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#### **Via Email**

September 17, 2025

Allison Buckley  
Natural Resource Planner  
PO Box 1316  
Northville, NY 12134

#### **Re: Draft Recreation Management Plan for Speculator Tree Farm, Perkins Clearing and Burnham Mountain Tracts**

Dear Ms. Buckley:

Protect the Adirondacks (PROTECT) appreciates the opportunity to submit comments on the Draft Recreation Management Plan (RMP) for the Speculator Tree Farm, Perkins Clearing, and Burnham Mountain conservation easement tracts. We apologize for the slight delay in submitting these comments and respectfully request that they still be considered as part of the public review process.

We commend the Department of Environmental Conservation (DEC) for its preparation of the draft RMP and recognize the dedicated efforts of its staff to complete this draft for public review. PROTECT is particularly supportive of the DEC's decision not to permit public ATV use on these easement lands. As outlined below, we believe this decision reflects sound environmental stewardship and is consistent with the long-term protection of natural resources and public enjoyment.

#### **Background**

The subject properties total approximately 38,000 acres in the Towns of Lake Pleasant, Wells and Arietta and the Village of Speculator, and are subject to working forest conservation easements owned by the State of New York. The property shares boundaries with several state Forest Preserve management units, including the Jessup River Wild Forest, the

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Siamese Ponds Wilderness Area, the West Canada Lakes Wilderness Area, and the Silver Lake Wilderness Area.<sup>1</sup>

The draft RMP builds on the Interim RMP adopted by the Department of Environmental Conservation (DEC) in 2004. The interim RMP provides for 36 miles of snowmobile trails; and 36 miles of roads open to public motor vehicle use; several trail heads and parking areas; 17 primitive campsites; and one day use area.

The draft RMP leaves in place the measures in the Interim RMP, and proposes adding approximately 6.3 miles of new snowmobile trails; improving and maintaining the 36 miles of roads open to motor vehicle use and adding an additional one mile of new roads open to public motor vehicle use; improving four existing hiking trails; upgrading three existing campsites to accessible standards and adding one new accessible lean-to; adding three new primitive campsites; adding a new bicycle trail network; and improving existing car-top boat launches. The draft RMP does not propose to provide public ATV access or use on the easement lands.

## **Comments**

### ATV Use

PROTECT strongly supports DEC's decision to prohibit public ATV access on these conservation easement lands. As documented in our prior research,<sup>2</sup> public ATV use near and within Forest Preserve lands has resulted in substantial negative impacts, including:

1. Degradation of roads and trails through rutting and erosion;
2. Widening of trails due to users avoiding damaged areas;
3. Conflicts with non-motorized recreational users;
4. Illegal entry into Forest Preserve lands, often by bypassing barriers;
5. Creation of unauthorized motorized routes;
6. Damage to sensitive aquatic resources, including wetlands and streambeds; and
7. Vandalism of Forest Preserve infrastructure.

DEC's decision is justified by well-documented evidence of these adverse effects, and PROTECT applauds this precautionary and protective approach. The decision to prohibit public ATV use is particularly justified because of the substantial amount of Forest Preserve, including Wilderness, that borders these conservation easement lands.

### Other Motor Vehicle Use

While PROTECT supports the prohibition of ATV use, we are concerned that the draft RMP retains and expands an already extensive snowmobile and public motor vehicle road network. Specifically, the plan proposes a total of approximately 42 miles of snowmobile trails and 37 miles

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<sup>1</sup> The draft RMP fails to acknowledge that the Burnham Mountain tract adjoins the Silver Lake Wilderness Area.

<sup>2</sup> Protect the Adirondacks, Rutted and Ruined: ATV Damage on the Adirondack Forest Preserve (2013), available at <https://www.protectadks.org/wp-content/uploads/2013/03/RuttedRuinedATVreport-LOWRES.pdf>.

of roads open to public vehicle use across roughly 60 square miles—an infrastructure density we believe is excessive and unnecessary for effective public access and recreation.

This level of motorized access is inconsistent with best practices for conservation land management and may undermine the long-term ecological integrity of these lands. Moreover, it could preempt future efforts to incorporate these lands into the Forest Preserve, particularly adjacent Wilderness Areas, where motorized access would be incompatible with their classification.

It is essential that the RMP's proposed management actions do not foreclose or pre-ordain classification of the easement lands in the event that some or a portion of those lands are eventually added to the Forest Preserve. The plan to maintain and expand the existing snowmobile and road network is at odds with proper conservation planning and will likely hinder or undermine addition of these lands to the adjoining Wilderness areas if they become Forest Preserve. The RMP should evaluate whether there are roads open to public motorized use, especially redundant or dead-end routes, that should be closed to protect the ecological integrity of the conservation easement lands.

#### Impacts on Adjoining Forest Preserve

The draft RMP acknowledges that the easement tracts border several Forest Preserve management units, including the Jessup River Wild Forest, Siamese Ponds Wilderness Area, West Canada Lake Wilderness Area, and Silver Lake Wilderness Area. However, the plan includes no provisions for buffer zones or limitations on snowmobile and vehicle use near these sensitive boundaries. To the contrary, the draft RMP proposes to extend an existing snowmobile trail up the Fly Creek Road to the boundary of the Siamese Ponds Wilderness Area.

We respectfully express our strong opposition to this proposal to create a snowmobile trail that dead ends at the Wilderness Area. Bringing snowmobiles into such close proximity to this designated Wilderness boundary is incompatible with the protections afforded to this area under the Adirondack Park Agency Act, which designates private lands within one-eighth mile of a Wilderness boundary as a Critical Environmental Area. Extending a snowmobile route to the very edge of this sensitive landscape undermines the wilderness character, threatens wildlife habitats, creates the threat of trespass into the Wilderness Area by snowmobiles, and introduces noise and emissions into an area specifically set aside for its natural and undisturbed qualities. We therefore urge DEC to reconsider this proposal.

#### Conclusion

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 RMP. We urge DEC to reconsider the expansion of the motorized use network and to include stronger measures to protect adjoining Forest Preserve lands. These steps are essential to uphold the conservation goals of the easement and to ensure compatibility with the broader Forest Preserve system.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Amato", with a stylized flourish at the end.

Christopher Amato  
Conservation Director and Counsel