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November 27, 2023

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Megan Phillips
Deputy Director, Planning
Adirondack Park Agency
P.O. Box 99
Ray Brook NY 12977

Re: Draft 2023 Forest Preserve Classification Package

Dear Megan:

Protect the Adirondacks has reviewed the draft Land Classification Package prepared by the Adirondack Park Agency (“APA”) for approximately 6,000 acres of Forest Preserve within the Adirondack Park. We note that the classifications of newly acquired lands account for only about 5,300 acres of new Forest Preserve. According to PROTECT’s special report “20% in 2023”¹, the State will need to protect some 3.2 million acres of land to reach the goal set forth in the 30 by 30 law signed by Governor Kathy Hochul in 2022. New additions to the Forest Preserve within the Adirondack Park will play a key role in achieving the goal of protecting 30% of the State’s lands and inland waters by 2030, and we urge the APA to gear up to work on implementing this critical legislation with the Governor’s office and the Department of Environmental Conservation.

We applaud APA for undertaking this process to classify newly acquired lands and to correct the classifications of existing Forest Preserve lands, including the 208.5 acre SUNY Cortland parcel in Long Lake used for Camp Pine Knot on Raquette Lake. We are pleased to see the designation of four new parcels as Wilderness lands, totaling 196.8 acres, including the 17.9 acre parcel on Thirteenth Lake in Johnsbury.

We also support the majority of the other proposed classifications as Wild Forest, State Administrative, and Intensive Use. We do have concerns about a few of the parcels, as described below.

¹ A copy of PROTECT’s “20% in 2023” report is available at <https://www.protectadks.org/new-special-report-20-in-2023-an-assessment-of-the-new-york-state-30-by-30-act/>.

1. Rollins Pond – Parcel FR-6-d

The small portion of land at the far northern end of the Rollins Pond campground is proposed for reclassification from Wild Forest to Intensive Use. However, that parcel does not contain any part of the Rollins Pond campground. The reclassification on the map appears to be related to the proposed foot trail to connect to the Adirondack Rail Trail Corridor described on page 28 of the draft Unit Management Plan (“UMP”) for Rollins Pond. We oppose any proposal to expand the footprint of the campground to the north, and we oppose the reclassification of that portion of land from Wild Forest to Intensive Use. The Saranac Lakes Wild Forest UMP already proposed a trail in that location and did not propose reclassification of the lands to Intensive Use. There is no justification to do so when the remainder of that area to the north is classified Wild Forest, with the exception of the Remsen Lake Placid Travel Corridor.

Rollins Pond Parcel FR-6-d should remain Wild Forest. Also, the Wild Forest classification should be expanded east to the edge of the water so that there is a natural boundary line between the classification for the land on the west side of the stream and the Intensive Use lands on the east side of the Rollins Pond outlet stream. Expanding the Wild Forest area to the east would not only create a natural boundary, rather than the current arbitrary straight boundary line, it would also assure that there is not a standalone piece of land with a classification different from the FR-6-d parcel.

2. Rollins Pond – Parcels FR-6-c and FR-6-b

The FR-6-c and FR-6-b parcels of land to the north/northeast of the campground should both be classified Wild Forest. The FR-6-b parcel that is currently proposed to be divided from the adjacent Wild Forest lands by “a new straight point to point boundary” should be expanded to the west so that the boundary line between the two land classifications hugs the edge of the existing campground footprint. A boundary line that follows the edge of the campground would be more natural than the straight-line boundary, which is contrary to Agency practice of following natural boundaries to divide land use classifications. We suggest that the boundary for the Wild Forest lands start 150 feet from the edge of the campground’s roads, structures and improvements. This distance is consistent with the setbacks provided by the Adirondack Park State Land Master Plan for Intensive Use areas.

3. Golden Beach – Parcel HA-6-d

We support reclassification of 31.1 acres from Intensive Use to Wild Forest as shown in Parcels HA-6-c and HA-6-d. In addition, APA should reclassify to Wild Forest all of the lands south of campsites 207 & 208 in the Golden Beach campground. These lakeshore lands are not appropriate for development and should be added to the adjacent Parcel HA-6-d to become part of the Sargent Pond Wild Forest. We suggest that the boundary for the Wild Forest lands start 150 feet from the edge of the campground’s southernmost campsites.

4. Marion River – Parcel HA-1 and Parcel HA-2

We support classification of the Marion River Parcel HA-2 to Wilderness since it adjoins the Blue Ridge Wilderness. We also support classification of the Marion River HA-1 parcel as Wild Forest. The parcel has significant wetlands and contains the Marion River, an important water connection between Raquette Lake and Blue Mountain Lake. The Marion River is classified Scenic pursuant to the State's Wild, Scenic, and Recreational Rivers Act. The parcel provides scenic recreation for canoeists, but, at least at this time, due to prior and current human development on and near the parcel, it does not offer the kinds of solitude and opportunities for remote water-oriented recreation that might make it appropriate for classification as a Wilderness or Canoe area.

5. Crane Mountain/Huckleberry Mountain

Protect the Adirondacks respectfully suggests that APA consider a potential Wilderness classification for the Forest Preserve lands comprising Crane Mountain (Town of Johnsbury), which now includes the adjoining 1,276.2-acre Huckleberry Mountain parcel WR-2 that is part of this classification package. The Crane Mountain lands contain rugged, wilderness territory that meet the Adirondack Park State Land Master Plan's definition of Wilderness (page 22):

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.

While the Crane Mountain/Huckleberry Mountain Forest Preserve lands are currently less than ten thousand acres in size, they could effectively be managed as wilderness as the "Crane Mountain Wilderness Area" covering an area of around 3,700 acres.

Conclusion

We appreciate the APA's work to classify newly acquired Forest Preserve lands and to correct the classifications of existing Forest Preserve lands. As set forth above, we have only a few concerns about the proposed classifications.

On behalf of the Board of Directors of Protect the Adirondacks, please accept our gratitude for the opportunity to share our comments on the 2023 draft Land Classification proposal.

Sincerely,

A handwritten signature in black ink that reads "Claudia K. Brayner". The signature is written in a cursive, flowing style.

Deputy Director