



The mission of the ADIRONDACK COUNCIL is to ensure the ecological integrity and wild character of the ADIRONDACK PARK for current and future generations.

June 27, 2018

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RE: Comments on the Draft Amendments for the Vanderhacker Mountain Wild Forest and High Peaks Wilderness Unit Management Plans

On behalf of the Adirondack Council, I would like to thank you for the opportunity to provide the following comments on the draft amendments for the Vanderhacker Mountain Wild Forest (VMWF) and High Peaks Wilderness Area (HPWA) Unit Management Plans (UMPs). These comments include by reference the attached letter provided to the Department dated April 20th, 2018 and verbal comments we provided at the April 3rd and June 21st, 2018 public input sessions. The Council would like to recognize the Department of Environmental Conservation (DEC) for their efforts to move the management planning of these iconic Forest Preserve areas ahead in a prompt and meaningful manner, as these world class resources need world class protections now to ensure their legacy for future generations.

In reviewing both UMPs, the Council believes these documents represent a fundamental shift in tone and management directives and a rare opportunity to show that protection of natural resources and safeguarding the wild character of the Adirondack Park does not have to come at the expense of accommodating for recreation use, public safety, or economic vitality. While we see much to be encouraged by and much to cheer, there are fundamental weaknesses to the UMPs as proposed and substantial room to make improvements to prioritize natural resource protection and preservation. As drafted these UMPs contain errors and are not Adirondack Park State Land Master Plan (SLMP) compliant. Changes are necessary. Before the Adirondack Park Agency considers final approval there needs to be an opportunity for public review and comment of revised documents including those changes.

We ask DEC to continue to improve upon the excellent work done by staff to make these management plans more representative of the magnificent lands they



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Printed on paper produced at International Paper's Adirondack mill.



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describe and to take full advantage of the opportunity to make these UMPs a model for how conservation at a landscape scale can be successfully achieved. We look forward to reviewing your response to our comments.

In linking our comments to both UMPs within this letter, the Council acknowledges the positive move by DEC to intertwine these two UMPs within the documents themselves and the larger role that Complex Planning must play in the future management of Forest Preserve lands. This is a move that the Council strongly endorses, and believes is necessary as the DEC grapples with the ever increasing complexity of managing lands where uses and visitation connects multiple management units across an ever growing public-private lands interface.

Like national and state parks across America, visitation in the Adirondacks is growing to record levels, putting people, the resources, and the wild character of the Adirondack visitor experience at risk. Failure to manage this success, and to capitalize on this opportunity, puts at risk the sustainability of the protection of natural resources, wilderness character and the long-term economic viability of tourism-based businesses and the Adirondack Park economy. And while the challenge to manage the kinds of success we are seeing across the region are not unique to the Adirondacks, the opportunity to design a solution that is unique to the Adirondacks has never been more attainable.

There is consensus among a wide range of stakeholders that now is the time for decisive and visionary decision making backed by investments in staff and organization resources. This consensus comes with a recognition that these UMPs provide an opportunity to manage overuse in a manner based on the best science to preserve the natural environment, while preserving the intangible wild character of the land and still leveraging economic development and long term vitality in our Park's communities. Fundamental to achieving these goals is the key principle that practices, techniques, and data driven strategies proven effective elsewhere around the world can help re-establish the Adirondack Park as a leader in large landscape conservation and a world class model for people and nature thriving together.

We recognize that the challenges for achieving this vision are real. Demand for protection, stewardship, care and custody of state lands and waters are increasing at an often alarming and unsustainable rate. With the increased popularity in hiking, the addition of thousands of acres of new state Forest Preserve lands, an impactful investment in tourism promotion by the state, and the influence of social media, record crowds are enjoying the Adirondacks' natural resources.

In addition, as recent planning efforts have prioritized public access and expanded off-road motorized recreation, state agency budgets and resources have not kept up with the demands of the current situation. Given the circumstances, we compliment DEC staff for their impressive accomplishments given the challenges with staffing and budgetary limitations, especially as their responsibilities and the Forest Preserve acreage have increased.

There are good elements within each proposed UMP amendment, however, given these larger

issues, and that the proposed draft is too weak on natural resource protection, the amendments to the Vanderwhacker Mountain Wild Forest and High Peaks Wilderness areas need to be modified:

1. Inappropriate Joint Comment Period

The Council would like the record to show that while the process to get through the acquisition and classification of the new Finch lands has taken years and much has been said through the multiple opportunities for input about the types of uses that these lands can sustain, the use of a joint comment period in this case is not in keeping with the hard work by DEC and APA staff and genuine engagement by a record number of stakeholders. A joint comment period in this case fundamentally undermines the general public's trust in the overall process and curtails the value of public input at a critical stage of the comment phase and frankly does not justify the claim of expediency and efficiency provided by either the Agency or Department.

The agencies have different roles and responsibilities, and regardless of the public's lack of familiarity with the comment process, the agencies should not look to limit public interaction, nor limit their own power of checks and balances when it comes to review and approval of UMPs. We understand that the Agency and Department will get redundant comments even when the comment period is split and that input on SLMP conformance is particularly challenging given the complexity of the document. However, as a representative of our constituents, it is the Council's responsibility to look after our members' interest and do as thorough a technical review as possible.

Fundamentally, the use of a joint comment period on two of the most intricate and complex UMPs in the entire Forest Preserve system implies that there will be no significant changes that would warrant redrafting or reevaluation of the proposed management actions. This further implies that these UMPs will be moved forward regardless of any substantive issues raised or identified by the public and discounts material changes to the DEC draft UMPs based on substantive comments and facts received. The public should have the opportunity to comment to the APA on SLMP conformance based on a final UMP. As presented, we believe this joint comment period to be poor policy that clouds the issues and sets poor long term precedents for the management of New York State Forest Preserve lands.

- 2. Prioritization of Natural Resource Protection over Visitor Use Accommodation:** As presented, both of the UMPs provide substantial improvements on the use of Limits of Accessible Change (LAC) and phased implementation of management actions that will result if carrying capacity limits are exceeded. These are fundamental changes the Council believes need to be in all future UMPs. As promising as these improvements are, there is still a fundamental bias towards accommodating recreational use over natural resource protections that needs to be addressed in the Final UMP for both management areas, making them as currently drafted not compliant with the SLMP or programmatic EIS.

The foundation of all state land management AND compliance with the Adirondack Park State Land Master Plan (SLMP) both require that the UMP amendments must prioritize protection of the natural resources (ecological integrity) and honor the Park's wild character: The state constitution, law, and policy prioritize natural resource protection, ecological health, biodiversity, wildlife habitat, and wilderness, in the Forest Preserve, and must not be weakened. Management actions should prioritize natural resource protection, and value attributes such as solitude, quiet, and aesthetics that contribute to wild character. Protection of the world class natural resources and wilderness character is essential to the future improved economic vibrancy and viability of local Park communities.

3. Ski Trails and the Wright Peak Ski Trail reroute

The Council supports the proposed reroute of the lower section of the Wright Peak Ski Trail to connect to the Whale's Tale Ski Trail. We reiterate our support that appropriately designed and located ski trails continue a historic use that has long cultural ties to the recreational use on the Forest Preserve. We strongly support the photo monitoring and other data collection activities listed within the HPWA that will help inform future management actions. The Council has submitted past comments on various drafts of a ski trail guidance document and believes that this document should be completed and undergo thorough public review and comment before additional ski trail specific resources are built within the High Peaks. It is appropriate that the Wright Peak Ski Trail proposal is contingent on completion of the ski trail guidance and a finding that such guidance is SLMP and Article XIV compliant.

4. Gulf Brook Road Access

- a. The Council does not support the Preferred Alternative within the VMWF UMP
The Council opposes the use of the preferred alternative providing for access along Gulf Brook Road approaching the Four Corners and north to the Boreas Ponds. In keeping with the spirit of access to the southern High Peaks, we believe **Alternative 2** more accurately exemplifies the user experience the general public is looking for at this location.
- b. We agree that there is a clear need for a second gate at the Four Corners but believe that having a designated steward present and responsible for interacting with and educating visitors, enforcing rules and regulations, and controlling access beyond this highly sensitive route is necessary. While keys or codes are feasible to a certain extent, during the busy season access beyond both the primary Gulf Brook Road parking lot (Fly Pond) and the Four Corners Gate needs additional control and enforcement through a staff presence.
- c. We support protecting the Boreas Ponds Wilderness and are concerned with general public motorized access to the proposed parking lot north of Four Corners

and approximately 500' from the Boreas Ponds. CP-3 should facilitate a wilderness experience for persons with disabilities. The DEC has done great things to make the Forest Preserve more accessible for everyone, and clearly, more can and should be done. However, court opinions have clearly stated that the natural resources of the Park do not have to be compromised for access.

If there will be CP-3 beyond the Four Corners as proposed, adding four general public permitted parking spaces for "universal access" to facilities set aside for CP-3 access diminishes the Wilderness experience those users expect to have. Maintaining CP-3 only parking here would be consistent with the spirit of the classification compromise and more importantly in keeping with the intent and purpose of the CP-3 program. Using Universal Access as a means to provide for general public access (if even if limited by permit and locked access) is the wrong choice here. A two or three vehicle parking lot for CP-3 permitted individuals is all that should be allowed north of the "four-corners" if any public vehicles use is allowed in the Wild Forest corridor.

5. Day Use Areas

The proposal for the Boreas Ponds Dam Day Use Area in the Boreas Ponds Primitive Area, is not in keeping with the vast majority of public comments received during the classification process which called on the state to make the Boreas Ponds Wilderness. While compromise was the state's decision, the designation of a "day use area" at the Boreas Ponds Dam, Chapel Pond and Henderson Lake Dam areas as special management zones within the HPW UMP needs to be relabeled. As described within the UMP, these areas would more correctly be identified as "Day Access Only" sites. "Day Use Area" is confusing because of the SLMP implications and how the term is used by the DEC elsewhere will lead to expectations by the general public about the types of infrastructure that may be found there. As the UMPs point out, "Day Use Area" is technically defined within the SLMP and is associated with Intensive Use Areas. These areas should be relabeled to reduce confusion by the general public and to stay within the technical limits of the SLMP. Additionally, any infrastructure built or established in this Primitive Area, such as the boat hand launch or Class VI trails, needs to meet Wilderness standards. There should be no picnic tables or similar minor conveniences located within any day access only site within the High Peaks Wilderness area. As stated by DEC at a public meeting, the overlay should only provide for stricter not less strict regulations and management in these areas.

6. Gulf Brook Road Snowmobile Route

- a. The VWWF UMP fails to provide any additional assessment of the various snowmobile routes that could be implemented as a component of the community connector trail project. There are multiple viable route locations, based on geographic and environmental conditions, for a snowmobile connector route and there are more options than simply relying on the Boreas Ponds and Gulf Brook

Roads as the default options. The preferred alternative does not accurately convey the amount of tree cutting needed to link the Boreas Ponds Road to Blue Ridge Road.

- b. Council staff have spent significant hours on the ground documenting via GPS a possible north-south corridor from Trout Pond to Blue Ridge Road, as well as southerly east-west options outside the Hoffman Notch Wilderness that run parallel to and in places briefly use the Blue Ridge Road that would keep snowmobiles out of the interior of these new state lands. It is not factually accurate to state that there are cliffs or topographic features that eliminate such options. Relying only on the analysis previously done for the Community Connector Trail does not address the pros and cons of a southerly route in-depth and fails to provide the information necessary to determine the most appropriate location for any future snowmobile trail.
- c. This analysis is not only appropriate given the sensitive habitats involved but also for compliance with DEC's Snowmobile Trail Siting, Construction and Maintenance Management Guidance document. For this to be a meaningful management tool, alternatives that violate this guidance should not be given preference.

7. **Road Mileage Cap and Assessment**

As was widely discussed throughout the classification process, the addition of the new Finch lands includes a significant amount of new road miles. The SLMP effectively caps the mileage of roads open to the public on lands classified as Wild Forest as with snowmobile trails. Both of the UMPs fail to recognize the cap or to provide any analysis or address how these new roads impact the cap on new road miles permitted within the Forest Preserve as captured within the SLMP. This is a significant infrastructure analysis that was left out of the current draft UMPs. The Council provided an in-depth analysis of the so called "woods" and "winter" roads within the Boreas Tract during the classification comment period and believes that there are substantial legal questions regarding how these new road additions impact the overall cap and compliance with the SLMP. Revisions are needed that take the required "hard look" at this road cap mileage issue and provide a full analysis of the miles of roads contained within these new lands and if they are allowed under the road cap or necessitate further closures of other roads. **This is a significant material weakness that will require APA reevaluating for compliance after a revised UMP is prepared.**

8. **Whittling Away of Wilderness Character**

The Council appreciates that the new Finch lands provide a unique opportunity to accommodate increased recreational use of all types. In reviewing the significant additions of hiking trails, primitive tent sites, new lean-tos, and other infrastructure improvements in the remote backcountry regions of the High Peaks, the Council feels that at risk with all of

these additions is the loss of true “wilderness” character. While there are real and challenging management issues with overuse, both in the front country and back country, preserving wilderness, or the character of wilderness needs more attention.

Putting signs on certain summits and formalizing herd paths, while in some cases necessary, undermines that wilderness experience if there are no other mechanisms put in place to further account for increased visitor use, collection of relevant data, and a full assessment of the larger trail system. Relocating and/or hardening herd trails in a Wilderness area should happen when the data shows that this use is ongoing and will further erode the natural resource. This and similar actions should not be done simply as a convenience or to foster a social media photo opportunity or else it degrades the larger experience these lands can and should provide. Alternatives, including limits on use, as part of user redistribution should be considered.

The maintained or unofficial trails to the summits of all of the 46ers and other peaks show signs of significant erosion. The 1996 HWA UMP recognized that issue and proposed management actions to account for and address summit erosion. The current amendments in the HPW UMP are silent on this issue and given the amount of proposed trail construction and improvements, it is hard to see how these improvements won’t add to growing significant resource impacts on some of the Park’s most fragile habitats.

The goal of a new redesigned and improved “sustainable trail” system is laudable. To maintain wilderness standards and compliance with wild forest character requirements some system for limiting maximum daily use at some locations at some times of the year is an unavoidable necessity of a sustainable, wilderness trail system in a popular and overused wildland complex. The Department has experience with systems that limit use in Forest Preserve locations. Fair, user friendly and adaptable systems of maintaining limits at some locations at some times is needed and failure to include even consideration of such action is one of the failings of these draft UMPs. The Department has recognized that limits are one of six established “best management practices” or keys to “essential wilderness management.” That recognition makes this omission confounding.

9. Limits of Acceptable Change and Phased Implementation

The strong emphasis on using Limits of Acceptable Change (LAC) is a necessary and well accepted approach to managing sensitive natural areas and is an effort the Council endorses. However, as described within both UMPs, the state is making management decisions based on assumptions about visitor use rather than on well documented and established baseline data. The LAC decision making matrix is predicated on knowing what impacts your resource can sustain and how that use (or overuse) will change over a given time frame considering a wide range of variables and factors.

The state has been pretty explicit that much of that data does not exist and gathering it will take time and energy. So while we support the effort to embrace LAC within these UMPs, the lack of any relevant baseline data to support many of the proposed management actions simply shows them to be attempts at accommodating use rather than real long range planning efforts. Essentially, by implementing management actions before understanding the underpinnings of the impact, the Department is degrading the resource and then building that degradation (additional use) into the baseline date creating an artificially high threshold.

Similarly, phased implementation as proposed within the UMPs takes a fundamentally sound management practice and undermines its practicality and usefulness within the context of the UMPs. Examples of this are found within both UMPs and include among many others the multiple stacked mountain biking loops proposed at Ragged Mountain, the trails proposed for Boreas Mountain, and the potential to expand the Four Corners parking lot, etc. All of these proposed actions point to an *expectation* of use rather than a *determination* of use. Phased implementation of management activities should not be cited within a UMP as a predictive measure simply because the act of seeking smaller UMP amendments in the future are clumsy and time consuming. Don't water down sound land management practices in an attempt to accommodate current overuse problems. Doing so only weakens future efforts to make informed and appropriate data driven decisions and continues to emphasize accommodation of recreational use over natural resource protection.

Specific Actions of Concern and Mistakes Noted in both UMPs:

- a. Boreas Mountain Trails: Proposing three trails for this site without any baseline data on the resources capacity, need or necessity undermines the flaws within the UMPs about phased implementation and about prioritizing recreation over natural resource protection. While future use may encourage additional trails, as captured within the UMP, this use would simply be accommodated without any real analysis on the impact to Boreas Mountain and the surrounding habitat. Given that Bicknells Thrush habitat exists within this region, the UMP treats this area more like Wild Forest than as Wilderness and shows a prioritization for recreation over natural resource protection.
- b. Page 106, Vanderwhacker UMP, proposing two (2) separate stacked single-track mountain bike loops within the same general area underscores a flawed phased implementation approach. The Council is on the record supporting mountain biking in appropriate areas within Wild Forest areas. There is literally no analysis for the feasibility or need for one, much less two, separate trail systems here. Given the high levels of volunteer engagement needed to make one such system successful, it is excessive to start off by proposing two systems when the viability of one trail network is questionable without a larger analysis and assessment.

- c. Increasing parking lot sizes without corresponding restrictions on road side parking. Section Q, page 122 of the High Peaks Wilderness UMP states that all existing parking areas will be maintained, while page 69 of the HPWA states that some of these problem roadside parking sites on Rt 73 will be closed. This contradiction needs to be clarified as the expectation established by the DEC throughout the public hearing process was that roadside parking would be limited or eliminated if expanded parking lots were built for a number of the high use areas. To maintain current parking options and build larger parking lots will only increase the overuse problem. This must be clarified and changed within a final UMP. This also contradicts the 1999 UMP being amended, which strived for limits. The increase in parking capacity is proposed with no “hard look” or reasonable analysis, when the problems associated with current overuse are well documented and known to state and other officials.
- d. Page 123, High Peaks Wilderness UMP, lacking analysis to show that many of the proposed trail construction actions are necessary or needed in a Wilderness Area. The UMPs do not account for how these improvements will address overuse.
- e. Page 127, Cheney Cobble trail is clearly mislabeled within a number of the trail related items. Underscores how certain elements of these plans were drafted to meet a deadline rather than to provide consistent planning recommendations.
- f. Maintenance of Gulf Brook and Boreas Roads. Language on pages 58/59 of the Vanderwacker UMP states that while “the roads have never been tested for ongoing public use and especially not for general use by passenger cars” these road will need “extensive work” to upgrade these to public road standards for vehicle traffic. The Council believes that to protect the boundary of the Wilderness/Wild Forest line and the wild character of this area, these roads should be kept narrow and seasonal in nature. None of these proposed forest preserve roads should be widened. And as mentioned above, there is the issue of the road mileage cap.

Appropriate and Necessary Management Actions:

- a. The emphasis within both UMPs for phased data collection and expanded carrying capacity analysis is not only necessary for informed decision making but also a requirement of the State Land Master Plan. The collection of this data should document current natural resource conditions and establish new baselines on recreational impacts that will help managers in creating a comprehensive regional plan incorporating best-management practices. The establishment of monitoring plans that will allow the Department to determine conditions on the ground and to use prescriptive management actions to achieve outcomes that address impacts is a significant improvement in these UMPs.
- b. The reroute of the Cascade Trailhead is appropriate and necessary. The impacts from overuse are extreme on this trail with sections of trail tread regularly exceeding 20 ft in width, with some areas of the trail over 30 ft wide. In order for the new Cascade trail and trailhead to be successful both must be well designed,

well built, and well maintained. The existing trailhead can continue to serve a limited number of hikers and rock/ice climbers on a first-come, first-serve basis or with a reservation system.

- c. The proposed parking lot for Ampersand Trailhead addresses a significant safety hazard at a highly impacted and heavily visited area of the Park. Like the Cascade Trailhead relocation, this relocation must be well planned and designed to address public safety while still addressing significant backcountry degradation.
- d. Increased designated camping sites is appropriate in concentrating visitor impact in some of the highest use areas within the High Peaks.
- e. The expanded use of bear canisters will standardize their use across the High Peaks and help to protect humans and bears. The Council supports the expansion of the bear canister rule.
- f. Trailhead parking at Upper Works addresses a clear need for parking at a remote access area that has been underserved for years.
- g. Addressing rock and ice climbing access at high use sites and setting up a task force to look at the issue of fixed permanent anchors is long overdue and a necessity due to the high visibility and activity focused around these activities. The Council supports UMP recommendations to stabilize soils on cliff tops and bases, provide fair and equitable access to rock and ice climbing resources, the creation of kiosks with Climbing LNT and other relevant information on them, and the closure of certain climbing routes during peregrine falcon nesting season. The Council asks to be a part of any future stakeholder discussion meetings around these issues.
- h. Proposed new canoe put-ins and take-out locations for the Hudson River will provide excellent new access and paddling opportunities within the Vanderwhacker Mountain Wild Forest.

10. Trailless Areas Special Management Zones

The No-Trail areas proposed within the High Peaks Wilderness should be formally designated as “special management zones” within the UMP. A full monitoring plan should be implemented within this area to capture visitor use and impacts, including the development of informal trail systems. **In addition, the Council proposes that an informal, free, online, and user friendly permit system be implemented for these low-use areas.** This permit system would provide a foundation for natural resource monitoring in the backcountry, limit the maximum number of people allowed in the special management (trailless) area on any particular day, and allow DEC to experiment with management alternatives in a low use area of the High Peaks.

11. Complex Planning

In recent comments submitted to the Olympic Regional Development Authority (ORDA) on changes within the Mount Van Hoevenberg Olympic Sports Complex UMP, the Council supported the location of a Cascade/Porter trailhead at the Intensive Use Area.

We recognized this as a potential successful example of integration of management strategies across Forest Preserve Units and a prime example of why it is impractical to address management of resources at a landscape scale using a unit by unit approach.

The Council believes the VMWF and HPWA UMPs could better recognize and articulate that the Forest Preserve is a holistic system and action items strategies should address issues across management areas and Forest Preserve units. Given the interconnected nature of state lands, particularly in the High Peaks region, it is impossible to envision a viable strategy without accounting for adjacent or nearby Forest Preserve units. This planning effort must integrate management objectives and actions across all unit boundaries, state easements, state lands and private lands, and look at natural resource protection, visitor use experience, wild character, human health and safety, etc. in a holistic and comprehensive manner.

In addition, the Council believes that the newly created Central High Peaks zone should be expanded to include logical nearby popular mountain ranges showing significant signs of impact from overuse. The Central Zone should include the Dix, Santanoni, and Seward/Seymour ranges.

12. Application of proven best management practices (BMPs)

This includes promoting innovative and state-of-the-art land and water protection actions based on the most current and widely accepted wilderness management, conservation land and water stewardship science, within all planning and unit management plans. This should include Ecosystem-based Management (EBM) practices from across the country and around the world. BMPs include:

- a. Planning and coordination for Forest Preserve protections with all agencies and jurisdictions.
- b. Education and outreach for visitors and residents, including backcountry safety, accident prevention, and Leave No Trace principles.
- c. Front-country infrastructure including roadside safety, visitor information and orientation services, personnel, rest rooms, parking lots, parking enforcement, boat inspection and decontamination stations and launches, intensive use options (on lands so classified) and lodging (on private land).
- d. Back-country infrastructure that does not impinge on the protection of natural resources and wild character, including trails, camp-sites, lean-tos, necessary bridges and personnel.
- e. Limits on use when education, outreach and infrastructure management fail to address carrying capacity, including permits, fees and limits.
- f. Funding, personnel and enforcement, more state staff and expanded partnerships.

In closing, given the history and ecological importance that are associated with the future of these new state lands, robust regulatory oversight, public agency engagement, and new funding is

necessary to guard against adverse ecological and aesthetic impacts due to overuse and poor management. Efforts must be made to acknowledge and promote outdoor recreation as an important part of the cultural heritage and economic lifeblood of the Park but not at the expense of the wilderness character and natural resources that make the Adirondacks an international treasure.

Overall, the Adirondack Council believes these two important UMPs create a new blueprint for state land management and with some changes are the types of documents that the Council could support. We encourage DEC to see these UMPs as a means to create a new model within the Adirondack Park that provides access and recreation without compromising some of the most iconic and unique wild lands in one of the most highly trafficked regions of the Park. Given the stakes, these world class resources deserve world class protections to ensure their legacy for future generations. Thank you for reviewing and accepting our comments.

Respectfully,



Rocci Aguirre
Conservation Director

Attachments: April 20th Input letter, Snowmobile Connector Route Alternative 2016

CC: Kathy Moser, Deputy Commissioner, NYS DEC
Robert Davies, Director of Lands and Forests Division, NYS DEC
Robert Stegemann, Region 5 Director, NYS DEC
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