



3 May 2018

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Email - SLMP\_UMP\_Comments@apa.ny.gov

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

Dear Walt,  
Thank you for the opportunity to comment on the 2016 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 is a nonprofit organization with 30,000 members in 27 statewide chapters served by a 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.

ADK supports the rerouting of snowmobile trails and that the sum of new trails and closures of old trails does not result in a net increase on snowmobile trail mileage in in the Black River Wild Forest Unit Management Plan amendment.

However, we have some concerns with several proposed changes to existing snowmobile trails and the creation of new snowmobile trails in this Unit. 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 2016 amendment. The map does not follow the buffer rules correctly along the North Lake-Sand Lake-Mill

Creek (NSM) Trail. After creating our own map (see attached) using the same rules the DEC applied in Figure 1, we found there to be a noticeable difference in buffer location. According to our analysis (but not DEC's), the NSM travels through remote interior forest. In the 2009 Snowmobile Trail Siting Management Guidance, DEC describes *remote interior* as "the geographic area more distant than two miles from the nearest motorized travel corridors in all directions." DEC describes Class II trails as being "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. "Periphery" is defined in the Guidance as "the geographic area within two miles of a motorized corridor." ADK therefore strongly opposes 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 since the NSM travels through remote interior forest.

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 removals 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 XIV section 1 of the New York 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.

Overall, ADK finds that the amendment lacks justification for the proposed changes to snowmobile trails to Class II trails, and we are unable to support these portions of the proposed amendment.

ADK supports the North Country National Scenic Trail (NCNST) 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. We understand the flexibility required by the “Corridor of Opportunity.” We understand that a route (Figure 7) which avoids wetlands and reduces the number of foot bridges needed is favored as long as the scenic value is preserved.

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 not provide 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 North Country 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, which is good planning. 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), we recommend that it not be open to snowmobiles.

Construction of the NCNST will comply with the ASLMP and best trail building practices will be employed in the construction of this 18"-24" non-motorized, foot trail such as: use of natural materials, no cutting of trees over 3" DBH, skirting streams and wetlands when possible, proper drainage, minimal cut & fill benching, minimal grades (10-15%) avoiding unstable slopes, gentle switchbacks, minimal structure as needed to protect resource, use of old trails etc.

It is important that the NCNST route be included in the North Tract Conservation Easement agreement as it is the link between Black River Wild Forest and West Canada Lakes Wilderness where existing trails provide the route for the NCNST. Without this link, a NCNST hiker will need to walk busy roads, such as Route 28, to/from the Inlet and Moose River Plains WF area to access the route.

We appreciate the opportunity to comment on the 2016 amendment to the Black River Wild Forest UMP.

Sincerely,



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# Black River Wild Forest Motorized Use Buffer

