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February 2, 2024

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Matthew Nowak  
Environmental Program Specialist 1 (NR)  
NYS DEC  
7327 State Route 812  
Lowville NY 13367

**Re: Draft Recreation Management Plan  
Big Moose Tract Conservation Easement**

Dear Matthew:

Protect the Adirondacks has reviewed the draft Recreation Management Plan for the Big Moose Tract Conservation Easement. While we generally do not have objections to the proposed management actions, we do have a concern about impacts to the adjacent Forest Preserve, and a couple of concerns about the proposed recreational use on the Big Moose Tract.

1. The draft Recreation Management Plan (p. 42) proposes to maintain some portions of the snowmobile trails to a width of 12 to 14 feet. A trail of this width would be unconstitutional if located on Forest Preserve lands. While these snowmobile trails are located on conservation easements lands that are not subject to Article 14 of the Constitution, in some instances the snowmobile trails on the Big Moose Tract are part of a longer trail that also crosses the Forest Preserve. Our concern is that the snowmobile trails not become widened on the Forest Preserve to the same width as the trails on the Big Moose Tract. Specifically, the draft Recreation Management Plan proposes the extension of the Stillwater Spur Trail located in the Independence River Wild Forest, which is not subject to this Recreation Management Plan, but is managed in accordance with the Independence River Wild Forest Unit Management Plan (UMP).

The Independence River Wild Forest UMP indicates that the Stillwater Spur Trail is to be classified as a Class I trail in accordance with the "Management Guidance: Snowmobile Trail Siting, Construction and Maintenance on Forest Preserve Lands In the Adirondack Park" ("Guidance"), and that the Stillwater Spur Trail could at some point in the future be reclassified to a Class II trail. However, the Guidance has since been rescinded by DEC and the policy from

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a different classification system, so it is unclear what classification currently applies to the management of the Stillwater Spur Trail. In any event, the trail on the Forest Preserve can be no wider than eight feet, so the Stillwater Spur Trail on Big Moose Tract should be consistent with that trail width. The proposed width for the Stillwater Spur Trail on the Big Moose Tract should be reduced to eight feet to provide consistency and to protect the Forest Preserve from trails that become widened by the use of snowmobilers coming from Big Moose Tract.

2. There is significant amount of wetlands on the Big Moose Tract. DEC must take care to ensure that there are no wetlands impacts as a result of the proposals to construct the alternative snowmobile trails.

3. We applaud the DEC's proposal to conduct a basic visitor survey for the Big Moose Tract. The survey should include a question about whether the visitor would return to use other hiking trails if those trails were opened by DEC. Also consider editing question 2 of the survey to ask whether or not other groups impacted the on-trail experience, and provide a range of possible responses (e.g., Very Negatively, Negatively, No Impact, Positively, Very Positively).

### **Conclusion**

Overall, this conservation easement has limited opportunities for public recreation. There is only a single half-mile hiking trail on this property to the Stillwater Mountain Fire Tower, and there are various snowmobile trails on the property. In view of the purchase price that was paid for this conservation easement and for the ongoing cost of paying its portion of the property's annual property taxes, DEC should consider pursuing additional recreational opportunities for the public, particularly for new hiking and bicycle trails and campsites. To the extent that these rights are not included in the current conservation easement, DEC should seek to have these additional recreational opportunities agreed to by the landowner.

On behalf of the Board of Directors of Protect the Adirondacks, please accept our gratitude for the opportunity to share our comments on the draft Recreation Management Plan for the Big Moose Tract Conservation Easement.

Sincerely,

  
Deputy Director