



30 October 2015

Ed Sykes  
NYSDEC  
7327 State Hwy 812  
Lowville, New York 13367  
[r6.ump@dec.ny.gov](mailto:r6.ump@dec.ny.gov)

Conservation

✱

Education

✱

Recreation

*Since 1922*

RE: Draft Unit Management Plan (UMP) for Westward Waters Unit State Forests

Dear Mr. Sykes,

Thank you for giving the Adirondack Mountain Club (ADK) the opportunity to comment on the Draft Unit Management Plan (UMP) for the Westward Waters Unit State Forests.

The Adirondack Mountain Club (ADK) is dedicated to the conservation, preservation, and responsible recreational use of the New York State Forest Preserve and other parks, wild lands, and waters vital to our members and chapters. ADK represents over 28,000 members who enjoy hiking, canoeing, kayaking, cross-country skiing, camping, backpacking, biking, mountaineering, snowshoeing, and other "muscle-powered" outdoor activities in New York. We sponsor programs that range from teaching people to hike and paddle safely to repairing our state's peerless hiking trail network. We are advocates for responsible recreation and protection of the Forest Preserve, state parks and other wild lands. Our priorities today are state budget funding for open space protection and for stewardship of our Adirondack and Catskill Forest Preserve and our incomparable state parks system.

#### **ATV Use on State Forest**

ADK does not support allowing riders on state public ATV trails without first addressing the current trespass problems of ATV riders. Due to agency cutbacks there are currently too few Environmental Conservation Officers (ECO) and Forest Rangers to police the current impact of ATVs. This issue must be addressed to halt the current impact. Sufficient funding for enforcement needs to be connected to the registration process of all ATVs, and must be addressed before any effort can be made to establish and maintain connector trails (proposed in table III.D pg. 85) within the unit.

**Headquarters**  
814 Goggins Rd.  
Lake George, NY  
12845-4117  
Phone: (518) 668-4447  
Fax: (518) 668-3746  
e-mail: [adkinfo@adk.org](mailto:adkinfo@adk.org)  
website: [www.adk.org](http://www.adk.org)

**North Country Operations**  
PO Box 867  
Lake Placid, NY  
12946-0867  
Reservations: (518)523-3441  
Office: (518)523-3480  
Fax: (518)523-3518

**Albany Office**  
301 Hamilton Street  
Albany, NY  
12210-1738  
Phone: (518) 449-3870  
Fax: (518) 449-3875

The opening of any trail will be subject to intense review in order to confirm its compliance with the State Forest Master Plan and to ensure it undergoes the necessary State Environmental Quality Review (SEQR) process. As stated in the Strategic Plan for State Forest Management:

*“The inclusion of a connector trail in a UMP and the subsequent establishment of any such trail could only occur if it does not compromise the protection of the natural resources of the Unit, significantly conflict with neighbors of State Forests, nor interfere with other established recreational areas. Such designation shall only occur through the amendment or adoption of a UMP or another process which provides similar opportunities for public review and comments and full SEQRA review of the proposed designation.”*<sup>1</sup>

DEC states, *“An ATV trail system, minimum of 30-40 miles long and at least 5,000 acres or larger, that is sited wholly or substantially on State Forests cannot be accommodated. Any smaller trail system will not meet the desire by ATV riders for a long-distance loop trail system and has proven to increase illegal use and natural resource damage and therefore cannot be considered.”*<sup>2</sup> This statement should be considered when determining whether a connector trail is connecting two legal riding areas of sufficient size so as to not encourage illegal riding, especially on state forest.

Special attention must be paid to the Independence River, Otter Creek, High Towers and Sand Flats State Forest as they connect directly to the Adirondack Forest Preserve. The potential for a connector trail in these units to enable illegal riding opportunities within the Forest Preserve would compromise the protection for the natural resources within these units.

Thank you for your time and consideration of our comments.

Sincerely,



Neil F. Woodworth  
Executive Director and Counsel  
Adirondack Mountain Club, Inc.

---

<sup>1</sup> New York State Department of Environmental Conservation. *Strategic Plan for State Forest Management*. (2011). Pg. 223.

<sup>2</sup> New York State Department of Environmental Conservation. *Strategic Plan for State Forest Management*. (2011). Pg. 222-223.

