



Board of Directors

January 12, 2021

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NYS DEC Region 5 Office
Division of Lands and Forests
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Ray Brook, NY 12977-0296

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RE: Public Comments Draft Debar Mountain Complex Unit Management Plan

Barbara Rottier
Secretary

Dear Mr. Guglielmi:

David Quinn
Treasurer

The Debar Mountain Complex (DMC) covers 88,300 acres of public Forest Preserve that includes the 80,400-acre Debar Mountain Wild Forest, the 6,000-acre Madawaska Pond/Quebec Brook Primitive Area, and the 1,900-acre Deer River Primitive Area. The draft Unit Management Plan (UMP), the first for this area in the 48 years since the Adirondack Park State Land Master Plan was approved and required UMPS. The Debar Mountain Wild Forest UMP has been a long time coming. We understand this the Department of Environmental Conservation (DEC) has been working on this UMP for 17 years. Protect the Adirondack congratulates the DEC on finally completing a public draft for these important lands in the public Forest Preserve.

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Protect the Adirondacks is mystified as to why the DEC refuses to comply with basic requirements of the Adirondack Park State Land Master Plan (APSLMP) for things like assessments of public use, public use impacts on natural resources, and projections of future public use, to name a few. UMP after UMP, these requirements are ignored.

General Comments

Please find general comments on the draft DMCUMP following here:

Peter Bauer
Executive Director

UMP Format: The DMCUMP differs significantly from the last major UMP for the Saranac Lake Wild Forest Area developed by the DEC and approved by the Adirondack Park Agency (APA). Whereas the SLWFUMP had a 50-page section "Inventory, Use, and Capacity to Withstand Use" followed by sections "Management and Policy" and "Proposed Management Actions, the new DMCUMP has sections "Natural Resources" followed by "Recreational Resources and Human Uses" and "Phases of Implementation." While there is some overlap in the materials between these two

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UMPs, there is also considerable information that was included in the SLWF that was omitted from the DMCUMP.

DMCUMP Violates Adirondack Park State Land Master Plan: The new draft DMCUMP fails to address many of the key requirements enumerated in the Adirondack Park State Land Master Plan (APSLMP) for a UMP. Many of these required analyses, assessments, and inventories are critical for planning and managing public recreational use in the Forest Preserve. Unfortunately, many of these required analyses, assessments, and inventories simply were not undertaken in any serious way in the development of the DMCUMP.

The APSLMP enumerates the requirements for the development of a UMP on pages 10–12. A review of these requirements shows that the DEC has failed to meet some of the most important ones.

First, the APSLMP requires “an inventory, at a level of detail appropriate to the area, of the natural, scenic, cultural, fish and wildlife (including game and non-game species) and other appropriate resources of the area and an analysis of the area’s ecosystems” (p 10). The DEC has satisfied this requirement in the draft DMCUMP in the “Introduction” and “Natural Resources” sections.

Second, the APSLMP requires “an inventory of all existing facilities for public or administrative use” (p 11). The DEC has satisfied this requirement in the draft DMCUMP in the “Recreational Uses and Human Resources” section.

Third, the APSLMP requires “an inventory of the types and extent of actual and projected public use of the area” (p 11). The public use data in Appendix E (copied below) on page 209 is rife with data gaps and does not include Loon Lake Mountain data, one of the most popular hikes in the unit. No meaningful long-term trends can be ascertained from this data. Also, the DMCUMP does not include any projections for public use. The DMCUMP fails to conform to the requirements of the APSLMP to complete “an inventory of the types and extent of actual and projected public use of the area.”

Appendix E Public Use Information

Debar Complex Register Data Year	Azure Mountain	Debar Mountain	Debar Pond	Hays Brook Truck Trail	Osgood Pond
1999	1,442x	X	X	810	X
2000	X	X	X	569	X
2001	X	X	X	685	1,037
2002	2,129x	940x	X	549	969
2003	4,282	1,172	X	649	713
2004	5,158	1,312	X	670	550
2005	3,858	1,206	X	916	685
2006	4,235	1,258	406	778	572
2014	X	665x	345	406x	371x
2015	2,052x	1,267	230x	105x	600

2016	2,909x	1,430	458	827	113x
2017	X	1,221	699	791	630
2018	5,739	1,185	1,054	719	547
2019	4,116x	X	933	566	339x

Fourth, the APSLMP requires “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.” (p. 11) The DEC has failed to meet this requirement across the unit in the draft DMCFUMP. There is not a detailed list of areas threatened by overuse.

Fifth, the APSLMP requires “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” (p 11). The DEC has attempted to develop some form of visitor use management program, outlined in the “Recreational Resources and Human Uses” section. This section lays out a monitoring protocol that is akin to the Saranac Lakes Wild Forest UMP protocol, but differs from the protocols in the recent amendments to the High Peaks Wilderness UMP and Vanderwhacker Mountain UMP. While the DEC details a monitoring protocol that will supposedly be used in this unit in the future, it has not completed “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” as required by the APSLMP. As such, the DMCUMP fails to satisfy this requirement.

Sixth, the APSLMP requires “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. 11). The DEC has set forth a number of ambitious management objectives in this UMP, but has not invested in efforts to determine the carrying capacity of many different areas of this unit, whether waterbodies or trails. As such, the DMCUMP fails to satisfy this requirement.

Seventh, the APSLMP requires “These management objectives will address, on a site-specific basis as may be pertinent to the area, such issues as ...”

–“Actions to minimize adverse impacts on the resources of the area.” (p 11)

The DEC has partially satisfied this requirement but has failed to provide a full list of areas that require remediation.

–“The rehabilitation of such portions of the area as may suffer from overuse or resource degradation.” (p 11)

With regards to primitive campsites and lean-tos, the DEC has satisfied this requirement. With regards to ATV damage, the DEC has not satisfied this requirement.

–“The regulation or limitation of public use such that the carrying capacity of the area is not ex-

ceeded and the types of measures necessary to achieve that objective.” (p 11)

The DEC has failed to meet this requirement in the draft DMCUMP because no carrying capacity/visitor use management analyses have been completed.

–“The preservation of aquatic and terrestrial habitats of the area.” (p 11)

The DEC has satisfied this requirement in the draft DMCFUMP.

–“The preservation and management of the fish and wildlife resources (including game and non-game species) of the area.” (p 11)

The DEC has satisfied this requirement in the draft DMCFUMP.

–“The preservation and management of the lakes, ponds, rivers, and streams of the area, with particular attention to all proposed or designated wild, scenic and recreational rivers.” (p 11)

The DEC has failed to undertake carrying capacity analysis in the preparation and development of this draft UMP. As such, we do not believe that the current draft UMP conforms to the APSLMP.

–“The preservation and management of special interest areas such as the habitats of rare, threatened or endangered species and areas with the potential for the reintroduction of extirpated species, unique geological areas and historic areas or structures.” (p 11)

The DEC has satisfied this requirement in the draft DMCUMP, though we note in general that the DEC has failed to even consider or assess the feasibility for the restoration of extirpated species in the Adirondack Forest Preserve such as wolves and mountain lions.

–“The identification of needed additions or improvements to, and plans for providing for further appropriate public use of, the area consistent with its carrying capacity.” (p 11)

The DEC has not undertaken any carrying capacity/visitor use management analysis in the preparation and development of this plan. While the DEC notes that its plan is to undertake such analysis, the department has been saying that for years with almost no results. It’s important that carrying capacity analysis is undertaken and that things such as regulations that set limits on public use and the size of parking lots are tied to carrying capacity analysis. While subsequent UMP amendments may be made based on information obtained from carrying capacity analysis in future years, we note the absence of any completed carrying capacity analysis in the current draft of the DMCUMP. As such, we do not believe that the current draft UMP conforms to the APSLMP.

–“The removal of such non-conforming uses as may remain.” (p 11)

The DEC has satisfied this requirement in the draft DMCUMP.

–“The identification, in intensive use, historic and appropriate portions of wild forest areas accessible by motor vehicles, of measures that can be taken to improve access to and enjoyment of these lands, and associated structures and improvements, by persons with disabilities.” (p 11)

The DEC has satisfied this requirement in the draft DMCUMP.

Eighth, the APSLMP requires “the Unit management plans will also address the administrative actions and the minimum facilities necessary on a site-specific basis, as may be pertinent to the area to attain the stated management objectives of such area.” (p 11) The DEC has satisfied this requirement in the draft DMCUMP.

Ninth, the APSLMP requires “Schedules for achievement of such objectives will be included in each unit management plan. The land characteristics and the recommended objectives for each area will be related to and integrated with the characteristics and management objectives for adjacent public and private land areas. General recommendations for future acquisition will be included as appropriate.” (p 12) The DEC has satisfied this requirement in the draft DMCUMP.

Tenth, the APSLMP requires “An initial draft of the unit management plan for each state land area including alternative management objectives, where appropriate, will be submitted to the Agency for review and comment, prior to the preparation of the final draft plan for public review.” (p 12) We have no idea if this was completed because the DEC-APA treat these internal comments as shielded state secrets as opposed to an open and transparent discussion about public lands.

Eleventh, the APSLMP requires “Opportunity will be made for review and comment on the draft unit management plans by the public and other interested parties, and a public meeting or meetings will be convened as appropriate for that purpose.” (p 12) The DEC has satisfied this requirement in the draft DMCUMP.

Twelfth, the APSLMP requires “Final unit management plans will be prepared by the Department of Environmental Conservation after due consideration of all comments and recommendations made on the public review draft. The Commissioner of the Department of Environmental Conservation will adopt each final unit management plan, which will then be filed with the Agency. The Department of Environmental Conservation will report annually to the Agency on progress made toward the implementation of each adopted unit management plan.” (p 12) We have raised many questions in this letter and have included a section “Issues That Require a Specific Response from the DEC in the SEQ R Responsiveness Section in the Final DMCUMP” where we enumerate a number of issues that merit a response.

Trail Classifications: The DMCUMP includes a “Trail Classification” chart on page 152. A variation of this chart has been used in many UMPs since it was first used in the High Peaks Wilderness Area UMP in 1998. Protect the Adirondacks believes that these trail classifications should be confirmed in the APSLMP, where they would be properly and publicly reviewed and analyzed. The trail classification standards in this chart change UMP to UMP, as was recently seen with the DEC’s quiet and unilateral changes to Class VII Horse Trails starting in the Hammond Pond Wild Forest UMP. These trail classifications need scrutiny and analysis. These classifications are changed UMP to UMP, showing that they should be fully and publicly vetted and included in the APSLMP.

No Waterbody Carrying Capacity Analysis: The DMCUMP, as with all recent DEC UMPs, fails to comply with the directive in the APSLMP to undertake a carrying capacity study for major waterbodies. This is especially important for the very popular, and important, collection of waterbodies in this unit, such as Debar Pond, Madawaska Flow, Deer River Flow, Jones Pond, Lake Kushaqua, and Meacham Lake. The APSLMP states:

The water resources of the Adirondacks are critical to the integrity of the Park. The protection of the major watersheds of the state was a major reason for the creation of the forest preserve and continues to be of significant importance. Waters, particularly lakes and ponds, have their carrying capacity from a physical, biological and social standpoint just as do tracts of public or private land. The use made of state waters also has a direct impact on adjacent land holdings.

A genuine need exists to ensure that the scale and intensity of wateroriented uses are consistent with adjoining state and private lands and the general character of the Park, particularly so far as the type, speed and number of boats are concerned.

A comprehensive study of Adirondack lakes and ponds should be conducted by the Department of Environmental Conservation to determine each water body's capacity to withstand various uses, particularly motorized uses and to maintain and enhance its biological, natural and aesthetic qualities. First emphasis should be given to major lakes and ponds totally surrounded by state land and to those on which state intensive use facilities exist or may be proposed. The importance of the quality of these resources cannot be overemphasized. (p 4)

In addition to the citations above, the APSLMP also explicitly directs Forest Preserve managers not to exceed the carrying capacity of waterbodies:

Fishing and waterway access sites may be provided on any body of water irrespective of its size where the current or projected need for access clearly warrants such a site. Such sites will comply with the following management guidelines:

-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)

We urge the DEC to organize carrying capacity analyses on the major waterbodies in this unit in order to comply with the APSLMP. PROTECT believes that carrying capacity analysis is important for managing public recreational impacts and natural resource protection for the major waterbodies of the DMC.

While the "Management and Planning Methods" section includes a monitoring outline for "Water Resources" the APSLMP clearly has the expectation that monitoring and analysis should occur before a UMP is developed so that this important data can direct management decisions.

Class II Community Connector Snowmobile Trail Construction Violates the Adirondack Park State Land Master: The DMCUMP proposes 2.7 miles of new class II community connector snowmobile trails. 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." A snow-

mobile trail “should be designed and located in a manner that will not adversely affect adjoining private landowners or the wild forest atmosphere....” Class II community connector snowmobile trails are 9-12 feet in width. They are road-like and simply do not have the character of a foot trail, which violates both the wild forest character and the wild forest atmosphere of the area. PROTECT has consistently stated that class II community connector snowmobile trails do not conform to these three standards.

A class II community connector snowmobile trail’s surface has been graded, leveled, and flattened by a multi-ton excavator. Extensive bench cuts are dug into side slopes that parallel the trail for long distances, protruding rocks are removed, extensive tree cutting is done, all understory vegetation is removed, and oversized bridges are built to support multi-ton groomers. In places bedrock may be fractured and chipped or gravel may be used to stabilize the trail surface. Bridges have been outfitted with plastic reflectors for nighttime driving. Roughly one acre of forest is cleared for every mile of class II trail that is constructed.

A “foot trail” is where people walk single file. They step over roots and rocks. The trail surface is uneven and follows the terrain. There are scarcely any stumps of cut trees. Vegetation on the side often 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.

The DMCUMP proposes to close over nine miles of snowmobile trails in the unit. These are un-used trails that have not been maintained and used consistently for snowmobiling. It’s important for the DEC and APA to note that though these “trails” will no longer be used for snowmobiling they will persist with their present forms and geometrical shapes for decades to come. Among the nine miles of snowmobile trails to be closed are 4.9 miles of snowmobile trails that ran on the Hays Brook and Sheep Meadow Administrative roads, which will continue to serve as roads and be used by motor vehicles. Closing these roads to snowmobiles doesn’t make them any less of a road, nor will they revegetate. The 4.4 miles of trails proposed for closure were dead-end trails that were not part of a larger network and had not been used in years. These trails have grown in somewhat. The reality is that the 9.3 miles of snowmobile trail closure will not produce a tangible environmental benefit to the Forest Preserve, whereas the 2.7 miles of new class II trails will see the destruction of thousands of trees and clearing of nearly three acres of forests. The trail closures provide only a benefit on paper, not a real environmental benefit for the Forest Preserve.

PROTECT has identified that there are many other areas of the APSLMP for Wild Forest areas that are expressly violated by the design and construction of class II community connector snowmobile trails and by grooming with large tracked (motor vehicle) groomers. These include:

1. Basic Guideline 2 (Motor Vehicles, Motorized Equipment and Aircraft 6) states that public access accommodations should be “consistent with the wild forest character.”

PROTECT does not believe that the new road-like class II community connector class II snowmobile trails are consistent with the wild forest character. The route’s width, bridges, reflectors, bench cuts, ledge cuts, use of gravel and straw, extensive surface alteration, tree removal, understory removal are all inconsistent with the “wild forest character” of Wild Forest areas.

2. Basic Guideline 2 (Motor Vehicles, Motorized Equipment and Aircraft #8) 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 class II community connector snowmobile trails meet the minimal maintenance test expressed here. DEC and the APA claim that the grooming of these trails is maintenance. PROTECT does not believe that numerous trips per week by a multi-ton tracked groomer on a major snowmobile route meets the “minimal maintenance” test.

3. Basic Guideline 2 (Motor Vehicles, Motorized Equipment and Aircraft 9) 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 mileage rates less than most SUVs, PROTECT questions the “self-sufficiency” of the users of class II community connector snowmobile trails where the principal recreational use of snowmobiling can only be accomplished if a multi-ton tracked groomer has regularly groomed the trail.

Climate Change and Class II Community Connector Snowmobile Trails: Under the 2019 Climate Leadership and Community Protection Act (CLCPA), state agencies are mandated to weigh the impact of climate change in their decisions. Section 7(2) of CLCPA requires all State agencies to determine whether their administrative approvals are consistent with the attainment of, or will interfere with the attainment of, the statewide greenhouse gas emission limits in ECL Article 75. If inconsistent, they are required to explain why, and to identify alternatives or mitigation measures. In this case, the directive to the DEC from CLCPA is to assess the impacts of forest clearing to build 2.9 miles of new class II trails, which as legally stipulated in the recent trial of *Protect the Adirondacks vs DEC/APA* found that each mile of class II trail saw clearing of more than one acre of forest land.

In his book “Climate Change in the Adirondacks” (2010) scientist Jerry Jenkins provides calculation about the clearing of forest land, which creates a loss of carbon storage and the release of carbon into the atmosphere. Jenkins wrote “Clearing an acre of forest creates a debt of 257 tons.” By our analysis, this UMP seeks to clear three acres of forestland to create new class II trails, which will lead to a carbon debt of 771 tons compared to where the tract is today.

Protect the Adirondacks is concerned about the DEC’s compliance with the Climate Leadership and Community Protection Act. We urge the DEC to detail and quantify the climate change impacts of this project, the steps the DEC took to mitigate these impacts, and how the DEC has complied with the letter and spirit of the Climate Leadership and Community Protection Act.

Class II Community Connector Snowmobile Trails Violate the State Constitution

Class II community connector snowmobile trails are designed and built for snowmobiles to travel 25 miles per hour or higher and be groomed with large, tracked groomers. No other recreational “trail” use sees this kind of speed by users. No other trail system in the Forest Preserve requires 9-11 foot wide

trails, specifically designed and constructed to allow regular grooming with large multi-ton motor vehicles and high-speed snowmobile travel. Unlike other trails built by hand, class II trails are excavated with heavy machinery, utilize extensive bench cutting, remove thousands of trees over 3 inches diameter at breast height (DBH), remove tens of thousands of 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. No other recreational activity in the Forest Preserve, outside of Intensive Use Areas, requires such profound terrain alteration and destruction of natural resources.

PROTECT believes that class II community connector snowmobile trails violate Article XIV, Section 1 of the NYS Constitution.

Mountainbike Trails

PROTECT has monitored mountainbike trails on the Forest Preserve over the last 15 years since the first was built between the Whiteface Mountain Intensive Use area and Wilmington Wild Forest. We find that specially designed mountainbike trail networks are very successful, while the random mountainbike trails on an old road or foot trail are scarcely used. The two mountainbike trail networks in the Wilmington Wild Forest have been very successful because they are a cluster of specially designed single-track trails that provide a range of options for riders of different abilities in a compact area. These two networks were also built in a part of the Adirondacks with a local supportive population and nearby partner organization, which is important because mountainbike trails require a high degree of maintenance.

For some reason the DEC believes that it must include a new mountainbike trail complex in every UMP, even where they make no sense. For instance, the approved mountainbike trail network in the Vanderwhacker Mountain Wild Forest area on Ragged Mountain along the Blue Ridge Highway has neither a local population base or a partner organization to support and help maintain such a trail network. That system makes no sense. The two mountainbike trail networks approved in the Moose River Plains Wild Forest area also have no local population base or a partner organization to support and help maintain these trails. That system makes no sense. The Saranac Lake Wild Forest area saw approval of a mountainbike trail network and has begun trail construction. That area of the Adirondacks has a local population base or a partner organization to support and help maintain these trails. As such, that system makes sense. The mountainbike trail system in the DMC makes no sense. It's foolishness for the DEC to promote mountainbiking in the DMC because the public interest simply is not there.

The Myth of the Multi-Use Trail

It's time to stop "Multiple Use Trail" fraud in Forest Preserve management in the Adirondack Park. These trails are primarily designed for snowmobile or horse trails, which undermine other uses. The aesthetic hiking experience is vastly undermined by the wide, flat conditions of a multi-use trail, which alienates public interest in these trails.

Trailless Area

A motorless and trailless core should be a goal within every Wild Forest area and UMP. These areas will grow in importance as the decades pass and it's important that state agencies plan and manage a trailless area system across the Forest Preserve. We urge the DEC to work to develop a viable and big trailless area within the Debar Mountain Wild Forest Area in the final UMP.

Specific Comments

Here are specific comments on the draft Debar Mountain Complex UMP.

Visitor Use Monitoring: The management of hiking trails and campsites in the Adirondack Forest Preserve has generally not been science-based for design, construction and maintenance. Most hiking trails, and many campsites, were established decades ago. There are few modern, newly designed, and sustainably constructed hiking trails in the Adirondack Forest Preserve, such as the highly successful Moxham Mountain Trail, the rerouted new trail up Coney Mountain, the newly built trail on Lyon Mountain. There are not many such campsites either. DEC and APA have not made the sustainability of, and the protection of natural resources within, hiking trail and popular camping corridors a priority in UMPs or UMP amendments.

The new DMCUMP outlines a protocol in the "Management and Planning Methods" section similar to the recent Saranac Lake Wild Forest UMP, and similar to the protocols proposed for the Vanderwhacker Mountain Wild Forest Area and High Peaks Wilderness Area UMP amendments. We support the renewed effort by the DEC to pursue carrying capacity analysis, and we're aware that some natural resource baseline information was gathered in the High Peaks last summer to begin carry capacity analysis there.

Generally, the Action Steps and Objectives for monitoring the lands resources in the DMC, such as trails, parking areas, campsite, etc., are thorough and well scoped. The challenge, of course, is the actual implementation of a monitoring program, which never seems to be a high priority for the DEC.

New Climate Change Section: PROTECT is disappointed that this section does not attempt to calculate carbon debts or benefits from proposed actions. There are many viable carbon calculators for the DEC to utilize to undertake this task beyond the Jerry Jenkin's book. We urge the DEC and APA to develop an assessment for long-term climate change impacts based on management decisions.

Parking Areas: We generally see that the series of modest parking areas are sufficient to handle the public use in most of the DMC area. The DMCUMP includes plans to build a number of new small parking areas. Proposals for new or expanded parking areas should include estimated tree counts for trees projected to be destroyed. The destruction of trees should be a consideration in APLSMP compliance.

Primitive Campsites: This DMC has 54 designated campsites. The DMCUMP proposes to close 9 and build 20 new campsites, for a total of 69, and bring into compliance with the Campsites Guidance and APSLMP. We support this effort.

Lean-tos: The DMCUMP calls for five new lean-to, retention of five lean-tos, and removal of one lean-to. PROTECT supports this plan.

Roadside Camping: Roadside camping is very popular in the DMC. Currently, there are 25 roadside campsites. These sites are clustered at Jones Pond, on the Kushaqua-Mud Pond Road, Slush Pond Road, and Mountain Pond Road, among other places. The DEC proposes to close nine and to bring all others into compliance with the 2019 Primitive Tent Site Guidance standards. We support this effort.

Fishing and Canoe Access: The DMCUMP proposes new access facilities for Benz Pond, Deer River Flow, Madawaska Flow, Slush Pond, Mountain Pond, Santa Clara Flow, Osgood River and East Branch of the St. Regis River. PROTECT supports this plan.

Madawaska Flow Management: This area has been managed since its purchase as a motorless lake and we believe that has worked very well. We're pleased to see that the DEC is planning to continue managing Madawaska Flow as a motorfree waterbody in the DMCUMP.

Roads Management: The ability of the public to use motor vehicles on designated roads is one of defining aspects of Wild Forest areas. The DMC has over 10 miles of roads. We're concerned about this mileage of roads, though we realize that many are due to access rights for private landowners. We support the proposed closure of the 0.5-mile Coal Hill Road.

Motorless Debar Pond: Debar Pond should be managed as a motorless lake. Launching should be provided for "car top" boats only. There are very few motorless lakes and ponds in the Adirondacks, despite the huge number of lakes and ponds. The public needs more motorless lakes and ponds that are easily accessible in the Adirondack Park. Debar Pond is ideal for a motorless lake associated with a day use area.

Loon Lake Mountain Firetower: We support restoration of the Loon Lake Mountain Firetower.

Debar Mountain Firetower: We oppose any efforts to rebuild the firetower on this mountain, which was removed decades ago.

Debar Mountain Cabin: This should be managed through benign neglect as a human ruin in the wilds.

Ranger Staffing

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.

Issues That Require a Specific Response from the DEC in the SEQR Responsiveness Section in the Final DMCUMP

1. Please explain why the DEC refuses to comply with the APSLMP requirement to undertake a carrying capacity analysis on Debar Pond, Madawaska Flow, Deer River Flow, Jones Pond, Lake Kushaqua, and Meachem Lake.
2. Protect the Adirondacks is concerned about the DEC’s compliance with the Climate Leadership and Community Protection Act. We urge the DEC to detail and quantify the climate change impacts of this project, the steps the DEC took to mitigate these impacts, and how the DEC has complied with the letter and spirit of the Climate Leadership and Community Protection Act.
3. Please explain the failure to conform to the key requirements enumerated in the Adirondack Park State Land Master Plan (APSLMP) for developing a UMP. Many of the required analyses, assessments, and inventories are critical for planning and managing public recreational use in the Forest Preserve. The DMCUMP failed to undertake x of x of the analyses, assessments, and inventories required by the APSLMP.
4. Why is the DEC using different forms of carrying capacity analysis from one UMP to another? Given the historic difficulties of the DEC in developing and implementing any kind of carrying capacity analysis or visitor use monitoring program, why is it now developing and implementing two different analyses? We fail to see how this is effective or efficient.
5. Why was no trailless area proposed? Trailless areas or cores have been identified in the High Peaks Wilderness Area and Saranac Lake Wild Forest UMPs, among others, are both an important management tool and public policy goal.
6. Please confirm that Madawaska Flow and Debar Pond will be managed as motorless waterbodies.
7. Why in the year 2021 are there some many gaps in the DEC trailhead register data? What are the problems at the DEC for gathering and collecting this data?
8. What guarantees can the DEC provide that it will actually undertake the monitoring protocols that are outlined in the “Management and Planning Methods” section?

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

Sincerely,



Peter Bauer
Executive Director