



23 February 2017

Corrie O'Dea, Forester
NYSDEC 232 Golf Course Road
Warrensburg, NY 12885

Via Email: r5.ump@dec.ny.gov

Conservation

✱

Education

✱

Recreation

Since 1922

RE: Scoping Hammond Pond Wild Forest UMP Revision

Dear Corrie,

The Adirondack Mountain Club (ADK) appreciates the opportunity to comment on the Hammond Pond Wild Forest UMP Revision.

NCNST

ADK and North Country Trail Association members, Norm Kuchar, Walt Hayes, and Mary Coffin among others, have worked with you on identifying and scouting the route of the North Country National Scenic Trail (NCNST) as approved in NCNST Adirondack Park Trail Plan FGEIS.¹ Map 7 in Appendix 13 of the FDEIS shows the plan for the NCNST through the Hammond Pond Wild Forest. As Mary Coffin has explained in her comments to you this is a critical section of the planned trail, which connects the NCNST west of I87 to Vermont. Completing this section of the NCNST will require 10 miles of new trail construction. We respectfully request that the NYS Department of Environmental Conservation (DEC) add the NCNST, as planned in the FGEIS, to the Draft Hammond Pond UMP and that the trail be planned and constructed so that it meets National Park Service certification criteria as well as DEC best foot trail construction practices. In October 2015, Governor Andrew Cuomo and DEC Acting Commissioner Marc Gerstman signed off on the 2015 DEC North Country National Scenic Trail Adirondack Park Trail Plan, FGEIS. Map 7 and page 31 describe the section proposal corresponding to the Hammond Pond Wild Forest.

Additionally, please consider creating a parking lot and Trailhead for the NCNST at River Road on the western border of the Hammond Pond Wild Forest in the Town of Schroon near Schroon Falls, and please consider a parking area and Trailhead off Johnson Pond Road (Town of Schroon) near Peaked Hill.

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Please consider the following recommendations by Norm Kuchar, Walt Hayes, and Mary Coffin:

- cross the Schroon River on a road bridge,
- access the Hammond Pond Wild Forest on narrow sections of Forest Preserve land,
- include scenic cascades on Johnson Pond Brook,
- the Peaked Hill Trail is too steep and must be improved or preferably relocated around the west side of Peaked Hill, and crossing Johnson Pond Rd
- create a sustainable trail between Johnson Pond Road and Moose Mountain Pond Trail (following Berrymill Brook around the west end of Owl Pate to the nice waterfall on Moose Mountain Pond outlet),
- extend the Hammond Pond Trail over Bloody Mountain for scenic views of the High Peaks, before entering the Lyme Timber property
- Foot bridges may be needed to cross Johnson Pond Outlet and Berrymill Flow Outlet.

ATVs

Increasingly DEC is under pressure to allow ATV access on Forest Preserve land in conjunction with local road openings for connections between legal riding areas as defined in NYS Vehicle and Traffic Law 2405. ADK does not support the use of ATVs on the Forest Preserve. Opening trails to ATV use in the Forest Preserve is not lawful and violates 6 NYCRR 196.1 (b). ADK supports the prohibition of public use of all-terrain vehicles within the forest preserve, and an increase 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. The use of ATVs on public roads in the Adirondack Park and Catskill Park is governed by Title 11, Article 48C, Section 2405 of the New York State Vehicle and Traffic Law. In the early 2000s DEC opened 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 fact, 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.⁴ 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 1800 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 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 within the Hammond Pond Wild Forest.

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 Adirondack Park's economy is particularly vulnerable to invasive species.** A study commission by Adirondack Park Invasive Plant Program conservatively estimated the potential impact from just 8 invasive species to be between \$468 to \$893 million loss to the

Adirondack's economy. Prevention efforts are of paramount importance and are critical to the economy, ecology and quality of life in the Adirondack Park. The UMP must include an inventory and distribution of existing known invasives (such as is available on the Adirondack Park Invasive Plant Program (APIPP) web site <http://adkinvasives.com/Invasive-Web-Map/index.html>) and the NY iMapInvasives Website (<http://www.nyimapinvasives.org/>). The UMP should also consider 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. DEC should develop prevention/management plans in collaboration with APIPP as part of the revision. The UMP should explain how the waterbodies in the unit fit into **Adirondack Park-wide AIS spread prevention plans, and the successful program of watercraft decontamination, management and control activities across the Adirondack Park**. Compared with spread prevention, the costs of directly managing infestations are high and often exceed the capacities of state action, local governments, and non-profits. Across the Adirondacks we need to **continue to build an effective AIS spread prevention and decontamination network** comprised of coordinated inspection locations and strategically located decontamination facilities.

The APSLMP was recently amended with the following statement. This statement provides additional justification for addressing invasive species in UMPs,

“The negative impacts of invasive species on natural forest and aquatic communities are well documented. Colonization and unrestrained growth of invasive species cause the loss of biodiversity, interruption of normal hydrology, suppression of native vegetation, and significant aesthetic, human safety and economic impacts. Terrestrial and aquatic invasive species have been identified at increasing rates of colonization along roadsides in campgrounds, and in water bodies of the Forest Preserve. Some of these species have the potential to colonize backcountry lands, lakes and ponds and degrade natural resources of the Forest Preserve.

Efforts should be made to restore and protect the native ecological communities through early detection and rapid response efforts to eradicate or control existing or newly identified invasive species populations. Subject to existing policy and guidelines, the Department will use the basic tools needed to preserve, protect and restore the natural native ecosystems of the Forest Preserve.”⁵

Hemlock Woolly Adelgid

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.

In the Adirondack Park hemlock is very dense especially in the south 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 Adirondack 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 Adirondacks.¹¹ Closer to home, 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). Anyone who has hiked, paddled, or driven through the Adirondack Park should realize what we will lose. If we do not act quickly, we may lose the species.¹⁴ The UMP should address the likely threat to the unit by this invasive pest, identify known hemlock stands, and include or reference early detection and rapid response and spread prevention plans, and best management practices for Hemlock Woolly Adelgid.

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

Sincerely,

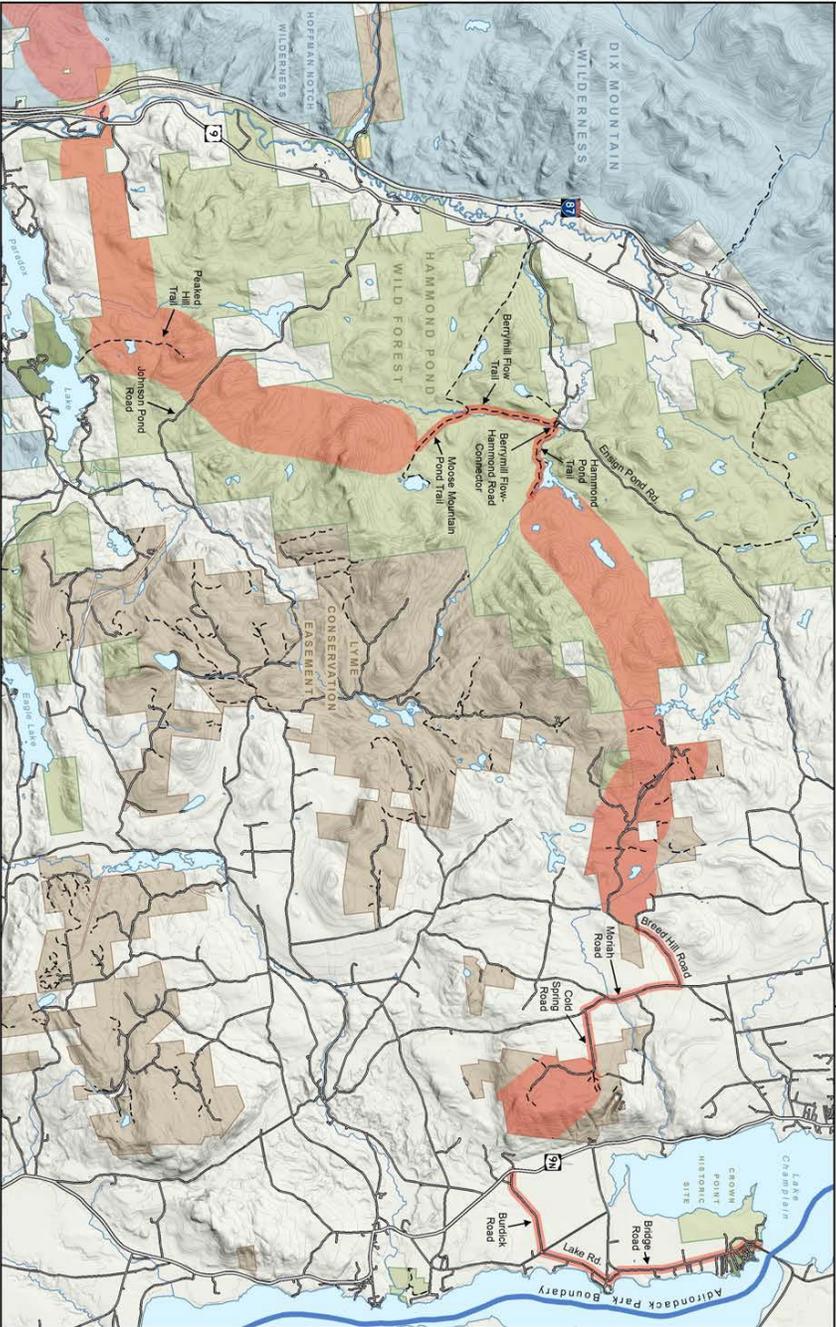
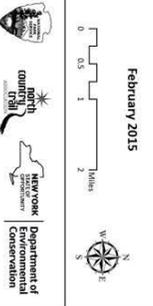
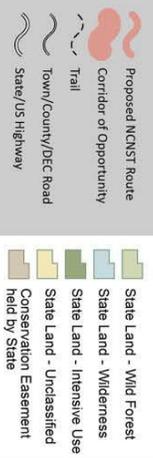
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North Country National Scenic Trail

Adirondack Park Trail Plan

Map 7

Hammond Pond Wild Forest
Lyme Conservation Easement



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- ¹ <http://www.dec.ny.gov/outdoor/39658.html>
www.dec.ny.gov/docs/lands_forests_pdf/ncnst001.pdf
- ² <http://www.protectadks.org/2013/03/protect-urges-governor-cuomo-and-dec-to-ban-atv-use-on-the-forest-preserve/>
- ³ wcsadirondacks.org
- ⁴ <http://www.dec.ny.gov/lands/64567.html>
http://www.dec.ny.gov/docs/lands_forests_pdf/spsfmfinal.pdf (p. 215-218)
- ⁵ https://www.apa.ny.gov/Documents/Laws_Regs/APSLMP.pdf (p.12)
- 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%2Fnanews%2Fnastories%2FHWA-Study-FINAL-012915.pdf&ei=tzvTVepuyLh5pM2y6AY&usg=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>