



8 December 2016

Jeff Rider, Supervising Forester
NYS DEC
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Conservation
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RE: Draft Amendment to the Overlook Mountain Wild Forest UMP

Dear Jeff,

Thank you for the opportunity to provide comment on the Draft Amendment to Overlook Mountain Wild Forest UMP. Adirondack Mountain Club members are deeply committed to protecting the Forever Wild forest lands of the Catskill Park. Our members spend hundreds of hours maintaining trails and serving as stewards for the beautiful resources, waters, forests, and mountain peaks of the Catskills.

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We are generally pleased with the action presented in the Draft Overlook Mountain Wild Forest UMP, however the EAF is deficient in many aspects. ADK encourages DEC to review these deficiencies below and analyze what we believe to be significant Type 1 actions with potential to cause significant environmental impacts in an Environmental Impact Statement (EIS).

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ADK applauds the addition to the Forest Preserve of 576 acres, the official classification of these acres, and ADK applauds the proposed trailhead facilities and additional parking to deal with existing impacts to the area. However, we are very concerned that an EIS has not been prepared to analyze a number of issues which could have significant impacts on the environment including,

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- the addition of parking areas, the potential overuse of this area, and resulting impacts to the resource
- the proposal of a designated C-P3 road for vehicle access in an area known to be threatened Timber Rattlesnake (*Crotalus horridus*) habitat (this issue is not included in the EAF)

- the doubling of the size of the Wild Forest (this issue is not included in the EAF)
- the classifications of at least two parcels as Wild Forest that could be considered for inclusion in the Indian Head Wilderness, the OSI-KID parcel and the Town of Woodstock Parcel (this issue is not included in the EAF)

These actions listed above should be analyzed and justified in an EIS. Three of these issues are not even mentioned in the EAF, including the CP-3 road designation, the addition of nearly 600 acres to the forest preserve, and the classification action. These actions are clearly Type I actions. Further, the Catskill Park State Land Master Plan while permitting a classification to be accomplished through a UMP revision, still requires that the action actually be considered and analyzed as part of the action when establishing significance in an EAF.

Other issues with the EAF include the fact that the Indian Head Wilderness and the threatened Timber Rattlesnake (*Crotalus horridus*) habitat of the Wild Forest **should be** considered critical environmental areas (Question 7 should be Yes), the proposed action **could significantly increase traffic** on both the Overlook Mountain trail by vehicles and other uses including hikers, it **could significantly increase** the number of visitors to the area (Question 8 should be Yes), and the area of the action, especially the area of the proposed CP-3 trail, is habitat for the threatened Timber Rattlesnake (*Crotalus horridus*) (Question 15 should be Yes). Further, in the short form of the EAF the answers provided for questions 1,2,3,5, and 9 are incorrect and should be changed to “Moderate to large impact may occur.”

Finally, in Part 3 of the EAF, “Determination of Significance,” the CP-3 road designation and impact on rattlesnake habitat, the addition of nearly 600 acres to the forest preserve, and the classification action are, again, not included.

Although ADK supports the very successful DEC CP-3 Program, ADK is opposed to the designation of the Overlook Mountain Spur Trail from Meads Mountain Road to the fire tower as a CP-3 designated road.

There are so many better and more appropriate locations for CP-3 summit access in the Catskills. DEC could also consider using ski areas throughout the Catskills.

They all have summit access roads. Negotiated agreements could provide a group of summits that people with disabilities could use to drive-in during the ski off-season. The Catskills also have dozens of woods roads that access lesser summits that have wonderful views.

The proposed CP-3 road is steep and curvy in places in its lower half. The road washes out and the loose rock and clay make it slippery even in dry conditions. When it's wet, icy, or has a slick of snow, the conditions are even more problematic. Properly-equipped vehicles and experienced drivers who service the cell phone towers fishtail in steep spots on the way up and skid and slide in places on the way down when they've encountered curves and pedestrians. Combine that with a hundred daily exercisers and dog walkers, and 250 or more each day on weekends, and it will be a disaster waiting to happen on this narrow road. Should a vehicle skid off or otherwise block the road, it could hamper an emergency response for people higher on the mountain. Improving the road will only add to vehicle speed.

Threatened Timber Rattlesnakes (*Crotalus horridus*) routinely cross or travel on the road. Easily seen by hikers, these threatened reptiles would be invisible to vehicles. Near the summit, there is Timber Rattlesnake (*Crotalus horridus*) hibernaculum of this NYS threatened species. They have been hunted and killed or otherwise taken by collectors for over a century. Vehicle access during spring emergence or their fall migration back to the den site could reverse decades of protection. For vehicles accessing the summit to watch sunsets or fireworks, the Timbers are out on the summer evenings, further endangering them. Vehicles parked anywhere from the summit cabin to the tower would be right in the middle of Timber travel since the snakes cross over the grassy opening all over near the tower.

Two other issues that ADK would like to see DEC address in this UMP amendment include, how to mark the American Chestnut trees along the Overlook road so cell tower workers do not cut them, and ideas on how to discourage the camping and tree cutting immediately behind the overlook.

While ADK commends DEC for attempting to fix resource impacts to the Overlook Mountain Wild Forest with this Draft UMP amendment, there are clearly major deficiencies in the EAF and the UMP. The action as a whole, including the CP-3

road designation proposal, the addition of nearly 600 acres to the forest preserve, and the classification action itself, which have been completely left out of the environmental assessment and determination of significance for this action, must be analyzed as part of the whole action in an EIS.

Sincerely,

A handwritten signature in black ink that reads "Neil F. Woodworth". The signature is written in a cursive style with a prominent "N" and "W".

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