

4 May 2018

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RE: Cranberry Lake Wild Forest Unit Management Plan (UMP)

The Adirondack Mountain Club (ADK) appreciates the opportunity to comment on the Cranberry Lake Wild Forest 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.

We respectfully request that you consider the following concerns and comments outlined below.

Hiking Trails

Moore Trail: This popular riverside trail along the East Branch of the Oswegatchie River connects Inlet with the hamlet of Wanakena. The Wanakena trailhead has a small three or four car parking lot adjacent to the South Shore Road Bridge across the Oswegatchie. The Moore trail exits from the parking lot and drops down to river level. Recently, the St. Lawrence County Highway Department determined that the South Shore Road Bridge needed to be replaced. Because this bridge needs to remain in place until the new bridge is finished, it is most likely that the new bridge will run side by side to the old bridge and would be built upstream and west of the old bridge. If this occurs, the current Moore Trail parking area and trailhead would be eliminated by the north side piers and footings of the new bridge. Accordingly, DEC will need to re-locate the eastern terminus of the Moore Trail and sign the new trailhead. Hikers

using the Moore Trail can use the large parking lot a quarter of a mile away that serves the High Falls – High Rock Trail off South Shore Road.

Cranberry Lake

Cranberry Lake Campsites: The Cranberry Lake Wild Forest includes 46 primitive campsites along the shore of this the third largest lake in the Adirondack Park. Some of the campsites have lovely views, attractive swimming beaches, privies and other camping amenities. These campsites are very popular and it has become common practice for some campers to leave a tent, tarp and other camping gear when they leave in order to stake out the campsite for their next visit. Some family groups coordinate these activities to ensure that these desirable campsites stay in the family or group of friends. It appears that some of these groups rarely obtain a multi-day or large group permit from the local rangers.

DEC needs to prepare a plan to preclude this kind of user behavior. Otherwise, newer visitors to Cranberry Lake may find the most appealing campsites have been monopolized by the same group of users.

Develop Early Detection and Rapid Response Plans for Invasive Species.

Please develop early detection and rapid response plans for invasive species in the CLWF. 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 UMP should include an inventory of invasive species which are a threat to the unit such as variable watermilfoil. The UMP should also include a consideration of likely threats from invasives, such as Hemlock Woolly Adelgid (see below) and aquatic invasive species such as water chestnut or hydrilla.

In the revised UMP, DEC must include the boat-washing station that has been sited at the intersection of Route 3 and Benson Mines-Newton Falls Road (Route 50) as a critical facility for the protection of Cranberry Lake and Aquatic Invasive Species Spread Prevention.

Threat of Hemlock Woolly Adelgid. Consider Potential of Bio-Control.

Hemlock Woolly Adelgid (HWA) should be identified in the UMP as a threat. DEC should recognize that eastern hemlock, a foundation species, plays an important role in the Unit. DEC should identify mature trees and stands, coordinate monitoring, and develop a prioritization and treatment regime to protect hemlocks in this forest unit. DEC should identify and protect old growth stands and should work with the Regional PRISMs (APIPP and SLELO),¹ **the NY State Hemlock Initiative, and DEC's Bureau of Invasive Species and Ecosystem Health** to prepare for the threat of HWA in this unit. New York faces potential decimation of eastern hemlock from HWA, which has not yet been identified in the Cranberry Lake Wild Forest Unit (see figure below from <http://www.nyimapinvasives.org/>) but has been recently discovered near Lake George in the Adirondack Park. HWA has already caused significant decline in the Catskill Park, and has been identified on other New York State Public Lands including Letchworth State Park, and Allegany State Park.

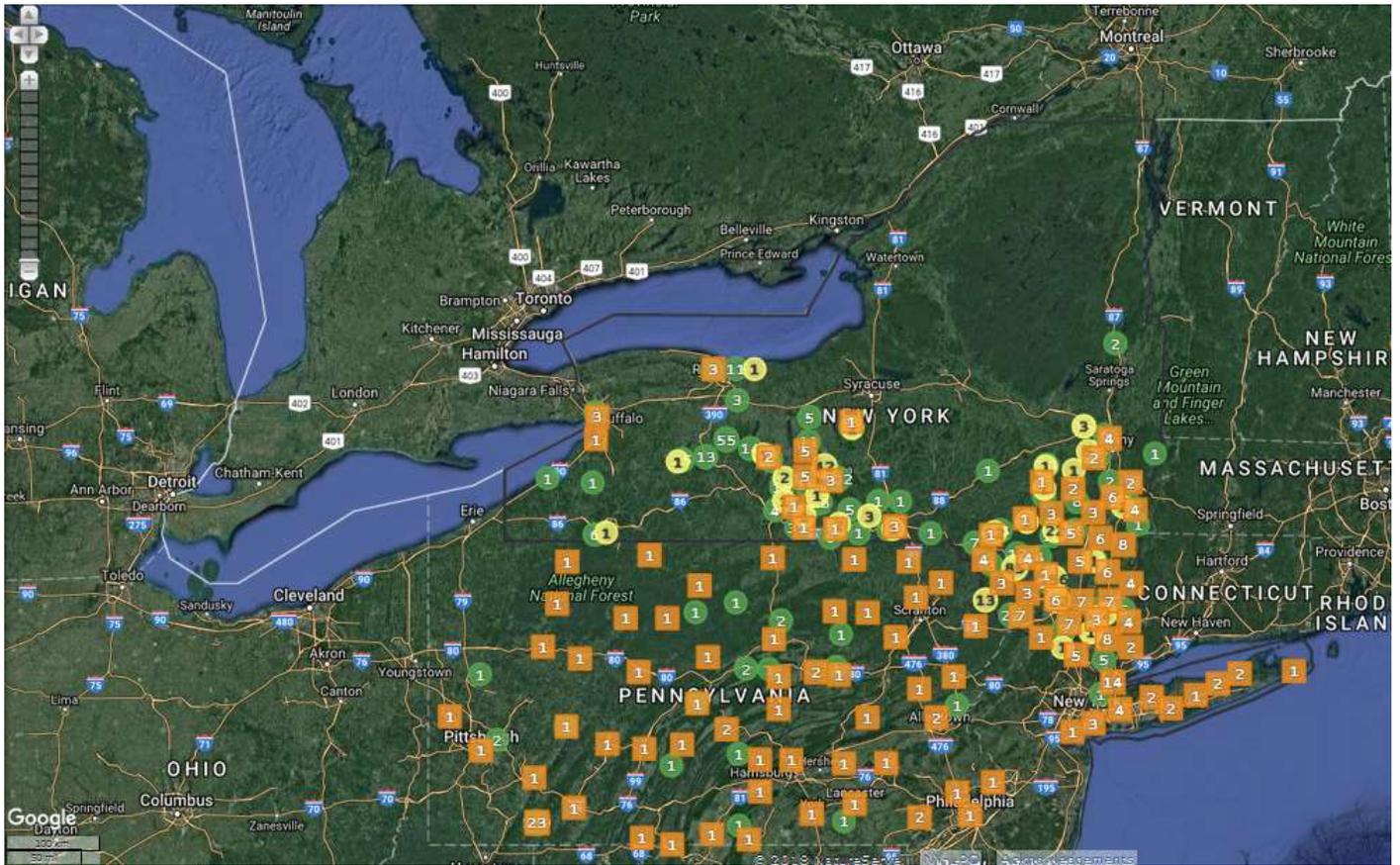


Figure 1 Distribution of HWA in New York State

Hemlocks are a foundation species.² Foundation species are critical species in the habitats they help create.³ 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.

Hemlock is prevalent in St Lawrence County (see figure below).

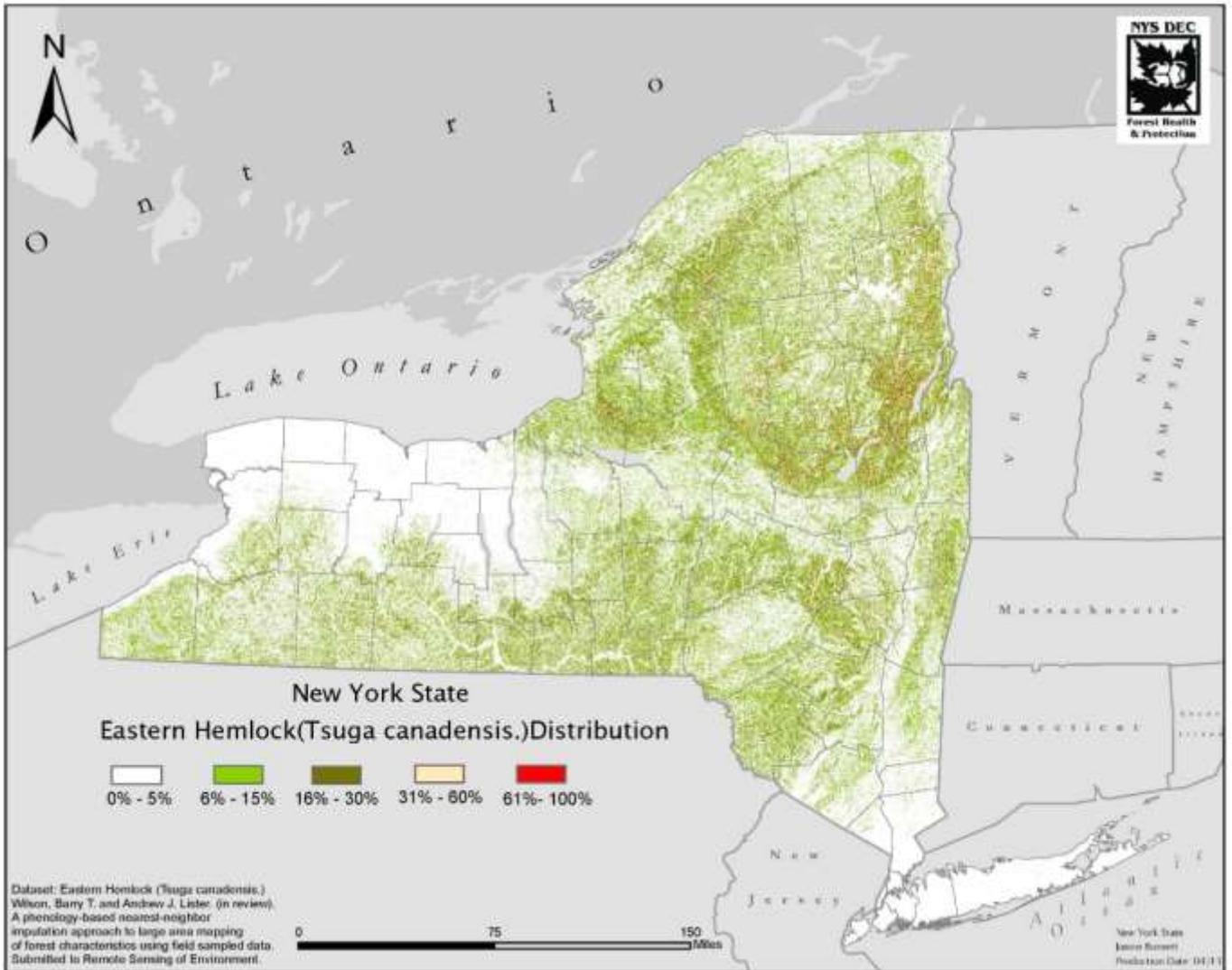


Figure 2 Distribution of Hemlock in New York State

Imagine the impact to the landscape in St Lawrence County and across the state from a severe decline of hemlock--a highly likely scenario without a significant increase in early detection efforts, treatment, and development of bio-controls, such as the predator beetle (*Laricobius nigrinus*), and silverflies (*Leucopis argenticollis* and *L. piniperda*).⁴

We only need look to places such as the Great Smoky Mountains for an example of the devastation in store for the forests of New York State.⁵ HWA has been advancing quickly through New York State,⁶ and now is in the Adirondack Park in Lake George, NY. Decline of hemlocks is already well underway in the

Catskills.⁷ 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.⁸ We must stop or slow the advance of HWA in New York State before it impacts the Cranberry Lake Wild Forest.

Historic and Archaeological Site Protection

Any archaeological research must be in consultation with the appropriate Tribal Historic Preservation Office (THPO), that is, with the Saint Regis Mohawk THPO, and the Seneca Nation of Indians THPO.⁹ The UMP for this unit must reflect this important mandated consultation. OPRHP Policy Directive HP-POL-005 (11/01/2016) states,

Historic preservation carried out by federal and state agencies is a collaborative process that encourages communities to be involved in decisions affecting their history. The New York State Office of Parks, Recreation and Historic Preservation and its State Historic Preservation Office (collectively in this document referred to as SHPO) have developed this Policy for incorporating the knowledge and concerns of Indian Nations and Tribes (collectively in this document referred to as Indian Nations) into reviews of projects affecting their historic properties.¹⁰

The policy directive also states,

This Policy clarifies SHPO's process when reviewing projects that directly or indirectly involve interested Indian Nations; it cannot substitute for the obligations of other State and federal agencies regarding consultation with Indian Nations.¹¹

DEC must be proactive in this regard and not assume that approval by OPRHP, the New York State Museum, or APA, alleviates the DEC's responsibility of consulting with Native Nations through their THPOs.

Education, Messaging, and Outreach

DEC should consider Leave No Trace Outdoor Skills and Ethics educational programming and messaging throughout this Unit and on all NYS Public Lands Forest. ADK strongly suggests that DEC *Develop a Leave No Trace Skills and Ethics Integration and Outreach Plan*. This plan should cover messaging on the DEC web pages, at trailheads, on literature, and in programming. The development of the plan should be

coordinated with other state agencies and offices to ensure that promotional efforts for Adirondack Tourism that use state funding incorporate Leave No Trace messaging.¹²

ADK also urges DEC to commit to integrated training of Leave No Trace Skills and Ethics on the Trainer or Master Educator Level¹³ for DEC staff and Forest Rangers.¹⁴ The Master Educator level of training would be especially important for Forest Ranger staff who have significant one-on-one interaction with Forest Preserve visitors. DEC is a formal partner with the Leave No Trace Center for Outdoor Ethics and already has Master Educators on staff. Both the Center and the DEC Master Educators could help develop a plan for the agency and provide educational support, tools, and materials. ADK, which is one of ten site providers of Master Educator Courses for the Leave No Trace Center, could also assist in developing a plan.

An important consideration in Leave No Trace outreach involves explaining to visitors why they need to change their behavior in order to conform to land management rules and regulations. For visitors to public lands this makes a connection between their behavior and impacts to the place that they enjoy. Messaging should also include an alternative that complies with the regulations and emphasizes how following the suggested behavior or action will protect the resource and make the visitor's experience more enjoyable. As described above, one issue on Cranberry Lake that could be improved through this type of outreach and engagement involves helping visitors understand the impacts to Cranberry Lake Wild Forest and other visitors from staying at a campsite over three days without a permit or using gear storage at sites to retain or claim campsites for extended periods between occupancy.

DEC should also work with the New York Department of State (DOS) and their new ArcGIS Information Gateway¹⁵ to disseminate rules, regulations, and educational information specific to locations, and land units.

Capacity to Withstand Use

Recently, the Interagency Visitor Use Management Council, a planning entity composed of federal public land agencies (including the U.S. Forest Service and the National Park Service), posted its Visitor Use Management Framework.¹⁶ This framework could provide additional insight to DEC's long-term planning process which currently involves (1) the goal-achievement process; (2) the Limits of Acceptable Change (LAC) model employed by the U.S. Forest Service; and (3) the Visitor Experience and Resource Protection (VERP) model employed by the National Park Service. One key component of this framework is the use of a sliding scale for all components of the process to ensure that efforts match the size and scope of the project as well as the resources available.

ADK urges DEC to include indicators and thresholds as described by the Visitor Use Management Framework in its planning to define monitoring objectives, a monitoring schedule, and management actions to be taken should resource conditions deteriorate. According to the VUMF, "Indicators are defined as specific resource or experiential attributes that can be measured to track changes in conditions so that progress towards maintaining desired conditions can be assessed. Thresholds are defined as minimally acceptable conditions associated with each indicator.... Thresholds serve a critical role to alert when conditions are close to becoming unacceptable."

Minimum Maintenance Roads

Unfortunately, this year the Adirondack Association of Towns and Villages (AATV) has announced their support for Minimum Maintenance Road Legislation (A418/S2537) This bill has great potential to preclude access to DEC trailheads for hikers, hunters, fisherman, mountain bikers, and other recreationists on low volume or seasonal roads. The bill would authorize towns to pass local ordinances enabling them to lower the level of road maintenance, stop plowing roads or even abandon roads leading to state trailheads. ADK strongly opposes this legislation, arguing that state taxpayers pay considerable taxes on Forest Preserve lands, state forests, and other state public lands served by these Low Volume Roads (LVR).

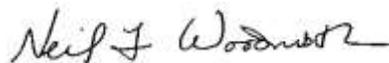
In 1885-1886, a legislative compromise was made to allow for the creation of the Forest Preserve which was the passage of a law in 1886 that provided for all lands then or thereafter included in the Forest Preserve to be "assessed and taxed at a like valuation and at a like rate as those at which similar lands of

individuals within such counties are assessed and taxed." Since 1886, the RPTL has authorized the State to pay taxes on its Forest Preserve as if it were privately owned. Since all NYS residents benefit enormously from these "forever wild" state forests, it was thought then, as now, that all NYS taxpayers ought to share in full taxes to the hundreds of affected small towns and school districts in the Adirondack and Catskill Mountains. Although the practice of taxing state land began with legislation in 1886 that permitted taxation of the Adirondack and Catskill Forest Preserve, since that time taxability has been extended to reforestation lands, some institutional properties, and parks including Letchworth State Park (1914), the Palisades, Bear Mountain, and Harriman State Parks (1916), the Allegany State Park (1924, 1928), the Saratoga State Park (1930), and the Hudson Highlands and Baird State Parks (1941-42).¹⁶ In 1932 reforestation lands were made taxable, including the beautiful lands of our state forest system, and unique areas such as Zoar Valley. Additionally, wildlife management areas, canal lands, and lands acquired for flood control have also been made taxable over the years. On privately held conservation easement lands across the state, the rights held by the state are also taxable.¹⁷

New York State must protect the right to access state lands and has the right to demand that local roads be maintained given that New York State is paying taxes on state lands as do private citizens.

Thank you for the great work you do protecting and stewarding our Adirondack Forest Preserve.

Sincerely,



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¹ <https://www.dec.ny.gov/animals/47433.html>

² <http://www.lternet.edu/research/keyfindings/foundation-species-matter>

³ <http://adkinvasives.com/wp-content/uploads/2015/04/WHITMORE-Lk-Placid-28-Mar-15-1.pdf>

⁴ <https://www.nps.gov/grsm/learn/news/new-hwa-beetle.htm>

<https://blogs.cornell.edu/nyschemlockinitiative/biocontrol-program/>

<http://www.news.cornell.edu/stories/2015/06/cornell-introduces-silver-flies-save-hemlock-forests>

<https://blogs.cornell.edu/nyschemlockinitiative/>

⁵ <http://www.lakeplacidnews.com/page/content.detail/id/523715/Flies-could-avert-hemlock-threat-in-New-York.html?nav=5005>

⁶ <http://www.dec.ny.gov/animals/95656.html>

⁷ <https://www.na.fs.fed.us/nanews/nastories/HWA-Study-FINAL-012915.pdf>

⁸ <http://www.lakeplacidnews.com/page/content.detail/id/523185/A-threat-to-hemlocks.html?nav=5005>

⁹ <http://nathpo.org/wp/thpos/find-a-thpo/#ny>

¹⁰ <https://parks.ny.gov/inside-our-agency/documents/GuidancePolicies/ConsultationofIndianNationsTribes.pdf>

¹¹ <https://parks.ny.gov/inside-our-agency/documents/GuidancePolicies/ConsultationofIndianNationsTribes.pdf>

¹² <https://Int.org/>

¹³ <https://Int.org/learn/training-structure>

¹⁴ <https://Int.org/blog/authority-resource-technique-action>

carhart.wilderness.net/docs/manuals/waappg.pdf

¹⁵ <http://opdgig.dos.ny.gov/#/home>

Contact Jeff Herter at DOS for more information: jeff.herter@dos.ny.gov

¹⁶ <https://www.tax.ny.gov/research/property/reports/landcomp/section2.htm#4>

¹⁷ <https://www.tax.ny.gov/research/property/reports/landcomp/section2.htm#4>