



16 June 2017

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RE: Siamese Ponds Wilderness UMP and Jessup River Wild Forest UMP
Amendments for partial implementation of the *North Country National Scenic Trail – Adirondack Park Trail Plan* (NCNST), 2015; 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.

Dear Kirstin,

The Adirondack Mountain Club (ADK) appreciates the opportunity to comment during the Siamese Ponds Wilderness UMP and the Jessup River Wild Forest UMP. We have incorporated the concerns and comments of Mary Coffin, an ADK member and Chair of the North Country Trail Association (NCTA) State Volunteer Council for New York. We have also incorporated the concerns and comments of David Pisaneschi, the Conservation Chair for ADK's Albany Chapter which maintains the 11th Mountain Trail and lean to on the East Branch of the Sacandaga.

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.

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.

The Adirondack Mountain Club works through agreement with the North Country Trail Association (NCTA) to support the successful completion, maintenance, and permanent protection in perpetuity of the NCNST and corridor.

Eagle Cave Bat Hibernaculum Protection

ADK unquestionably supports the management action proposed by DEC to physically gate and close against human use (and abuse) Eagle Cave in conservation efforts to protect little brown bats and northern long-eared bats which have been disturbed or killed by irresponsible individuals.

Wakely Brook Trail / North Country National Scenic Trail Development and Un-marked to Marked Trails

ADK supports construction of the new Wakely Brook Trail to connect the Kunjamuk Trail with the Round Pond Trail. This link provides a direct connection to Puffer Pond on public land for the NCNST and the potential for a through hike for the foot traveler on a footpath from the north end of Elm Lake Road to the North Creek Snow Bowl.

ADK supports official designation (and foot trail) marking of the Round Pond Trail, the Kings Flow East Trail, and the Puffer Pond Brook Trail. The following trails should be considered for NCNST marking: Cisco Brook trail, Long Pond Trail, Crossover Trail, Kunjamuk Trail, new Wakely Brook Trail, Round Pond Trail, Kings Flow East, Puffer Pond Brook Trail, Botheration Trail, Halfway Brook Trail, Raymond Brook Trail (Vanderwhacker Mt. Wild Forest).

Retain Eastern Puffer Pond Lean-to

ADK supports retention of the Puffer Pond lean-to, which was identified for removal in the 2005 UMP. Web concur that the most eastern lean-to needs repair and should be moved back from the water.

Hut to Hut Trail Connection to Indian Lake



As stated in the draft UMP amendment for the Siamese Ponds Wilderness, “DEC proposes a new section of trail connecting with town roads leading to Indian Lake as proposed in the Hut-to-Hut plan. This section of trail would go from the John Pond - Clear Pond Loop Trail running northerly through Siamese Wilderness Area (approx. 1.6 miles) and an adjacent Jessup River Wild Forest parcel (approx.1.0 mile) out to Parkerville Road in the Town of Indian Lake.”

ADK favors the construction of a new trail segment connecting the John Pond - Clear Pond Loop Trail to Parkerville Road as long as no “huts”, platform tents or yurts are constructed on Forest Preserve land. Such structures would violate the ASLMP and NYS constitution.

To the extent that this unit management plan (UMP) of the Siamese Ponds Wilderness UMP and Jessup River Wild Forest UMP refers to this part of the Forest Preserve as part of strategic lodging locations 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), these references are 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 Siamese Ponds Wilderness and Jessup River Wild Forest, it is **amending the UMP in order to implement the Hut-to-Hut Plan which does call 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 business 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*.¹ 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*² 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 Siamese Ponds Wilderness and Jessup River Wild Forest UMP Amendment should be removed.

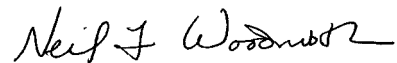
Botheration Pond Trail Re-Route and Clear Pond Trail Re-Route

ADK supports the re-routing of a portion of the Botheration Pond Trail (part of the NCNST) and Clear Pond Trail. This short relocation will obviate construction of a 55 ft. replacement bridge over the Sacandaga River. However, if any bridges are constructed, all bridges and trail infrastructure should be in accordance with the natural materials rule.

All trails in this unit which are on the NCNST route must remain non-motorized, single use foot trails in compliance with the ASLMP use criteria for Wilderness.

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

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*³ (hereafter, *the Hut-to-Hut Plan*), that could impact the Siamese Ponds Wilderness or Jessup River 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 by Traverse/Route Day
01 North Creek/Indian Lake Circuit	Day 1 Thirteenth Lake (1)—Existing Lodge? Challenge cited
01 North Creek/Indian Lake Circuit	Day 2 Kings Flow (1) —Existing Lodge? Challenge cited
07 North Creek/Indian Lake South Traverse	Day 1 Thirteenth Lake—Existing Lodge? Challenge cited
07 North Creek/Indian Lake South Traverse	Day 2 Kings Flow---Existing Lodge? Challenge cited
15 Grand Siamese Ponds Circuit	Day 1 Kings Flow---Existing Lodge? Challenge cited

15 Grand Siamese Ponds Circuit	Day 2 Thirteenth Lake—Existing Lodge? Challenge cited
15 Grand Siamese Ponds Circuit	Day 4 Near 11 th Mountain
15 Grand Siamese Ponds Circuit	Day 5 Near Baldwin Springs
15 Grand Siamese Ponds Circuit	Day 6 Griffin
15 Grand Siamese Ponds Circuit	Day 8 Northern Terminus of Elm Lake Road
15 Grand Siamese Ponds Circuit	Day 9 Near Crotched Pond Trail

¹ http://www.dec.ny.gov/docs/lands_forests_pdf/huttohut.pdf

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

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

³ http://www.dec.ny.gov/docs/lands_forests_pdf/huttohut.pdf