

29 February 2016

Michael Marsh, Forester  
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Conservation

✧

Education

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RE: Black River Wild Forest Unit Management Plan (UMP) Amendment

Dear Mr. Marsh,

Thank you for the opportunity to comment on the proposed amendment to the Black River Wild Forest (BRWF) Unit Management Plan (UMP).

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. ADK is especially concerned with the impacts of motorized use on public lands, including impacts to natural resources, and to other recreational opportunities.

ADK is concerned with several proposed changes to existing snowmobile trails and the creation of new snowmobile trails in the Black River Wild Forest Unit Management Plan amendment. After thoroughly examining the maps, and reviewing the reasoning provided, we do not believe all of the proposed changes are justified.

The first issue concerns Figure 1 in the amendment proposal. The map does not seem to follow the buffer rules correctly along the North Lake-Sand Lake-Mill

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Creek (NSM) Trail. After creating our own map (see attached Figure 1a) using the same rules the DEC applied in Figure 1, we found there to be a noticeable difference in buffer location. Looking along the NSM Trail the 2 mile buffer area differs for both maps along this trail. We would greatly appreciate having DEC review and compare our attached map with Figure 1 in the amendment and help us understand the discrepancy.

According to our attached Figure 1a, the NSM would be a Class II “corridor trail” running through remote interior forest. In the 2009 Snowmobile Trail Siting Management Guidance, DEC describes Class II trails which “are located in the periphery of Wild Forest or other Forest Preserve areas” and “only rarely are any segments of them located further than one mile away from the nearest” motorized travel corridor. ADK therefore strongly oppose the proposal that the NSM Trail be reclassified as a Class II trail because it does not fit within the established guidelines for Class II trails.

We would also like to call attention to Table 3 in the amendment, which proposes that 26.0 miles of existing snowmobile trails be reclassified as Class II trails. DEC needs to explain why such a change is needed and examine the impacts of such a change. This action would open 26.0 miles of new trail for equipment to groom and widen the trail as needed per the guidelines for Class II trails. We are very concerned with the number of tree removals needed to create the proposed Class II trail system. The removal may, individually or cumulatively when considered with the entire planned construction of Class II community connector trails in the Adirondack Park, exceed the Materiality Standard as defined by article IVX section 1 of the State Constitution.

Additionally, ADK also would like to inquire about the proposed trails connecting Otter Lake to McKeever. More specifically the trail that would link the Dump Road to Wolf Lake Landing Road. The proposed amendment references the original Black River Wild Forest Unit Management Plan Section IV subsection A-5 and claims that it calls for this trail to be built and become part of the C7 corridor trail.

Subsection A-5 states,

A multipurpose snowmobile, bike and hiking trail will be located from the Cohen Road east of the railroad corridor, to the southern end of the Otter Lake Airport, using mostly old skid roads (total 1.25 miles.) The proposed trail would provide total State land access to services in Otter Lake without having to cross NYS Route 28. The Trackside Blazers Snowmobile Club has offered volunteer labor, so development costs to New York State could be minimal. After this phase is completed, a connection between the Dump Road and the Wolf Lake Landing Road is recommended. The implementation and layout of Phase II using the Brewer Lake Road and old existing trails as much as possible will be studied.

ADK would like to point out that while the original Unit Management Plan does indeed recommend that this trail be built it does not mention anywhere that this trail would become part of C7. It is our opinion that DEC cannot use the original Unit Management Plan as justification for making this trail part of C7 since it is not mentioned in subsection A-5.

Furthermore, ADK is not satisfied with the reasoning provided for the proposed Class II trails to be made around the Remsen-Lake Place (RLP) Trail. In the amendment DEC claims that these trails need to be made so that snowmobilers have alternative routes because the RLP Trail is unfit to use at low snow depth because of the hazard the old railroad creates. ADK contests that this justification is unfounded and wonders why snowmobilers need another option. If snow depth is low should a snowmobile be on a trail either? Rocks and large tree roots at low snow depth surely would pose hazards as well.

Overall, ADK finds that the amendment lacks justification for the proposed changes to snowmobile trails, and we are currently unable to support the proposed amendment.

ADK supports the National Scenic Trail route as described in NYS DEC's NCNST Adirondack Park Trail Plan and Final GEIS Oct 2015 approved by DEC, APA and the Governor and included in the BRWF UMP Amendment. ADK looks forward to seeing the gaps filled between existing trails and the completion of the North Country National Scenic Trail across the Black River Wild Forest and North Lake Conservation Easement Lands and units east to the Vermont border.

The Stone Dam Lake Trailhead is the main entry into the Adirondack Park from the west. ADK suggests that parking at this trailhead be enlarged and improved. At present the parking is down in a depression, accommodates only 2-3 cars and it so steep it can only be exited in dry season. The road shoulder does is not a suitable alternative for parking. ADK also recommends that a large kiosk be installed at the Stone Dam trailhead to welcome hikers to the NCNST in the Adirondack Park.

Since the National Scenic Trail is a non-motorized, single-track foot trail it is important that trails open to mechanized users not run concurrent with the foot trail. For the most part other trails such as bike or snowmobile trails within the unit are entirely separate. Good. The one exception is the snowmobile use of the trail into Little Woodhull Lake from North Lake Road. Since this would be a dead end snowmobile trail, and the former connection to the Sand Lake Trail is closed to motorized travel, and for about one-half mile might run concurrent with the NCNST, I recommend that it not be open to motorized snowmobiles.

We appreciate the opportunity to comment and ask that DEC address our concerns with the amendment.

Sincerely,

A handwritten signature in cursive script that reads "Neil F. Woodworth".

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

# Black River Wild Forest Motorized Use Buffer

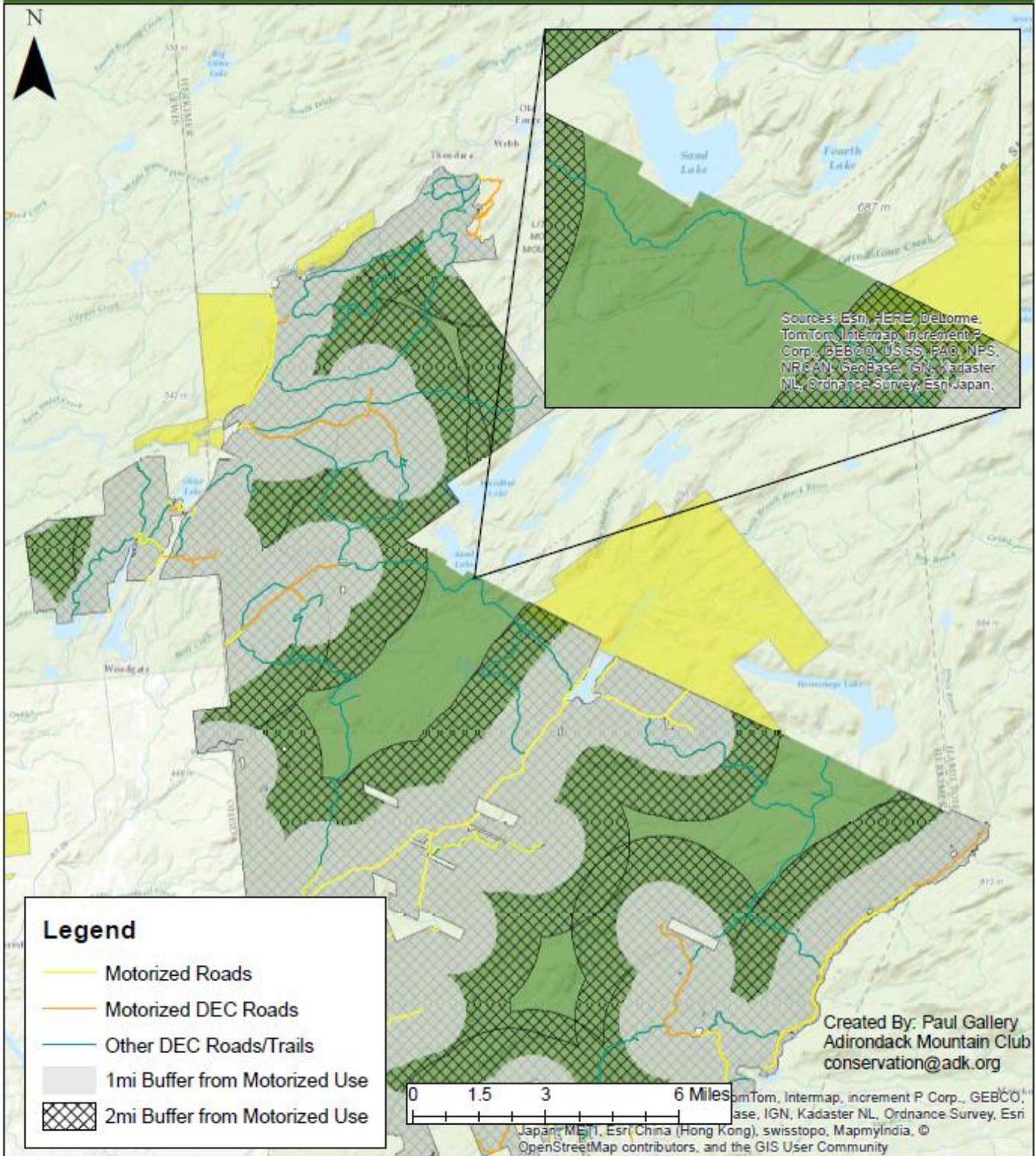


Figure 1a: Buffer Zone in BRWF

