



16 June 2017

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Conservation

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Education

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Recreation

Since 1922

RE: Blue Mountain Wild Forest UMP Draft Amendment to the 1995 UMP and for partial implementation of the *Conceptual Plan for a Hut-to-Hut Destination-based Trail System for the Five Towns of Long Lake, Newcomb, Indian Lake, Minerva, and North Hudson (Hut-to-Hut), 2015*; and the *Great South Woods Complex Planning Strategy and Recommendations (Great South Woods), 2016*, and the *Essex Chain Lakes Management Complex Plan*.

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Dear Josh,

The Adirondack Mountain Club (ADK) appreciates the opportunity to comment during the Blue Mountain Wild Forest UMP Draft Amendment to the 1995 UMP. We greatly appreciate your attention to detail and process in this UMP amendment and truly appreciate the high-quality illustrations that help explain the projects and alternatives.

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**Adirondack Mountain Club**

ADK is a nonprofit organization with 30,000 members in 27 chapters and 36 year-round staff offering programs that help people discover, play in, and protect natural places. Since its founding in 1922, The Adirondack Mountain Club has protected wild lands and waters through the work of its dedicated member volunteers and staff. ADK members hike, camp, snowshoe, cross-country ski, paddle, and cycle the lands and waters of the Adirondack Park and other state lands. Our members are also monitors and maintainers of trails and recreation infrastructure as well as watchdogs of public lands and watersheds to monitor for invasive species or irresponsible and destructive motorized trespass.

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The Adirondack Mountain Club's professional trail program has been maintaining, re-building, and constructing non-motorized trails since 1979. ADK approaches every trail project with the same overarching principle: design a trail that will be

sustainable for multiple generations of recreationists. Every purpose built trail that ADK constructs requires minimal maintenance, protects the natural resource, and provides a safe and interesting experience for the user.

### **Development of an accessible tent site on Lake Durant**

ADK supports the development of an accessible tent site on Lake Durant, provided that the users will be bringing their own camping equipment and that this will not be provided by DEC.

### **Creation of a spur trail that connects the hamlet of Long Lake to the Northville Placid Trail (NPT)**

ADK supports the construction of the proposed trail spur from the Northville Placid Trail to the hamlet of Long Lake via the Mount Sabattis Town Park. However, to the extent that this unit management plan (UMP) of the Blue Mountain Wild Forest refers to this part of the Forest Preserve as part of a strategic lodging location of Route # 3 of the Conceptual Plan for Destination Based Hut to Hut Trail System for the Five Towns of Long Lake, Newcomb, Indian Lake, Minerva and North Hudson (Hut to Hut Conceptual Plan), this reference is illegal and should be stricken. The Hut to Hut Conceptual Plan has not been evaluated and approved under the provisions of the State Environmental Quality Review Act (SEQRA) and the public has not been afforded an opportunity to comment on the Hut to Hut Conceptual Plan. The Hut to Hut Conceptual Plan has not been evaluated by the Adirondack Park Agency for conformance with the Adirondack Park State Land Master Plan (APSLMP).

In a White Paper dated June 14, 2017 (Appendix A), ADK articulates each of the reasons why the erection and operation of hut to hut lodging and dining structures, yurts and tents on Forest Preserve would violate Article XIV, section 1 of the state constitution, multiple provisions of the APSLMP and Department of Environmental Conservation statutes and regulations. The Hut to Hut White Paper is attached hereto and fully incorporated by reference to this letter as if the White Paper language was fully set forth herein.

Although the **draft UMP** does not specifically call for Lodging and Dining facilities on the Forest Preserve and in the Blue Mountain Wild Forest, it **is attempting to**

**amend the UMP in order to implement the Hut-to-Hut Plan which calls for Lodging and Dining facilities on the Forest Preserve and which has never been evaluated by the SEQR process. Further, the *Conceptual Plan* makes the Forest Preserve the default for these facilities if private land owners and businesses do not agree to support the plan (Appendix B).** Lodging and Dining facilities on the Forest Preserve violate the ASLMP and NYS constitution.

**DEC must not consider dining and lodging facilities on the Forest Preserve as they are described in the model *Conceptual Plan for a Hut-to-Hut Destination Trail System for the Five Towns*.<sup>1</sup> To do so would invite litigation.**

### **Great South Woods Complex Planning Strategy and Recommendations.**

Like the Hut to Hut *Conceptual Plan* discussed above, the *Great South Woods Complex Planning Strategy Recommendations*<sup>2</sup> document has not been evaluated and approved under the provisions of the State Environmental Quality Review Act (SEQRA) and the public has not been afforded an opportunity to comment on this plan. *The Great South Woods Complex Planning Strategy Recommendations* has not been evaluated by the Adirondack Park Agency for conformance with the Adirondack Park State Land Master Plan (APSLMP). Any reference to *the Great South Woods Complex Planning Strategy Recommendations* in the Blue Mountain Wild Forest UMP Amendment should be removed.

### **Construction of an additional lean-to on a heavily-used section of the Northville Placid Trail**

ADK supports the construction of an additional lean-to on a heavily-used section of the Northville Placid Trail between Tirrell Pond and the proposed spur trail to the Hamlet of Long Lake.

### **Modifications to the Blue Mountain summit facilities**

The APSLMP guidelines, under permitted structures and improvements, for Wild Forest Areas permits small-scale electronic communication and relay facilities for official communications only. Clearly this guideline applies to the existing communication facilities on the summit of Blue Mountain. The county and public radio facilities may well violate this provision of the APSLMP. Moreover while the APSLMP guidelines for Wild Forest permits telephone and electrical lines to

service permitted DEC administrative structures, fiber optic lines for public radio and/or county communications would not be authorized by this section of the APSLMP. With regard to the proposed improvements to the access road, ADK supports alternative 1 and opposes alternative 2. The widening of the access road with an undisclosed amount of tree cutting and blasting of summit ledge rock as set forth in Alternative 2 clearly violates the guidelines of the APSLMP provisions for state administrative areas that require the minimization of extensive topographical alteration and vegetative clearing and require the preservation of the scenic, natural and green space resources of the state administrative area.

### **Essex Chain Lakes Management Complex Plan**

DEC stated on their web page for this amendment action that the Essex Chain Lakes Management Complex Plan is also being considered as part of this amendment process,

“The [Essex Chain Lakes Management Complex Plan](#) proposed a suite of actions to provide public recreational opportunities on recently acquired state lands, many of which fall within the Blue Mountain Wild Forest. As such, the Plan also acts as an amendment to the Blue Mountain Wild Forest UMP,”<sup>3</sup>

Therefore, we are hereby attaching and incorporating by reference our comments on the draft and final Essex Chain Lakes Management Complex Plan, comment submissions on July 24, 2015 (Appendix C), and October 15, 2015 (Appendix D), as well as our letter to the APA, December 10, 2013 (Appendix E).

Thank you for considering the above comments. We look forward reviewing a revised Draft Amendment.

Sincerely,



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**Appendix A**

Attached: **June 14, 2017, White Paper of the Adirondack Mountain Club (ADK) regarding Hut to Hut and Lodging and Dining Proposal for the Adirondack Forest Preserve.** *The New York State Governor's 2017 State of the State message proposed under the Adventure NY program to place lodging and dining facilities on the Forest Preserve lands of the Boreas Pond Tract.*

**Appendix B**

In the table below we identify the Hut-to-Hut Routes (and Lodging Locations by Day) identified in the *Conceptual Plan for a Hut-to-Hut Destination Trail System for the Five Towns<sup>4</sup>* (hereafter, *the Hut-to-Hut Plan*), that could impact the Blue Mountain Wild Forest with Lodging and Dining Facilities on Forest Preserve Lands in violation of NYS Law and Regulations.

**Table 1. Proposed Lodging Facilities from the Conceptual Plan that are likely to Violate NYS Law and Regulations**

Proposed Traverse/Route	Potential for Proposed Lodging and Dining Facilities on Forest Preserve on the Blue Mountain Wild Forest by Traverse/Route Day
03 Long Lake Northville Placid Trail Spurs	Blue Mountain Wild Forest
04 Blue Mountain Lake/Northville Lake Placid Trail	Blue Mountain Wild Forest
05 Long Lake/Blue Mountain Lake Hiking and Paddling Circuit	First Night Long Lake
05 Long Lake/Blue Mountain Lake Hiking and Paddling Circuit	Day 2 Blue Mountain Lake
05 Long Lake/Blue Mountain Lake Hiking and Paddling Circuit	Day 5 Long Lake
06 Blue Mountain Lake / Long Lake Water Trail	First Night Blue Mountain Lake
06 Blue Mountain Lake / Long Lake Water Trail	Day 3 Long Lake

07 North Creek/Indian Lake South Traverse	Day 7 Indian Lake
08 North Creek/Indian Lake South Traverse	First Night Blue Mountain Lake
08 North Creek/Indian Lake South Traverse	Day 2 Long Lake
08 North Creek/Indian Lake South Traverse	Day 4 Blue Mountain Lake
10 Newcomb/Long Lake Traverse	Day 4 Long Lake
12 Historic Great Camp Circuit	Day 2 Blue Mountain Lake
14 Indian Lake/Newcomb Traverse	First Night Indian Lake
14 Indian Lake/Newcomb Traverse	Day 1 Near Outer Gooley Club Farmhouse
14 Indian Lake/Newcomb Traverse	Day 2 Near Goodnow Flow
14 Indian Lake/Newcomb Traverse	Day 3 Newcomb
15 Grand Siamese Ponds Circuit	First Night Indian Lake
15 Grand Siamese Ponds Circuit	Day 10 Indian Lake
16 Blue Mountain Lake to Indian Lake Traverse	First Night Blue Mountain Lake
16 Blue Mountain Lake to Indian Lake Traverse	Day 1 Near Barker Pond
16 Blue Mountain Lake to Indian Lake Traverse	Day 3 Indian Lake
17 Newcomb to Long Lake Circuit	First Night Newcomb
17 Newcomb to Long Lake Circuit	Day 4 Long Lake
17 Newcomb to Long Lake Circuit	Day 6 Newcomb
18 Newcomb/Tahawus/Boreas Circuit	First Night

	Newcomb
19 Newcomb/Minerva Transverse	First Night Newcomb
19 Newcomb/Minerva Transverse	Day 1 Near Goodnow Flowage
19 Newcomb/Minerva Transverse	Day 1 Near Goodnow Flowage
21 Grand Central Adirondack Circuit	First Night Newcomb
21 Grand Central Adirondack Circuit	Day 2 Near Salmon Pond
21 Grand Central Adirondack Circuit	Day 3 Long Lake
21 Grand Central Adirondack Circuit	Day 5 Blue Mountain Lake
21 Grand Central Adirondack Circuit	Day 6 Near Barker Pond
21 Grand Central Adirondack Circuit	Day 7 Indian Lake
21 Grand Central Adirondack Circuit	Day 15 Near Goodnow Flow
21 Grand Central Adirondack Circuit	Day 16 Newcomb
22 Grand High Peaks Circuit	??? No details provided, but likely to impact Blue Mountain Wild Forest
23 Indian Lake/North Creek via Hudson Gorge (North Transverse)	First Night Indian Lake
24 Indian Lake/North Creek Circuit	Indian Lake
25 Newcomb/Long Lake Traverse via the Fishing Brook Range	First Night Newcomb
25 Newcomb/Long Lake Traverse via the Fishing Brook Range	Day 2 Near Salmon Pond
25 Newcomb/Long Lake Traverse via the Fishing Brook Range	Day 3 Long Lake
26 Snowy Mountain Circuit	Day 1 and 2 Indian Lake



**Appendix C**

Attached: Letter to Corrie O’Dea, Forester, New York State Department of Environmental Conservation, July 24, 2015, Re: The Essex Chain Lakes Management Complex UMP (ECLMC UMP)

**Appendix D**

Attached: Letter to Kathy Reagan, Deputy Director for Planning, NYS Adirondack Park, October 15, 2015, Re: The Essex Chain Lakes Management Complex UMP (ECLMC UMP)

**Appendix E**

Attached: Letter to Terry Martino, Executive Director, Adirondack Park Agency, December 10, 2013, Regarding: Classification of Former Finch Lands

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<sup>1</sup> [http://www.dec.ny.gov/docs/lands\\_forests\\_pdf/huttohut.pdf](http://www.dec.ny.gov/docs/lands_forests_pdf/huttohut.pdf)

<sup>2</sup> <http://www.dec.ny.gov/press/110195.html>

<http://www.dec.ny.gov/lands/107049.html>

<sup>3</sup> <http://www.dec.ny.gov/lands/22609.html>

<sup>4</sup> [http://www.dec.ny.gov/docs/lands\\_forests\\_pdf/huttohut.pdf](http://www.dec.ny.gov/docs/lands_forests_pdf/huttohut.pdf)