



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

May 11, 2015

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Terry Martino
Executive Director
NYS Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: Proposed Final Supplemental Environmental Impact Statement (FSEIS) for the Community Connector Trail Plan (CCTP) and related Final Unit Management Plan (UMP) Amendments for the Vanderwhacker Mountain Wild Forest, Lake Harris Public Campground, and Camp Santanoni Historic Area

Dear Ms. Martino,

The Adirondack Council has significant concerns and legal questions regarding the proposed FSEIS for the Community Connector Trail Plan and the above-proposed final UMP amendments. While we continue to review this information, given the substantive and material changes to the documents, we oppose the Board authorizing these documents in their given form to proceed to public comment at the May 14th Adirondack Park Agency (APA) meeting.

With regard to the other items on the State Lands Committee agenda, we have submitted no objections to the staff's recommendations concerning the Jessup River Wild Forest UMP amendment. The Council supports the authorization for public comment on the Meacham Lake Campground, Alger Island Campground and Forth Lake Day Use Area UMP amendments. In general, the Council supports recreational community connections when balanced with the preservation of the wild character of the remote interior of the Forest Preserve. We believe consideration of the proposed FSEIS for the Community Connector Trail Plan and three amended UPMs do not meet this test and should not proceed without several legal and process questions being addressed.

The segmentation of the UMP planning process with the still unfolding but directly relevant and connected Essex Chain Complex UMP is a primary issue. The consideration of the future of the Polaris bridge and possible trails that join two separate Forest Preserve units as presented in Section 5: Polaris Bridge to Route 28N should be part of one integrated public process and not segmented into two different UMP processes.

The associated Final UMP amendments have substantial and material changes that warrant this document being relabeled a "Revised Public Draft" and being reopened for full public review and comment.

EXECUTIVE DIRECTOR

WILLIAM C. JANEWAY



DEFENDING THE EAST'S GREATEST WILDERNESS

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SUSTAINABLE FORESTRY INITIATIVE

As presented, the proposed FSEIS and UMP amendments do not appear to conform to the State Land Master Plan (SLMP) and the due process outlined in the *Memorandum of Understanding Between the Adirondack Park Agency and the Department of Environmental Conservation Concerning the Implementation of the State Land Master Plan, Revised March, 2010*. Of specific concern is the apparent lack of adequate time for Agency staff to conduct a thorough review for SLMP conformance given the complexity of the Trail Plan, the River Management Plan, and the associated Final UMP Amendments as prescribed on page 13 of the APA/DEC MOU.

While review of the full document is ongoing, approval by the APA to move this UMP as a Final document to public comment would fail to address among other issues:

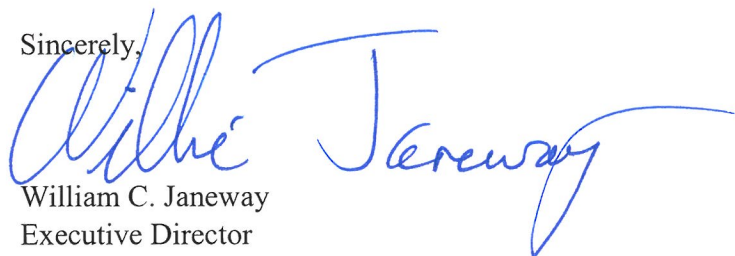
1. Compliance with the SLMP Management Guidance for Wild, Scenic, and Recreational Rivers as stated on page 44, under Basic Guidelines, requiring the UMP to precisely detail the river corridor boundaries. Specifically, it appears that the DEC is proposing a preferred alternative for Section 5 of the Community Connector Trail running north along the east side of the Hudson that would in places fall within the ½ mile preferred river corridor of a Scenic River area.
2. The use of the Polaris Bridge as a component of a snowmobile trail over the Scenic Hudson River, which would constitute a new public non-conforming use;
3. Apparent lack of consistency (and intent) with the 2009 Snowmobile Trail Management Guidance document by creating parallel Type II Community Connector trails within close proximity to the Vanderwhacker Mountain Wild Forest.

As noted above, our review continues and we expect to provide additional comments in the future. Understanding that the information for this week's APA meeting only became publicly available last Thursday, we suggest that the APA delay action. If the agency does vote to proceed, we request a ninety-day public comment period.

The Adirondack Council asks that this document be rescinded, revised to address the legal and process issues identified above, and if or when reissued be a "Revised Public Draft" that includes the draft Essex Complex UMP or excludes the Polaris bridge, is consistent with the SLMP and the APA/DEC MOU. The public comment should then be reopened on these and other substantive and complex issues.

Thank you for considering our suggestions.

Sincerely,



William C. Janeway
Executive Director

cc: Lani Ulrich
Robert Stegemann
Kathy Regan
James Townsend