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**Via Email: [RPcomments@apa.ny.gov](mailto:RPcomments@apa.ny.gov)**

March 2, 2026

Bart Haralson  
Adirondack Park Agency  
P.O. Box 99  
Ray Brook, NY 12977

**Re: APA Project 2026-0022  
NYSDEC  
Pharaoh Lake Trail, Pharaoh Lake Wilderness  
Town of Horicon, Warren County**

Dear Mr. Haralson,

Protect the Adirondacks (“PROTECT”) appreciates the opportunity to provide comments on the above-referenced project, which requires a wetlands permit from the Adirondack Park Agency (“APA”) because it involves the replacement, re-alignment, and expansion of a three-foot wide boardwalk on a trail that traverses wetlands located in the Pharaoh Lake Wilderness Area. The previously constructed elevated boardwalk authorized by the Pharaoh Lake Wilderness Unit Management Plan (“Pharaoh Lake UMP”) on the Pharaoh Lake Trail to cross the wetlands has deteriorated and become unusable. As a result, users are not staying on the path of the boardwalk and have caused the width of the trail corridor to significantly expand and to increase the area of impacted wetlands.

The Department of Environmental Conservation’s (“DEC”) application materials include a New York Natural Heritage map of wetlands in the area of the project site. It is unclear if APA has sufficient information about the wetlands (e.g., coverytype, connection to surface water, productivity or diversity, species habitat) to determine the value rating of the wetlands being impacted and make the required findings to issue a wetlands permit. *See* ECL Article 24; 9 NYCRR § 578.5. The necessary information must be provided by DEC before any permit is issued by APA.

PROTECT supports DEC’s efforts to replace the boardwalk to reduce the negative impacts to the wetlands that are occurring from the use of the current trail with the collapsed three-foot wide boardwalk. We note the reduction in

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the proposed cribbing footprint sited in the wetlands as compared to the prior footprint, and the proposed 1” spacing on the decking to allow light to reach the vegetation in the wetlands. However, we urge APA and DEC to reduce the width of the new boardwalk from the proposed width of five feet to three feet to limit the amount of coverage of wetland vegetation. *See* 9 NYCRR § 578.8.

According to DEC and APA’s 2024 draft Inter-Agency Guidance for Trail Networks in the Forest Preserve (“Draft Guidance”), equestrian trails in Wilderness Areas should be Single Lane Trail Class 1 or 2. Equestrian Trail Class 1 and 2 allows a tread width of 12 inches to 24 inches. According to the Draft Guidance, the tread width of foot trails in Wilderness Areas may be up to 24 inches in width.

The boardwalk width should not be two and half times wider than the widest tread width for the uses allowed (hiking and equestrian) on this trail located in a Wilderness Area. Due to the low height of the wetland vegetation in the area of the boardwalk, there would be enough sight visibility for hikers and horse riders traveling in opposite directions to see each other and wait on either end of the boardwalk rather than passing one another in the middle of the boardwalk. Accordingly, more than three feet of width for the boardwalk is unnecessary for the approved uses and may encourage users to attempt to pass one another on the boardwalk when it would not be safe to do so.

We greatly value the State and local emergency rescuers who are called upon to find and evacuate people from the vast reaches of the Pharaoh Lake Wilderness Area. The management of Wilderness Areas must respect that improvements in these areas are to “be designed to emphasize the self-sufficiency of the user to assume a high degree of responsibility for environmentally-sound use of such areas and for their own health, safety and welfare.” Adirondack Park State Land Master Plan at 25. The design of improvements in Wilderness Areas should be restrained and should not be expanded beyond the design that is considered conforming for the uses allowed in a Wilderness Area, even if a different, larger design for an improvement would provide additional ease for safety protection and rescue operations.

Notably, it is our understanding from speaking with the DEC Forester that the description of the beams in DEC’s application materials does not mean that the beams for the boardwalk will be made of plastic and that they will be made of wood. APA should confirm with DEC that the beams and decking are made of natural materials and include a provision in the APA permit requiring that the entire boardwalk be made of natural materials as required by, and defined in, the Adirondack Park State Land Master Plan.

Finally, DEC’s application materials state that all waste and leftover materials from the construction project will be hauled out from the site after construction. APA should also include a provision in the APA permit requiring that all of the old boardwalk materials (wood and stone) are removed from the wetlands.

On behalf of the Board of Directors of PROTECT, please accept our gratitude for the opportunity to share our comments on this proposed project.

Sincerely,

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

Claudia Braymer  
Executive Director

cc: Kirstin Seleen, Forester, NYSDEC