



Working for
Wilderness

9 July 2018

Kathy Regan, Deputy Director for Planning
NYS Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
Fax: 518-891-3938
SLMP_ump_comments@apa.ny.gov

RE: Saranac Lakes Wild Forest proposed Final UMP

Dear Kathy,

The Adirondack Mountain Club (ADK) appreciates the opportunity to comment on APSLMP Compliance of the Saranac Lakes Wild Forest proposed Final Unit Management Plan (SLWFUMP).

Adirondack Mountain Club

ADK is a nonprofit organization with 30,000 members in 27 chapters and 36 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 and other state lands. Our members are also monitors and maintainers of trails and recreation infrastructure as well as watchdogs of public lands and watersheds to monitor for invasive species or irresponsible and destructive motorized trespass.

Our comments below follow the subheadings of the proposed management actions of this UMP. We have also incorporated the comments of John Omohundro, a conservation leader in our ADK Laurentian Chapter in St. Lawrence County and have consulted with Marilyn Gillespie who was a member of the Citizen Discussion Group for the plan.

We applaud the Department of Environmental Conservation (DEC) for the comprehensiveness of this UMP and the thoughtful examination of the complex management issues presented by public use of this popular and very large unit of the Forest Preserve.

ADK notes that the hydrilla scare in 2017 at Upper Saranac Lake illustrates the importance of establishing new boat inspection and washing stations for the DEC boat launches at key public water access points in the area, especially at downtown Saranac Lake and at The Crusher Boat Launch. The plan should address the danger posed by invasive species and promote spread prevention more aggressively. Water access points such as South Creek, Moose Pond and Lake Colby should have proper gating to prevent the launching of boats with un-inspected trailers. DEC should consider designating as motor-free other water bodies in the SLWF that are accessed only by car-top boats and are currently free of aquatic invasive species. There should also be monitors/educators at all trailer ramps.

DEC should declare motor-free water bodies that are both accessed only by car-top boats and currently free of invasive species. Better preemptive and spread prevention controls are also needed for terrestrial invasives. We urge DEC to implement additional prevention actions such as motor vehicle inspections to determine the origin of firewood transported into the SLWF by campers.

ADK is very concerned that there is no site-specific plan outlined in this UMP for invasive species spread prevention, early detection and rapid response, and eradication management actions. We are supportive of the listed management actions under *Control of Exotic and Invasive Species*, such as following the *Inter-Agency Guidelines for Implementing Best Management Practices for the Control of Terrestrial and Aquatic Invasive Species on Forest Preserve Lands in the Adirondack Park*. However, the UMP needs to map where invasives are currently present, describe the Best Management Practices that will be used to prevent the spread and management of the invasives, and explain how DEC is working to prevent new infestations in the SLWF. DEC must also explain the impact the recreational management actions outlined in this UMP will have on invasive species spread, especially aquatic invasive species. BMPs for spread prevention must be part of an alternatives analysis for these actions. Further, with the recent discovery of Hemlock Woolly Adlegid in the Adirondack Park, this UMP should map hemlock stands and outline management actions for early detection.

ADK is supportive of many of the management actions outlined in this UMP, including actions that are designed to reduce impact by prohibiting or limiting motorized use of sensitive areas that protect against the spread of invasive species, and that provide safe, high quality recreational experiences for visitors. We are very concerned that there is very little data or analysis of management action impacts. The alternatives analysis, for example, seems to simply choose one management action per subheading for an alternatives analysis. For example, under Trailheads, one parking lot action is chosen for an alternatives analysis. In another example, under Fishing Water Access, the UMP simply analyzes the 4 access choices the department used, but these choices or alternatives were not considered or analyzed site-specifically. Finally, there is no attempt to look at cumulative impacts.

Trails

ADK supports the re-opening the Sangemo Canoe Carry and the new carry trail from Saint Germain Pond to Upper Saint Regis Lake. We also support the re-route of Scarface Mountain Trail, the re-route of the Bartlett Carry trail off the road and into the woods. ADK supports the closure of the trail from the Rollins Pond Campground to Deer and Lead Ponds. ADK also approves of the designation of a trailless area of over 7400 acres in the SLWF.

Mountain Bike Trails

ADK supports the construction, designation, and maintenance of single track mountain bike trails, and supports Alternative 2. However, if DEC intends to build wider trails it must map sections by design, width, and intended use and explain the rationale for wider trails. **Single track trails are appropriate for use with hikers and bikes, and wider trails are not needed for beginner bikers.** We endorse posting as “closed to bike use” those trails which the UMP determines should be closed to bike use for environmental impact and /or user conflict concerns.

Cross-Country Ski Snowshoe Trails

We agree with the DEC observation that some trails in the SLWF are difficult to access in winter because roads and parking lots are not plowed or are blocked by plow snowbanks. ADK encourages partnering with local towns to enlist towns or counties to plow parking lots and access roads to increase the

contribution of cross-country skiing and snowshoeing to local economies. ADK supports the proposed management actions for cross-country ski trails proposal on page 115-116 of the UMP.

Snowmobile Trails

ADK supports the 2.18 miles of new snowmobile trails to be opened and the proposed closure of 15.33 miles, comprising a net loss of 9.82 miles of snowmobile trails in the SLWF. ADK believes any new trails in the SLWF should be class I trails with the character of foot trails and groomed only by utility snowmobiles with drags.

Horse Trails

ADK supports the designation of the Old Wawbeek Road and the administrative road that proceeded to the north from Old Wawbeek Road to State Route 30 as open to horse use if the road is brought up to DEC Horse Trail Standards.

Motor Vehicle Access and All-Terrain Vehicle (ATV) Use

ADK supports the closure of motor vehicle roads as described on pages 124 and 125 of the UMP and urges stronger enforcement actions on these roads to reduce or prevent illegal ATV use. Effective ATV barriers and gates should be employed to discourage and prevent illegal ATV riding. ADK supports the creation and designation of CP-3 roads such as Dunlap Road.

Trailheads

ADK supports creating a new parking lot for access to Middle Saranac Beach and Ampersand Mountain with space for 15 cars on the south side of Route 3 on lands of the High Peaks Wilderness. The existing lot on the north side of the road should be retained, but DEC should work with the state Department of Transportation to install guardrails to limit overflow parking for a half mile east and west of these parking areas. ADK supports construction of a new parking lot for 7 cars at Averyville for access to new trails in that area (page 127).

DEC should create a winter parking area for 10 vehicles at Corey's Road near the Stoney Creek Bridge that will allow for a snowplow to turn around, and allow visitor parking during the winter months. DEC should limit public winter vehicle access beyond this parking lot in winter.

DEC should create a parking lot on Mountain Lane (Old Mountain Road) at the western end of the road near the intersection with NYS Route 73 with parking for 11 cars to provide access for winter users especially for use of the Sentinel Range Wilderness. ADK supports Alternative 4 for the Ampersand Mountain Trailhead parking to be limited to those cars that fit in parking lots with guardrails to enforce no shoulder parking.

South Creek Water Access

We strongly encourage DEC to prohibit motor boats and motor boat launch on South Creek. ADK supports these measures at South Creek to prevent the spread of invasive species, damage to shallow water areas, and erosion of shorelines caused by trailers and other recreational actions. The public should carry water craft to the water. Boulders and gates should remain in place.

Campsites and Lean-tos

DEC should propose stove-only-use for campsites in the SLWF in areas that have significant loss of site vegetative screening and a shortage of dead and downed wood. Stove only, no campfire designated campsites would also address the significant damage caused by unattended and improperly located campfires. In designating replacement campsites, the quarter-mile separation of sites required by the APSLMP is important, but consider that pond-side campsites often have better insulation from their shore-side neighbors than they do from occupied campsites across the water. DEC should consider siting new campsites to account for this. The closure and/or retention of campsites should be based on the principle of Limits of Acceptable Change with an assessment and analysis of the carrying capacity of the resource.

There is a significant problem with individuals monopolizing campsites by circumventing regulations intended to limit the length of time someone can use a campsite. Individuals leave personal camping

gear at the site while the site is not occupied by anyone. This is a violation of a DEC regulation prohibiting the leaving of unattended personal property on state land. Forest rangers could tag these sites and return several days later to confiscate the personal property left to squat on these sites sometimes for weeks at a time. Signing in areas where campsite squatting is a chronic problem should warn people that this behavior will no longer be tolerated. The rest of the public deserves a chance to use these prime campsites.

ADK supports the management actions explained on pages 146-147, including properly locating pit privies or box toilets at all campsites. ADK supports the closure of 64 campsites and building of 68 new campsites with closure of degraded campsites occurring as new campsites are constructed. ADK supports the one week camping limit on Follensby Clear Pond and Polliwog Pond. Fire rings may need to be relocated to more sustainable and safer locations. Highly popular campsites should be managed using a permit only reservation system, fees should be charged, and the system carefully monitored to prevent cheating or gaming the system (pages 143-144). A limited number of group campsites should be created and regulated by a permit, reservation system. ADK support the Preferred Alternative discussed on Page 143 implemented with a reservation system. **ADK opposes any amendment to the APSLMP that allows groups over 12 people to camp at primitive tent sites in Wild Forest areas (page 145).**

Other Structures

Improvements must conform to APSLMP Guidelines. All pit and box privies must be set a minimum of 150 feet from lakes, ponds, rivers, or streams. Any privy violating this APSLMP guideline must be removed. Box toilets will be phased in as pit privies require replacement.

Public Use and Access

ADK agrees with DEC that a “visitor’s knowledge and experience are a large factor in the level of impacts that they create,” and that “...education of proper outdoor recreational techniques is important in protecting the resources of the SLWF.” DEC’s effort to encourage use of “Leave No Trace” recreation is a great example of the department’s efforts to reduce recreational impacts. Leave No Trace training for staff, volunteers, visitors and community members should be broadened by partnering with

organizations and volunteers to provide a program of Leave No Trace outreach and messaging throughout the year and through all messaging and media outlets.

Watercraft Use

ADK supports prohibiting motorboat use of Weller and Little Weller Ponds and the enforcement of the 5 mph speed limit on the entire section of Raquette River in SLWF. DEC should prohibit public motor boat use on Beach and Bog Ponds in Franklin County. ADK supports a maximum horsepower of 15 horsepower on Follensby Clear Pond, Polliwog, Middle, Green, East Pine, and Horseshoe Ponds. We urge the Department to limit motorized use on the smaller of these ponds to electric motors only, (or in some cases prohibit motorized use) (page 155). Electric motors leave decreased wakes, a reduced threat of transporting invasive species and eliminate the noise, air and water pollution associated with gas powered engines.

Proposed Regulations

ADK strongly supports amendments of 6NYCRR Part 190 to prohibit the disposal of food, washing food containers, soap or detergent in waterbodies, and the prohibition of the use of audio devices outside immediate area of campsites (page 157).

ADK supports new regulations to prohibit fires and camping on wild forest lands on east side of Lake Clear, and to prohibit camping (with fines for illegal camping) on Brewster Peninsula and within 500 feet of Fernow forest trail and on the Lake Colby Nature Trail parcel.

ADK supports the amendment of 6NYCRR section 196.5 to prohibit the operation of mechanically propelled vessels other than those powered by a motor 15 horsepower or less on Horseshoe Pond, Middle Pond, Polliwog Pond, Follensby Clear Pond, and East Pine Pond,

Adopt New Regulations

ADK supports new regulations to prohibit the public from launching boats powered by a motor with a rating greater than 15 horsepower in Hoel Pond, Follensby Clear Pond, East Pine Pond, and Lake Clear Outlet.

ADK asks for a new regulation that prohibits the use of motors on South Creek.

ADK supports a prohibition of motorboat use on Weller Pond and Little Weller Pond.

Special Management Areas

Lake Clear Beach

ADK supports regulations that prohibit camping on Wild Forest Lands on east side of Lake Clear, especially the Lake Clear Beach.

Lake Colby Nature Trails

ADK supports Preferred Alternative 2 for management of the state owned portion of the Lake Colby shoreline and nature trail area (page 162).

McKenzie Pond Road Boulders

DEC should manage the area as a bouldering area. DEC should prohibit rock-climbing equipment in the area, maintain current trails, construct a parking area off of McKenzie Pond Road to hold ten cars, and build a trail to the bouldering areas from a parking lot (page 163-164).

Scenic and Recreational Rivers

DEC should enforce a 5 miles per hour speed limit on Saranac and Raquette Rivers (page 165). ADK supports the removal of the cable car from over the Raquette River.

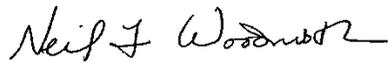
Saranac Lake Islands Wild Forest Administrative Camping Plan

The campsite management plan started in 1977 and has been very effective. DEC should continue to charge the camping fee and continue the reservation system and reservation fee. ADK opposes the

classification of Saranac Lake Administrative Area to Intensive Use. The area will not have facilities and amenities typically associated with a DEC public campground. ADK supports alternative five on page 176. ADK concurs with the rationale for rejecting an Intensive Use designation. DEC should continue the permitting and management of 87 sites but limit site use to maximum of 6 campers per site except as provided in Alternative 5 (pages 177).

Thank you for considering the above comments.

Sincerely,



Neil F. Woodworth

Executive Director and Counsel

Adirondack Mountain Club

neilwoody@gmail.com

518-449-3870 Albany office

518-669-0128 Cell

518-668-4447 x-13 or 25 Lake George office