



15 March 2017

Erin Jennings, Forester and Land Manager
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Via Email: R7.UMP@dec.ny.gov

Conservation
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Education
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Recreation
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RE: Scoping Fish Creek Unit Management Plan (UMP) for Kasoag, Klondike, Orton Hollow, and Stone Hill State Forests

Dear Erin,

The Adirondack Mountain Club (ADK) appreciates the opportunity to comment during the scoping stage for the Fish Creek Unit Management Plan (UMP).

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ATVs

ADK does not support the public use of ATVs in the Fish Creek Unit Management Plan (UMP) for Kasoag, Klondike, Orton Hollow, and Stone Hill State Forests. Increasingly DEC is under pressure to allow ATV access on state land in conjunction with local road openings for connections between legal riding areas as defined in NYS Vehicle and Traffic Law 2405. ADK supports the prohibition of public use of all-terrain vehicles on state public land, and an increase in penalties for violations of all-terrain vehicle laws in such sensitive areas. The state has opened Adirondack Park roads in Wild Forest Areas in the past, as well as trail systems on state forests, but has subsequently closed the roads and trails because of environmental damage and inconsistency with state law.

Every pilot ATV program on NY state lands has been shut down because of environmental damage caused by ATVs. For example, the *Strategic Plan for State Forest Management* outlines several case studies in which ATV trail systems were implemented on State Forest Lands, including New Michigan State Forest, Anderson Hill State Forest, Brasher State Forest, Morgan Hill and Taylor Valley State Forests. All of these trail systems were all closed due to the environmental impacts by ATVs on these state forest lands.¹ Other examples include DEC's opening of 54 roads to ATV use in Wild Forest Areas of the western Adirondack Park. DEC was forced to shut these systems down because they did not comply with

Section 2405. Adirondack conservation groups also documented the significant damage to the Forest Preserve connected with this ATV access.² For example, the Wildlife Conservation Society (WCS) published a paper on ATV use in the Adirondack Park in 2003, *All-Terrain Vehicles in the Adirondack Park*.³ The paper explains how ecological damage from ATVs is long-term and difficult to remediate, especially in sensitive habitats.

In NYS there has been a significant increase in pressure on the state legislature to pass bills, which would increase the current allowable weight of all-terrain-vehicles (ATVs), from 1,000 lbs to 1500 lbs. There is also pressure to allow ATV riding on roads throughout the state that have been opened by local law in violation of New York State Vehicle and Traffic Law, and contrary to NYS Attorney General Opinion 2005-21² and NYS Department of Environmental Conservation (DEC) legal opinion.³ The use of ATVs on public roads is governed by Title 11, Article 48C, Section 2405 of the New York State Vehicle and Traffic Law. ATV manufacturers expressly define that their vehicles are not designed for road or highway use.⁴ Documentation by the U.S Consumer Product Safety Commission and the National Highway Transportation Safety Administration's (NHTSA) Fatality Analysis Reporting System (FARS) that a majority of ATV deaths take place on roads.⁵

Snowmobile Use

ADK does not support the creation of any additional snowmobile trails or motorized use in the Fish Creek Unit Management Plan (UMP) for Kasoag, Klondike, Orton Hollow, and Stone Hill State Forests.

Addressing Global Climate Change

Maximizing carbon sequestration should be a priority in our New York State Forests. The New York State Open Space Conservation Plan highlights the need to address global climate change. In addressing global climate change it is important to protect our coastlines, riparian corridors and wetlands; to maintain an interconnected network of protected lands and waters enabling flora and fauna to adapt to climate change; and to maintain and grow our state's forests. Forests play a large role in mitigating the effects of climate change by naturally storing carbon. Trees are typically about 50% carbon. More than 63% of New York State is forest land, amounting to 19 million acres of land covered by trees. Approximately 14.4 million acres are privately owned. How these forests are managed can play an important role in carbon sequestration and moderation of the heat and dryness impacts of climate change. Trees are unique in their ability to store large amounts of carbon in their wood and studies show that trees continue to add carbon as they grow. A study published recently in *Nature* shows that the *"Rate of tree carbon accumulation increases continuously with tree size."*⁴

The USGS, a coauthor in the study further explains,

"This continuously increasing growth rate means that on an individual basis, large, old trees are better at absorbing carbon from the atmosphere. Carbon that is absorbed or "sequestered" through natural processes reduces the amount of carbon dioxide in the atmosphere, and can help counter-balance the amount of CO₂ people generate. However, [the study is] careful to note that the rapid absorption rate of individual trees does not necessarily translate into a net increase in carbon storage for an entire forest. 'Old trees, after all, can die and lose carbon back into the atmosphere as they decompose,' says Adrian Das, a USGS coauthor. "But our findings do suggest that while they are alive, large old trees play a disproportionately important role within a forest's carbon dynamics. It is as if the star players on your favorite sports team were a bunch of 90-year-olds.'"⁵

New York's 19 million acres of trees hold a lot of carbon as do forest soils. ADK urges that NYS manage its state forests with the primary goal of combating climate change and improving its climate resiliency. DEC should also consider management of some state forest areas to promote stands of old growth mature trees to increase

forest carbon stocks, help clean our air and water, preserve wildlife habitat, and provide a setting for outdoor recreation.

Invasive Species

Invasive species are spreading at rapid rate, reducing water quality, property values, and recreational opportunities along the way.

New York State has enacted numerous regulations and laws that will prove vital to stopping the spread of aquatic and terrestrial invasive species, but public education, spread prevention, and mitigation are needed before the impacts become insurmountable. The UMP must include an inventory of existing known invasives (such as is available on the SLELO web site <http://www.sleloinvasives.org/about-invasives/invasive-species-slelo-region/>), a consideration of likely threats from invasives, such as Hemlock Woolly Adelgid (see below), and include or reference early detection and rapid response and spread prevention plans, and best management practices.

Hemlock Woolly Adelgid

Moving forward additional funding will be needed to continue to combat invasive species. Aquatic Invasive Species are not the only threat New York faces. New York faces **potential decimation of eastern hemlock (*Tsuga canadensis*) from a forest pest, hemlock woolly adelgid (*Adelges tsugae*) (HWA),⁶** which has not yet entered the Adirondack Park, but has already caused significant decline in the Catskill Park, and has been identified in Letchworth State Park, and Zoar Valley, and Allegany State Park (where our members helped identify HWA under a *citizen science* project run by OPRHP).

Hemlocks are a foundation species.⁷ Foundation species are critical species in the habitats they help create.⁸ In the case of hemlocks they moderate stream water temperatures for trout and other animals, provide a buffer for nutrient inputs to maintain water quality, stabilize shallow soils especially in steep gorges, provide shelter for animals and plants which is especially important in winter, provide critical habitat for migrating neo-tropical birds, and provide acidic substrate for lichens.

Hemlock is widespread throughout New York and is very dense in some areas, such as in the southern part of the Adirondack Park and in areas like Lake George, Keene Valley, and in much of the Lake Champlain Basin (including its far edge in the Saranac Lakes Wild Forest and the St Regis Canoe Area).⁹ Imagine the impact to the New York landscape from a severe decline of hemlock—a highly likely scenario without a significant increase in early detection efforts (like those our members are engaged in as citizen scientists), treatment and development of bio-controls, such as the predatory beetle (*Laricobius nigrinus*).¹⁰ We only need look to places such as the Great Smoky Mountains for an example of the devastation in store for the New York State.¹¹ Decline of hemlocks is already well underway in the Catskills.¹² HWA has been advancing quickly through New York State,¹³ and now is at the doorstep of the Adirondack Park (and likely is already present). If we do not act quickly, we may lose the species.¹⁴ The Fish Creek UMP Fish Creek Unit Management Plan (UMP) for Kasoag, Klondike, Orton Hollow, and Stone Hill State Forests must address the threat posed by HWA.

Thank you for considering the above comments. We look forward reviewing the Draft UMP.

Sincerely,

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¹ <http://www.dec.ny.gov/lands/64567.html>

http://www.dec.ny.gov/docs/lands_forests_pdf/spsfmfinal.pdf (p. 215-218)

² <http://www.protectadks.org/2013/03/protect-urges-governor-cuomo-and-dec-to-ban-atv-use-on-the-forest-preserve/>
³ [wcsadirondacks.org](http://www.wcsadirondacks.org)

⁴ <http://www.usgs.gov/newsroom/article.asp?ID=3781#.VJBM0Hti-T8>

⁵ <http://www.usgs.gov/newsroom/article.asp?ID=3781#.VJBM0Hti-T8>

⁶ <http://www.dec.ny.gov/animals/7250.html>

⁷ <http://www.lternet.edu/research/keyfindings/foundation-species-matter>

⁸ <http://adkinvasives.com/wp-content/uploads/2015/04/WHITMORE-Lk-Placid-28-Mar-15-1.pdf>

⁹ <http://adkinvasives.com/wp-content/uploads/2014/03/Hemlock-Woolly-Adelgid-Adirondack-Distribution-Map.pdf>

¹⁰ <https://www.nps.gov/grsm/learn/news/new-hwa-beetle.htm>

<http://www.news.cornell.edu/stories/2015/06/cornell-introduces-silver-flies-save-hemlock-forests>

<https://blogs.cornell.edu/nyshemlockinitiative/>

¹¹ <http://www.lakeplacidnews.com/page/content.detail/id/523715/Flies-could-avert-hemlock-threat-in-New-York.html?nav=5005>

¹²

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=12&ved=0CFoQFjALahUKEwiqprXP5rLHAhVIXB4KHsSmDG0&url=http%3A%2F%2Fwww.na.fs.fed.us%2Fnews%2Fstories%2FHWA-Study-FINAL-012915.pdf&ei=tzvTVepuyLh5pM2y6AY&usq=AFQjCNFRO6h3W_R1J2EKupOn32xQBBQLpQ&

¹³ <http://www.dec.ny.gov/animals/95656.html>

¹⁴ <http://www.lakeplacidnews.com/page/content.detail/id/523185/A-threat-to-hemlocks.html?nav=5005>