public Comment on draft Blue Ridge Wilderness Area Unit
Management Plan Amendment for New Snowmobile Trail**

Dear Mr. Addison:

The proposed amendment to the Blue Ridge Wilderness Area Unit Management Plan (BRWUMP) to build a new section of a community connector class II snowmobile trail has many problems. Protect the Adirondacks sees this as a poor decision that will set a terrible precedent for Wilderness areas and marks a serious weakening of Wilderness Area protections. In New York State, Wilderness Areas in the Forest Preserve have historically enjoyed the strongest environmental protections for public lands in the state. This proposal to build a new road-like snowmobile trail through a Wilderness Area marks a major weakening of wilderness protections in the Adirondack Forest Preserve. Protect the Adirondacks calls upon the Department of Environmental Conservation (DEC) and Adirondack Park Agency (APA) to reject this plan.

The DEC press release that announced this proposal included the following statement: "The proposed trail will connect the communities of Indian Lake, Inlet, Raquette Lake, and Long Lake as part of the Adirondack Community Connector Trail System," said Director Stegemann. "DEC's goal is to protect natural resources, provide outdoor recreational opportunities for residents and visitors, and ensure the Forest Preserve is an asset to the communities and a benefit to local economies." It's important to point out that the "communities of Indian Lake, Inlet, Raquette Lake, and Long Lake" are already connected with an "Adirondack Community Connector Trail System" for which the State of New York spent millions of dollars to purchase lands for the Forest Preserve, to secure permanent snowmobile trail rights on conservation easements, and to construct of class II snowmobile trails.

Protect the Adirondacks

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There's a reason that a snowmobile trail has not been built in a Wilderness area since the creation of the APA and the adoption of the Adirondack Park State Land Master Plan (APSLMP) in 1972. For 46 years, it has been fully recognized that snowmobiles and motor vehicles undermine and destroy the essential qualities of Wilderness lands. If the APA approves this action, it will threaten all Wilderness lands in the Adirondack Forest Preserve. The proposed action should be abandoned.

This proposal is yet another major milestone in the historic expansion of motor vehicle access in the Adirondack Forest Preserve; this has been a key priority of the Cuomo Administration. This proposal follows on the heels of the weakening of the APSLMP three years ago to allow motor vehicles and bicycles in the Essex Chain Lakes Primitive Area, which is supposed be managed like a Wilderness Area. That revision to the APSLMP marked the first time in the APLSMP's 46-year history that the APA weakened, not strengthened, protection for the Forest Preserve. The proposal to build a road-like snowmobile through the Blue Ridge Wilderness marks a major weakening of Wilderness protections in the Adirondacks.

The impacts from construction of a community connector class II snowmobile trail are severe and will last for decades. Attached are a number of pictures that detail the many ways that a class II trail alters the terrain of the Forest Preserve, devastates to native flora, alienate all other public recreational uses, spread invasive and non-native species, and degrades the Forest Preserve. The impacts of a class II trail are far different from a foot trail.

For many reasons Protect the Adirondacks opposes the proposal to amend the Blue Ridge Wilderness Area UMP to authorize the location and construction of a major snowmobile trail through Wilderness lands. Our comments and concerns are detailed below.

Proposed Snowmobile Trail Violates Wilderness Standards in Adirondack Park State Land Master Plan

A central tenet of Wilderness area management and classification is the absence of motor vehicles from a large landscape. The fundamental purpose of a Wilderness area is that ecological processes are allowed to proceed unimpacted by humans to the greatest extent possible. As a result, human impacts are minimized to those caused by walking, paddling, or cross-country skiing. Wilderness areas by their basic definition are supposed to receive the lightest of impacts from human recreational activities. The APSLMP articulates this purpose in its basic definition of Wilderness:

A wilderness area, in contrast with those areas where man and his own works dominate the landscape, is an area where the earth and its community of life are untrammelled by man--where man himself is a visitor who does not remain. A wilderness area is further defined to mean an area of state land or water having a primeval character, without significant improvement or permanent human habitation, which is protected and managed so as to preserve, enhance and restore, where necessary, its natural conditions, and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's

work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least ten thousand acres of contiguous land and water or is of sufficient size and character as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological or other features of scientific, educational, scenic or historical value. (p 22)

This definition is important because it clearly prohibits the use of snowmobiles and any kind of motor vehicles in a Wilderness area. The basic Wilderness definition states that lands classified as Wilderness should be managed in a wild, natural, untrammeled state where any impacts or marks of humans are difficult to detect. A wide, road-like community connector class II snowmobile trail contradicts everything that a Wilderness area is all about.

The prohibition on motor vehicles is a core, foundational part of the Wilderness classification in the Adirondack Forest Preserve. The prohibition of motor vehicles is detailed and affirmed throughout the Wilderness section of the APSLMP. The Wilderness area guidelines in the APSLMP explicitly directs state land managers eight times to prohibit motor vehicles and snowmobiles in Wilderness areas.

First, the “Wilderness Basic Guidelines” states:

1. The primary wilderness management guideline will be to achieve and perpetuate a natural plant and animal community where man's influence is not apparent.
2. In wilderness areas:
 - a) no additions or expansions of non-conforming uses will be permitted; (p 22)

These passages clearly describe management objectives for Wilderness areas that are opposed to motor vehicle recreational access. Further, this passage states that non-conforming uses, such as motor vehicle use, will be prohibited in Wilderness areas.

Second, the Structures and Improvements section of the Wilderness guidelines in the APSLMP details the various facilities that are allowable in a Wilderness area. This section states:

Structures and improvements

1. The structures and improvements listed below will be considered as conforming to wilderness standards and their maintenance, rehabilitation and construction permitted. (p 23)

It's important to note that there is no listing of “snowmobile trail” in the list of allowable Structures and Improvements.

Third, the second part of “Structures and Improvements” section provides a list of the structures and improvements that are prohibited in Wilderness areas:

2. All other structures and improvements, except for interior ranger stations themselves (guidelines for which are specified below), will be considered non-conforming. Any remaining non-conforming structures that were to have been removed by the December 31, 1975 deadline but have not yet been removed, will be removed by March 31, 1987. These include but are not limited to:

- lean-to clusters;
- tent platforms;
- horse barns;
- boat docks;
- storage sheds and other buildings;
- fire towers and observer cabins;
- telephone and electrical lines;
- snowmobile trails**;
- roads and administrative roads;
- helicopter platforms; and,
- buoys. (p 24)

It's important to note that “snowmobile trails” is explicitly listed as a “non-conforming” structure in a Wilderness area. Snowmobile trails are not allowable in Wilderness areas.

Fourth, the “Motor Vehicles, Motorized Equipment and Aircraft” section in the APSLMP Wilderness guidelines states yet again importance of the prohibition on motor vehicles in Wilderness lands.

Motor vehicles, motorized equipment and aircraft

1. Public use of motor vehicles, motorized equipment and aircraft will be prohibited.
2. Administrative personnel will not use motor vehicles, motorized equipment or aircraft for day-to-day administration, maintenance or research. (p 25)

These guidelines emphasize an explicit ban on motor vehicles in Wilderness areas. The public is prohibited from using motor vehicles in Wilderness areas and state administrative personnel are to undertake their management duties without the aid of motor vehicles.

Fifth, the “Motor Vehicles, Motorized Equipment and Aircraft” section further denotes the prohibition on motor vehicles by describing the sole exception for use motor vehicles for emergencies and the administrative burden for reporting about such use. The rules around this special exception highlight the overall importance of the prohibition on motor vehicle use in Wilderness areas.

6. Irrespective of the above or any other guidelines in this master plan, use of motor vehicles, motorized equipment and aircraft will be permitted, by or under the supervision of appropriate officials, in cases of sudden, actual and ongoing emergencies involving the protection or preservation of human life or intrinsic resource values -- for example, search and rescue operations, forest fires, or oil spills or similar, large-scale contamination of water bodies.

7. Written logs will be kept by the Department of Environmental Conservation recording use of motorized vehicles, motorized equipment and aircraft. The Department will prepare an annual report providing details of such motorized uses and the reasons therefore and file it with the Agency. (p 25-26)

Sixth, the "Roads, Snowmobile Trails and Administrative Roads" section in the APSLMP Wilderness guidelines states yet again the prohibition on motor vehicles in Wilderness lands.

Roads, snowmobile trails and administrative roads

1. No new roads, snowmobile or administrative roads will be allowed. (p 26)

Once again, the APSLMP is affirming the importance on the ban of motor vehicles in Wilderness lands. This section provides even greater direction to state lands managers about the absolute management imperative to keep motor vehicles out of Wilderness lands.

Seventh, the "Roads, Snowmobile Trails and Administrative Roads" section in the APSLMP Wilderness guidelines also provides the following directives to state land managers about management priorities in Wilderness lands:

- close such roads and snowmobile trails to motor vehicles as may be open to the public;
- prohibit all administrative use of such roads and trails by motor vehicles; and,
- block such roads and trails by logs, boulders or similar means other than gates.

3. During the phase out period:

- the use of motorized vehicles by administrative personnel for transportation of materials and personnel will be limited to the minimum required for proper interim administration and the removal of non-conforming uses; and,
- maintenance of such roads and trails will be curtailed and efforts made to encourage revegetation with lower forms of vegetation to permit their conversion to foot trails and, where appropriate, horse trails. (p 26)

These passages clearly affirm the importance of banning motor vehicles in Wilderness areas. These passages direct state land managers to specific methods to utilize to ensure that motor vehicles are excluded from Wilderness areas.

Eighth, the “Recreational Use and Overuse” section in the APSLMP Wilderness guidelines states yet again the prohibition on motor vehicles in Wilderness lands.

Recreational use and overuse

1. The following types of recreational use are compatible with wilderness and should be encouraged as long as the degree and intensity of such use does not endanger the wilderness resource itself:

--hiking, mountaineering, tenting, hunting, fishing, trapping, snowshoeing, ski touring, birding, nature study, and other forms of primitive and unconfined recreation.

--access by horses, including horse and wagon, while permitted in wilderness, will be strictly controlled and limited to suitable locations and trail conditions to prevent adverse environmental damage. (p 27)

Nowhere in the “Recreational Use and Overuse” section is “snowmobile trail” or “snowmobile” use listed as a compatible recreational use that should be encouraged. The omission of snowmobiling speaks volumes about the fact that snowmobiling is not an allowable use in a Wilderness area.

The APSLMP Exception to the Rule that Allows Location of a Snowmobile Trail in Wilderness

In addition to the exception for use of motor vehicles in Wilderness areas by state personnel for emergencies, there is one other exception. The APSLMP provides a single opportunity for public use of motor vehicles in a Wilderness area, which is to be undertaken in limited instances and on a site-specific basis. The “Boundary Structures and Improvements and Boundary Marking” section in the APSLMP Wilderness guidelines outlines this exception:

Boundary structures and improvements and boundary marking

1. Where a wilderness boundary abuts a public highway, the Department of Environmental Conservation will be permitted, in conformity with a duly adopted unit management plan, to locate within 500 feet from a public highway right-of-way, on a site-specific basis, trailheads, parking areas, fishing and waterway access sites, picnic areas, ranger stations or other facilities for peripheral control of public use, and, in limited instances, snowmobile trails. (p 27)

The heart of the proposal to build the new community connector class II snowmobile trail through northern reaches of the Blue Ridge Wilderness Area is based upon the APA-DEC’s interpretation of this passage in the APSLMP. The proposal contends that a new

roughly 4-mile-long, 9-12 feet wide snowmobile trail complies with the APSLMP as long as it stays within 500 feet of a highway right-of-way.

Protect the Adirondacks does not believe that this passage provides carte blanche authorization for a snowmobile trail in a Wilderness area even if it is located within 500 feet of a highway right-of-way. The APSLMP passage above sets out two explicit tests. Moreover, these tests must be evaluated in the context of directives to state land managers for Wilderness management. The eight directives listed throughout the Wilderness guidelines place an absolute priority on the prohibition of motor vehicles in Wilderness areas. The essence of Wilderness management in the APSLMP is the ban on motor vehicles for public recreational use. Any consideration of the exception to the rule that bans motor vehicles in Wilderness areas must provide overwhelming evidence that the new trail will be short and that it will have a minimal impact on the flora and fauna of the Wilderness area.

The two tests identified in the “Boundary Structures and Improvements and Boundary Marking” section in the APSLMP Wilderness guidelines are 1) limited instances; and 2) a site-specific basis. Protect the Adirondacks finds that the proposal to build a new 9-12-foot-wide snowmobile trail through the Blue Ridge Wilderness fails to pass these two tests.

The limited instances test directs state planners to look at snowmobile trail routes that by definition are short and restrained. We do not believe that a newly constructed, 4-mile-long trail constitutes a short or restrained route. State planners argue that this 4-mile section must be evaluated in terms of the total mileage of snowmobile trails in the Adirondack Forest Preserve. This is a false argument. The limited-instances test has nothing to do with total snowmobile trail mileage, but rather it has to do with the distance the trail is routed through a Wilderness area. We believe that this 4-mile route should be evaluated in terms of the mileage of snowmobile trails in Wilderness. The proposed trail is simply too long to pass the limited instances test. A 4-mile snowmobile trail through a Wilderness area marks a major change in APSLMP practice. No such decision has been made for 46 years.

The site specific basis test directs state planners to evaluate the potential impacts of a proposed route. The question facing state planners is whether the lands in question are suitable for a major snowmobile trail. Wilderness lands by definition have limited developed facilities. Wilderness management places a premium on letting ecological processes proceed unfettered by human activities. Any new structure or improvement will have a significant impact. The impact of a road-like, 9-12-foot-wide class II trail will be vastly greater than something like a foot trail.

Simply put, the fundamental question of the site specific basis test is whether the area will be negatively impacted by the new snowmobile trail. The answer in this case is indisputably yes. The specific impacts of the proposed trail through the Death Brook valley in the Blue Ridge Wilderness will be immense due to the totally undeveloped nature of the area, steep slopes, wetlands, and the dominance of old growth and mature forest ecosystem. Though these lands border NYS Route 28, they have been managed as Wilderness for 46 years and for much longer have been lands protected in the Forest

Preserve, with some portions identified on the 1895 state lands map. Protect the Adirondacks does not see any rational standard by which the proposal for a new class II snowmobile trail passes muster with the site specific basis test.

It should be noted that across the Adirondacks the places where it makes sense to have snowmobile trails already have snowmobile trails, which utilized the abundant road system in Wild Forest areas. The new trail being developed in the Blue Ridge Wilderness, as well as between Newcomb and Minerva, among other places, are of marginal value and will not be heavily used, but come at a high environmental cost. The proposal to route a snowmobile trail through the Death Brook valley in the Blue Ridge Wilderness is an example of a trail that will have marginal public recreational value but immense environmental cost.

There is also an argument for a different reading of the “Boundary Structures and Improvements and Boundary Marking” section that provides the exception for state agencies to build a snowmobile trail in Wilderness. A fairer reading of this passage is that it does not allow new trails to be built, but was written in contemplation of management decisions for newly purchased and newly classified Wilderness lands where some vestiges of previous human use, such as old roads or tote roads, could still be accessed for a snowmobile trail within 500 feet of a highway right-of-way. As such, the location of a snowmobile trail would involve little tree cutting, terrain alterations or destruction of the native forest flora.

Protect the Adirondacks does not see how the proposed new snowmobile trail through the Blue Ridge Wilderness complies with the APSLMP Wilderness standards and guidelines.

Other APSLMP Comments

- Page 1 of the Draft UMP says that there is a “great need” for this trail, but there is no evidence of this alleged need in the document.
- The Draft UMP does not address the carrying capacity of the unit, as required by the APSLMP.
- Page 4 of the Draft UMP states that an objective of the plan is to “provide a snowmobiling opportunity in the unit...”. This is inappropriate, since snowmobiling is generally prohibited in Wilderness areas.
- The map at page 6 of the Draft UMP shows a “500’ Buffer” in the Wilderness Area along Route 28. This is not consistent with the APSLMP, which makes no such designation.

Proposed New Snowmobile Trail in Blue Ridge Wilderness Violates Snowmobile Trails Guidance

The proposed Raquette Lake to Long Lake snowmobile trail violates the document “Snowmobile Trail Siting, Construction and Maintenance on Forest Preserve

Lands in the Adirondack Park.” The trail guidance contains language that directs state planners to route snowmobile trails on the periphery and not to duplicate trail systems.

The new proposed trail is redundant because there is already a snowmobile trail that connects Raquette Lake and Long Lake. The existing trail system connects Raquette Lake to Indian Lake through the Moose River Plains. Then it connects Indian Lake to Newcomb through the Blue Mountain Wild Forest and conservation easements purchased in 2010 where the principal public recreation right purchased was the permanent snowmobile trail. Then the trail connects from Newcomb to Long Lake, passing through Forest Preserve and newly purchased conservation easements in 2010 where the principal public recreation right purchased was the permanent snowmobile trail. This route is longer, but snowmobilers enjoy driving snowmobiles. In fact, the recreational thrill of snowmobiling is riding the snowmobile. It’s not like people are being asked to walk from Raquette Lake to Long Lake via Indian Lake and Newcomb. They’re riding their snowmobiles, which is an activity that they have paid thousands of dollars to pursue for their recreational enjoyment and pleasure.

The second way in which the proposed new class II trail through the Blue Ridge Wilderness violates in the Guidance is that the new trail is slated to be routed through the heart of the Sargent Ponds Wild Forest Area. This trail will pass through the dead center of the unit rather than being routed on periphery.

Community Connector Class II Snowmobile Trails Spread Invasive Species, Damage Established Native Flora

The APSLMP explicitly directs state lands managers to protect Wilderness areas from both invasive and non-native species and to protect native flora communities. By their very nature class II trails spread invasive species and destroy native flora communities. The “Flora and Fauna” section in the APSLMP Wilderness guidelines provides the following directives:

Flora and fauna

There will be no intentional introduction in wilderness areas of species of flora or fauna that are not historically associated with the Adirondack environment, except: (i) species which have already been established in the Adirondack environment, or (ii) as necessary to protect the integrity of established native flora and fauna. Efforts will be made to restore extirpated native species where such restoration appears feasible. (p 26-27)

The Santanoni to Harris Lake class II snowmobile trail was marked by infestations of Japanese Knotweed and ragweed. The newly built section of the Seventh Lake Mountain Trail radically transformed the natural forest setting and disrupted the established native flora. Throughout the length of the Seventh Lake Mountain Trail an intact forest was transformed to a wide grassy meadow. Where a closed canopy forest was once dominant, vast stretches of the Seventh Lake Mountain Trail are now long grassy areas. This result expressly contravenes the directive from the APSLMP to protect established native flora.

Community Connector Class II Snowmobile Trail Construction Violates the Adirondack Park State Land Master Plan

The APSLMP defines a snowmobile trail as “a marked trail of essentially the same character as a foot trail” and mandates that it be “compatible with the wild forest character of an area.” The APSLMP goes on to state that a snowmobile trail “should be designed and located in a manner than will not adversely affect adjoining private landowners or the wild forest atmosphere....” There is no way that community connector class II snowmobile trails bear any rational resemblance to something having the “character of a foot trail” or protects the “wild forest atmosphere.”

A class II community connector snowmobile trail surface is graded, leveled, and flattened by multi-ton tracked excavators. Extensive bench cuts are dug into the trail in many sections that run for a hundred yards and are 15 to 20-feet wide in many areas. Protruding rocks are removed, roots are cut back, and extensive tree cutting is undertaken, often at a rate of 1,000 trees per mile. All understory vegetation is removed and oversized bridges more than 12 feet in width are built to support multi-ton groomers. Ledge rock is fractured and split apart, trail surfaces are scarred by 6-wheel ATVs that leave deep wheel ruts during construction and maintenance, crushed gravel is often used to stabilize degraded areas, and the trail is studded with stumps. Extensive areas of forest canopy are opened above the class II trail and the trail surface is dominated by extensive grass fields incongruent with the surrounding forest. Bridges are outfitted with plastic reflectors for nighttime driving. Trail signs resemble road traffic signs.

A “foot trail” is where people walk single file. Foot trails are narrow and built to go over and in between roots and rocks and around trees. Foot trail surfaces are uneven and follow the terrain. Few trees are cut down for foot trails and there are scarcely any stumps of cut trees. Vegetation on the trailside encroaches, and the trail is canopy covered. Steppingstones and split logs are commonly used to pass over streams and wet areas. There are no reflectors and grass is scarce.

For all practical purposes, community connector class II trails resemble roads much more than they resemble foot trails.

The APSLMP Wild Forest Basic Guideline 4 states “Public use of motor vehicles will not be encouraged and there will not be any material increase in the mileage of roads and snowmobile trails open to motorized use by the public in wild forest areas that conformed to the master plan at the time of its original adoption in 1972.” The construction of class II trails across the Forest Preserve has greatly encouraged motor vehicle use on the Forest Preserve. Class II trails thus violate the SLMP.

PROTECT has identified many other areas of the APSLMP that are expressly violated by community connector class II snowmobile trails in their construction, intended use, and by grooming with large tracked (motor vehicle) groomers. These include:

- Basic Guideline 2 (Motor Vehicles, Motorized Equipment and Aircraft) states that public access accommodations should be “consistent with the wild forest character.” PROTECT does not believe that the new road-like class II trails are consistent with the wild forest character. The trail’s width, bridges, reflectors, bench cuts, ledge cuts, use of gravel and straw, extensive surface alteration, tree cutting, stumps, and removal of trees and rocks are all inconsistent with the “wild forest character” of this area.
- Basic Guideline 2 (Motor Vehicles, Motorized Equipment and Aircraft) states “All conforming structures and improvements will be designed and located so as to blend with the surrounding environment and require only minimal maintenance.” PROTECT does not believe that the new road-like class II snowmobile trails meets the “minimal maintenance” test. DEC and the APA claim that the grooming of this trail network is maintenance. Class II trails cannot be used without grooming. These trails see grooming multiple times per day on weekends. How can a trail that requires grooming in order to be operable meet the “minimal maintenance” test?
- Basic Guideline 2 (Motor Vehicles, Motorized Equipment and Aircraft) states “All management and administrative actions and interior facilities in wild forest areas will be designed to emphasize the self-sufficiency of the user to assume a high degree of responsibility for environmentally sound use of such areas for his or her own health, safety and welfare.” Leaving aside concerns of snowmobile “environmentally sound use” with their gas-mileage rates less than those of most SUVs, PROTECT questions the “self-sufficiency” of the users of class II snowmobile trails: the principal recreational use of snowmobiling can only be accomplished if the trail has been regularly groomed by a multi-ton tracked groomer.
- Basic Guideline 2 (Structures and Improvements 1C) states that snowmobile trails are allowed in Wild Forest areas and “their maintenance, rehabilitation and construction” is allowable by “snowmobiles on snowmobile trails.” There are major points here where the DEC and APA brazenly violate the APSLMP.
- The use of a large multi-ton groomer on a class II trail changes everything. This is the key fact obfuscated by APA and DEC in the *Guidance*. The snowpack on a class II snowmobile trail is groomed by large tracked groomers, not the ground of the trail surface. Hence this is not trail maintenance sanctioned by the APSLMP. The APSLMP states that the “... the use of motor vehicles, motorized equipment and aircraft will be allowed [on Wild Forest] as follows...by administrative personnel where necessary to reach, maintain or construct permitted structures and improvements.” Note that the APSLMP does not say “reach, maintain, **groom** or construct...” which it would have to if grooming was allowed by a motor vehicle on a designated “trail” rather than a snowmobile with drag.

New Trail Will See Clearing of Over 5 Acres of Wilderness

The new proposed trail will see the clearing of more than 5 acres of Forest Preserve. Community connector class II trails require extensive tree cutting and excavating the trail surface to make sure that it is smooth and level. The trail surface is graded to a

consistent appearance. The result is that the lands within this corridor are very different from the lands outside the corridor. The trail surface is a graded area that is often planted with a grass seed mix, while the areas outside the corridor are forest lands.

At about four miles in length and at 9-12 feet in width the trail will see clearing of over 5 acres; $4 \times 5280 \times 11/43,560 = 5.33$ acres. There will be no shrubs or trees in the community connector class II trail corridor. This area will mark a clearing of over 5 acres of Forest Preserve lands classified as Wilderness.

Why is Community Connector Class II Snowmobile Trail Building Accelerating as Winter Weather Declines Due to Climate Change?

PROTECT questions whether the APA and DEC should be investing in an extensive new class II snowmobile trail system in an era of global climate change. In the year 2018, we now live in an Adirondack Park where it's as likely to rain in winter months as it is to snow. We live in a part of the world that receives 30 percent more rain than it did thirty years ago, and less snowfall. Winter months show greater warming trends than summer months. The future will bring inconsistent snowmobile seasons at best, which is already borne out in the marketplace by declining snowmobile sales and registrations.

PROTECT is puzzled as to how the two environmental agencies in New York State can make major policy decisions, as well as major financial decisions, without taking into account the effects of long-term trends of global climate change on the Adirondack Park.

PROTECT Predicts APA and DEC will Transform Snowmobile Trail Network to ATV Trail Network as Reliable Snowfall Wanes

PROTECT predicts that the APA and DEC someday will issue a new "Guidance" to convert intermittently snowless community connector class II snowmobile trails into community connector all-terrain vehicle trails. As snowmobiling wanes, we have no confidence that these agencies will withstand pressure to unleash vast ATV networks across the Forest Preserve on the road-like class II snowmobile trail system. The damage from ATV trail networks to the Forest Preserve will be vast and unrelenting as we already have seen in areas such as the Ferris Lake, Black River, and Independence River Wild Forest areas where DEC has been unable or unwilling to control illegal ATV abuse. We expect to hear the same arguments, justifications, and obfuscations that the DEC and APA used to build a community connector class II snowmobile trail system recycled to justify a new ATV "trail" system on the Forest Preserve.

Class II Community Connector Snowmobile Trails Violate the State Constitution

The proposed Class II snowmobile trail would violate Article XIV, Section 1 of the State Constitution because it would result in the destruction of thousands of trees and would destroy the wild forest nature of the Forest Preserve lands that it passes through. Protect the Adirondacks notes with dismay that the Draft UMP fails to even mention Article XIV in its discussion of "guiding documents", as if the proposed trail was not part of the Forest Preserve.

Class II trails are designed and built for snowmobiles to travel 25 miles per hour or higher and are groomed with large tracked groomers. No other recreational use in the Forest Preserve requires 9-12-foot-wide trails, specifically designed and constructed to allow regular grooming with large multi-ton motor vehicles and used by high-speed motor vehicles. Unlike other trails built by hand, these trails are excavated with heavy machinery, utilize extensive benchcutting, remove large numbers of trees over 3 inches diameter at breast height (DBH), and remove many more trees under 3 inches DBH, remove the entire native understory, often replace the native understory with a grass mix, open the forest canopy, often fracture and chip away bedrock, utilize oversized bridges often equipped with reflectors, and are built to handle operation of motor vehicles at high speeds. No other recreational activity in the Forest Preserve, outside of Intensive Use Areas, requires such profound terrain alteration and destruction to accommodate recreational use. For all of these reasons, class II snowmobile trails violate Article XIV, the forever wild provision, of the State Constitution.

Page 2 of the Draft UMP states that the trail will use existing skid roads and trails, presumably so as to reduce the amount of trees that will be cut. However, PROTECT believes that there are few, if any, such existing roads or trails that could be utilized, in part because the land in question has been part of the Forest Preserve for many decades. The existence or non-existence of such routes should be ascertained before any decisions are made on this proposed trail, not after.

The UMP Amendment Requires A Supplemental EIS

The 2006 Snowmobile Plan for the Adirondack Park (page 16) states that “the generic environmental review that was conducted as part of this Final Plan/GEIS is outlined in Appendix P. This generic review will be supplemented by site-specific environmental review conducted during the Unit Management Planning process.” The State Environmental Quality Review Act (SEQR) regulations at 6 NYCRR section 617.10(d)(4) require that a supplemental environmental impact statement (EIS) be prepared whenever a generic EIS was prepared and a subsequent site-specific proposal was not adequately addressed in the generic EIS and the subsequent action may have a significant adverse environmental impact.

The Draft UMP Amendment contains no SEQR review of any kind. Due to the environmental constraints on the proposed trail route (as discussed herein), and the potential for cutting thousands of trees, this proposal will have a significant adverse environmental impact (as described herein) and a supplemental EIS must be prepared to assess these impacts and measures to avoid them. Such a supplemental EIS would also allow APA and DEC to consider the various alternatives to the proposed trail that are discussed in this letter. 6 NYCRR section 617.9(b)(5)(v).

The 2006 Snowmobile Plan only looked at the impacts of snowmobile trail construction. It did not address multiple use trails, such as the one now being proposed. The construction requirements and impacts of trails for mountain bike and other multiple uses differ from those for snowmobile trails. These impacts must be addressed in the supplemental EIS.

Also, the trail now being proposed was not part of the connector trail system proposed in the 2006 Snowmobile Plan (see pages 45-46) so it was not covered by the prior SEQR review.

PROTECT also notes that the amended SEQR regulations that will take effect on January 1, 2019 will require that all SEQR reviews take into account the effects of climate change on the proposed project. 6 NYCRR section 617.9(b)(5)(iii)(i) (new). This was not done in the 2006 Snowmobile Plan and must be done now.

The Draft UMP improperly segments the SEQR review of the proposed trail. The trail will have three sections, all of which will be essential for it to serve its stated purposes, including connecting the communities of Raquette Lake and Long Lake. These sections would be located on the Blue Ridge Wilderness Area, at least two parcels of private land, and the Sargent Ponds Wild Forest Area. The trail would also require a bridge across the South Inlet and a road crossing of NYS Route 28, which could affect traffic safety. The Draft UMP covers only the first section of the trail and does not address the potential adverse environmental impacts of these other parts of the action. This is an improper segmentation of the SEQR review, in violation of 6 NYCRR sections 617.2(ag) and 617.3(g)(1).

SEQR requires that specific mitigation measures for adverse impacts be identified. Page 2 of the EIS states that “the Department will take appropriate action to mitigate and rectify the issues.” No such mitigation measures are identified.

For all of these reasons, a supplemental EIS must be prepared.

This UMP Amendment is Part of the Largest Expansion of Motor Vehicle Use in the History of the Adirondack Forest Preserve

The proposed new snowmobile trail through the Blue Ridge Wilderness marks a major milestone in the current expansion of motor vehicle access to the public Forest Preserve. For the first time in 46 years of modern Forest Preserve regulation there is a proposal to locate a snowmobile trail in a Wilderness area. This is a fact celebrated by many motor vehicle enthusiasts. Unfortunately, this proposal is consistent with a series of decisions at the APA to open the Forest Preserve to motor vehicles:

- Many miles of class II snowmobile trails have been approved that require cutting of 1,000 trees per mile, excavation with heavy equipment, and extensive terrain alterations.
- The APA twisted Forest Preserve classifications to allow the public to drive within a stone’s throw of the Essex Chain Lakes and Boreas Ponds.
- The APSLMP was amended to allow motor vehicles in a Primitive Area, which is supposed to be managed like a Wilderness area.
- A new bridge is proposed for snowmobiles over the Cedar River and the Polaris bridge over the Hudson River is being retained for snowmobiles.
- A gerrymandered classification saw the creation of a narrow motorized Wild Forest corridor between the Hudson Gorge Wilderness and Essex Chain Primitive Area.

- Forest Preserve roads, such as the Bear Creek Road, were unnecessarily widened to facilitate higher levels of motor vehicle use.
- The APA and DEC have undermined the CP-3 policy for special motor vehicle access for the disabled in order to allow public motor vehicle access to the same areas.

These decisions come at a great cost to the ecological health of the Forest Preserve and to the wilderness spirit that establishes the bedrock of the SLMP. The state has invested far more in building the motor vehicle access infrastructure in the Adirondack Forest Preserve than it has to upgrading and maintaining the High Peaks Wilderness, the most popular area in the Forest Preserve. The state's investment in motorizing the Forest Preserve is misguided.

The Total Fiction of a Multi-Use Trail

The idea that this new trail from Raquette Lake to Long Lake will be used for anything other than a snowmobile trail is a complete fiction. A community connector class II snowmobile trail is built to a width of 9-12 feet, and is often much wider due to extensive bench cuts, at times reaching widths well over 20 feet. These trails are graded extensively with heavy equipment to flatten the surface. Large rocks and roots are removed. These wide trails often result in an open canopy and are often planted with a grass seed mix that creates a long grassy corridor. These "trails" are nothing like a foot trail and are ugly and unpleasant to walk on in spring, summer, or fall. These trails are often eroded. The new Seventh Lake Mountain Trail receives very little use outside of the limited use it sees during snowmobile season. The idea that class II trails will enhance spring-summer-fall tourism or public recreation is a farce.

New Trail Will Undermine the Quality of Life of Local Residents

There are dozens of houses in the community often referred to as "Burke Town" in Raquette Lake just south of Route 28 and east of South Inlet. This community is surrounded by Forest Preserve with the Moose River Plains Wild Forest on three sides. There is hardly a more remote community or a community established in a more peaceful and wild setting in the Adirondacks. The new class II snowmobile trail is routed to run south of Burke Town in the Forest Preserve. This trail will significantly diminish the peacefulness and quality of life of the residents. This trail will mark a major change to their community and will be a major disruption and degradation to the quality of life of residents.

No Private Land Agreements for New Trail, No Way to Cross Marion River, No Trail Routed through Sargent Ponds Wild Forest

The proposed snowmobile trail through the Blue Ridge Wilderness is currently a "Trail to Nowhere". There are no agreements with the private landowners to pass through the private parcels that lie between the Blue Ridge Wilderness and the Sargent Ponds Wild Forest. There is no identified location or permit for a bridge crossing on the Marion River, other than a single private bridge, for which there is no agreement in place for the State's use. There is no Unit Management Plan for the Sargent Ponds Wild Forest, and no

route through this unit has been identified. There is no DOT permit or final planning for how snowmobiles will cross South Inlet or Route 28.

Due to all these unknowns, no action should be taken on this new snowmobile trail. All other planning should be completed before final action is taken on the snowmobile trail through the Blue Ridge Wilderness. As discussed above, all parts of the trail must be addressed in the SEQR review, to avoid improper segmentation. That can not be done until the routes for all sections of the trail have been determined.

As a practical matter, it makes no sense to amend this UMP until the locations of all sections of the trail are known. There is no need to rush the process for this amendment. Slowing down the process will also give APA and DEC time to consider the alternatives discussed in this letter.

The Trail Would be Useless Without Permanent Easements Across Private Lands

Even if agreements can be reached with the private landowners to cross their lands, it appears that that DEC believes that these will be temporary revocable agreements, rather than permanent easements. Page 3 states “The use of the Seventh Lake Mountain – Sargent Ponds Multiple-Use Trail as a whole could be impacted should the private landowner revoke the public’s rights to use the trail.” It would be an egregious waste of hundreds of thousands of dollars in public funds to build a trail that could be closed to the public at the utter and complete whim of a private landowner, to say nothing of the damage to the Forest Preserve that would occur, all to no good end. Unless permanent easements are obtained from all of the private landowners in question, this trail should not be built.

Testimony from Snowmobilers at Raquette Lake Public Hearing Show Weaknesses of this Proposal

On November 28, 2018, the DEC held a public hearing at the Raquette Lake Central School on this proposal. Two comments from snowmobiling enthusiasts are worth noting here. First, one snowmobiling leader from Indian Lake pleaded with state leaders not to remove snowmobiling from “the ice.” He talked about the central importance of snowmobile riding in the Adirondacks of having full access to frozen lakes. He said many people agreed with him and that he hoped that this new trail would not lead to snowmobiles being expelled from Raquette Lake. This thought was widely applauded.

The second comment was from a rider who said he found the new Seventh Lake Mountain Trail a terrible ride. He said there were not enough straight and long sections and that it required low speeds. He said that he hoped that the new trail through the Blue Ridge Wilderness Area would be better. He said that he seldom rides the Seventh Lake Mountain Trail because he finds it difficult and un-enjoyable. The reality is that the State of New York will likely spend millions of dollars to build the new trail from Raquette Lake to Long Lake, yet this trail will always be far less popular and used than the existing route along Raquette Lake, Forked Lake and Long Lake because lakes can be ridden at much higher speeds. In essence, the state is building a new snowmobile trail that the snowmobile community doesn't like and will seldom use. In this way, the state is

making an exceedingly poor long-term management decision and investment in the public recreation infrastructure in the Adirondacks.

Other Options Must be Considered: Reclassification to Wild Forest; Park-Wide Review of Wilderness Areas

There are other options that the APA and DEC should investigate that would not inflict long-term damage on Wilderness lands in the Adirondacks and uphold what is supposed to be the strongest protections accorded by the State of New York for public lands. It appears to Protect the Adirondacks that the motivations to build a new snowmobile trail through the Blue Ridge Wilderness is as much about weakening Wilderness area protections as it is to enhance snowmobile riding between central Adirondack communities. One way to undertake the trail, but not do violence to Wilderness protections in the APSLMP, is to reclassify the roadside areas along Route 28 on the north end of the Blue Ridge Wilderness area to Wild Forest.

Because of all the uncertainties around this trail from Raquette Lake to Long Lake, having to do with river crossing, private lands, and other Forest Preserve units there is time to take a comprehensive approach to this matter where the APA could make a decision in a Park-wide context. APA staff stated at the Raquette Lake public hearing that this section of the Blue Ridge Wilderness along NYS Route 28 is the only viable area in the Adirondack Park to route a snowmobile trail through a Wilderness area. There is time to slow down, look at Wilderness values throughout the Park, and make an informed decision. Protect the Adirondacks urges the APA to take a hard look at the issue of reclassifying the Route 28 roadside area to Wild Forest while looking at the same time for opportunities to expand Wilderness. There are abundant opportunities for expansion of the Silver Lake Wilderness Area south beyond the current boundary, which is the Hamilton County line. There is an opportunity to expand the West Canada Lake Wilderness north and the Hoffman Notch Wilderness west. These would not change recreational patterns and would make ecological sense. This is not the complete list of places where Wilderness areas could be expanded. The APSLMP Generic Environmental Impact Statement places a premium on Wilderness area protection. The expansion of Wilderness would help legal determinations for changes of roadside Wilderness to Wild Forest.

Class I Snowmobile Trail Should be Considered to Minimize Impacts

One alternative that does not appear to have been considered by state agencies is construction of a class I snowmobile trail rather than a class II snowmobile trail. If the desire is to link Adirondack communities with a bona fide snowmobile trail, a class I trail meets that objective as ably as a class II snowmobile trail. The Snowmobile Trails Guidance enumerates many ways that a class I trail has much less of a negative environmental impact than the class II trails.

The Snowmobile Trail Guidance directs that class I trails be built in ways that reduce impacts as compared with class II trails. Class I trails are narrower than class II trails, which minimizes tree cutting, terrain alterations, and destruction of the native forest flora. From the directive to use hand tools rather than multi-ton excavators, to

minimizing benchcutting, and to employ different standards for rock and root removal, class I trails have far less of an environmental impact than road-like class II trails. Protect the Adirondacks urges state planners to fully examine the utility of approving a class I trail rather than a class II trail in order to limit environmental impacts. The decision to limit environmental impacts in this way, while still providing motorized access under the one APSLMP exception for Wilderness areas, would show a greater fidelity to the spirit and directives of the APLSMP.

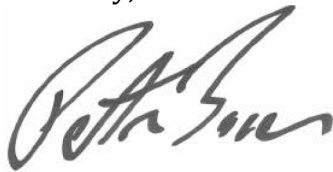
The sad reality is that the DEC field staff systematically undermine the effectiveness of the Snowmobile Trail Guidance. The class II trails constructed in the Moose River Plans Wild Forest and Vanderwhacker Mountain Wild Forest area widely fail to comply with many of the directives of the Guidance. The DEC has systematically exploited weaknesses in the Guidance to use heavy equipment to grade mile after mile of trails, to benchcut extensively for miles at widths 15-20 feet, and to aggressively flatten and excavate trail surfaces to create de facto roads. Only the DEC and APA could call a 5-ton excavator "low impact landscaping equipment." Moreover, the Guidance phrases "in limited instances" and "rare instances" are routinely abused.

Is this the Best We Can do for Economic and Community Development?

The State of New York will spend hundreds of thousands of dollars, if not more, to build this new snowmobile trail from Long Lake to Raquette Lake. This is a poor investment of public funds. When this trail is built, it will see far less use than the existing route over Raquette, Forked and Long Lake. This trail will see very little, if any, use in the spring, summer or fall. The money spent to build this Trail to Nowhere would be far better used to make grants to small businesses in the Raquette Lake, Inlet, Indian Lake, and Long Lake communities.

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,



Peter Bauer,
Executive Director

CC: B. Seggos, NYSDEC K. Lynch, NYSDEC
 S. Mahar, NYSDEC T. Berkman, NYSDEC
 R. Davies, NYSDEC K. Richards, NYSDEC
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Community connector class II trails requires extensive benchcutting, like the one on the left pictured above. These benchcuts often run for hundreds of yards. Recently constructed class II trails saw benchcutting of this magnitude on nearly half the lengths of the trails. Benchcuts are permanent changes to forest topography that will be evident for decades. Foot trails do not require anything like this.



Community connector class II trails change the forest ecology. Where there was once a forest or trees and a native understory of plants, shrubs and small trees, there is now a corridor of grass and ferns. These trails are not only environmentally destructive but they are not pleasant to hike on or ride a bike over. These trails are designed specifically for snowmobile use and are not inviting for any other kind of recreational use.



Community connector class II trails see extensive benchcuts and grading. In this way they maintain a road-like appearance and function, very different from a foot trail. Long stretches of this “trail” were graded with heavy equipment, which the Snowmobile Trail “guidance” states are supposed to be “limited.”



Community connector class II trails see dramatic removal of top soil and forest understory and as a result they are prone to erosion. This is a section word to bedrock on the Seventh Lake Mountain Trail in the Moose River Plains.



Construction of community connector class II trails cause immense damage to the forest. Trees are cut. The understory is removed. All rocks and roots are removed. The surface is graded with excavators that weigh 4-5 tons. The trail surface is so damaged that it's planted with a grass mix and stabilized with straw and gravel. The construction of a class II trail is nothing like the construction of a foot trail. Rather than "limited" as required under the "Guidance" the majority of this trail was graded and excavated.



A typical scene of how the forest is changed to build a community connector class II trail. More extensive grading and excavating.



Community connector class II trails are wide, flattened trails that are far closer in resemblance and function to a road than to a foot trail.



The machine weighs nearly 12,000 pounds. The Snowmobile Trail Guidance refers to this machine euphemistically as “low impact landscaping equipment.” Community connector class II trails require extensive benchcutting and grading with this type of machine. Foot trails are built with hand tools.



This bridge is 12 feet wide. The area cleared in front of this bridge extends to nearly 20 feet of disturbed area that has been graded and planted with grass. Community connector class II trails are regularly wider than 12 feet, stretching to 15 to 20 feet and wider in many places.



Another example of the damage to a forest caused by construction of a wide community connector class II trails. Here, benchcutting has been significant and the trail has been replanted with grass.



Community connector class II trails routinely see damage to trees along the trail corridor. Tree roots are regularly cut, such as those pictured above, causing them to topple, such as the one pictured in the lower left; note the cut roots. Other trees are damaged by the heavy equipment during construction, which will likely lead to tree mortality. Trees alongside foot trails are not damaged.



Community connector class II trails regularly see fill and debris used to build up banks to level the trail. This type of activity is not part of foot trail construction.



Four years after construction, the Seventh Lake Mountain Trail, a community connector class II trail, is a grass field that runs through the forest. Foot trails blend in with the forest whereas class II trails completely change the character and ecology of the Forest Preserve.



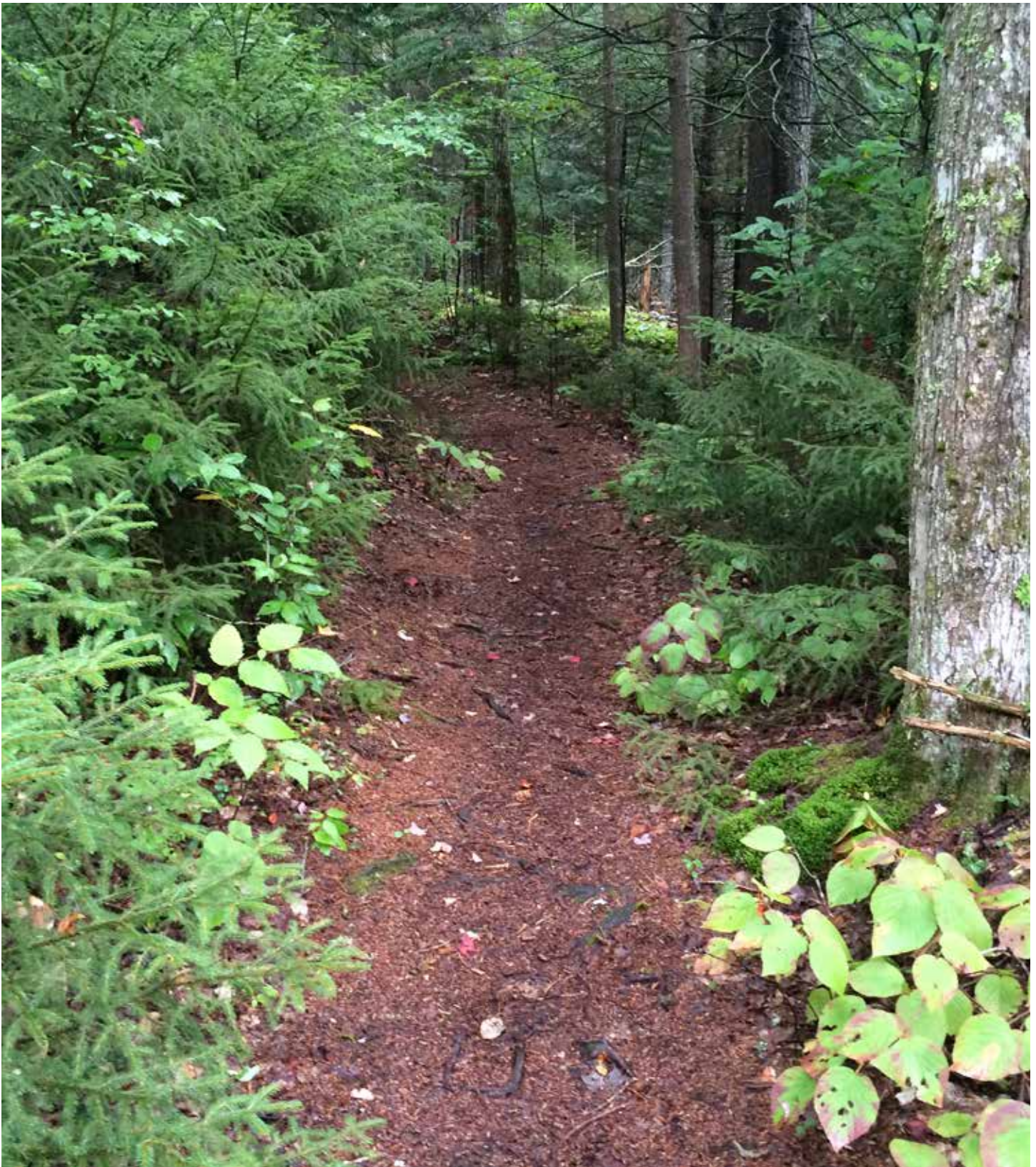
A typical example of a foot trail. Note the narrow trail tread, how native flora is diverse and grows abundantly on the trail edge, and how small trees grow on the trailside. Community connector class II trails are graded wide with heavy equipment and removed all forest understory and trees.



A typical example of a foot trail. Note the narrow trail tread and how the trail is rooted around a rock. Community connector class II trails are graded wide with heavy equipment and have removed all rocks.



A foot trail is designed to integrate with the forest. Rather than removing trees, a foot trail goes between or around trees. Roots and rocks are not removed. In contrast, a community connector class II trail sees the removal of trees, up 1,000 per mile, and removal of roots and rocks.



Community connector class II trails regularly are wide and excavated with heavy equipment. Foot trails, like the one pictured above, are narrow, constructed with hand tools, retain all natural vegetation and top soil.