

Response to Public Comment

**2018 Amendment to the 1999 High Peaks Wilderness Complex
Unit Management Plan - *Appendix D***

**2018 Amendment to the 2005 Vanderwhacker Mountain Wild Forest
Unit Management Plan - *Appendix F***

This page intentionally left blank

Miscellaneous Comments

Comment: Cascade Trailhead: 50-70% of the time the parking lots are not full. Leave them there! Many 1st time hikers choose cascade and are frankly not prepared for an additional 4 miles. My suggestion: when Rt.73 lots fill, direct traffic to Van Ho, where the hiker has an option to hike the extra 4 miles or pay for a shuttle bus (weekends only). It works for Keene Valley to The Garten.

Response: *The parking problem on Rt. 73 for Cascade Mountain is one aspect of why the choice was made to completely relocate the trail on Cascade Mountain Relocation to the Intensive Use Area provides many benefits, including safety and it is better equipped to handle human waste and trash associated with Trailhead parking. As many people have noted Cascade Mountain is a starter mountain for people who have never been hiking. With this relocation DEC has a direct way to provide education and outreach to those people at the start of their hike and with the Mt. Van Hoevenberg East Trail we have a built in shorter option that can help better set inexperienced hikers up for success. The actual trail up Cascade Mountain is another part of this equation. Most of the properly built rock waterbars on the trail have failed because of user impacts, which have then exasperated more erosion below them which feeds into the cycle of maintenance needs. The new trail up Cascade Mountain allows the DEC to start from scratch using the latest knowledge in trail building and user interactions to set up the trail for success. In the end we will have a trail that will require less maintenance than the existing trail, will be an entry point to the High Peaks Wilderness where users can be educated and provides safer access and protection of the natural resources.*

Comment: The option to “limit use if all else fails.” Keep in mind the licensed guides are legislated. We pay fees to conduct business on public lands and we have contracted customers. Find a way NOT to limit the licensed guides who are the safest people on the trails and waters.

Response: *If a system that limits usage or requires permits is proposed it will go through a series of discussion groups and public outreach, which would involve interested parties and stakeholders. During the development of any future plan, considerations would be given to all users of the areas targeted for the limits on use.*

Comment: We would encourage that the APA, in their consideration of amendments to the UMP for Vanderwhacker Mountain Wild Forest and Boreas Ponds Primitive Area State Administrative Areas, not mandate the removal of the Fire Tower on Vanderwhacker Mountain. Removal would not erase the footprint of man on the mountain, just as it has not removed that footprint from Ampersand Mountain. The fire tower has historic significance and provides a ‘destination’ with greater meaning for hikers. And, it greatly enhances views from the summit.

Response: *At this time, there are no management proposals to remove the Vanderwhacker Mountain Fire Tower. Additionally, the tower is currently a conforming structure on wild forest lands pursuant to the Adirondack Park State Land Master Plan, and as such is not required to be removed.*

Comment: I support the Mount Van Hoevenberg amendment. I hope that the new trails will enable World Cup competition at Van Hoevenberg. My understanding is the present trails do not meet those specifications. World Cup competition would be a boon to the Lake Placid area economically.

Response: *With the exception of trail reroutes to Cascade Mountain and Mt. Van Hoevenberg (the actual mountain), facilities within the Mt. Van Hoevenberg Intensive Use Area are not the subject of these UMP amendments.*

Comment: We're pleased that the UMP does not propose construction, installation, and operation of "hut to hut" type lodging facilities. ADK believes that under Article XIV, Section 1, Department of Environmental Conservation (DEC) statutes and regulations and the provisions of the Adirondack Park State Land Master Plan (ASLMP) preclude such lodging facilities on the Forest Preserve. The only camping structure permitted on the Forest Preserve is the lean-to.

Response: *Noted.*

Comment: The management of the High Peaks Wilderness and Vanderwhacker Wild Forest need to be managed with natural resource protection as the number one priority in order to keep our Forever Wild lands the special places they are. Recreational opportunities should not be the focus.

Response: *Recreational opportunities are only considered after resource protection.*

Comment: The Trump administration is stripping away protections for the American people, our public land, our wild places, and our environment. New York State has an opportunity to show that our leadership values the health of our earth and its people. This email is a plea to preserve the silence and remoteness of the new lands being added to the High Peaks Wilderness and Vanderwhacker Wild Forest. The overriding goal of the state's day-to-day management of these new "forever wild" lands and waters should be that of keeping the protection of their natural resources as paramount.

Response: *Recreational opportunities are only considered after resource protection.*

Comment: The historic log cabin at the 4 Corners should be retained, and maintained, with historic interpretive signage, and also for possible use for DEC forest ranger administrative purposes. The area surrounding the cabin should also be managed with historic interpretive signage reflecting the other structures that were there, and the rich logging history of the area.

Response: *The Amendments outline several alternatives for the historic cabin. The preferred alternatives are for administrative and interpretive use, which would allow for actions similar to your suggestion.*

Comment: We support relocating the Cascade Mountain trailhead to the Mt. Van Hoevenberg Complex Parking area. The test of this relocation last Columbus Day was successful. The change will eliminate the dangerous parking and traffic congestion at the current trailhead on Rt 73.

Response: *Thank you for the support in this matter.*

Comment: Include a map showing boundary for Adirondac Core Conservation Easement.

Response: *This conservation easement is still undergoing negotiation, and an exact boundary of the easement can't be shown at this time.*

Comment: While the proposed updates to the Unit Management Plan suggest numerous changes to the infrastructure such as new trails and new parking areas, the plan offers no suggestion of funding for new manpower to appropriately care for current trails, or to provide education to the new users.

Response: *The UMP Amendments are not the correct mechanism for allocating funds and staff.*

Comment: What we need is an investment in the current Forest Ranger staff to educate our new users.

Response: *The UMP process is not the appropriate tool to direct staffing, but it is the tool to outline proposals for which funding and staff can be applied and distributed to.*

Comment: I am writing to you today to ask you to please use science and research to inform the decisions and management of our Forever Wild lands.

Response: *The management proposals outlined in the Amendments are based on science and research and rely on data derived from ongoing monitoring to advance these proposals through the phases of implementation. The science and research conducted when the lands were acquired and classified have informed decisions made about this property. APA classified these lands based on the APSLMP criteria and capacity to withstand use. If the lands are classified Wild Forest, APA determined through a very thorough process that uses allowed in Wild Forest are compatible.*

Comment: There is much credit to be given for all the work and thought reflected in these two UMP amendments and they should go forward through more analysis in public.

Response: *Noted.*

Comment: DEC is approximately 5 years behind in trail maintenance projects. The hollowing out of the trail maintenance function has been going on for about 20 years. Each year, there are fewer State trail crews in the woods.

Response: *Noted.*

Comment: Bridges take years to replace; obvious problem areas on trails fester for years, while networks of paths develop around them. Volunteer groups can only do so much; and unfortunately, the good will of volunteer groups is used as a pretext for the State to shirk its responsibilities.

Response: *The Department continues to manage the resources allocated for trail construction and maintenance based on priorities established through a Department planning process. Every effort is made to address conditions for each area, but staff must prioritize their resources based on the level of need for each facility under its management.*

Comment: Why does the draft UMP Amendment fail to identify the fragile ecosystems and evaluate potential impacts of proposed mixed uses, trails and motorized access.

Response: *The UMP amendments document all the known wetlands as well as rare, threatened and endangered plants and ecological communities within the area. These resources were taken into consideration when developing management proposals, and no significant adverse impacts are expected to result from the implementation of these proposals.*

Comment: I agree with keeping the Boreas dam - at least for now. Without the dam, the cold-water trout fishery might be lost. Certainly, considerable additional study is required to determine whether the ponds would be better ecologically with or without the dam.

Response: *Noted.*

Comment: While I'm very sympathetic to the note of caution voiced by environmental groups who want the environmental impact of changes to the region to be thoroughly evaluated, I nonetheless support the DEC's plans wholeheartedly. In short, the Adirondacks region is a gem of New York state and the Northeast, and I doubt you'll be able to keep enthusiastic outdoors-people away. A plan for land management that involves education and yes, some facilities expanded for better access, will keep tourists from wandering around in unsafe ways. It will also keep them from denigrating the environment out of simple ignorance.

Response: *Noted.*

Comment: Part of appreciating this part of the country necessitates a commitment to its economic well-being. I believe that NY state government should do its utmost to

encourage the "outdoors" industry to develop economically, as this seems like a much more viable economic strategy for the region than relying on logging or industries that exploit the land (which is also bad for environment, etc.). I have self-interest but also a general interest in seeing the region remain economically vibrant, so that tourists from all walks of life are welcomed and comfortable. I believe the plan will accomplish these goals.

Response: Noted.

Comment: In short, please record this email as a solid endorsement of your proposed changes, presented in good will towards the local residents and with hopes for many awesome trips to the High Peaks in the future.

Response: Thank you for your support in this matter.

Comment: The Boreas Pond is manmade, same with the forest roads within the area so the views should be available to all human powered activities. Our tax monies paid for it yet not all can enjoy it. Perhaps the state can improve the trails so they are suitable to more uses.

Response: The proposals outlined within the amendments set forth plans to improve and construct facilities in a manner that promotes public access and follow the guidelines in the State Land Master Plan.

Comment: The draft amendment talks about possibly building a trail to the summit of Boreas Mountain from the east over Elk Lake Lodge land; doesn't the State already have a public access easement over the existing foot trail to the summit?

Response: The conservation easement allows for a trail to the summit of Boreas Mountain, but it does not allow it on the entirety of the historic Boreas Mountain Trail. The UMP amendment outlines the actual route as allowed by the conservation easement.

Comment: The road running west from Four Corners is called "Boreas Road" in the draft amendments while USGS maps show it as "Trout Pond Road". Changing the name could cause confusion since the western portion of Blue Ridge Road is also named "Boreas Road". The new Community Connector trail would thus run from one Boreas Road to a different Boreas Road.

Response: The road running west from the Boreas Dam to the western portion of the tract is called Boreas Road in the UMP Amendment because this is what it has historically been called throughout the Finch Paper companies ownership. The entire stretch of road between State Route 28N in Newcomb and I-87 in North Hudson is County Route 84 and named Blue Ridge Road.

Comment: In places, the draft amendments refer to the existing upper Gulf Brook Road parking area (currently with gate, privy, and register) and the next parking area to the south as if they were one and the same (the "Fly Pond" parking area). On the ground they are about a half mile apart.

Response: *The Fly Pond Parking Area is currently the most interior parking area where the gate, privy and register are located. The next parking area to the south is the Gulf Brook Mountain Bike Parking Area.*

Comment: The natural resource descriptions for the Boreas Ponds tract, while extensive, omit important biological, physical and ecological characteristics identified by APA staff and by independent scientists Drs. Schwarzberg and Glennon. The latter two scientific assessments are not mentioned, and no reference is made in the amendment of their assessment of the Boreas tract's remarkable resilience, connectivity, permeability, and ecological integrity. APA staff conclusions that "its (Boreas Ponds) ecological value cannot be overstated" is also notably absent in the amendment.

Response: *The UMP amendments address specific ecological concerns related to wildlife and fishery resources, and staff utilized scientific assessments, including those found in the APA's classification EIS and others, to identify the area's characteristics.*

Comment: We point out that the only "critical habitat" cited and described in the High Peaks Wilderness and Vanderwhacker Wild Forest amendments are "Deer Wintering Grounds." Deer wintering yards are legitimately critical habitat in this terrain, but hardly constitute the only critical habitat on the tract. For example, Northern Peatland and Northern Swamp habitats are cited for their unusually large patch sizes on the Boreas Ponds Tract (see Ecological Composition and Condition of the Boreas Ponds Tract by Michale Glennon, Ph.D., Wildlife Conservation Society, April 2016).

Response: *Department staff reviewed Dr. Glennon's analysis of the area's critical habitat in order to draft portions of the UMP amendment, and were aware of the fact that the information was contained within the classification EIS, but staff did not include all of the assessments in the amendment.*

Comment: References in the HPW UMP amendment to the 1999 HPW UMP are infrequent. It is almost as if the HPW UMP amendment is unrelated to its parent document, the UMP. It also true that these amendments are, largely, written as recreational management plans suitable, perhaps, for conservation easement lands, but completely unsuited and improper for all Forest Preserve, and most especially unsuited for Wilderness. Throughout we observe how DEC is giving priority emphasis to recreational facilities and uses at a new important gateway to the High Peaks Wilderness over natural resource protection and wild character.

Response: *The UMP Amendment is targeted to address how the public will access the new additions to the High Peaks Wilderness Complex in a manner that is most protective of the environment, with a few specific management proposals to the existing unit. Department staff relied upon the 1999 HPW UMP as the base document to*

analyze the proposed recreational activities in the context of the environmental setting. Staff used the 1999 HPW UMP to assist with identifying the acceptable levels of public access.

Comment: I support the new planned public access to Henderson Lake.

Response: *Thank you for your support on these proposals.*

Comment: The 50-foot-wide Wild Forest corridor will allow access to the two one-acre gravel pit areas to be used for maintenance only within the Boreas Tract by the towns under a carefully issued and monitored permit from the DEC. Roads beyond the Boreas Ponds dam sites and the Boreas Pond Rd gravel pit site should be abandoned once the remaining leases expire.

Response: *The locations of the Administrative use gravel pits are on the Gulf Brook Road near LaBier Flow and on the western portion of Boreas Road, and as such they are not affected by the Wild Forest Corridor between Gulf Brook Road and the Boreas Ponds Primitive Area. The Boreas Road to the north, beyond the Wild Forest Corridor, is for administrative use. The old Boreas Road beyond the Primitive Area through the wilderness will be abandoned immediately, as no lease camps exist beyond here.*

Comment: Continue to build capacity for joint volunteer activities in the High Peaks wilderness for resource protection projects.

Response: *DEC will continue to partner with any group that wishes to give back to the High Peaks Wilderness through stewardship activities. Each year 1000s of volunteer hours are devoted to trail work and education and outreach across this unit. Thank you to all who continue to give of their time.*

Comment: More Forest Rangers are needed to address the issue of public safety and natural resource protection on the Forest Preserve. More lands have been added to the Forest Preserve and public use is at an all-time high, though Ranger staffing levels have been stagnant. Increase forest rangers in zone 5-4 increase forest rangers 6 to 12 in zone 5-7 3 to 4, in zone 5-14 from 2 to 4, in zone 5-9 from 4-6. More Rangers are needed as more time is dedicated to search and rescue and public education.

Response: *Requesting additional DEC staffing is outside the scope of the UMP Amendments.*

Comment: Maintain the historic Boreas Cabin to allow for its use as an example of a 19th century logging camp structure. This is a rare opportunity for DEC to offer the public a chance to visualize and interpret a piece of Adirondack history. It would also be beneficial to have it available for emergency services for the benefit of the forest rangers.

Response: *The proposed alternatives for the cabin outline actions similar to your suggestion.*

Comment: DEC should include a map showing the proposed parking for the Niagara Brook Tract.

Response: *Thank you for the suggestion. The tract has been added to the overview map.*

Comment: DEC should include a map showing the proposed parking for the Hudson River Tract.

Response: *Noted.*

Comment: 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.

Response: *Noted.*

Comment: 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.

Response: *The Department has always looked at management objectives in a holistic manner, pursuant to the APSLMP which states that “the land characteristics and the recommended objectives for each area will be related to and integrated with the characteristics and management objectives for adjacent public and private land areas” and continues to do so as exhibited in these UMP Amendments.*

Comment: 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.

Response: Thank you for your response in this matter.

Comment: 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.

Response: At this time the patterns of use and impacts in these areas differ from the more remote areas proposed for addition to the Central Zone. DEC will be working to improve the overall conditions of campsites in these areas, which will help in dialing back some of the impacts that have grown in these areas since 1999.

Comment: The issues that affect the High Peaks Wilderness and the adjacent wildlands are the fruit of seeds planted a century ago, when the Conservation Commission began acquiring land in this region and developing it for hiking and camping. Most of today's trails were first cut in the 1910s, and for years the state's primary mission with the High Peaks was to maximize recreational development and encourage visitation of the state's highest mountains. In some respects, the state's current management philosophy for the High Peaks has been to walk back many of the actions of the twentieth century. But DEC and its forebears have not been solely responsible for creating the modern situation; several private organizations have also played key roles. These include clubs that have built and maintained facilities on state land, such as Henry Van Hoesen's old Adirondack Camp & Trail Club, which was the architect of the trail system originating from Heart Lake; and they also include organizations that maintain lodging within the region or reward hikers for successful completion of the forty-six peaks.

Response: Noted.

Comment: We do not make this statement to assign blame, but to point out that the current situation had a complex origin that predates the use of Facebook, Instagram, and Twitter. There are a multitude of factors that resulted in today's high visitation rates, and the solutions to the issues we face have grown beyond the ability of any one agency to address.

Response: Noted.

Comment: When we look across the northeastern U.S. we see much better planning processes for similarly challenging situations in other wilderness areas. One example is the planning to address overuse and related concerns on Franconia Ridge in the White Mountains, an effort spearheaded by The Waterman Fund. A diverse group of stakeholders is currently working through the Visitor Use Management Framework to address these issues.

Response: Noted.

Comment: New York State should re-establish itself as a leader in wilderness management by initiating a similarly robust process to address the challenges facing the High Peaks. The Waterman Fund's Northeast Alpine Stewardship Gathering held in April focused heavily on the issue of overuse. It's notable that no DEC staff attended that meeting (held in Fairlee, VT), and we have heard that lower level DEC staff requested to attend but were denied. All of the other regional wilderness management agencies and groups are working collaboratively to learn from one another and best address these issues. We feel it is significant that New York State is not engaging with these other agencies and groups.

Response: *During the fall of 2017 DEC staff had opportunities to speak with staff from Baxter State Park in Maine, when they visited NY, which was beneficial in sharing ideas and creating connections. DEC staff continue to network with regional and national partners and look forward to attending the 2019 Northeast Alpine Stewardship Gathering held in NY next year. Emerging efforts like the VUMF provide great opportunities for Land Managers to improve their approach to managing the Forest Preserve and it will be utilized in the management of these units.*

UMP Process and Public Participation

Comment: Request that the DEC extend the deadline for at least 30 additional days for comments during this important first step in the management decision-making process for the Boreas Ponds Tract and the amendments to the High Peaks Wilderness and Vanderwhacker Wild Forest Unit Management Plans (UMP).

Comment: The DEC/APA comment period should be 90 days, not 45 days; and the hearings should be scheduled all around the state not just in Albany and Newcomb (on May 23). There are many critical management issues in these areas that require thoughtful review.

Comment: It seems clear that the Governor, DEC and APA do not want to follow the time-tested process as you have done with these other plans. Why bother with more time?—the plans are fully baked.

Response: *The duration of 45-days was determined to be a reasonable timeframe for the public to review and provide comments.*

Comment: In order for individuals commenting during this first important step to make informed and substantive comments, DEC must provide more information on-line describing the context for the management decisions that will be proposed in the draft amendment to the UMP.

Response: *The justification and support for the Department's management recommendations can be found within the UMP amendments themselves—both in the body of the plans and in the appendices—as well as in the documentation supporting the Adirondack Park Agency's recommended classification of the lands subject to the UMP amendments.*

Comment: DEC should also consider having several more meetings, including meetings outside of the Adirondack Park so all New Yorkers have an opportunity to have their input included in the decision-making process.

Response: *The Department scheduled an additional meeting in Lake Placid to accommodate a broader geographic range of the interested public within proximity to the High Peaks Wilderness. Increasingly limited Department resources do not allow for UMP meetings outside the Park. As an alternative, the Department released a state-wide press release announcing the draft UMP amendments, and written comments continue to be the most effective way to provide the Department with feedback. Staff are always available and willing to answer questions via telephone and email.*

Comment: I feel the two meetings scheduled for today to address these SLMP plans are inadequate to properly inform taxpayers and other stakeholders. With a proper management plan, all should be happy. But only 2 meetings scheduled on the same day is blatantly inadequate. ALL interested parties – FROM ALL OVER NYS – should be there to discuss the plan and participate, not just local residents.

Response: *See previous response.*

Comment: The scope of these documents exceeds the available time to read and assess everything they contain.

Response: *The duration of the comment period for these UMP amendments was determined to be adequate in relation to the scope of the management proposals found within them, and is comparable to past UMPs and their associated comment periods.*

Comment: I believe these amendments are consistent with past management practices in the HPWA and that they conform to the SLMP.

Response: *Noted*

Comment: Follow the spirit of the APSLMP.

Response: *These UMP amendments were written to conform to the requirements of the APSLMP, including elements of a Unit Management Plan and the guidelines for management and use.*

Comment: I urge you to work with the many groups that love the 'Daks to achieve the preservation we all crave, and to try as much as possible to avoid the dangers of over-zealous, heavy-handed commands to the Adirondacks visitors.

Response: *The Department does, and will continue to work with stakeholders on issues within the Adirondack Park. The Amendments seek to construct new facilities and maintain existing facilities in the most sustainable manner possible in order to protect the resource and promote recreational opportunities.*

Comment: I am sure you will have many excellent comments provided on the Plan as a whole. To me, it certainly reads very well and is easy to follow and understand. Thank you for all of the work that went into producing it.

Response: *Thank you for your support on this matter.*

Comment: You show disdain for public input by presenting two amendments for simultaneous approval as if there is no point to considering public input.

Response: *Public input is a very important part of the UMP process that The Department takes very seriously. These amendments were planned, developed and moved forward together because of the complex nature in which they complement and service one another. This was done to thoughtfully present the proposals contained within as whole to better show the relations between them.*

Comment: Both amendments are very clear that they should be examined for the impacts on the other units and do have cross-references where proposals are on the border of each unit. We applaud this integrated approach. This approach encourages comments to do the same—that is, to address both plans in one comment letter.

Response: *Thank you for your support on this matter.*

Comment: The most important actions that APA, DEC, and local government could take are to respect public opinion and invite public involvement in the management of the Forest Preserve. If you think a certain tract should not be wilderness for reasons X, Y, and Z, then by all means make your case. Court the public's blessing in the same way you would to win approval for a constitutional amendment, which is the ultimate form of public input in Forest Preserve matters. Just be prepared to accept the consequences if the zeitgeist never swings your way.

Response: *The Department values the feedback it receives from members of the public on important issues related to the protection of natural resources, and the appropriate level of public access and recreation.*

Comment: 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.

Response: *Noted.*

Comment: Although actual access controls will be determined in the DEC's Final Unit Management Plan, the DEC's August 2016 Interim Access Plan should remain in effect until the remaining lessees expire.

Response: *The 2016 Interim Access Plan will remain in effect until the UMP Amendment is approved, work plans developed and work is constructed for any motor vehicle access beyond what is currently in place. The remaining leases that allow the lessees to access the area by motor vehicle expire on September 30, 2018. If there are concerns with public safety caused by the removal of lessee camps, then the Department will take appropriate steps to address these safety concerns. One potential action is to close the road temporarily until the unsafe condition can be addressed.*

Overuse, Carrying Capacity, Phasing and Conditional Proposals

Comment: Carrying capacity analysis should be done before facilities, structures and improvements are built.

Response: *These UMP amendments outline the process by which Department staff will evaluate carrying capacity on an ongoing basis, including before and after the implementation of facilities.*

Comment: The DEC should successfully implement its new carrying capacity analyses on existing facilities before doing so on new facilities.

Response: *Because public use of many of these lands began only recently, the Department has determined it is critical to immediately begin monitoring this use and its impact on the natural resources and the users themselves. The Department will periodically evaluate and refine its methodology to ensure that protections of these resources are being appropriately applied as necessary.*

Comment: Facilities should be sized and designed based on same kind of carrying analyses not on mysterious professional judgement.

Response: *Professional judgement plays a critical role in Department staff successfully carrying out their duties. This professional judgement, in turn, is informed by their education and experience in the field, including continuous observation and analysis, as well as consultation of other professional sources as needed.*

Comment: *Conditional Implementation:* I believe this is an appropriate approach to management actions going forward. Despite many years of experience, the exact patterns of use that will develop cannot be absolutely anticipated. Witness the experience of the Essex Chain. Here there was an initial burst of use that seemed to warrant fairly restrictive management policies. Experience since then has seen much

lower use levels. Once the "novelty" of the Boreas Ponds wears off, there is no way to predict what actual use levels will be.

Response: The Department's proposals for managing the Boreas Ponds Tract has been informed by the experience gained in the Essex Chain Lakes Primitive Area and many other locations within the Forest Preserve.

Comment: *Monitoring Plan:* The proposed monitoring plan appears to be adequate to support the conditional implementation strategy.

Response: Noted.

Comment: I find the hiking public to be very willing to learn how to best care for the resource once they are given the information on how to. It is this education that should be the focus of new plans in the High Peaks and not increased infrastructure.

Response: There is an important educational component throughout the amendment, and it will be an important management tool to help correct current issues and make new facilities successful. New infrastructure largely focuses on newly acquired lands and corrections to deteriorated facilities.

Comment: Moving users to other areas of the park that have even less parking available, even fewer NYS Forest Rangers, no summit stewards and no trailhead stewards is simply moving the problem to a new location, though perhaps one that is less visible and has even fewer resources.

Response: Distributing use to other facilities that are designed to accept this increased use will serve to promote other desirable areas and relieve some of the pressures currently seen on degraded facilities.

Comment: Increased use is here to stay because the State continues to heavily promote tourism in the area. Further, hardworking people in the local economy rely on hiker visitation to make a living. So rather than trying to figure out how to chase people away, we should focus on how to manage the increased use.

Response: These Amendments approach the use in terms of carrying capacity of the tracts, and outline proposals to construct and maintain sustainable facilities that can withstand this increased while not exceeding the carrying capacity of the land.

Comment: There is nothing in the amendment about additional resources for trail maintenance. In fact, the amendment proposes to waste trail resources building 26 new trails to places that will seldom be visited. This is driven from the obviously failed strategy that we can somehow reduce the traffic in the High Peaks by getting people to go to other places. We may get a few people to go to other places, but this will do NOTHING to reduce the traffic in the High Peaks. The State and volunteer organizations like ADK have been trying this strategy for at least 20 years. IT DOESN'T WORK. Please stop mindlessly pursuing a strategy that has been proven not to

work. All this does is siphon off the resources that should be used to repair that trails that the people have told you that they want to use.

Response: The focus of these UMP amendments is new facilities on newly acquired lands where access is desired. They also propose solutions to problems on pre-existing lands like new parking arrangements for areas and sustainably built re-routed trails. The amendments do not attempt to address all of the current use issues, as much more discussion and stakeholder involvement is needed.

Comment: The implementation section of this UMP amendment lacks clarity. While the phased approach makes sense, there is no indication of when these action steps are going to happen. It is an ambitious plan with lots of new and improved facilities. Given DEC's track record of getting staff and funding to implement UMPs, it leaves doubt for how these management actions will occur. What happened to the previous format of a 5-year implementation schedule with the estimated costs for each action? For such an important unit, the public deserves a more specific schedule to feel confident that funding will be allocated for these proposals.

Response: The phasing cannot be given a time frame at this time, because it is driven by data collected from monitoring efforts. The UMP process does not allocate funding for projects.

Comment: I support the state's commitment to developing and implementing a new carrying capacity analysis for public use on the Forest Preserve. The proposed carrying capacity analysis should be amended to include a timetable for each action and provide better detail for the phased actions. More information should be provided for the costs of each phase/action. Also, none of the required assessments or inventories detailed in the SLMP for a UMP have been completed.

Response: In the Department's experience the 5-year implementation schedule has not been achievable due to the fluctuation of funding and staffing levels from year-to-year. More important for public understanding is communicating the order in which the Department intends to implement the proposals within the plans and what conditions must be met in order to implement particular proposals.

Comment: Applaud the Department of Environmental Conservation (DEC) for the science-based approach to land use management employed in these UMP amendments. We greatly appreciate the emphasis on monitoring of resource impacts that will trigger management actions to protect and restore the resource. ADK strongly supports this excellent management strategy. However, we are greatly concerned that several key elements of this approach have not yet been defined including, 1) the monitoring protocols that will be used, 2) who will be doing the monitoring, 3) how the monitoring and analysis will be accomplished (i.e., how will the agency provide the needed staff and funding for this critical task?), and 4) ensuring that the monitoring, analysis, and management triggers actually result in management actions to protect the resource.

Response: Monitoring variables are mentioned for each facility in the amendments, and they can be monitored by a variety of DEC staff or partners. The UMP process is not the appropriate tool to direct staffing, but it is the tool to outline proposals for which funding and staff can be applied and distributed to. The carrying capacity discussion, action items for each facility, and the phasing of implementation outline the necessity for monitoring and data to drive management actions.

Comment: Concern that DEC is not tallying and analyzing accurate baseline data on visitor use from trailheads. This becomes problematic when making management decisions like those proposed for lengthening the trail to Cascade. We are concerned that this action will move many aspiring peak enthusiasts to Giant because this peak will then be perceived as the shorter and easier first peak. Without baseline data from the trailheads it will be difficult to measure the impact of management actions.

Response: The Cascade Mountain trail is one of the trails we have a record of usage going back to placement of the register. Public education, trail sustainability, natural resource protection and safer parking are all benefits of the trail relocation. While there maybe shifts in the usage of first time users to other areas perceived to be “easier”, DEC believes a robust education and outreach campaign, coupled with the benefits of the trail relocation and alternative Mt. Van Hoevenberg East Trail hike, will improve the experience of first time users and provide mechanisms for increasing overall education and awareness of users.

Comment: The general principle of the carrying capacity should take into account the variations in user behavior. One aspect particular to climbing use is that the more parking there is, then the more likely it is for smaller numbers of climbers, often only two or three for a rope team, will use the various climbing areas and such use is spread out over time and distance. This is better than having the 'carpooling' result in which teams will pool together because of limited parking. The resulting pooled larger group will likely use the approach trails and areas at the same time, following step by step each other along the same tracks made on the trails etc. So, it can be reasonably expected, with respect to climbing use, that the more parking there is, then there is more likelihood that smaller groups will be the users at any one time and smaller groups will have less of an impact in using the area. This is the likely better choice for management decisions to make in keeping existing route 73 parking areas and making new parking areas as well, depending of course on the specifics of other factors or indicators of each parking area and trailheads, etc.

Response: The Department has analyzed the potential parking options and the proposed actions are the safest and best management decision when considering all recreational uses of the area.

Comment: Because overuse is such a big problem in this area, it is imperative that dangerous roadside parking be eliminated and replacement parking lots be provided.

Also, at select locations, recreationists should be redirected to manage overuse at peak times, to protect the natural resources, and to preserve a wilderness experience.

Response: The Amendment outlines new parking actions and describes use limitations in the carrying capacity discussion as one of the six Essentials to Wildland Management, but this action will only be used as a last resort.

Comment: These documents address not only recreational access proposals for the newly acquired Boreas Ponds Tract, but issues of overuse and parking safety for the entire High Peaks Wilderness.

Response: Noted.

Comment: At select locations recreationalists should be redirected to manage overuse at peaks times and to protect natural resources and to preserve a wilderness experience.

Response: One of the six essential principles for wildland management is limiting use when all other options fail. At this time, the Department and its partners are exploring other options prior to placing direct limits on access, including indirect measures such as limits on parking and education (i.e. suggesting alternate locations for hiking).

Comment: These lands are never going to stay pristine, the water will be ruined by invasive coming in on boats hauled to the put in, and the serenity will simply fade away.

Response: Environmental protection is paramount and the access and facilities on these lands are designed to protect the natural resources of the area.

Comment: Support uses that minimally impacts sensitive resources in the area

Response: Facilities will be constructed and maintained to be minimally intrusive and avoid sensitive areas to the greatest extent possible while remaining sustainable for their intended use.

Comment: I spoke during the fall of 2017 to several residents who were concerned with overcrowding. If I was able to get an idea of the concerns from just talking to a few folks, it is likely true that concerns are widespread.

Response: Noted.

Comment: the draft amendments fail to comply with the requirements of the State Environmental Quality Review Act (SEQRA) because they do not adequately consider important resource impacts and alternative actions that would minimize actual and potential adverse impacts to natural resources and to users' opportunity to experience a "primitive, unconfined type of recreation" which is part of the SLMP Wilderness definition (page 20, SLMP).

Response: *The Department complied with the requirements of the State Environmental Quality Review Act (SEQR) by determining that the proposed actions were subject to SEQR, properly classified the actions, undertook a coordinated review, properly established lead agency, took a hard look at the potential adverse environmental impacts, determined there were no significant adverse environmental impacts, and then provided a reasoned elaboration as to why the adverse impacts were not significant. The SEQR analysis conducted by the Department considered the criteria set forth in the implementing regulations found in section 617.7 of Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR), and staff determined that the potential impacts were not significant. A SEQR alternative analysis is only required when the lead agency has determined there are significant adverse environmental impacts and an environmental impact statement is prepared. The Department will implement the 2018 Amendments using best management practices that will serve to minimize the potential for the proposed actions to result in adverse environmental impacts to the greatest extent practicable.*

Comment: The Ausable River Association shouldn't be crowd-funding a roadside outhouse project to do the DEC's Work for them. The DEC should put vault privies at all roadside parking lots.

Response: *DEC appreciates the Ausable River Association providing this critical resource to protect the watershed and improve the overall user experience. DEC is committed to improving the human waste issue along the Rt 73 corridor and proposals in the UMP Amendment work toward that.*

Comment: 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.

Response: *Given the Boreas Ponds Tract lack of past public recreation usage and an infrastructure designed around removing forest products materials, the Department feels that providing facilities to manage public access within this area in a manner that minimizes impacts from public use will aid in determining the overall best carrying capacity of the area. Trails and campsites that are purpose built will provide a basis for directing the public to appropriate areas and establish a baseline of use and its impacts on a purpose-built campsites and trails. Beyond the physical measures of capacity there will be a need to establish baselines of volume, usage and use patterns particularly around the ponds, to help inform the intangibles in the carrying capacity suite. With a good data set that indicates the quantity of visitors, the timing of their visitation and the chosen activities we can better adapt the phases of implementation to*

help inform decision making.

Comment: 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.

Response: *Given the fact that this property is newly-acquired, the State does not currently possess all of the information on how public access will impact the natural resources of these specific units, however, the Department staff assigned to regulating the use of these areas have years of experience in managing resource protection. This experience is but one part of the process that will be used to identify the appropriate management actions that are designed to provide for resource protection while still allowing for the acceptable levels of public access. Baseline data from other, similar areas will be relied upon to contribute to this process.*

Comment: 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.

Response: *The phased implementation does not seek to avoid future UMP Amendments, rather it provides a spectrum of possible recreational facilities that could be on the landscape. Beyond phase 1 in the implementation schedule no future steps are taken without data to support that decision. The methodology allows the Department the time needed to collect usage information and data on the actual usage on a purpose built recreational infrastructure after the basic level of access is built. As time progresses the data may indicate that subsequent proposals are not to be built. UMP Amendments will still be needed for new proposals, not mentioned in this UMP or changes to access or facilities beyond the scope of sustainable constructions or*

maintenance practices.

Comment: 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 Bicknell's 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.

Response: *If all phases of implementation are enacted in the UMP Amendment and the trail on easement is developed to be opened for public use there would be 3 trails up Boreas Mountain. Before that happens, there are many levels of development, data and consideration, which will be considered. Each of those trails provides a different distance and experience of hiking up Boreas Mountain. Within the public comments we have heard regarding Cascade Mtn, people have cited issues with making trails longer as a deterrent to use. The Department is committed to making a world class trail system that will protect natural resources, improve the overall user experience and minimize maintenance needs into the future. From the west the Boreas Mountain trail will be built following the latest BMPs for Trail Building and provide a trail that is entirely on the Forest Preserve. In contrast the allowance for the trail on the east side, within the Easement is limited to the original route used by the fire observers with a connection along a woods road from the northern end of the Branch Road in the Vanderwhacker Mountain Wild Forest. This route will have a different experience from the west with sustainability challenges to overcome, within the foot print. The RNT Loop Trail could possibly provide a 3rd route up Boreas Mountain, but is further back in the phases of implementation and directly driven by usage and impacts from the Boreas Mountain Trail.*

Comment: 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.

Response: *The schedule of Implementation has been adjusted to extend the phasing of the trails. The initial network to be constructed in the Blue Ridge Mountain Bike*

Network. Construction of additional trails beyond this will depend on the data collected during the monitoring efforts on the Blue Ridge Mountain Bike Network.

Comment: 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.

Response: *The proposals in these UMP amendments represent only a small part of the solution to the overuse problem in the High Peaks and along Route 73. The larger process for addressing overuse is an ongoing effort by the Department and its partners, with involvement by many stakeholders, and will include a broad suite of both short-term and long-term solutions. Every change will be evaluated both for effectiveness in addressing overuse as well as the impact to recreational users. Every solution will attempt to balance public safety, user enjoyment, and availability of Department resources. The language found on page 69 of the HPW 2018 Amendment on roadside parking is directed toward parking that occurs along the side of Rt. 73 in spaces not designated as a parking area. This language is consistent with the language on page 122 of the HPW 2018 Amendment. On page 122 the UMP proposes to maintain all existing areas designated for parking. This does not include those roadside spaces in which members of the public park their vehicles outside of the designated parking areas.*

Comment: 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.

Response: *The UMP Amendment's first phase of implementation seeks to provide formal purpose-built access to these newly acquired lands and connect backcountry infrastructure with the existing trail system. Following the development of the Wildland Monitoring Plan the Department can make subsequent management decisions based on actual information on impacts.*

Comment: 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.

Response: Thank you for pointing this out. The Cheney Cobble trail was removed from the UMP Amendment and work has been done to better edit documents.

Comment: Maintenance of Gulf Brook and Boreas Roads. Language on pages 58/59 of the Vanderwhacker UMP states that while "the roads have never been tested for ongoing public use and especially not for general use by passenger cars" these roads 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.

Response: The Amendment prescribes upgrading the road condition, but it does not refer to any widening, nor will there be widening beyond its current footprint. Additionally, Gulf Brook Road will be kept "narrow and seasonal" in nature.

Comment: How have the carrying capacity land ecosystem water and wetland resources been factored in to proposed campsites?

Response: All facilities have been proposed with a data driven carrying capacity approach in mind and all proposals have been incorporated into the data driven phased approach explained throughout the Amendments.

Comment: Make stronger effort in our current carrying capacity.

Response: Changes have been added to the UMP Amendment Carrying Capacity section to include a general description of the Desired Conditions for each type of facility. This will help in providing more direction for where the Carrying Capacity decision making for the physical impacts on the facility is going.

Comment: Phased approach is appropriate, shows outside the box thinking.

Response: Thank you for your support on this matter.

Comment: P. 129 – There should be a timeframe and cost estimate associated with each of the phases. This is an ambitious plan that will require sufficient staffing and funding to accomplish these action items. The DEC needs to do a better job of implementing the proposed management and development of facilities.

Response: A common directive throughout these Amendments is the dependence on monitoring actions to collect data. We rely on this data to drive the next phases or actions of the plan, so there is not a timeframe for implementation as typically seen in UMP's. Cost estimates for these are highly variable depending on the workforce that will be used to construct the facilities.

Comment: The management of hiking trails in the Adirondack Forest Preserve has generally not been science- based for design, construction and maintenance. Most hiking trails are remnant 19th century trails that run straight up mountainsides or follow old logging roads. There are few modern, newly designed, and sustainably constructed hiking trails in the Adirondack Forest Preserve, such as the highly successful Moxham Mountain Trail or the rerouted new trail up Coney Mountain. DEC and APA have not made the sustainability of and the protection of natural resources within hiking trail corridors a priority in UMPs or UMP amendments.

Response: *These UMP Amendments propose purpose built, sustainable trails instead of adopting existing old roads, herd paths or fall line trails. In addition, DEC is committed to improving the overall trail system.*

Comment: For a number of years, the DEC has listed boilerplate language in various Unit Management Plans about its plans to implement some form of recreation ecology management program. This language called for a combination of Carrying Capacity analysis, Levels of Acceptable Change (LAC) analysis, and the Visitor Experience and Resource Protection (VERP) framework. DEC stated in these UMPs that these tools would somehow be blended together into a cohesive analytical framework. Though this blended analysis was listed in various UMPS, the DEC has never organized any kind of meaningful impact and management monitoring program for the Forest Preserve, often called recreation ecology management.

Response: *This UMP Amendment proposes the development of a Wildland Monitoring Plan as the first Action Step in the Carrying Capacity Section and also in the Phases of Implementation. This Wildland Monitoring Plan will be used to inform all phases beyond initial access.*

Comment: The new HPWC UMP and VMWFUMP have taken a stab at a new “Wildlands Monitoring Plan” that commits the DEC to organizing and implementing a skeletal recreation ecology management program. Protect the Adirondacks congratulates the DEC on its decision to pursue a new wildland monitoring program. Unfortunately, the new “Recreational Resources and Human Uses” section in UMPs is poorly written and confused, fails to provide necessary information, and fails to enumerate a schedule for development and implementation that is publicly accountable.

Response: *These UMP Amendments are attempting to provide a new path to addressing carrying capacity. This will be an evolving process that we will learn from as we progress and provide for overall improvements in Forest Preserve management in the long-term. We look forward to working with partners to engage in the development of the Wildland Monitoring Plans.*

Comment: No Definition for Best Management Practices: The DEC states that “the essentials for wildland management” are “planning, education and outreach, front country infrastructure, backcountry infrastructure, limits on use when all else fails and resources both personnel and funding.” The DEC state’s further it will rely on six Best

Management Practices (BMPs) that include “planning; education and outreach; front country infrastructure; backcountry infrastructure; limits on use; and, financial resources for both personnel and programs.” While the DEC goes to great lengths to define some things in its new wildlands monitoring program, the BMPs are not adequately defined and as such are of limited value.

Response: UMP has been updated to define the BMPs.

Comment: Wildland Monitoring Plans Must be Public: The DEC states in its “action steps” that it plans to develop a wildlands monitoring plan and program. How will this plan be made public? In what format and under what circumstances? Will the public get to comment on it while in draft form? The UMPs do not address these issues.

Response: UMP has been updated, DEC will convene a focus group for the development of the Wildland Monitoring Plans.

Comment: DEC Program Reinvents the Wheel: There are many good recreation ecology programs being used across the U.S. and a number of practitioners and academics who implement and improve these programs. PROTECT does not see the benefit of the DEC developing its own program, when others are widely available.

Response: DEC is utilizing existing systems and observing the success of the federal agencies as they implement the use of the VUMF. This will all help to develop the Wildland Monitoring Plans and address Carrying Capacity.

Comment: Selected Indicators are Vague, Highly Subjective: The “biophysical,” “social,” “aesthetic,” and “ecosystem process” indicators that were selected for the Wildland Monitoring Plan appear highly subjective. We’re skeptical about they will be used in the field.

Response: This UMP Amendment proposes the development of a Wildland Monitoring Plan as the first Action Step in the Carrying Capacity Section and also in the Phases of Implementation. This Wildland Monitoring Plan will be used to inform all phases beyond initial access. There is also a provision for an annual report, which will outline the successes of implementation and challenges ahead.

Comment: How Will Results from Wildland Monitoring Plan be Provided to the Public? How will the public be able to see and assess the results of the Wildlands Monitoring Plan? The UMPs do not address this issue.

Response: DEC will be issuing an annual report, see this action item in the UMPs.

Comment: The UMPs do not provide any information about how the monitoring plans will be used to improve Forest Preserve management. What is the link between data and management policy? What will the DEC and APA do once it has completed carrying capacity analysis? We note that the 1999 High Peaks Wilderness Area UMP had a requirement for an annual report, but these died away quickly. We have concerns about

the ability of the DEC to undertake long-term and complex ecological monitoring on the Forest Preserve.

Response: This UMP Amendment proposes the development of a Wildland Monitoring Plan as the first Action Step in the Carrying Capacity Section and also in the Phases of Implementation. This Wildland Monitoring Plan will be used to inform all phases beyond initial access. There is also a provision for an annual report, which will outline the successes of implementation and challenges ahead.

Comment: No Timetable for Phases or Action Steps: The UMPs do not set any timetables for when different phases or action steps will be completed. In this way, the new protocol does not appear to comply the requirements in the SLMP for an implementation schedule.

Response: The phases of implementation section of this plan is designed to mirror a more realistic methodology of how DEC will approach the implementation of projects following approval of the UMP Amendments. A UMP Amendment cannot control how resources will be allocated throughout the state or agency, but it can provide direction on where to focus efforts when resources become available.

Comment: Required Natural Resource Inventory, Assessment, Analysis Information Not Included in UMP Amendment in Violation of SLMP.

Response: These UMP Amendments build upon the original UMPs for the areas being amended and a robust amount of information made available through the acquisition and classification processes. They provide important information about natural resources, including water resources, vegetation, wildlife and fisheries. Additional information concerning natural resources will be developed during implementation of the UMPs. This information will be used by DEC to inform its Wildland Monitoring Plans.

Comment: The “Unit Management Plan Development” section of the SLMP requires that the DEC organize a variety of assessments, inventories and analyses of the natural resources and facilities of a unit. If this information is not prepared, then the draft UMP or UMP amendment cannot conform to the SLMP. The SLMP calls for the following information:

- an inventory of the types and extent of actual and projected public use of the area;
- an assessment of the impact of actual and projected public use on the resources, ecosystems and public enjoyment of the area with particular attention to portions of the area threatened by overuse; and,
- an assessment of the physical, biological and social carrying capacity of the area with particular attention to portions of the area threatened by overuse in light of its resource limitations and its classification under the master plan.

Each unit management plan will also set forth a statement of the management objectives for the protection and rehabilitation of the area's resources and ecosystems and for public use of the area consistent with its carrying capacity. (p 27)

Response: These UMP Amendments build upon the original UMPs for the areas being amended and a robust amount of information made available through the acquisition and classification processes. They provide important information about natural resources, including water resources, vegetation, wildlife and fisheries. Additional information concerning natural resources will be developed during implementation of the UMP Amendments. This information will be used by DEC to inform its Wildland Monitoring Plan.

Comment: This information is vital for natural resource protection and recreational management planning. The SLMP says "Regardless of the criteria, the main objective is to appropriately provide sustain- able and desirable facilities without exceeding the carrying capacity of the land on which they are located." We do not see how the UMPs conform with these requirements in the SLMP.

Response: The natural resource information developed through the classification process and included in these UMP Amendments, along with the additional natural resources information that will be developed during implementation of the UMP Amendments, is vital to analysis and management of carrying capacity. The Wildland Monitoring Plans will use this information to help ensure natural resource protection that does not exceed the capacity of the lands on which recreational facilities are located.

Comment: There should be a carrying capacity analysis for Boreas Ponds that sets limits on use. The parking lot at the 4 Corners should not be built until the carrying capacity is completed and sized according to the number of boaters deemed appropriate to protect the Boreas Ponds. The SLMP requires this analysis.

Response: Given the Boreas Ponds Tract lack of past public recreation usage and an infrastructure designed around removing forest products materials, the Department feels that providing initial access and formalized, purpose built facilities will aid in determining the overall best carrying capacity of the area. Trails and campsites that are purpose built will provide drastically different levels of capacity vs an adopted trail system or using a forest road system. Through this portion of the initial access development, as planned, we will provide a baseline of use and its impacts on a purpose-built trail. Beyond the physical measures of capacity there will be a need to establish baselines of volume of usage and use patterns particularly around the ponds, to help inform the intangibles in the carrying capacity suite. With a good data set that indicates the quantity of visitors, the timing of their visitation and the chosen activities we can better adapt the phases of implementation to help inform decision making.

Comment: I support the state's commitment to developing and implementing a new carrying capacity analysis for public use on the Forest Preserve. The proposed carrying capacity analysis should be amended to include a timetable for each action and provide

better detail for the phased actions. More information should be provided for the costs of each phase/action.

Response: *Thank you for your support. The phases of implementation section of this plan is designed to mirror a more realistic methodology of how DEC will approach the implementation of projects following approval of the UMP Amendments. A UMP Amendment cannot control how resources will be allocated throughout the state or agency, but it can provide direction on where to focus efforts when resources become available.*

Comment: None of the required assessments or inventories detailed in the SLMP for a UMP have been completed.

Response: *These UMP Amendments build upon the original UMPs for the areas being amended and a robust amount of information made available through the acquisition and classification processes. They provide important information about natural resources, including water resources, vegetation, wildlife and fisheries. Additional information concerning natural resources will be developed during implementation of the UMP Amendments. This information will be used by DEC to inform its Wildland Monitoring Plan.*

Comment: The amendment's commitments to undertake carrying capacity and limits of acceptable change studies, and to monitor public use, and to phase in facilities development based upon data obtained by monitoring changes in biophysical, social, aesthetic and ecosystem indicators is commendable. Unfortunately, those studies are designed and scheduled to happen after or simultaneously with significant facilities development, instead of being done in advance to determine whether or not significant recreational facilities would result in unacceptable changes to the present character and resources of the area.

Response: *In order to protect natural resources, the Wildland Management Plans will use existing natural resource information and additional information developed during implementation of the UMP Amendments to guide future phases of facility development and to make any needed corrective adjustments to existing phases.*

Comment: Boreas Ponds possesses an extraordinarily high degree of wildness according to statements by state and private investigators. The so-called "non-degradation concept" is a widely-adopted principle of wilderness management across the country designed to preserve an existing high degree of wildness as the standard to be maintained and sustained, rather than lowered in order to achieve a higher recreational carrying capacity.

Response: *The Boreas Ponds were classified as Wilderness by the Adirondack Park Agency.*

Comment: Despite extensive documentation of the existence of a high degree of wildness at Boreas Ponds, the amendments propose to allow immediate degradation of those existing wild conditions in order to achieve a high recreational carrying capacity made possible by a new parking lot just 500 feet away from the Ponds themselves, a day use recreational area there, and seven other parking areas spaced within 7 miles of the Ponds designed for over 100 vehicles. It is apparent that DEC intends to deploy LAC indicators and studies to determine change and to phase in still more facilities only after considerable degradation of wild conditions has already taken place.

Response: *The phases of implementation section of this plan is designed to mirror a more realistic methodology of how DEC will approach the implementation of projects following approval of the UMP Amendments. A UMP Amendment cannot control how resources will be allocated throughout the state or agency, but it can provide direction on where to focus efforts when resources become available.*

Comment: By its characterization of social, psychological and aesthetic wild land indicators as “subjective” and “arbitrary”, the draft amendments imply that these indicators are less important and less valuable as indicators of change than bio-physical indicators more suited to numerical measurement. Yet, the SLMP lends great importance to those “certain intangible considerations that have an inevitable impact on the character of land. Some of these are social or psychological -- such as the sense of remoteness and degree of wildness available to users of a particular area” (SLMP, page 13). In fact, the spiritual, connectedness and experiential values of wildlands are extremely important for DEC managers to bear in mind and, in fact, are key indicators to be used in limits of acceptable change analysis across the country. The amendment should be changed to credit such positive attributes as spectacular views and unique places, feelings of remoteness, enjoyment of simple living, exploring a natural environment, sense of shared solitude, and a feeling of being connected in a spiritual sense. These should be employed as additional indicators in the promised LAC studies.

Response: *The UMP Amendment has been updated to better illustrate the intangible side of the carrying capacity process.*

Comment: 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.

Response: Noted.

Carrying Capacity Analysis Required for Boreas Ponds

Comment: The SLMP calls for carrying capacity for water bodies in the Forest Preserve. This is something routinely ignored in conformance reviews by the APA. Here is the relevant section of the SLMP: A fundamental determinant of land classification is the physical characteristics of the land or water which have a direct bearing upon the capacity of the land to accept human use.

Soil, slope, elevation and water are the primary elements of these physical characteristics and they are found in widely varied associations. For example, the fertility, erosiveness and depth of soil, the severity of slopes, the elevational characteristics reflected in microclimates, the temperature, chemistry, volume and turnover rate of streams or lakes, all affect the carrying capacity of the land or water both from the standpoint of the construction of facilities and the amount of human use the land or water itself can absorb. (p 14-15)

Response: *DEC is endeavoring to address the question of carrying capacity for the Boreas Ponds through a phased approach to implementation and the development of a Wildlands Monitoring Plan.*

Comment: The SLMP also explicit directs Forest Preserve managers not to exceed the carrying capacity of waterbodies: the physical, biological and social carrying capacity of the lake, or a portion of the lake, or other water bodies accessible from the site will not be exceeded (p 40).

Response: *The phased approach to implementation of the High Peaks Wilderness Complex UMP Amendment, guided by a Wildlands Monitoring Plan, will help to ensure that the carrying capacity of the Boreas Ponds is not exceeded.*

Comment: PROTECT believes it would make more sense to complete the required carrying capacity analysis and then use this information to size the parking lot at the

4 Corners to an appropriate size. The SLMP requires that the carrying capacity of Boreas Ponds not be exceeded, yet we see no information in the HPWC UMP amendment or VMWFUMP amendment that addresses this issue. How can the APA find that this UMP amendment conforms with the SLMP without this necessary carrying capacity analysis?

Response: The phased approach to implementation of the High Peaks Wilderness Complex UMP Amendment, guided by a Wildlands Monitoring Plan, will help to ensure that the carrying capacity of the Boreas Ponds is not exceeded.

Comment: 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.

Response: Noted.

Wilderness, Wildness, Trailless Areas

Comment: Wilderness around the country is being threatened. New York State has a unique opportunity to protect wilderness at this moment in time.

Response: The APSLMP's Guidelines for Management and Use of Wilderness Areas have been informed by over 45 years of management experience by the Department and regular evaluation and refinement by the Adirondack Park Agency. Wilderness protection is and will continue to be a priority for both agencies.

Comment: I really am not happy about further expansion of hiking trails

Response: The development of the trails proposed in these UMP amendments will serve to reduce recreational pressures (i.e. improve the social carrying capacity) in other locations, provide an enjoyable and sustainable user experience, and will only be implemented after a determination is made that the physical carrying capacity of the land will not be exceeded by doing so.

Comment: Encourage DEC to manage these new additions to the Forest Preserve so that the intangibles of wildness currently found there remain intact.

Response: DEC is committed to trying to ensure that all users of the HPWC have a well-rounded wilderness experience.

Comment: The DEC and APA do a fine job of balancing protection of the wilderness areas and the public's desire for recreational use.

Response: *Thank you for your support in this matter.*

Comment: The almighty dollar should not dictate the destruction of once 'WILD' land. People that support this now are leaving nothing natural left for the future. These still wild areas should be protected from humans, and be left alone for the future.

Response: *The bulk of the new lands added in these UMP Amendments were industrial forest land up until a few years ago. While they were modified for forest products extraction and harvested for timber for over a century, the classification of Wilderness on these lands is the beginning of them reverting to a naturally driven state. The timeline of natural recovery will take centuries as we allow the successional growth of the forest to exist, unaltered, other than a small amount of recreational infrastructure. The classification and UMP Process is not intended to hold these lands as snapshot of what exists in 2018, but rather what is possible over 100s of years for all the future generations.*

Comment: It is our charge to keep the Wild places wild for everyone. Even for those who never go there. It is essential to just have it there. Everyone does not need access to everything. We just don't.

Response: *In every UMP the Department strives to balance appropriate access to the Forest Preserve with the preservation of both tangible and intangible elements of wildness. Both article XIV of the NYS Constitution and the APSLMP include protections that ensure the long-term viability of the Forest Preserve as a wild place.*

Comment: I agree with the concept of retaining trailless sections, but wonder whether all three are needed. The Dix Trailless Section contains numerous attractive summits that could potentially draw some use away from the High Peaks. This would especially true if those trails and views were promoted at the Frontier Town gateway. Whatever access is developed for the LeClaire Hill Trail could be extended to the other higher peaks including Niagara, Nippletop, and Camels Hump.

Response: *Maintaining large trail-less areas is an appropriate way to provide a primitive and unconfined recreational experience with greater opportunities for solitude than in areas with maintained trails. Given the High Peaks Wilderness is over 275,000 acres in size, the 63,000 acres of managed trailless areas will still leave over ¾ of the unit with a managed trail system. Other trail proposals in the Boreas Ponds Tract and on former NL lands near Henderson Lake are designed to relieve some of the pressures felt elsewhere in the High Peaks.*

Comment: Support re-wilding of old logging roads.

Response: *Noted.*

Comment: I strongly suggest that if Wilderness road bridges are to be removed they should be replaced with foot bridges even in the "trail-less" areas. If the existing bridges are removed without replacement, there are three crossing in particular that could be very difficult or potentially hazardous. These are the culverts at the Boreas Headwaters, the bridge over White Lily Brook about 1 mile north of Four Corners, and the bridge over Slide Brook just west of the former hunting camp near Cheney Cobble.

Response: *The decision to place bridges over waterways is based on several factors, including expected levels of use and the presence of other facilities in the area. Neither managed trails nor other facilities will be built within the proposed trail-less areas, and it is expected that all types of recreation within these areas be at the primitive end of the recreational opportunity spectrum.*

Comment: When Wilderness culverts are removed the vicinity should be regraded to a more natural state. This was not done when culverts were removed on the Casey Brook Tract where the soil was simply placed on one side resulting in very noticeable berms and ditches.

Response: *Minor grading and rehabilitation will be performed when culverts are removed, to the extent that it does not unnecessarily cause erosion or damage the surrounding vegetation.*

Comment: The draft amendments don't discuss the fate of the existing Wilderness roads. These appear to be quite well built and won't simply disappear overnight. See, for example, the long-abandoned roads southeast of Cheney Cobble, at the foot of Panorama Bluff, and along Casey Brook.

Response: *The department will be removing culverts and other non-conforming structures on wilderness roads. The roads will be allowed to naturalize over time to minimize further disturbance to the sites.*

Comment: I have always financially supported maintaining our wilderness because I believe there is enough commercialism in our existing world in that 20 years, we have found plenty of places to enjoy the outdoors, the wild, the commercial, etc. There is a dearth of places to spread your wings and do what you wish. We do not need more. We do not need to exploit our world for people who need more playgrounds. There are enough already. Keep the wild, wild. Keep our waters that are pristine, pristine. We are slowly killing our world as we know it, and there is no other planet to "move to" despite what the movies and fiction authors would have us believe.

Response: *Noted.*

Comment: Since Boreas Ponds is surrounded by lands classified for the most part as Wilderness and near the dam by lands classified as Primitive, the Boreas Ponds is

closed by the terms of the APSLMP to use by snowmobiles, motorboats and floatplanes. The waters of the Boreas Ponds are Forest Preserve under the judicial decision in the Lows Lake case and must be managed as a Wilderness. We are pleased that there is nothing proposed in the UMP that is inconsistent with regulations and New York State law regarding this issue.

Response: Thank you for the support in this matter.

Comment: While it may be romantic to think there are still trails where way-finding skills are important, it is still a concern that eliminating that category of trail will no doubt increase the use of the 20 or so trails that have no designated trails. This plan shows no consideration of the impacts on the resources from the additional hikers. Does this change really fit the charge in the SLMP, "Human use and enjoyment of those lands should be permitted and encouraged, so long as the resources in their physical and biological context as well as their social or psychological aspect are not degraded." (Master Plan p. 1.) Such an analysis and determination is missing from the High Peaks plan and should be added.

Response: The trailless areas proposed in the High Peaks Wilderness Area offer a different recreational opportunity that some of the more traditional trails of the area. The trailless areas fit in well with the Amendment in that it offers natural resource protections, aligns well with the definition of Wilderness, and offers a more remote recreational opportunity for those seeking that experience.

Comment: Facilities like the bright blue porta-potties at the Giant Mountain Trailhead are not in keeping with the wild character of the pass. The DEC should consider permanent outhouses at trailheads similar to those used in national parks.

Response: The Department is looking into different sanitation solutions along the entire Route 73 corridor. Permanent outhouses are not always feasible, and porta-potties greatly reduce the prevalence of human waste accumulating in an undesirable fashion near parking areas.

Comment: I understand what a big challenge this is and I ask that you please take into consideration ALL recreational users of the park and their impact and contributions.

Response: When considering recreational opportunities, consideration is given to a diverse group of recreational users.

Comment: Support relocating the Cascade Mountain trailhead to the Mt. Van Hoevenberg Complex Parking area. The test of this relocation last Columbus Day was successful. The change will eliminate the dangerous parking and traffic congestion at the current trailhead on Rt. 73.

Response: Thank you for your support on this matter.

Comment: 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.

Response: *Following the phases of implementation and building a purpose built sustainable backcountry infrastructure the Department hopes to reduce the physical impacts of use in the Wilderness. Properly spaced and screened camping opportunities, that are inviting to use and provide a durable location to concentrate use will assist with giving users a more wilderness feel. The Wildland Monitoring Plan will work to address the carrying capacity of new facilities for those intangible attributes that are less direct in measuring or quantifying, but that cannot be done until we have data that indicates the volume and pattern of usage within the area.*

Comment: 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.

Response: *The UMP Amendments do not propose any new additions to signage on summits within the HPWC and further seeks to formalize that additional wooded or partially wooded summits will not have signage. Following the 1999 HPWC the removal of the summit canisters brought about the existing summit signage and recent trends suggest users are seeking signage, resulting in trampling on summit vegetation. This proposal provides clear direction. Herd path work will focus on mitigating natural resource impacts, on the ground evidence indicates many herd paths have extensive issues with impacts, that left unchecked will become larger.*

Comment: 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.

Response: *Since 1999 the Department and the Adirondack 46er organization have operated on a premise that one official herd path is maintained to each peak by that organization. The UMP Amendment clearly states that the goal is to systematically work to develop Trail Plans for each peak and address them overtime as resources become available.*

Comment: 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 sometimes 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.

Response: *The UMP Amendment is primarily focused the new lands added to this Wilderness Complex, however there are specific proposals within the existing HPWC lands to address specific issues. The Department is committed to developing the Wildland Monitoring Program and working with stakeholders to help further identify, define and target solutions for the threats against wilderness that exist. This information and conversations will help provide insight into future management decisions that may include utilizing all 6 of the Wildland Recreation BMPs.*

Comment: Never underestimate the degree to which people value wilderness.

Response: *Noted.*

Comment: It seems like the current administration is trying to rush this process to circumvent a thorough review, so it can get what it wants despite most people asking for more protection. Many of the recommendations in the UMP do not reflect what is best for the area in the long run. This is coming from an administration that rightfully sued the EPA to protect New Yorkers from pollution originating in other states and has generally protected the interest of all New Yorkers. However, with respect to the Adirondacks the administrations recent actions have been disconcerting and disappointing.

Response: *The acquisition of these lands as Forest Preserve, the classification of these lands and the management objectives outlined in these UMP Amendments have all been based on careful consideration of the need to protect valuable resources while managing the public desire to experience opportunities for recreation and solitude.*

Comment: Allowing motorized access within a mile or less of the ponds would distract from their Wilderness Classification. It would open the ponds to pollution from oil and gas. Allowing parking near the ponds would distract from the solitude that one expects to experience in a wilderness setting. I'm sure it wouldn't take long until someone drove past the barriers into the ponds. It seems that the current parking lot is a reasonable distance from the ponds. It would make sense to maintain a well-groomed trail for cyclists, kayakers and those with disabilities. That would be a worthwhile compromise by using the current location. A 3.6-mile hike on a mostly level and well-maintained trail would be fairly easy.

Response: *Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.*

Comment: It would be short sighted to proceeding with the UMP as written and then waiting to see what the impact is. How would APA board members or the Governor feel if people could park on their front lawns?

Response: *Noted.*

Comment: The High Peaks don't need more publicity. Where are the studies that show the economic benefits of creating more trails and access? The area is already suffering from over use. Any economic gains would be short term because after a few years people would realize it's no longer the wilderness experience they expected. You will be driving away the people you want to target.

Response: *Usage in the High Peaks Region has been increasing every year. The development of additional sustainable recreational opportunities around more of the High Peaks can provide opportunities for people to explore more areas.*

Comment: Please keep the remaining Wilderness in New York true wilderness. We don't need another Disneyland.

Response: *Noted.*

Comment: 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.

Response: *Noted. Language has been added to the Trailless Area proposal indicating the Wildland Monitoring Plan will be utilized for keeping track of these areas.*

Comment: 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.

Response: *Noted.*

Comment: PROTECT notes the absence of a designated trailless area in the VMWF area. PROTECT notes that the area west of Vanderwhacker Mountain stretching to the Hudson River would be an excellent trailless area. Unfortunately, the APA and DEC have approved a second and redundant Indian Lake to Newcomb class II trail to be cut through that area. This is tragic given the beautiful stretches of forest, including old growth. This redundant trail violates the snowmobile trail “Guidance” directive not to build duplicative trails.

Response: *There are several large expanses of trailless areas within the Vanderwhacker Mountain Wild Forest, including the area north of Vanderwhacker Mountain, the area between the Hudson River and Moose Pond Club Road, and the Oliver Hill area. Though these are not specifically named as trailless in a UMP or UMP Amendment, they are being managed as trailless.*

Comment: One positive proposal in the HPWUMP is the proposal to create three trailless areas.

Response: *Thank you for your support on these proposals.*

Bicycling

Comment: Mtn. bike trail network should not be approved without feasibility analysis of trail network in North Hudson.

Comment: Since mountain bikes travel approximately twice the speed of hikers they should be allowed access to twice as many miles of trails as hikers. To hike 5 miles could take about 2 hours but to bike 5 miles it could take only 1 hour. So, in order to make it worthwhile for mountain bikers to visit an area they would want at least 4-5 hours of saddle time. Therefore, access to 25 miles would be suitable for a one-day visit but access to 50 miles would guarantee a two to three-day visit.

Response: *The construction of phase 1 of the mountain biking trail network is part of a larger investment by the State, including the planned campground and day-use area at Frontier Town, to promote recreational use of the Forest Preserve in the vicinity of North Hudson. As explained in the plan, the phased approach to trail construction will allow for the evaluation of need at various times before the entire trail system is implemented.*

This evaluation will also consider other uses, as the trails are proposed for hiking and x-country skiing as well.

Comment: Fat bikes which can be used on packed trails during the snow season, many times they share snowmobile trails which is ok with the NY State Snowmobile Association, NYSSA had added a fat bike seminar to their statewide conference to educate users on this new winter activity.

Response: *Fat bikes are a subset of bicycles and are allowed anywhere bicycles are allowed. In these plans, bicycle use is proposed to be allowed on all snowmobile routes.*

Comment: Electric pedal assist and throttle assist bicycles, which we prefer to be regulated like motorized vehicles until we can assess the impact caused by these new devices. Pedal assist would be more like a bicycle causing minimal impact but throttle assist electric bikes are more like motorcycles and could cause more damage to the trails. Handicap placards can allow physically challenged individuals to use pedal assist electric vehicles on trails appropriate for their use.

Response: *Both electric pedal assist and throttle assist bicycles are considered motor vehicles pursuant to DEC regulations, and as such are only allowed where public motor vehicles are allowed.*

Comment: Bike packing is the newest trend that utilizes long distance single track trails or forest roads or a combination of both for self-sufficient adventure. Similar to long distance back packing this new activity would need access to primitive backcountry camping areas along long distance scenic routes. Route determination would be evaluated in terms of what is actually rideable.

Response: *The Newcomb to North Hudson Community Connector Trail, as proposed in this and other Department planning documents, will allow for bicycle use. Numerous primitive tent sites are proposed along the trail, providing ample opportunities for camping.*

Comment: Mountain bikers in general prefer single track trails and there already are enough areas where bikes are off limits so improved access is welcomed.

Response: *Noted.*

Comment: Most of the trails in this region are old extraction trails and are not built with sustainability in mind so not many people will be using them unless they are modified to become more rideable.

Response: *The proposed mountain bike trails will be designed, constructed, and maintained in a manner that provides both long-term sustainability and user enjoyment.*

Comment: In the UMP you refer to Mountain Bicycles as ATB All Terrain Bicycles - This is not common terminology.

Response: *The plan has been changed to correct this terminology.*

Comment: It is current DEC Policy in Region 7's Draft Recreational Plan in 2007 that all trails are open to Mountain Bicycles unless signed otherwise and we would like you to stick with this policy as it treats mountain bicycles fairly. This draft plan was to be used as a model for other regions developing recreational policies. Refer to the region 7 recreational plan part 190 - use of public lands.

Response: *Department regulations allow for bicycling on any trail (except in Wilderness and Primitive Areas) unless the trail is signed as closed to bicycling. These areas will be managed consistent with the regulations.*

Comment: Vermont's Kingdom trails give access to over 100 miles of purpose built mountain bike trails and this has boosted the local economy tremendously because people stay for long weekends in off season and stay for a week or more during the summer. Other similar trail systems are being built for mountain biking in Quebec and other areas throughout the USA.

Response: *Noted.*

Comment: The State has proposed creating new motorized bike trails. I am absolutely opposed to any motorized trail additions in this sensitive area. I am equally opposed to the parking lot nearest to the recently acquired Boreas Ponds. This location at 4 Corners is less than a mile away from them and would introduce pollution too close to those pristine waters.

Response: *Various Mountain biking opportunities have been outlined in the Amendment, but none involve motorized bikes, as this is not an allowable trail use in the Forest Preserve. The parking configuration has been determined to strike a balance between providing appropriate access to destinations within these two units for people of all abilities with appropriate protections of the lands and waters in the region. These proposals are supported by the underlying land classifications, the existing infrastructure, and the ability of the natural resources of the area to withstand the anticipated use of these facilities.*

Comment: The two proposed mountain bike trail systems violate the new mountain bike Trail Siting and Maintenance "Guidance" with regards to choosing the location of a trail network and working with local partner organizations for trail maintenance. Not every Wild Forest area makes sense for a mountain bike trail system.

Response: *The Department has outlined the locations for various mountain bike opportunities. Currently there is only biking along Forest Preserve Roads, but partnerships for the construction and maintenance of trails will be sought when those*

action items are initiated, and local officials in North Hudson have expressed an interest in creating this opportunity within their town. It is the Department's understanding that Agency staff believe that the trails are designed and sited in conformance with the trail guidance.

Comment: We also support the proposed mountain bike trail network that will be similar to the trail networks built by ADK trail crews at Wilmington and Windham. The small parking area to service this trail network off the Blue Ridge highway is well thought out and designed to avoid user conflict. Cycling should be permitted on roads in areas or corridors classified as Wild Forest and otherwise where it is lawful to ride bikes. The Adirondack Park State Land Master Plan (APSLMP) Primitive Area Definition (Page 28) under Bicycles states, "the same guidelines will apply as in wilderness areas except that bicycles may be used: (a) on existing roads legally open to the public and on administrative roads specifically designated for such use by the Department of Environmental Conservation as specified in individual unit management plans; and, (b) on former all-season roads in the Essex Chain Lakes Primitive Area, as described above under "Primitive Recreational Trails"

Response: *Thank you for your support in this matter. The Amendment outlines mountain bike use on many of the roads within the Wild Forest, but not within Primitive Areas.*

Comment: ADK interprets this to mean that in order for bicycles to be ridden on the section of the Boreas Ponds road classified as Primitive (the section surrounding the Boreas Ponds Dam), DEC would need to 1) designate the road as an administrative road and 2) designate the road as open to bicycle use. DEC should consider the designation of horseback riding trails on some old roads in both Wild Forest and Wilderness Areas.

Response: *This Amendment does not designate the section of Boreas Road located within the Boreas Ponds Primitive Area as open to bicycles.*

Comment: The proposed mountain bike trail system should be phased in starting with the proposed "Blue Ridge Trails" off of Elk Lake Road. The system proposed off of Gulf Brook Road should not be built until several years of usage of the Blue Ridge Trails have been assessed, and the impacts on the surrounding wild lands has been analyzed.

Response: *The Amendment proposes the phasing of trail systems beginning with the Blue Ridge Mountain Bike Network. Subsequent phases of implementation will be based on the results of the wildland monitoring program for data driven actions.*

Comment: P.94 – I fully support the creation of the Blue Ridge Mt Bike Trail Network for the same reasons stated above. In addition, it is a good idea to have all-season use in mind so many trail users benefit from the effort of building the trails.

Response: *Thank you for your support in this matter*

Comment: Fat tire bikes don't leave impacts on the trail system.

Response: *Noted.*

Comment: The East River Rd should be open to bicycles beyond the bridge as well as foot traffic. Since the road is being maintained for motor vehicle use by DEC and private access to McIntyre Conservation Easement lands, it will be suitable for bicycle use.

Response: *Given the flashy nature of the floodplain, use by private landowners, and lack of destination, The Department does not see it suitable to promote recreational opportunities other than foot traffic.*

Comment: P. 93 – I fully support the creation of the Gulf Brook Mt Bike Trail Network. The Adirondack Park is lacking in purpose-built mountain bike trails and this trail development will be a step toward accommodating the increased interest in riding a bicycle on single track. Again, it is critical to employ proper layout and design to create a desirable trail network that is sustainable and fun for a range of abilities. The Wilmington WF trails demonstrate that it can be done right with the help of experienced trail builders.

Response: *Thank you for your support in this matter.*

Comment: As an avid cyclist, I can also say that the Boreas Ponds Tract would not be suitable for "family biking." The dirt roads are not paved like suburban bike trails and such use would inconsistent with the SLMP.

Response: *The family style biking mentioned in the Amendment is for mountain biking, similar to the very popular Camp Santanoni mountain biking trip along Newcomb Lake Road, not one which requires pavement.*

Comment: Protect the Adirondacks has many questions about the efficacy of two pro- posed new specially designed mountain bike trail networks for the VMWFUMP. We are skeptical about their viability. These two systems are poorly located and do not have the important local support of successful mountain bike trail areas, such as The Flume and Hardy Road systems in the Wilmington Wild Forest area. The two proposed mountain bike trail networks in the VMWF appear to violate basic tenets of the new *Management Guidance: Siting, Construction and Maintenance of Single-track Bicycle Trails on Preserve Lands in the Adirondacks Park* in several ways. The two net- works do not seem to meet the criteria to establishing a new mountain bike trail network.

Response: *The Department feels the mountain bike networks meet the criteria outlined in the Management Guidance. It is the Department's understanding that Agency staff believe that the trails are designed and sited in conformance with the trail guidance.*

Comment: Two proposed mountain bike trail networks flunk Guidance criteria for siting new trails: The new Guidance lays out a four criteria for a new stacked loop mountain bike trail system. These criteria include “local support” and “location” as two important factors:

Local Support: The devotion of a local organization, municipality, or combination that is prepared to assist with trail maintenance and construction activities. Resources required for construction and maintenance of a stacked loop trail network requires this capacity.

Response: *The above are considerations to give a new stacked loop network. The Department will seek to work with partners, as it does for all other trails, for the design, construction and maintenance of these trails. It is the Department’s understanding that Agency staff believe that the trails are designed and sited in conformance with the trail guidance.*

Location: Stacked loop trail networks are most appropriate where Forest Preserve lands abut municipal lands or publicly accessible private lands, generally within two miles of hamlet boundaries or one mile from Intensive Use areas.

Response: *The Guidance also outlines connecting stacked loop networks to hamlets with long distance trails and gives these trails priority during the bicycle trail planning process. These networks are connected to the community connector trails outlined in this Vanderwhacker Mountain Wild Forest UMP Amendment, the 2015 Community Connector Trail Plan, and the 2016 Essex Chain Lakes UMP.*

Comment: No local bike trails group near new proposed trails: These two systems are the fourth and fifth mountain bike stacked looped trail networks proposed by the DEC. Two exist in the Wilmington Wild Forest area, one has been approved but not constructed in the Moose River Plains Wild Forest, and another has been proposed in the Saranac Lake Wild Forest UMP. The Wilmington trails networks have local population centers in Lake Placid and Wilmington and attracts riders who are both local and visitors to the area. There is also an active partnership with a local bike trails organization for trail maintenance. It appears that the DEC’s zeal to build new mountain bike trail networks has far outpaced local organizations and local partnerships.

Response: *The Department will seek to work with partners, as it does for all other trails, for the design, construction and maintenance of these trails.*

Comment: A build-it-and-they-will-come mythology is not adequate natural resource planning: DEC is planning to build these new mountain bike trail systems largely on a build-it-and-they-will-come belief with no data about public demand for mountain biking regionally across the Adirondack Park or locally in the greater North Hudson area.

Response: Mountain biking is one of the fastest growing recreational pursuits. The installation of the mountain bike trails will be done on a phased basis, and the Department will evaluate the effectiveness and demand for the trails before building the final phases of the trail networks.

Comment: New trails fail to meet Guidance emphasis to build new trails that accommodate more than one type of user: A basic tenet of the new Guidance is that planning for mountain bike trails should consider “Accommodating more than one recreational use on a trail can help accomplish resource protection goals by reducing trail development and environmental impacts.” (p 6) The two systems proposed in the VMWF appear designed exclusively for mountain biking and will not be attractive for hiking or cross-country skiing.

Response: The Amendment describes how these trails, along with several other trails will be designed, constructed and maintained to be enjoyable for cross country skiing.

Comment: Mountain Bike Network should not be approved without feasibility study analysis in North Hudson.

Response: The Department has determined there is interest for this type of activity in the currently proposed locations based on input from the local and mountain bike communities.

Comment: Facilities should be sized and designed on some kind of carrying analysis and not on mysterious professional judgement.

Response: The mountain bike networks are described in the phased approach. Like the other facilities outlined in the Amendments, these will depend on monitoring and data driven management actions.

Comment: The fact that planners in the VMWF failed to adhere to the Guidance reveals more about the weaknesses of the Guidance than about the draft UMP. Recreational management in the Adirondack Forest Preserve today is about building separate trail networks for a variety of outdoor recreational activities, including hiking, mountain biking, snowmobiling, automobile travel and roadside camping, cross country skiing and powder skiing. At the same time that the DEC is building an infrastructure to facilitate separate and diverse uses, it also masks the impacts of the most controversial trail network – the road like class II community connector trails – by calling them “multiuse” trails though few will ever use any of the class II trails for anything other than snowmobiling,

Response: The Department feels the mountain bike networks meet the criteria outlined in the Management Guidance.

Motorized Recreation, Access, Parking

Comment: Motorized recreation beyond the first gate marginalizes protections for wild lands and waters, making them susceptible to invasive species and would create confusing managerial headaches like the unpopular Essex Chain of Lakes.

Response: *Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.*

Comment: I applaud New York State for including the Boreas Ponds in an expansion of the High Peaks Wilderness area and expect the state to follow through on its commitment to protect Boreas Ponds from invasive species and crowding by restricting access for lands south of the ponds by cars, trucks and snowmobiles. Motorized vehicles should not reach the ponds or be close enough to disturb wildlife or harm water quality. The Department of Environmental Conservation (DEC) must protect Boreas Ponds and the High Peaks Wilderness from motorized use.

Response: *Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.*

Comment: This land is special and just because there is a road there does not mean it needs to be used. The minute you get cars that close to anything the pollution begins. It begins with the cars themselves, their emissions, and the amount of stuff that comes with a car as opposed to it being carried by a person.

Response: *Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.*

Comment: Parking alternative 2 should be the preferred alternative.

Response: *Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.*

Comment: Limit access to the beginning of gulf brook road or below Wolf Pond Mountain.

Response: *Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.*

Comment: I'm sending this in response to the article that I read in the Post Star paper that stated that you are considering moving the access parking lot to the Boreas Ponds to within 1/10 of a mile from the pond dam. This is ludicrous. I am in my early 60's. Last year I went in there numerous times. I parked approximately 3 miles from the ponds. I have a 12 ft. canoe that I put on a small cart and I pull this with gear in it to the pond dam. Having it so people can drive to within 170 yards of these ponds is going to ruin this place. Giving that type of access makes it so the people that go there do not appreciate what is there. I personally feel you have to put some effort into something like this and you will appreciate it much more. Please do not ruin this place.

Response: *Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.*

Comment: I read with dismay in more than one publication of the plan to approve access to the ponds within a quarter of a mile. I am OPPOSED to this plan. I have been into the area...I walked...I'm 70 years old. It was a lovely walk.

Response: *Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by*

appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.

Comment: I'm in favor of the wilderness designation but think that road access should be moved much closer than the current gate at 3.5 miles. This is much too far for most people to carry a boat and would result in excluding the vast majority of users. Something in the order of 0.5 to 1.0 miles is much more reasonable and would maintain a wilderness feel without being unnecessarily exclusionary.

Response: *The preferred alternative outlined in the Amendment allows for general access to within 0.8 mile of the dam and permit access to within 0.1 mile of the dam.*

Comment: While I admire the DEC's attempt to provide access for people with disabilities, they will be able to enjoy only one view of the mountains, i.e., from the bridge at the outlet from Boreas Ponds. They wouldn't be able to access any of the other limited land views without a boat.

Response: *Noted.*

Comment: If hikers can access the High Peaks and other areas from parking at the Loj, Upper Works, and The Garden, why should parking be allowed closer than Fly Brook? It's as if the old truck road to Marcy Dam was improved and allowed people to park close to Marcy Dam.

Response: *Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.*

Comment: Construct more parking at Fly Brook and do not construct new lots at Four Corners and Boreas Ponds.

Response: *Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.*

Comment: I object to the proposals to create parking at Four Corners and Boreas Ponds. Both will be detrimental to the wilderness experience in this area. The only

justification for building these lots is to provide access to the new lands for people with disabilities as well as those who want to paddle the Ponds.

Response: Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.

Comment: Widening and maintaining Gulf Brook Road for increased two-way traffic is a hefty financial burden and an immediate safety concerns. Gulf Brook Road should be closed to motorized traffic.

Response: The Department is committed to providing reasonable access to Boreas Ponds and the southern High Peaks Wilderness, and the maintenance of Gulf Brook Road is a critical element of this access. There is currently no plan, however, to widen Gulf Brook Road. Motor vehicles will continue to be able to pass each other at various locations along the road, including former log landings, existing and proposed parking areas, and numerous points along the road that are already wide enough for passing vehicles.

Comment: Dangerous roadside parking should be eliminated and replaced with parking lots provided.

Response: The Department is proposing to allow parking only in designated parking lots, and enforcing a prohibition on roadside parking pursuant to a regulation.

Comment: The old quarry on Trout Pond Road at the foot of Brace Brook Road is prone to flooding. The best location for the proposed parking area here would probably be on the east side of the road and not on the quarry site.

Response: The exact location of the parking area will be determined through the work-planning process and will be sited in a sustainable manner.

Comment: All proposals pertaining to overuse and parking safety in the rest of the High Peaks Wilderness should be shelved because the process in which they were developed was not transparent and was therefore flawed. These topics need a robust planning process with extensive stakeholder involvement.

Comment: The "No Parking" area along Route 73 should extend to the Mt. Van Hoevenberg entrance - ultimately backed up by extended guide rails that would physically prevent parking and end the need for enforcement.

Response: The proposals in these UMP amendments represent only a small part of the solution to the overuse problem in the High Peaks and along Route 73. The larger

process for addressing overuse is an ongoing effort by the Department and its partners, with involvement by many stakeholders, and will include a broad suite of both short-term and long-term solutions. Every change will be evaluated both for effectiveness in addressing overuse as well as the impact to recreational users. Every solution will attempt to balance public safety, user enjoyment, and availability of Department resources.

Comment: Removing lots will increase the amount of walking along route 73, which is dangerous, especially in winter. All lots should be plowed in the winter to minimize this hazard.

Response: *This UMP Amendment proposes an alternative to the status quo that provides overall net benefits to the area and experience of those traveling through the area. Natural resource protection, safety and aesthetics will all be elevated with this plan. A connecting trail will parallel Rt. 73 on the west side of the highway to allow safe, off highway access from parking lots to Chapel Pond, rock climbing and hiking locations. These lots will be plowed in the winter and DEC encourages climbers to snowshoe on the trails in the winter time to gain access.*

Comment: the pull off/lot at the Spider's web trail should be reopened so that climbers can avoid having to cross/walk on the highway.

Response: *This area is in the Giant Mountain Wilderness Area and outside the scope of this UMP Amendment. As DEC works with partners and stakeholders to finalize the parking proposals along the Rt. 73 corridor, there will be larger considerations that include areas outside the HPWC.*

Comment: *New Giant Mt. parking:* I can't see that this makes any sense at all. Currently, there is relatively good parking for the majority of the vehicles on the widened shoulders. Yes, some hikers must cross that busy highway, but why give up what now seems to work reasonably well. Additionally, construction of a trail to join the Ridge Trail will not be all that easy. A route east of the rocky knoll would have to ascend a steep, boulder-filled gully and would then reach Dipper Brook where the far bank is high, steep, loose gravel. A lower-level connecting trail would be more feasible, but it would still face steep approaches on each side of Dipper Brook. Additionally, hikers would hike for fifteen minutes or so within close earshot of Rt. 73 - not exactly a good way to start a hike.

Response: *Noted.*

Comment: Reconfiguring existing parking at the Giant Mountain Trailhead requires vehicles to park parallel to the road, which is inefficient space-wise. By widening the shoulder, and perhaps adding diagonal parking lines, vehicles could park diagonally, and thus increase capacity. Additionally, some of the existing shoulders could be paved and widened to improve the safety of pedestrians and climbers. Reconfiguring existing parking areas may be less expensive than building new lots from scratch.

Response: Roadside parking has been part of the use of the Chapel Pond area for as long as people have been enjoying this area. This UMP Amendment proposes an alternative to the status quo that provides overall net benefits to the area and experience of those traveling through the area. Natural resource protection, safety and aesthetics will all be elevated with this plan. The parking areas will provide safe, off highway access from parking lots to Chapel Pond, rock climbing and hiking locations and a single crossing point on Rt 73 for those hiking Giant Mountain, which will improve overall safety of those users.

Comment: Restricting motorized access would allow Boreas ponds to become the 4th water body in the top 100 largest lakes in the forest preserve to be motor free and in the back country.

Response: As a wilderness waterbody, Boreas Ponds will be free of motorized uses. The Department is committed to providing reasonable access to the Ponds for people of all abilities, and providing limited parking within 500 feet of the water, in lands classified as Wild Forest, is the best method of providing this access.

Comment: We now have to defend the right to have four permit parking spaces which depending on which standard you use, is 648 square feet, 580 feet from the Boreas Ponds Dam. The argument that permit parking is undermining CP3 permit parking is laughable at the least and hypocritical at its best. If you truly feel that it is undermining CP3 parking then you should be standing up here or in Albany or Ray Brook arguing for CP3 parking right at the dam where there is room to park, not 580 feet away.

Comment: With regard to the Boreas Ponds access road (Gulf Brook Road), I do not believe automobile access should be an option past the existing interim gate. I do however feel individuals with CP-3 permits should be allowed access to LaBier Flow or even closer when possible.

Response: Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.

Comment: With the current draft plan, I feel the noise from vehicles driving to LaBier Flow and vehicles dropping off boats, gear and/or people will negatively impact the serenity of the Ponds and surrounding areas of the Wilderness area. Allowing a public access road 7 miles into the parcel is ill conceived and antithetic to the ideals of Forever Wild. Hundreds of people have been able to access the Ponds and beyond with the interim gate in place. They have enjoyed solitude and serenity that only a 3.5-mile walk from a parking lot (Wilderness) can provide. Adding unlimited vehicle access to LaBier

Comment: Flow will only degrade the unique experience many of us seek. There are plenty of other state lands accessible by car, let's keep this area WILD.

Response: *Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.*

Comment: I am opposed to expansion of any motorized vehicles in the Adirondack Park, especially in the Boreas Pond area.

Response: *Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.*

Comment: These lands are never going to stay pristine, the water will be ruined by invasive coming in on boats hauled to the put in, and the serenity will simply fade away. It is our charge to keep the Wild places wild for everyone. Even for those who never go there. It is essential to just have it there. Everyone does not need access to everything. We just don't.

Response: *The bulk of the new lands added in these UMP Amendments were industrial forest land up until a few years ago. While they were modified for forest products extraction and harvested for timber for over a century, the classification of Wilderness on these lands is the beginning of them reverting to a naturally driven state. The timeline of natural recovery will take centuries as we allow the successional growth of the forest to exist, unaltered, other than a small amount of recreational infrastructure. The classification and UMP Process is not intended to hold these lands as snapshot of what exists in 2018, but rather what is possible over 100s of years for all the future generations.*

Comment: Agrees cp-3 access should be accommodated, but the area should be protected as a motor free. Equestrian guide services to access the destinations along with the maintenance of select trails to allow wheel chair access to destinations will fully meet the ADA. Could be achieved by lift-assisted wagons, mounting platforms etc.

Response: *Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections*

against invasive species and overuse. There are proposals to build access routes and equestrian mounting platforms for people with disabilities in several locations as well.

Comment: Lastly, as the owner of a handicapped parking sticker, I feel there are places that I should not go even if I want to be there. The wilderness areas are for hale and hearty folks. Accommodating those with mobility problems should not be everywhere just because foolhardy people want to go there. Therefore, I also oppose building that parking area nearest the Ponds for that use. There are ample places that will serve in other places in the Adirondack Park. This last may sound very harsh, but it is practical and realistic.

Response: *Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.*

Comment: General parking should remain at the current parking lot and gate, over three miles from Boreas Ponds. The current "Interim" parking lot should be the primary parking lot for most visitors. We had supported a 4 to 6 car parking lot for use only by CP-3 qualified individuals (motorized access program for people with disabilities) 2 located about 1/10th of a mile south of the Boreas Ponds. However, if DEC intends to make this lot available for universal access by the general public, then we rescind support for this lot.

Response: *Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.*

Comment: This would entail limiting public motorized access to the southern extent of the Boreas Ponds Tract and the so-called "Vanderwhacker Pond Triangle," so that the general public is not permitted to drive anywhere near any of the Value I wetlands. This includes gating Gulf Brook Road either at its beginning or at a point south of Wolf Pond Mountain.

Response: *The parking configuration proposed in these plans, including the proposal for CP-3 parking 580 feet from Boreas Ponds, has been determined to strike a balance between providing appropriate access to destinations within these two units for people of all abilities with appropriate protections of the lands and waters in the region. These proposals are supported by the underlying land classifications, the existing*

infrastructure, and the ability of the natural resources of the area to withstand the anticipated use of these facilities.

Comment: Any CP-3 program access provided (motorized access program for people with disabilities) must be exclusive and not mixed with any other motorized use since this will undermine the special access available through DEC's CP-3 program.

Response: *The Department does not feel allowing additional use by permit undermines the CP-3 program. These other permits allow for a limited amount of additional cars to access the Boreas Ponds Parking Area. This permit system also serves members of the public that may not qualify for the CP-3 permit program but given their abilities require additional access beyond the four corners parking area to access the area near the ponds.*

Comment: There should be no "universal access" for motor vehicle use by the general public on the Wild Forest corridor leading to the Boreas Ponds. Universal access for the general public violates the CP-3 policy, which requires that there be no motorized access for the general public in Forest Preserve areas designated for special motorized use for disabled people.

Response: *As a pre-existing Department program, CP-3 was determined to be the best method for accommodating people with disabilities near Boreas Ponds without requiring them to acquire the same access permits as the general public.*

Comment: Let parking for Cascade be managed much like it is managed at the Garden in Keene Valley. That is that parking be allowed in those spots off the road. When they are full the parking has to be at Van Hoevenberg Lot. It would make far more sense to work with the local communities, or private enterprises to develop a shuttle system to the busier trailheads than to simply keep building more trailheads. Shuttle buses have been the solution to parking problems in National Parks across the country. Hikers do not mind paying a small fee and dealing with a set schedule to use shuttle buses.

Response: *The parking problem on Rt 73 for Cascade Mountain is one aspect of why the choice was made to completely relocate the trail on Cascade Mountain Relocation to the Intensive Use Area provides many benefits, including safety and it is better equipped to handle human waste and trash associated with Trailhead parking. As many people have noted Cascade Mtn is a starter mountain for people who have never been hiking. With this relocation DEC has a direct way to provide education and outreach to those people at the start of their hike and with the Mt. Van Hoevenberg East Trail we have a built in shorter option that can help better set inexperienced hikers up for success. The actual trail up Cascade Mtn is another part of this equation. Most of the properly built rock waterbars on the trail have failed because of user impacts, which have then exasperated more erosion below them which feeds into the cycle of maintenance needs. The new trail up Cascade Mtn. allows the DEC to start from scratch using the latest knowledge in trail building and user interactions to set up the trail for success. In the end, we will have a trail that will require less maintenance than*

the existing trail, will be an entry point to the High Peaks Wilderness where users can be educated and provides safer access and protection of the natural resources.

Comment: Although we support the provision for a parking area for cars carrying canoes or kayaks in the Four Corners area about a mile south of the Boreas Ponds The proposed parking area is too large and should be reduced to eight to ten spaces. Access to this parking area should be limited to the parking lot capacity and accessible by day use permit only. We are very disappointed that the proposed parking at this lot is not proposed for a permit system.

Response: *The Amendment proposes the initial construction of a 10 car parking area. The parking configuration proposed in these plans has been determined to strike a balance between providing appropriate access to destinations within these two units for people of all abilities with appropriate protections of the lands and waters in the region. These proposals are supported by the underlying land classifications, the existing infrastructure, and the ability of the natural resources of the area to withstand the anticipated use of these facilities.*

Comment: These UMP Amendments are part of the Largest Expansion of Motor Vehicle Use in the History of the Adirondack Forest Preserve

Response: *Noted.*

Comment: There should be no parking area created at the 4 Corners. Parking should be limited to the existing lot (referred to as the Fly Brook Lot in the UMP); automobiles and other motorized vehicles should not pass beyond the gate at this lot, except for those with valid CP-3 disabled permits, accompanied by a forest ranger. This lot, as it exists, could also be the staging area for horse and wagon access similar to the horse and wagon access to the Great Camp Santanoni. Automobile access beyond the gate at the Fly Brook Lot would be too precarious for two-way automobile traffic, and would necessitate widening the existing road. The public has been accessing the Boreas Ponds from this lot by foot for two years. It is a shorter route to the Boreas Ponds than is the hike up the access road to Great Camp Santanoni. There is no need for motorized access beyond this point, which should be managed to protect the wild lands of this area.

Response: *The parking configuration proposed in these plans, including the proposal for CP-3 parking 580 feet from Boreas Ponds, has been determined to strike a balance between providing appropriate access to destinations within these two units for people of all abilities with appropriate protections of the lands and waters in the region. These proposals are supported by the underlying land classifications, the existing infrastructure, and the ability of the natural resources of the area to withstand the anticipated use of these facilities.*

Comment: I half-heartedly support using the road that already exists. How it will be maintained is a problem. In a State that has failing roads and bridges all over, we

should be very careful about adding to the maintenance costs. It is foolish to accommodate the few and burden the many to do it.

Response: Thank you for your support in this matter. Upgrades and annual maintenance are described in the Amendment.

Comment: Public motor vehicle parking should be limited to the current interim Fly Pond parking area 3.2 miles from Blue Ridge Road. Only the two permitted day use parking spots should be allowed at the Boreas Ponds Dam for the CP-3 permit holders. No public parking should be allowed at the four corners. This is basically a modification of Alternative 3. My 78-year friend, who I have paddled with, fished with and hiked with over the last 35 years in the Adirondacks, had no problem making the 7 mile round trip hike to the Boreas Ponds from the Fly Pond parking area. As a navy veteran, his attitude is when he can't make the hike anymore (which I suspect will not be for some time), he won't go. He and I (I'm 64 years old) do not see the need for general public parking beyond the Fly Pond parking area. Walking is great exercise, keeps you young, will create less wear on the Gulf Brook Road and be more protective of the resources.

Response: Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.

Comment: Andrew Brook Road is not included on any of the maps. The UMP should include a map of all the motor vehicle access roads and administrative roads. The names that were used for the Recreation & Access Plan are not consistent the road names used for this UMP in the following cases: Ragged Mtn. Rd. vs The Branch Rd., Sand Pond Rd. vs Andrew Brook Rd., Trout Pond Rd. vs Boreas Rd.

Response: All motor vehicles roads proposed in this plan, including the Andrew Brook Road, are shown on the maps. The road names proposed at this time reflect a better understanding of the historical names associated with the roads, and will be used moving forward.

Comment: We applaud New York State for including the Boreas Ponds in an expansion of the High Peaks Wilderness area and expect the state to follow through on its commitment to protect Boreas Ponds from invasive species and crowding by restricting access for lands south of the ponds by cars, trucks and snowmobiles. Motorized vehicles should not reach the ponds or be close enough to disturb wildlife or harm water quality. The Department of Environmental Conservation (DEC) must protect Boreas Ponds and the High Peaks Wilderness from motorized use.

Response: Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and

waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.

Comment: Real access to paddle Boreas can be achieved. The hand-carry provision is not clear and I fear hand carrying our gear and then locking my very expensive wheelchair back in my car, all with the help of someone such as my wife, may make for a non-accessible paddling site. Consider yourselves and how we all change, and how you may like to see this site used by your future selves.

Response: *Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.*

Comment: The parking lot proposed at the end of Gulf Brook Road, at the end of the Wild Forest corridor, 500 feet from Boreas Ponds, should be for disabled access only, through the DEC CP-3 program. The potential for "keg rolls", as occurred at Marcy Dam, is too high to allow general public parking (referred to as "universal access" in the UMP) in this area, which is surrounded by lands and waters which are to be managed as Wilderness.

Response: *The Boreas Ponds Parking Area will be available to two CP-3 motorized access permit holders and four general permit holders at a time. Parking in this area is on a daily basis and not for overnight use. The nearest overnight parking will be at the Four Corners Parking Area approximately 0.7 mile away.*

Comment: One thing I think maybe someone should consider is moving the parking attendant booth at the Loj down near the creek/bridge. This would generate a lot more income on the busy weekends to help with steward costs, no-parking signs. etc.

Response: *The booth at the Adirondack Loj is on private property. North of the booth is a Town Road all the way to Rt. 73. This is outside the scope of the UMP Process.*

Comment: I propose shuttles or buses to trails head.

Response: *Shuttles can be a valuable part of a larger plan to address overuse and public transportation. Given all the variables including multiple land units, local governments, various agencies and businesses, this is beyond the scope of the current UMP Amendment.*

Comment: I would also allow one side of the access road to parking and ticket all those not obeying the signs. This would help with people not being allowed to park on both sides causing congestion.

Response: *Noted.*

Comment: As part of the proposed amendment to the UMP it is indicated that a boat launch/parking area was going to be installed at Opalescent road area...this small road stops at a gat /bridge which is the entrance to our club. We have had problems with people actually parking in front of the gate/bridge which blocks our entrance. Would you consider moving that parking area down the road slightly to avoid these conflicts

Response: *The Department wants to ensure unencumbered access to the owners, land managers, and lessees of the private lands to the east of the MacIntyre East Tract, along with their own administrative access to the area. A new parking area will be installed so as to not block the entrance of the gate. Parking spaces will be delineated and a regulation prohibiting parking outside of a designated space will be developed if issues arise.*

Comment: Do not support the closure of roadside parking around Chapel Pond. While the proposal calls for replacing roadside parking with new formal parking lots to the south of Chapel Pond, removing roadside parking will force ice climbers to walk along Hwy. 73 during the winter months, causing unsafe conditions. Also, given the popularity of this area in the summer months, the DEC should consider keeping existing parking opportunities in addition to construction of the proposed lots.

Response: *As parking changes happen on Rt 73 there will be education and outreach to help inform users. Roadside parking has been part of the use of the Chapel Pond area for as long as people have been enjoying this area. This UMP Amendment proposes an alternative to the status quo that provides overall net benefits to the area and experience of those traveling through the area. Natural resource protection, safety and aesthetics will all be elevated with this plan. A connecting trail will parallel Rt. 73 on the west side of the highway to allow safe, off highway access from parking lots to Chapel Pond, rock climbing and hiking locations. These lots will be plowed in the winter and DEC encourages climbers to snowshoe on the trails in the winter time to gain access.*

Comment: Because overuse is such a big problem in this area, it is imperative that dangerous roadside parking be eliminated and replacement parking lots be provided. Also, at select locations, recreationists should be redirected to manage overuse at peak times, to protect the natural resources, and to preserve a wilderness experience.

Response: *Noted.*

Comment: Keep the present parking spots and expand to allow for increased traffic, please. Use the "soft coercion" of persuasion and gentle nudges rather than the "hard coercion" of prohibitions and limits for as long as possible.

Response: DEC will continue to study usage in the Chapel Pond are, including climbing and users of the pond. Working with the Giant Mountain Wilderness Area UMP process and the Wildland Monitoring Plan the carrying capacity will be studied and provide direction for any expansion of parking capacity.

Comment: Rather than eliminate and reduce parking, I propose rerouting the overly used, extremely eroded Roaring Brook trail to a location closer to expanded parking.

Response: This suggestion will be considered when DEC addresses the Giant Mountain Wilderness Area UMP Amendment in the future.

Comment: Double or triple parking at all trail-heads build comfort stations at all trail-heads – increases tourism and keeps New York dollars in New York

Response: Noted.

Comment: At all scenic overlook locations cut back vegetation to allow tourists to view scenery from their vehicles or with a very short walk (Like Oregon does for the Historic Columbia River Highway). Make the scenic highways truly scenic for drivers and passengers.

Response: Noted.

Comment: The proposed parking plan will encourage MUCH more pedestrian traffic along roadways. Eventually, the mindless pursuit of the "Inadequate parking" strategy will get someone killed. And DEC will own that, unless you recognize that this is a new era, and that adequately designed parking is a safety requirement.

Response: The Department believes that measures identified in the UMP Amendments that will limit roadside parking promote a safer user experience.

Comment: Route 73 is a heavily congested area with recreationalist of all sorts gathering on the road. It baffles me why speed hasn't been reduced here. I've seen an accident where a vehicle made a U-turn and was slammed by an oncoming vehicle. Honking and near misses are alarmingly frequent. The obvious solution is to reduce the speed, regardless of the parking plan. "30 mpg when flashing" indicators on weekends and heavy use holidays could be put in place. If safety is the issue, it seems obvious—and far less expensive than building new lots—to simply reduce the speed during peak times.

Response: Noted.

Comment: The VM plan is deficient in describing the controls on parking along the corridor from Fly Creek to the Boreas Dam.

Response: Parking will only be allowed in designated spots. A description of this is outlined in the Amendments.

Comment: How will drivers know when they arrive at Fly Creek that there is space at Four Corners?

Response: Drivers may proceed to the Four Corners to see if there are parking spaces available. If all parking spaces are full then drivers will need to return to the Fly Pond Parking Area.

Comment: How will the frustrated driver who has to turn around be discouraged from roadside parking?

Response: Parking will only be allowed in designated spots. Signs throughout the area will indicate this, and law enforcement will enforce the regulation.

Comment: What will insure that each parking area is limited to the stated capacity? Surely there is greater impact from increased two-way traffic going back and forth to find open parking areas. Only gates and attendants will help and these are not spelled out in the plan.

Response: Parking will only be allowed in designated spots. Signs throughout the area will indicate this, and law enforcement will enforce the regulation.

Comment: Others are commenting on the lack of a comprehensive transportation and parking plan in the High Peaks plan but this plan is short on the overall analysis of the relationship between parking and back-country overuse

Response: The Amendments are primarily focused on the facilities related to the newly classified State lands, and within the amendments is a detailed carrying capacity discussion with proposals tied to data driven actions, ongoing monitoring and new sustainably built facilities. The existing parking and use issues are currently being evaluated by The Department, various stakeholder groups, and other agencies and will be addressed in the near future when proper analysis is complete.

Comment: We are confident that you are aware of the requirement of Basic Guideline 4 found at page 36. It states that "Public use of motor vehicles will not be encouraged and there will not be any material increase in the mileage of roads and snowmobile trails open to motorized use" (emphasis added). The VM plan acknowledges this requirement by including a chart of changes in snowmobile mileage. A similar analysis is required for roads and none is provided here

Response: The Department believes there has not been a material increase in the miles of roads open to public motor vehicles in wild forest areas since 1972. The Department and the Agency are engaged in a process that will lead to an Agency APSLMP

interpretation regarding road mileage in Wild Forest Areas of the Forest Preserve. This interpretation, once made, will apply to all Wild Forest UMPs.

Comment: Repair and rebuild State Highways throughout the parks and add passing lanes on long uphill grades to improve traffic flow.

Response: *The Department does not have jurisdiction over State Highways.*

Comment: Naturally, the increased use has overwhelmed the existing, tiny parking facilities. One might think that the inadequate parking is a result of lack of planning, but actually this is intentional. The State has tried to reduce use by providing inadequate parking. But the visitors are coming anyway, and they are going to park wherever they can. This has resulted in inconvenient, and in many cases unsafe situations. Much of this problem results from the State Land Master Plan, which is “frozen in time,” and is based largely on how things were in the Adirondacks in the 1940s. The plan imagines, for example, that the Cascade Mountain trail will offer “outstanding opportunities for solitude.” Of course, this is not realistic. There is plenty of solitude available on Cascade Mountain; but 99% of the visitors are concentrated on the tiny thread of the trail. It makes no sense to look for solitude there; but the parking is being managed to try to achieve that unrealistic goal. Instead, all that is being achieved is to create a safety hazard.

Response: *The parking and new trail proposals for Cascade are designed to remove parking from State Route 73 and place it in a safer area, which will directly access a new sustainably built trail that will protect the natural resource and increase user enjoyment.*

Comment: I find parking areas a major issue around the country in backcountry or even more accessible climbing areas. Specially as the sport or area becomes more popular. It's important to make parking easy and organized with ample space which won't lead to parking on the side of the road or other places where you shouldn't or aren't designated.

Response: *The proposals in the Amendments are intended to protect the resource, reduce parking congestion and increase user safety.*

Comment: There should be no parking area created at the 4 Corners. Parking should be limited to the existing lot (referred to as the Fly Brook Lot in the UMP); automobiles and other motorized vehicles should not pass beyond the gate at this lot, except for those with valid CP-3 disabled permits, accompanied by a forest ranger. This lot, as it exists, could also be the staging area for horse and wagon access similar to the horse and wagon access to the Great Camp Santanoni. Automobile access beyond the gate at the Fly Brook Lot would be too precarious for two-way automobile traffic, and would necessitate widening the existing road. The public has been accessing the Boreas Ponds from this lot by foot for two years. It is a shorter route to the Boreas Ponds than is the hike up the access road to Great Camp Santanoni. There is no need for

motorized access beyond this point, which should be managed to protect the wild lands of this area.

Response: Motor Vehicle access beyond the Fly Pond Parking Area will allow for a limited number of people to Park at the Four Corners lot and less at the Boreas Ponds Parking Area. The Department does anticipate the Fly Pond Parking area being used by equestrians and horse and wagon users.

Comment: PLEASE do not eliminate ANY parking anywhere. It's great to add parking, but the reality is that we need all the parking we can get.

Response: The parking management actions are proposed in order to increase user safety and maximize environmental protection.

Comment: If you need a key to park at North Hudson, folks coming from the west have an extra 28 miles to pick up and return key.

Response: The program will need to be administered from one facility. The closest facility to Boreas Ponds, and likely the one that sees the most traffic, is located in North Hudson.

Comment: P.60 – I support allowing motor vehicle use of the Boreas Rd west of the four corners during big game hunting season.

Response: Thank you for your support in this matter.

Comment: Motorized Road Impacts: Because, as cited below, the potential adverse ecological implications of opening up forest roads such as the Gulf Brook Road to daily public motorized uses were identified by APA staff and independent scientists studying the Boreas Ponds Tract, SEQRA demands that the UMP amendments address them, also.

“Impacts of roads here are high. In terms of environmental impact zone, it exists up to 1 kilometer on either side of the road. The road impacts are related to type, timing, and intensity of road use” (from notes of APA Resource Analysis and Scientific Services staff speaking about the Boreas Ponds Tract, Feb. 1, 2018 APA Meeting in Ray Brook).

“It is almost impossible to overstate the degree to which roads influence wildlife populations, even small forest roads like the ones on the Boreas. Impacts of forest roads on species and ecosystems begin during the construction phase, but persist and accumulate well after a road is no longer in use, with effects including mortality from construction, mortality from vehicle collision, modification of animal behavior, alteration of the physical environment, alteration of the chemical environment, spread of exotics, and increased use of areas by humans” (from Ecological Composition and Condition of the Boreas Ponds Tract by Michale Glennon, Ph.D., Wildlife Conservation Society, April 2016).

Response: Department staff took a hard look at the range of reasonable alternatives for motor vehicle access within the units, and have concluded that public use of roads within the units will not result in any significant adverse environmental impacts. The roads of the units are currently being used by motor vehicles, ATVs and snowmobiles. The unit management plans call for the closure of a significant amount of road mileage, and the Department will implement a program to best gauge what the appropriate level of access should be for each unit.

Comment: In addition, the public safety risks are also likely to be high given daily competition for this narrow road and road shoulder from two-way passage of cars and trucks competing for space with hikers and paddlers wheeling boats. By gating the Gulf Brook Road at the Fly Pond parking area, and by limiting further motorized access only to certified persons with disabilities who otherwise cannot get to the Ponds, many potential environmental and public safety impacts are significantly reduced. For two years, persons of all abilities have proven that they are willing to walk from the Fly Pond parking area, assisted or not, and wheel their boats to LaBier Flow and the Boreas Ponds. This two-year pattern of muscle- powered public access should be continued in the amendment to the Vanderwhacker Wild Forest UMP with the appropriate exceptions made for persons with disabilities.

Response: Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.

Comment: Though PROTECT supported this compromise as the best deal possible within the political constraints and realities of the Andrew Cuomo Administration, we note that road maintenance on the Gulf Brook Road will be extremely costly for state agencies and that this road in particular, given the grades and topography of the area, will require regular and extensive maintenance. While we support use of this road now, we question the long-term ability of the state to adequately maintain this road as a safe and operational route for the public.

Response: Noted.

Comment: Another controversial part of the new VMWFUMP is the plan for public parking on the Gulf Brook Road to access the Boreas Ponds. The state is proposing three parking areas: 1) Parking 500 feet from the Boreas Ponds for disabled individuals and the general public under a universal access program; 2) 0.8 miles from the Boreas Ponds at the 4 Corners; and, 3) 3 miles from Boreas Ponds at Fly Brook.

This small parking lot 500 feet from Boreas Ponds is proposed to hold motor vehicles for individuals who have obtained permits under the CP-3 program (Commissioner's

Policy for Motorized Access Program for Persons with Disabilities), which allows special access for individuals to use motor vehicles to access natural resource areas in the Forest Preserve, as well as all other individuals under a “universal access” permit program. This parking area should be restricted to only allow use for people with CP-3 access. While PROTECT has long been supportive of the CP-3 program, we find the use here to be troubling because the state is proposing to allow the non-disabled public also to access this parking lot near within 500 feet of Boreas Ponds. This undermines the CP-3 program. PROTECT strongly opposes any form of public parking by any means beyond CP-3 at the proposed parking area 500 feet from the Boreas Ponds. PROTECT believes all public parking should be at a point 0.8 miles back, or further at a location east of LeBiere Flow, from the Boreas Ponds at the 4 Corners area. The general public should not be allowed any closer in a motor vehicle than 0.8 miles. PROTECT supports an additional small public parking lot proposed to be located at Fly Brook. This parking area will accommodate hikers and the paddlers. We also support a parking lot at the entrance to the Gulf Brook Road, just off the Blue Ridge Highway.

Response: Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.

Comment: I like to fly with Helms Aeroservice, and I have been informed that Boreas Ponds is potentially accessible by sea plane. I have camped in Wild Forest, and I have not seen evidence of any environmental degradation resulting from the sea plane. When the plane lands in September, the loons call out as if to scare the plane away. And the loons are successful every time.

Response: Boreas Ponds is located within the High Peaks Wilderness Area; therefore, public use of motor vehicles, motorized equipment, and aircraft are prohibited pursuant to the APSLMP.

Comment: In the case of Boreas Ponds, the basic plan is to open all the gates to maximize access to the roads south of the wilderness boundaries, and then photograph the resource impacts as they happen. But there are better alternatives for Boreas Ponds that would protect all of the sensitive resources found on the tract while offering options for recreational access:

Response: General motorized access will be kept to the Four Corners Parking Area. Access by permit can be achieved to within 0.1 mile from the ponds, and seasonal motorized access to the western end of Boreas Road will be granted during big game season.

Comment: The Board specifically supports the proposed parking lot near the Boreas Ponds Dam for disabled visitors as well as universal access, and generally appreciates the attention paid to the needs of disabled and limited mobility visitors.

Response: *Thank you for your support in this matter.*

Comment: The Board supports the proposal for seasonal hunting vehicular access on the Boreas Road.

Response: *Thank you for your support in this matter.*

Comment: Maintaining Gulf Brook road costs \$46,000 annually. By letting that road re-wild, the DEC could hire a new Forest Ranger every year indefinitely. This is a misguided waste of funds, as a vast majority of the public comment asked for a wild Management of the High Peaks.

Response: *The Amendment mentions maintaining the Gulf Brook, Boreas, Branch and Andrew Brook Roads will cost an estimated total of \$14,000 annually.*

Comment: Put the parking at the Boreas Ponds Dam.

Response: *Parking alternative #1 was selected as the preferred alternative after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public with the appropriate protections against invasive species and overuse. Outreach and education, collecting use numbers, and regular monitoring of conditions on the ground (and in the water), followed by appropriate responses to the data collected, are all tactics to be employed by Department staff to ensure these lands remain wild.*

Comment: Parking does not seem well thought-out.

Response: *See the above comment.*

Comment: Where do you park if you have a snowmobile or horse trailer?

Response: *Parking for horse trailers will be at the Fly Pond, Gulf Brook Mountain Bike and Blue Ridge parking areas. Snowmobile trailers will be able to park in the Blue Ridge Parking Area.*

Comment: The argument that handicap access to the Boreas Ponds Dam site is needed is simply a red herring to open the door for unlimited motorized access. I would be happy to assist anyone using a large tire or electric wheel chair who would like to reach the ponds, especially our veterans. From primarily a safety perspective, but also an aesthetic one, the use of snowmobiles and ATV on the same trails as hiker and skiers is simply not compatible.

Response: ATV's are not an allowable form of recreation in the Forest Preserve. The CP-3 route is for motor vehicles only, not ATV's. Additionally, Snowmobiles will not be allowed beyond the Four Corners. The construction of the Boreas Ponds Trail allows non-motorized users to access the ponds without needing to use the same trails as motor vehicles.

Comment: The Commissioner's Policy for Motorized Access Program for Persons with Disabilities provides "motor vehicle access to certain State lands under the jurisdiction of the Department for qualified people with disabilities." Under this policy access with motor vehicles is provided to permit holders on roads where the general public is either prevented from using motor vehicles or where a permit holder can use a different type of motor vehicle, such as an All-Terrain Vehicle (ATV), that is prohibited for general use. Under CP-3, motor vehicle use is provided so that disabled people can access natural resource areas.

Response: As a pre-existing Department program, CP-3 was determined to be the best method for accommodating people with disabilities near Boreas Ponds without requiring them to acquire the same access permits as the general public.

Comment: What is being proposed along the Wild Forest corridor on the Boreas Road, from the 4 Corners, to a point 500 feet from the ponds, will allow the general public the same opportunity as the disabled for enhanced motor vehicle access to the Boreas Ponds. The CP-3 policy states:

It shall be the policy of the Department to provide a qualified person with a certified disability access by a suitable motor vehicle to appropriate lands under its jurisdiction.

A qualified person with a certified disability who wants to access State land by a suitable motor vehicle, where either the desired location is closed to motor vehicles or is open to certain motor vehicles, but not the type of motor vehicle desired to be used by that person, may do so only through the authority of a Permit. Such Permit shall provide that a specified qualified person with a certified disability is authorized to operate a suitable type of motor vehicle as designated in the permit on all roads, trails and geographical areas designated by the Department for such use and elsewhere as specifically approved, consistent with current law and rules and regulations. In the Adirondack Park and the Catskill Park, motor vehicle use is prohibited on trails and in geographical areas, and is limited to designated and specifically marked roads on lands classified as Wild Forest and Intensive Use.

Response: The parking area located near the Boreas Ponds for CP3 and universal access is closed to the general public. Only those members of the public that have received a Department-issued permit will be allowed access to this parking area. The purpose of this permit system is to restrict the number of motor vehicles that can access this parking area in order to limit any potential adverse impacts to the Boreas Ponds.

Comment: Motorized use is prohibited on all lands classified as Wilderness, Canoe and Primitive.

Response: *There are no motorized proposals in the Wilderness or Primitive lands in the UMP Amendments.*

Comment: Under the DEC proposal, CP-3 permit holders and the general public with universal access permits will share a parking area 500 feet from the Boreas Ponds. By combining public use and CP-3 access, the DEC is openly violating the CP-3 policy. The APA should reject this proposal.

Response: *This is not an APSLMP issue. It is a management decision by DEC.*

Comment: In the case of Boreas Ponds, the basic proposal expressed by both UMP amendments is to open all the gates to maximize access to the roads south of the wilderness boundaries, and then photograph the resource impacts as they happen. This is not hyperbole, but an honest summation of a proposal that first appears on pages 46-47 of the High Peaks plan and is repeated several places elsewhere. The word “impact” appears 108 times in the course of the High Peaks plan’s 150 pages, but in every instance DEC does a conceptual dance around that word.

Response: *The Department is responsible for protecting the natural resources of each unit of public land it manages, and to allow reasonable public access when the natural resources can support it. Staff have determined that the use of the road network south of the Boreas Ponds does not currently lead to any significant adverse environmental impacts. Staff have also established a process of examining the public use of the areas in order to determine if there is a need to restrict future access.*

Comment: While the Department acknowledges that its actions will result in impacts to the resource, the UMP attempts to assure us that these are things to worry about in the future, not the present. The assumption is that the Boreas Ponds Tract is so new that we can’t know what the impacts will be, so it’s OK to start building things and then see what happens over time. Lest anyone concede the apparent wisdom of this line of reasoning, consider that DEC can trace its origins to the administration of Governor John A. Dix in 1911, meaning it was founded the year before the sinking of the Titanic. The Department therefore has 107 years of institutional experience to inform its stewardship decisions in matters like this, and therefore should have every ability to predict the outcome of its actions in the Forest Preserve. As members of a concerned citizenry, it is our role not to let DEC get away with playing dumb.

Response: *These UMP Amendments provide for initial access and connectivity within the unit and to the adjacent backcountry infrastructure. Without providing some basic access for usage, there won’t be any data to collect to address Carry Capacity needs. The physical infrastructure of the front country and backcountry facilities will be built with modern sustainable methods to help reduce impacts associated with use. If we can negate the physical impacts to the natural resource, we can better devote time to studying the intangible side of the carry capacity concept. Proposals in the UMP*

Amendments avoid all the pitfalls of subpar trail and campsite siting and construction. The Department intends to rely on its 107 years of experience to properly plan for resource protection while allowing a reasonable amount of public access. The determinations made by Department staff were not done in vacuum, and rely heavily on the collective years of experience in gauging what degree of public access were accommodated by similar units of lands. If you bring the commenter's premise – of not allowing any public access without knowing what the impacts are – to its logical end, it would lead the Department to conclude that no amount of access is reasonable on any newly acquired units of land.

Comment: DEC's proposal to allow public motorized access along the full length of the Wild Forest corridor can be nothing but harmful to the wilderness character of the area. Throughout the Adirondacks, dozens of lakes have been forever altered by the introduction of aquatic invasive species (AIS). The pattern of this distribution makes it clear that waterways with direct and easy access are most susceptible. Furthermore, AIS are most likely to take root in shallow waterbodies where the lake bottom receives direct sunlight—a description that applies to LaBier Flow and most of the Boreas Ponds. By contrast, remote lakes and ponds in the Adirondacks are largely free of AIS, due in large part to the difficulty of access.

Response: *The parking configuration proposed in these plans, including the proposal for CP-3 parking 580 feet from Boreas Ponds, has been determined to strike a balance between providing appropriate access to destinations within these two units for people of all abilities with appropriate protections of the lands and waters in the region. These proposals are supported by the underlying land classifications, the existing infrastructure, and the ability of the natural resources of the area to withstand the anticipated use of these facilities. Hand-carry vessels are a low risk of introducing AIS due to their lack of trailers and motors, and being clean, drained and dry.*

Comment: A proper management plan should include measures that will prevent the introduction of AIS to these waterways, rather than react to the AIS once they are discovered. Parking areas at LaBier Flow and near the Boreas Ponds dam will place these two ponds in direct threat, and once AIS is discovered in them there will be no resolution, since plants like Eurasian milfoil cannot be eradicated after it becomes established.

Response: *Hand-carry vessels are a low risk of introducing AIS due to their lack of trailers and motors, and being clean, drained and dry.*

Comment: A parallel argument can be made regarding the ponds' trout population and the potential for the illegal introduction of nonnative fish species. DEC can promulgate all the regulations in the world, but as long as parking exists adjacent to the water, the Department will be abdicating its ability to protect the ponds from intentional and careless introductions. Such concerns were raised by public comments during both the

land classification and UMP scoping process, but APA and DEC have shown no responsiveness.

Response: DEC will be continuing the baitfish prohibition in the High Peaks Wilderness Area in order to prevent the introduction of non-native species of fish.

Comment: The most effective means of protection for the ponds and their watershed is to limit public motorized access to them—a concept that the public has expressed a ready willingness to embrace. Specifically, we suggest that DEC restrict motorized access to the southern extent of the Boreas Ponds Tract and the so-called “Vanderwhacker Pond Triangle,” so that the general public is not permitted to drive anywhere near the ponds or any of the Value I wetlands. This includes gating Gulf Brook Road either at its beginning or at a point south of Wolf Pond Mountain.

Response: The parking configuration proposed in these plans, including the proposal for CP-3 parking 580 feet from Boreas Ponds, has been determined to strike a balance between providing appropriate access to destinations within these two units for people of all abilities with appropriate protections of the lands and waters in the region. These proposals are supported by the underlying land classifications, the existing infrastructure, and the ability of the natural resources of the area to withstand the anticipated use of these facilities.

Comment: Access Issues: The proposed construction of new public parking areas off of Rte. 73 in the eastern High Peaks and off of Rt. 3 in the western High Peaks are apparently being undertaken without any study of the capacity of the interior Wilderness resource to withstand the increased public use made possible by the new parking areas (pages 67-69, HPW UMP amendment). That analysis is required under the 1999 High Peaks UMP. Proposed actions for two 20-car lots south of the current Ridge Trail parking off Rt. 73, 25-car capacity for the Round Pond trailhead off Rt. 73, and a 15-car lot off Rt. 3 to access Ampersand Mountain should not be undertaken in the absence of the analysis required by the current UMP.

Response: None of these proposals add additional parking capacity, they simply move parking facilities to safer locations.

Comment: DEC is still obligated by the existing UMP to assess, analyze and match new peripheral parking proposals to the ability of interior Wilderness resources to sustain the levels of public use associated with new parking areas.

Response: The parking configuration proposed in these plans, including the proposal for CP-3 parking 580 feet from Boreas Ponds, has been determined to strike a balance between providing appropriate access to destinations within these two units for people of all abilities with appropriate protections of the lands and waters in the region. These proposals are supported by the underlying land classifications, the existing infrastructure, and the ability of the natural resources of the area to withstand the anticipated use of these facilities.

Comment: Motorized Access to Boreas Ponds and High Peaks Wilderness from Vanderhacker Wild Forest: The SLMP specifically mandates that “public use of motor vehicles will not be encouraged and there will not be any material increase in the mileage of roads...open to motorized use by the public in wild forest areas” than were present when the Master Plan was adopted in 1972.

Response: *The Department believes there has not been a material increase in the miles of roads open to public motor vehicles in wild forest areas since 1972. The Department and the Agency are engaged in a process that will lead to an Agency APSLMP interpretation regarding road mileage in Wild Forest Areas of the Forest Preserve. This interpretation, once made, will apply to all Wild Forest UMPs.*

Comment: Public and administrative use of motor vehicles is definitely and impermissibly being encouraged by these amendments at Boreas Ponds and at the McIntyre tracts. By our count, sixteen (16) new parking areas are proposed in these areas in the absence of any assessment of the potential impact of the proposed public motorized uses on wilderness resources. Nor has DEC evaluated the impacts of a many additional parking areas on already impacted parts of the HPW in contravention of the SLMP’s requirement that DEC give “special attention on those portions of the area threatened by overuse” (SLMP, pages 7-9). Of particular concerns is that six of the new parking lots in the Vanderhacker Wild Forest are proposed just for the Boreas Ponds alone. Added to the two current parking areas, that makes eight parking areas with more than a 100- car capacity. The parking area and motorized access to within 500 feet away from the Ponds is proposed without any assessment of how this and the day use facility will impact the Ponds, including the disposal of human trash and human waste, the potential for introduction of invasive aquatic and terrestrial plant species, and the degradation of Wilderness values including the opportunity to experience solitude and an unconfined, primitive wilderness experience.

Response: *The parking configuration proposed in these plans, including the proposal for CP-3 parking 580 feet from Boreas Ponds, has been determined to strike a balance between providing appropriate access to destinations within these two units for people of all abilities with appropriate protections of the lands and waters in the region. These proposals are supported by the underlying land classifications, the existing infrastructure, and the ability of the natural resources of the area to withstand the anticipated use of these facilities.*

Comment: Where warranted by natural resource considerations the DEC is specifically authorized by the Master Plan to manage the Boreas Ponds in ways more protective than the Wild Forest classification of the roads. The Wild Forest classification of the roads makes motorized access along the entire length of Gulf Brook Road a legal option; it does not require it if remarkable and fragile resources demand more protection. And they do exist. As APA staff said during the classification discussion at the February 2018 APA meeting, “the ecological values of the Boreas Ponds cannot be overstated.”

Response: The parking configuration proposed in these plans, including the proposal for CP-3 parking 580 feet from Boreas Ponds, has been determined to strike a balance between providing appropriate access to destinations within these two units for people of all abilities with appropriate protections of the lands and waters in the region. These proposals are supported by the underlying land classifications, the existing infrastructure, and the ability of the natural resources of the area to withstand the anticipated use of these facilities.

Comment: Accordingly, DEC should not open the Gulf Brook Road to motorized access beyond the current Fly Pond Parking area unless and until the requisite environmental impact, ecological site evaluations and wild lands enforcement and monitoring procedures are fully in place utilizing carrying capacity and LAC studies with full stakeholder involvement. The closer mechanized uses get to the wetlands and the Ponds, the greater the ecological risks of bringing invasive species, trash, noise, pets and other intrusions into this classified Wilderness.

Response: The parking configuration proposed in these plans, including the proposal for CP-3 parking 580 feet from Boreas Ponds, are supported by the underlying land classifications, the existing infrastructure, and the ability of the natural resources of the area to withstand the anticipated use of these facilities.

Comment: The one mile of Boreas Ponds Road leading to the Ponds should be gated to public motorized traffic, including snowmobiles, and improved as necessary to allow wheelchair access for those persons with disabilities requiring such access. The Boreas Road should be viewed, treated and managed as an accessible trail which invites tranquil, quiet walking/hiking, wheeling of boats or wheelchair use to reach the Boreas Ponds.

Response: The Boreas Road between the Four Corners and the Boreas Ponds Primitive Area will be gated near the Four Corners and general access will be kept at the Four Corners Parking Area. This section of road is not compliant to current accessibility standards, so a new trail would need to be constructed between the Four Corners and the Boreas Ponds in order to construct truly accessible access. Snowmobiles will not be allowed beyond the gate.

Comment: We also urge DEC to establish a permit reservation system for all access to the Boreas Ponds.

Response: DEC is currently engaged in an open and transparent process with numerous stakeholders to examine the issues associated with overuse. What the most effective and appropriate management tools for different overuse challenges, including consideration of a permit system where and when it might be necessary, and the timing for the implementation of such tools are being assessed as part of a public process.

Comment: A permit system through Reserve America should be established now for all hikers, paddlers and day use visitors to the Ponds – before overuse begins to cause

serious and perhaps irreversible damage to the sensitive and unique resources of the Boreas Ponds ecosystem.

Response: DEC is currently engaged in an open and transparent process with numerous stakeholders to examine the issues associated with overuse. What the most effective and appropriate management tools for different overuse challenges, including consideration of a permit system where and when it might be necessary, and the timing for the implementation of such tools are being assessed as part of a public process.

Comment: The only exception to the continued interim management on access should be some level of appropriate CP-3 access. Parking and motorized access for the able-bodied should end at the existing Fly Pond parking area. We note that the draft amendments allow both the able-bodied and persons with disabilities to drive to within 500 feet of the Ponds and to compete for parking there. This violates CP-3, which provides that roads in Wild Forest can be opened to motorized use by permit exclusively for persons with disabilities.

Response: The parking configuration proposed in these plans, including the proposal for CP-3 parking 580 feet from Boreas Ponds, is supported by the underlying land classifications, the existing infrastructure, and the ability of the natural resources of the area to withstand the anticipated use of these facilities. The department does not feel this proposal violates the existing CP-3 policy.

Comment: The public motorized traffic from Four Corners to the Ponds authorized by this draft amendment also violates State Land Master Plan guidelines for Wilderness areas. The SLMP permits, where necessary, certain recreational uses within 500 feet of where a Wilderness boundary intercepts a highway, such as where Gulf Brook Road meets the Boreas Road at Four Corners. Public motorized uses penetrating one mile into a Wilderness area are not among those listed uses, and is therefore prohibited by the Master Plan.

Response: There is not motorized use proposed in lands classified as Wilderness in these plans. Motorized use will be contained in the Wild Forest corridor that extends north from the 4 corners and stops before Boreas Ponds.

Comment: Vanderwhacker Wild Forest should serve as a connecting buffer to protect the interior Boreas Ponds and HPW. The amendments, instead, largely treat these as disconnected units, bounded sharply by allowed recreational uses, without respect to “a place where the land’s primeval character and influence are retained and natural processes are allowed to operate freely...where humans are visitors and the imprint of their work is substantially unnoticeable...and a place with outstanding opportunities for solitude or a primitive and unconfined type of recreation” (HPW UMP, page 3).

Response: These Amendments were developed together as a complex in order to fully capture how they naturally fit together and how the proposals complement one another.

Comment: 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.

Response: *The parking configuration proposed in these plans, including the proposal for CP-3 parking 580 feet from Boreas Ponds, has been determined to strike a balance between providing appropriate access to destinations within these two units for people of all abilities with appropriate protections of the lands and waters in the region. These proposals are supported by the underlying land classifications, the existing infrastructure, and the ability of the natural resources of the area to withstand the anticipated use of these facilities.*

Comment: 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.

Response: *One of the preferred alternatives for the management of the historic cabin is for maintenance and administrative use, which could be used to administer the gate and permit system. Specific staffing proposals are beyond the scope of a UMP Amendment.*

Comment: 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.

Response: *The parking configuration proposed in these plans, including the proposal for CP-3 parking 580 feet from Boreas Ponds, is supported by the underlying land classifications, the existing infrastructure, and the ability of the natural resources of the area to withstand the anticipated use of these facilities.*

Comment: 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-comers" if any public vehicles use is allowed in the Wild Forest corridor.

Response: The parking configuration proposed in these plans, including the proposal for CP-3 parking 580 feet from Boreas Ponds, is supported by the underlying land classifications, the existing infrastructure, and the ability of the natural resources of the area to withstand the anticipated use of these facilities.

Comment: 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.

Response: The Department believes there has not been a material increase in the miles of roads open to public motor vehicles in wild forest areas since 1972. The Department and the Agency are engaged in a process that will lead to an Agency APSLMP interpretation regarding road mileage in Wild Forest Areas of the Forest Preserve. This interpretation, once made, will apply to all Wild Forest UMPs.

Comment: One of the best examples of how the new High Peaks UMP will almost certainly have unintended consequences can be found on pages 68 and 69, where a proposal to construct three new parking areas with a combined capacity of 65 cars near Chapel Pond is outlined. Obviously, the goal is to improve the safety of the area, which is the trailhead for Dix Mountain, Giant Mountain, and numerous climbing routes. The area attracts dozens of cars every weekend, all of them parked along the side of NY 73—one of the busiest highways in the region. At first glance, this would resolve a troubling public safety issue by providing a place for hikers and climbers to park off the main highway. However, the UMP cannot guarantee what will happen to the old

roadside parking areas. If the new parking lots are built before confirming anyone has the authority or wherewithal to close the old ones, then DEC will merely be building additional capacity to further overload the trails. People will continue to use the old parking areas after the new ones fill up, thus failing to resolve the safety issue while directly contributing to the overuse issue.

Response: *The UMP is not able to dictate management on RT 73. DEC will be working with DOT, local government and stakeholders to time the development of the parking lot construction and any restrictions on roadside parking. It will be important that this process be paired with an extensive public outreach effort and will need all parties to commit to helping ensure a successful implementation of this vision.*

Comment: However, how are the parking restrictions on Route 73 going to be addressed.

Response: *DEC will work with partner agencies, local government and stakeholders to provide education and outreach concerning changes along Rt 73.*

Comment: The option of providing an off-road parking area just a few hundred yards to the west of the existing trailhead, but located on the state lands operated by ORDA should be considered. There is an existing flat wide shelf of about 100yards just to the south of the pull off on Rt 73, with good visibility for entering and exiting traffic (see map below).

Response: *Noted.*

Comment: An off-road parking area would address the very unsafe conditions of parking along the shoulders of the road. If parking was also restricted along Rt 73, the parking area could be designed to accommodate the number of cars consistent with a determined carrying capacity for hiker use on Cascade. This area would also require only a minimal reroute of the base of the Cascade Trail, and a section of the ORDA XC-Ski trail.

Response: *Noted.*

Comment: State agencies need to develop a plan for public parking along the Route 73 corridor and Adirondack Loj Road that is based on the carrying capacity of associated High Peaks and natural resource protection.

Response: *DEC will be working with a diverse group of stakeholders in furthering the discussion of overuse along this corridor. Development and implementation of the Wildland Monitoring Plan will assist this group in making informed decisions.*

Comment: PROTECT supports use of the Gulf Brook Road as a public motor vehicle road in a Wild Forest area on the Forest Preserve. This road will provide public access to the Boreas Ponds as well as to hiking trails that access the High Peaks Wilderness.

We note that that the retention of this road was a centerpiece of the historic compromise that saw the Boreas Ponds classified.

Response: Thank you for your support of this proposal.

Comment: Regarding the proposals for the Cascade Trail reroute, a number of questions remain. First, DEC doesn't provide an analysis of alternatives. The 1999 UMP proposed a 50-car parking lot that would be sited on the Intensive Use Area, but off of Route 73 and close to the current trailhead. Why was this recommendation deemed inappropriate now? Why wasn't it ever implemented?

Response: The preliminary discussions following the 1999 UMP weren't fruitful. When weighing all the benefits of the current proposal, it is clear that this option will be a net benefit to the users of the High Peaks Wilderness. Aside from providing safe parking off the highway the current proposal's biggest benefit it is the education and outreach efforts at the trailhead facility, within the Mt. Van Hoevenberg Intensive Use Area. This facility will allow DEC to provide education and outreach through face to face interactions and utilizing onsite technology to elevate the overall awareness and preparedness of the users. The trail experience will be different, not only in length but one which is not as steep and users can choose to divert up Mt. Van Hoevenberg to take in the southerly view of the High Peaks Wilderness.

Comment: UMP amendment does not clearly define the route through the Mount Van Hoevenberg ski trail network. This creates concern that there will be a significant potential for conflicts between skiers and people snowshoeing up Cascade in the winter. Furthermore, there is no analysis of parking lot capacity in the wintertime at the Mount Van Hoevenberg facility, nor of how the addition of hiking traffic will impact that capacity.

Response: The exact route through the intensive use area is dependent on the placement of the proposed World Cup Ski loops that are proposed in the Intensive Use area. DEC and ORDA are committed to providing a world class sustainable trail that doesn't co-align with any of the Intensive Use Ski Trails.

Comment: Without a significant and perpetual enforcement effort at the existing Cascade Mountain trailhead on Route 73, what will prevent people from using the old route? The experimental trail relocation in October 2017 required uniformed DEC personnel to physically enforce the closure of the old trail and direct hikers to the temporary trailhead. It should be abundantly obvious that such enforcement was a one-off event.

Response: DEC will completely close down the existing trail once the new trail is built. This will include mitigating compaction of the old trail tread and an extensive amount of brushing in of the trail corridor to make following the trail very difficult. Hikers who park appropriately could still bushwhack from this area, but the new trail will be the focus point for those who are new to the area.

Comment: The solution to parking issues in the High Peaks region goes far beyond simply building bigger parking areas. There is some wisdom to building better, safer, and more strategically located trailhead facilities throughout the Route 73 corridor, but without simultaneously enforcing the closure of the roadside parking areas DEC's actions will inevitably result in increased backcountry impacts and no reduction of the safety issues. And since DEC lacks the authority or capacity to address parking on the shoulder of a state highway, it is unacceptable to propose such un-vetted solutions in this UMP amendment.

Response: *By itself the DEC cannot facilitate the changes proposed, however working with the NYS DOT, other partner agencies, local government and stakeholders the DEC is seeking to provide an alternative to the status quo to help improve the overall experience of the visitors and users along Rt. 73.*

Comment: Bigger parking lots do not solve the overuse problem - they exacerbate it.

Response: *DEC is not proposing to build any large parking lots in the UMP Amendments. Proposals along Rt. 73 do not increase the formal parking capacity from what is available right now.*

Comment: look at how the new Adirondack Loj No Parking signs work at keeping the road safe, while also helping to keep maximum use at a limit due to parking capacity. It should be attempted before trees are cut to build lots the resource doesn't need.

Response: *Noted.*

Comment: If new lots are built, no parking signs must be put up to limit overuse. Once the lots fill, what do you think will happen? The answer; the SAME roadside parking.

Response: *All the parking lot proposals in the UMP Amendments rely on working with partners to ensure that parking is limited to the formal parking facility at each location.*

Comment: The existing Cascade 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.

Response: *There will be 2 parking lots left to provide access for Pitchoff and winter access to climbers going to Cascade Falls on the west end of Cascade Lake.*

Comment: 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.

Response: Thank you for your support on this proposal.

Comment: Trailhead parking at Upper Works addresses a clear need for parking at a remote access area that has been underserved for years.

Response: Thank you for your support on this proposal.

Snowmobile Trails

Comment: Place a snowmobile trail within the Blue Ridge Road right-of-way.

Response: There are several areas of steep terrain and private lands that make following the road corridor difficult. The proximity of the trail directly adjacent to the road diminishes user experience and raises safety concerns for all user groups that will use the trail.

Comment: As snowmobile trail along the south side of Blue Ridge Road will alert drivers to crossing wildlife, permit more sunlight to strike the roadway, require less road salt, and create a safer travel corridor.

Response: Despite the other advantages of utilizing the road shoulder, one of the Department's primary objectives in siting snowmobile trails is the minimal overlap with other motorized uses to increase user safety and enjoyment of the trails.

Comment: No study about intended use of proposed class 2 trail system exists for Newcomb to north Hudson. No trail should be built without feasibility study.

Response: An analysis of need for all community connector trails was conducted in the 2006 Snowmobile Plan for the Adirondack Park. Additional site-specific analysis, as well as a discussion about intended uses of the trail, was conducted in the 2015 Community Connector Trail Plan for the Towns of Newcomb, North Hudson, and Minerva.

Comment: Amendments will create an attractive snowmobile experience for those who visit the Newcomb, Minerva, north Hudson area of the ADK park.

Response: Noted.

Comment: To minimize the negative impact of snowmobiles, I favor routing the Newcomb-to-North River snowmobile corridor close to the public highway at Boreas Road, in accordance with Alternative A in the Vanderwhacker Mountain UMP. This satisfies the state's goal to keep community connector snowmobile trails near the periphery of the Forest Preserve.

Response: There are numerous terrain and wetland challenges with using Alternative A described in the 2015 Community Connector Trail Plan. Snowmobile trail construction and maintenance along Alternative A will be difficult for long term sustainability, and this is true to a greater extent when considering other multiple users of the trail. Due to private land restrictions, the trail would have to remain along the side of the highway for extended periods which decreases user enjoyment and brings about safety concerns for all user groups. Alternative B (involving the Gulf Brook Road) provides the ability to

construct the most sustainable trail possible while maximizing user experience and safety.

Comment: Community Connector Trail Plan proposal - It is clear that this section was drafted some time ago and well before the transfer of the property from the Nature Conservancy to New York State. Public snowmobile access on the Boreas Pond Road and the Gulf Brook Road will be disruptive to wildlife and the resource in general. It will also likely result in some individuals continuing on their snowmobiles to the Boreas Ponds themselves. DEC rangers will be challenged to prevent this as they are already stretched thin. In addition, the use of these road by both skiers and snowmobilers is not compatible and may result in collisions and injury. An alternative for the community connector trail closer to Blue Ridge Road should be considered.

Response: *There are numerous terrain and wetland challenges with using Alternative A described in the 2015 Community Connector Trail Plan. Snowmobile trail construction and maintenance along Alternative A will be difficult for long term sustainability, and this is true to a greater extent when considering other multiple users of the trail. Due to private land restrictions, the trail would have to remain along the side of the highway for extended periods which decreases user enjoyment and brings about safety concerns for all user groups. Alternative B (involving the Gulf Brook Road) provides the ability to construct the most sustainable trail possible while maximizing user experience and safety. Additionally, the access along the Wild Forest corridor to the north will be gated and snowmobiling will not be allowed. One of the proposals outlined in the Amendment is to construct a non-motorized alternative to Boreas Ponds which will relieve user conflicts between snowmobilers and skiers.*

Comment: Class II community connector snowmobile trails violate the State Land Master Plan and "forever wild" provision of the State Constitution. There should be no class II trails built in this Wild Forest area.

Response: *Class II snowmobile trails are a compliant facility in accordance with the NYS Constitution and the APSLMP.*

Comment: ADK does not support the proposed snowmobile trail that is defined in the VMWF UMP. ADK believes that several routes along the Blue Ridge Highway, alternatives A and D discussed in DEC's 2015 Community Connector Plan (CCP) (see map below from CCP Appendix 5)⁶ would require fewer trees to be cut than alternatives B and C. Alternatives B and C would require building a new trail from the west end of the Gulf Brook-Boreas Road south route across the trailless triangle of the Vanderwhacker Mountain Wild Forest and potentially compromise remote wildlife habitats and wetland areas around Vanderwhacker Pond. Alternative A would require the least amount of new tree cutting.

Response: *There are numerous terrain and wetland challenges with using Alternative A and D. Snowmobile trail construction and maintenance along Alternative A and D will be difficult for long term sustainability, and this is true to a greater extent when considering*

other multiple users of the trail. As outlined in the Management Guidance, a balance between tree cutting, rock removals and terrain modifications must be met. Due to private land restrictions, the trail would have to remain along the side of the highway for extended periods which decreases user enjoyment and brings about safety concerns for all user groups. Alternative B (involving the Gulf Brook Road) provides the ability to construct the most sustainable trail possible while maximizing user experience and safety.

Comment: No Community Connector Snowmobile Trails should be built in this region. The wilderness management of the Boreas Ponds should take into consideration the noise pollution impacts of snowmobiles, and the importance of maintaining solitude in wilderness areas.

Response: *The proposed Community Connection was selected after careful consideration by the Department on how best to balance access to these lands and waters by a broad cross-section of the recreating public.*

Comment: Snowmobilers travel across the country for snowmobile opportunities and this would make an attractive destination for snowmobilers to travel to from not only the local area, but from the state of New York and other neighboring states.

Response: *Noted.*

Comment: We believe it is extremely important and advantageous to allow snowmobile use on the Gulf Brook Road and Boreas Pond Road. This would maximize the use of the existing road infrastructure and would only require a single 4-mile trail be designed and constructed to connect to the Newcomb and Minerva area of the Adirondack Park.

Response: *Noted.*

Comment: We would also suggest that snowmobile use be allowed east on Boreas Road to the primitive land boundary. It would make perfect sense to allow snowmobile use, similar to other motor vehicle use that is currently allowed in this area.

Response: *There is not a destination or view at the end of the Wild Forest corridor, just a small parking area. A trail to this area does not have a benefit to the snowmobile plan.*

Comment: No Community Connector Snowmobile Trails should be built in this region. The wilderness management of the Boreas Ponds should take into consideration the noise pollution impacts of snowmobiles, and the importance of maintaining solitude in wilderness areas.

Response: *The 2006 Snowmobile Plan for the Adirondack Park outlines objectives.*

Comment: Route the Newcomb-to-North River snowmobile corridor close to the public highway at Boreas Road, in accordance with Alternative A in the Vanderwhacker

Mountain UMP. This satisfies the state's goal to keep community connector snowmobile trails near the periphery of the Forest Preserve, and it involves less trail construction than Alternative B, the state's preferred option.

Response: There are numerous terrain and wetland challenges with using Alternative A described in the 2015 Community Connector Trail Plan. Snowmobile trail construction and maintenance along Alternative A will be difficult for long term sustainability, and this is true to a greater extent when considering other multiple users of the trail. Due to private land restrictions, the trail would have to remain along the side of the highway for extended periods which decreases user enjoyment and brings about safety concerns for all user groups. Alternative B provides the ability to construct the most sustainable trail possible while maximizing user experience and safety.

Comment: The American Council of Snowmobile Associations, in conjunction with the New York State Snowmobile Association is in agreement that the proposed snowmobile trails plan as outlined in the UMP Amendment is consistent with the State Land Management Plan due to the consistency of the land classification and the minimization of new trail construction. Snowmobile use will only have positive impacts on the local area, from environmental to economics.

Response: Noted.

Comment: The Newcomb-to-North River snowmobile corridor should be routed close to the public highway at Boreas Road, in accordance with Alternative A in the Vanderwhacker Mountain UMP. This satisfies the state's goal to keep community connector snowmobile trails near the periphery of the Forest Preserve, and it involves less trail construction than Alternative B, the state's preferred option. The passage of the Health and Safety Land Bank Amendment in 2017 should open opportunities to site the trail within an expanded highway corridor, thus sidestepping all Forest Preserve management restrictions.

Response: There are numerous terrain and wetland challenges with using Alternative A described in the 2015 Community Connector Trail Plan. Snowmobile trail construction and maintenance along Alternative A will be difficult for long term sustainability, and this is true to a greater extent when considering other multiple users of the trail. Due to private land restrictions, the trail would have to remain along the side of the highway for extended periods which decreases user enjoyment and brings about safety concerns for all user groups. Alternative B provides the ability to construct the most sustainable trail possible while maximizing user experience and safety.

Comment: P.88 – Proper trail design and siting will be necessary to make the Newcomb to North Hudson Community Connector Trail attractive as a multiple-use trail. The section from Blue Ridge Rd to Four Corners will provide cyclists an off-road alternative to access the Boreas Ponds without using Gulf Brook Rd where motor vehicles are allowed.

Response: *Noted.*

Comment: Disappointed snowmobilers can't go up the Wild Forest Corridor toward the dam for a view.

Response: *Snowmobilers can still access the dam by foot, but the use of snowmobiles will be prohibited beyond the four corners.*

Comment: The preferred snowmobile community connector trail between Newcomb and North Hudson is now proposed to go from the Roosevelt truck trail north to the Boreas Road, and then over to the Gulf Brook Road, and then to connect to the Blue Ridge highway. However, as far as we know DEC lacks agreements with private landowners on the Blue Ridge highway needed to make the actual connection to North Hudson. DEC and APA should not approve a preferred community connector snowmobile trail without having private landowner agreements and rights-of-way in hand, or this proposed connector begins and ends at the same public highway in contradiction to the goals and objectives of the Comprehensive Adirondack Park Snowmobile Plan.

Response: *Other than the crossing of Blue Ridge Road, the connection described above that connects Roosevelt Truck Trail to the Blue Ridge Road on the southern end of Gulf Brook Road lies completely within Forest Preserve.*

Comment: Despite the Wilderness classification of over 11,000 acres of the Boreas Ponds tract, DEC is proposing new snowmobile access within close proximity to the HPW without any analysis of the potential noise and air pollution impacts to the Boreas Ponds addition to the HPW and the pre-existing HPW.

Response: *Snowmobile access along the route will be at least 500 feet from the Wilderness Boundary at all points.*

Comment: In fact, the draft amendment's proposed snowmobile uses map shows snowmobiles driving right to the Boreas Ponds dam and the Wilderness boundary, causing obvious noise pollution impacts directly upon the quiet winter solitude at this sensitive wilderness boundary.

Response: *The description in both the Draft and Final Amendment outlines the trail location, neither of which include snowmobiling along the Wild Forest corridor between the Four Corners and the Boreas Ponds Primitive Area. An error in initial mapping did show this route as open, but it is corrected in the Final Amendment.*

Comment: The Final Programmatic Environmental Impact Statement supporting the Master Plan states that such impacts are unacceptable and unlawful at a Wilderness boundary:

"The Wilderness, Primitive and Canoe classifications generally prohibit the use of motor vehicles, motorized equipment and aircraft. Any amendment to the Plan which would

sanction such uses in these areas would severely diminish the Primitive character of those lands and should not be proposed. Noise intrusion is only one component of an area's character. The mere knowledge that motorized access is permissible diminishes an area's sense of remoteness." (FPEIS, Impact of Proposed Guidelines on Area Character and Landscape Quality, page 35, emphasis added.)

Thus, it is clear that DEC cannot lawfully allow snowmobiling or other motorized uses up to or near the Boreas Ponds Wilderness boundary. Furthermore, DEC's proposal to allow snowmobiling up to the Wilderness boundary without analysis of the potential impacts from noise and air pollution violates SEQRA.

Response: Snowmobile access along the route will be at least 500 feet from the Wilderness Boundary at all points.

Comment: Construction of class II community connector trails requires extensive construction and terrain modifications to facilitate large bulldozer size groomers and high-speed snowmobiling. These trails require extensive use of heavy machinery to excavate, widen, grade and cut bench cuts into trails. These machines remove all understory, require extensive tree cutting of trees over 3" diameter at breast height (DBH), and require the removal of thousands of trees less than 3" DBH. These road-like "trails" require oversized bridges as well as extensive use of deep waterbars to control storm water impacts from open roadway conditions and sharply reduced forest cover. These 9-12 foot wide trails, which are very often wider, are clear cuts that snake through the Forest Preserve for miles. PROTECT finds that these trails are the most intensive and damaging types of trails built in the Forest Preserve today.

Response: Noted.

Comment: Why is Community Connector Class II Snowmobile Trail Building Accelerating as Winter Weather Declines Due to Climate Change?

Response: Snowmobiling has been, and will continue to be, an important recreational opportunity to the State of New York. The Department has the responsibility to take into consideration any changes in the environmental setting when making determinations on the appropriateness of public recreational opportunities.

Comment: PROTECT questions whether the APA and DEC should be investing in an extensive new class II snowmobile trail system in light of global climate change. In the year 2018, we now live in an Adirondack Park where it's as likely to rain in winter months as it is to snow. We live in a part of the world that receives 30 percent more rain than it did thirty years ago. Winter months show greater warming trends than summer months. The future will bring inconsistent snowmobile seasons at best, which is already borne out in the marketplace by declining snowmobile sales.

Response: Noted.

Comment: Comment: PROTECT is puzzled how the two lead agencies for environmental issues in New York State can make major policy decisions as well as major financial decisions without taking into account the effects of long-term trends of global climate change on the Adirondack Park.

Response: *Noted.*

Comment: PROTECT Predicts APA and DEC will Transform Snowmobile Trail Network to ATV Trail Network as Reliable Snowfall Wanes

Response: *Public use of ATV's is not allowed on trails pursuant to the APSLMP.*

Comment: PROTECT predicts that the APA and DEC someday will issue a new "Guidance" to convert intermittently snowless community connector class II snowmobile trails into community connector all-terrain vehicle trails. As snowmobiling wanes, we have no confidence that these agencies will withstand pressure to unleash vast ATV networks across the Forest Preserve on the road like class II trail system. The damage from ATV trails networks to the Forest Preserve will be vast and unrelenting as we already have seen in areas such as the Shaker Mountain Wild Forest where DEC has been unable to control illegal ATV abuse. We expect to hear the same arguments, justifications, and obfuscations that the DEC and APA used to build a community connector class II snowmobile trail system being used to create a new ATV "trail" system on the Forest Preserve.

Response: *Impacts from the public use of ATVs are different than the use of snowmobiles. Snowmobiles are used when the ground is frozen and snow covered which then limits the impact to the ground and other terrain features. Snowmobiles typically require groomed trails so natural resources off-trail are protected. In contrast, ATVs can cause advanced trail degradation, particularly when conditions are warm and wet, and they are able to have far greater access to off-trail areas due to the nature of their operational use.*

Comment: Class II Community Connector Snowmobile Trails Violate the State Constitution.

Response: *Whether Class II Community Connector Snowmobile Trails violate the New York State Constitution is for a court of law to decide. Accordingly, the Department will not provide a response to this comment.*

Comment: Class II trails are designed and built for snowmobiles to travel 25 miles per hour or higher and are groomed with large tracked groomers. No other recreational use in the Forest Preserve requires 9-11 foot wide trails, specifically designed and constructed to allow regular grooming with large multi-ton motor vehicles and used by high-speed motor vehicles. Unlike other trails built by hand, these trails are excavated with heavy machinery, utilize extensive bench cutting, remove thousands of trees over 3 inches diameter at breast height (DBH), remove tens of thousands of trees under 3

inches DBH, remove the entire native understory, often replace the native understory with a grass mix, open the forest canopy, often fracture and chip away bedrock, utilize oversized bridges often equipped with reflectors, and are built to handle operation of motor vehicles. No other recreation- al activity in the Forest Preserve, outside of Intensive Use Areas, requires such profound terrain alteration and destruction to accommodate recreational use. For all of these reasons, class II trails violate the Article XIV, the forever wild provision, of the State Constitution.

Response: See above response.

Comment: Community Connector Class II Snowmobile Trail Construction Violates the Adirondack Park State Land Master Plan. The SLMP defines a snowmobile trail as “a marked trail of essentially the same character as a foot trail” and mandates that it be “compatible with the wild forest character of an area.” The SLMP goes on the state that a snowmobile trail “should be designed and located in a manner than will not adversely affect adjoining private landowners or the wild forest atmosphere...” There is no way that class II community connector snowmobile trails bear any rational resemblance to something having the “character of a foot trail” or is consistent with “wild forest atmosphere.”

Response: The 2009 Management Guidance: Snowmobile Trail Siting, Construction and Maintenance on Forest Preserve Lands in the Adirondack Park was determined by APA to be in compliance with the APSLMP.

Comment: A “foot trail” is where people walk single file. Foot trails are narrow and built to go over and in between roots and rocks and around trees. Foot trail surfaces are uneven and follows the terrain. Few trees are cut down for foot trails and there are scarcely any stumps of cut trees. Vegetation on the trail side encroaches, and the trail is canopy covered. Steppingstones and split logs are commonly used to pass over streams and wet areas. There are no reflectors and grass is scarce.

Response: Noted.

Comment: For all practical purposes, class II community connector trails resemble roads much more than foot trails.

Response: The 2009 Management Guidance: Snowmobile Trail Siting, Construction and Maintenance on Forest Preserve Lands in the Adirondack Park outlines the process for constructing and maintaining snowmobile trails. The document also describes how snowmobile trails will have generally the character of a foot trail.

Comment: APSLMP Wild Forest Basic Guideline 4 states “Public use of motor vehicles will not be encouraged and there will not be any material increase in the mileage of roads and snowmobile trails open to motorized use by the public in wild forest areas that conformed to the master plan at the time of its original adoption in 1972.” The construction class II trails across the Forest Preserve has greatly encourage motor

vehicle use on the Forest Preserve. Class II trails violate the SLMP in this way.

Response: The approval of this UMP amendment would put the Park-wide total for snowmobile trails at 803.91. Anything below the mileage of 848.88 is not considered to be a material increase in the mileage of snowmobile trails since 1972.

Comment: PROTECT has identified many other areas of the SLMP that are expressly violated by the design and construction of class II community connector snowmobile trails by their construction, intended use, and by grooming with large tracked (motor vehicle) groomers. These include: Basic Guideline 2 (Motor Vehicles, Motorized Equipment and Aircraft) states that public access accommodations should be “consistent with the wild forest character.” PROTECT does not believe that the new road-like class II trails are consistent with the wild forest character. The trails’ width, bridges, reflectors, bench cuts, ledge cuts, use of gravel and straw, extensive surface alteration, tree cutting, stumps, and removal of trees and rocks are all inconsistent with the “wild forest character” of this area.

Response: The 2009 Management Guidance: Snowmobile Trail Siting, Construction and Maintenance on Forest Preserve Lands in the Adirondack Park was determined by APA to be in compliance with the APSLMP.

Comment: Basic Guideline 2 (Motor Vehicles, Motorized Equipment and Aircraft) states “All conforming structures and improvements will be designed and located so as to blend with the surrounding environment and require only minimal maintenance.” PROTECT does not believe that the new road-like class II snowmobile trails meets the “minimal maintenance” test. DEC and the APA claim that the grooming of this trail network is maintenance. Class II trails cannot be used without grooming. These trails see grooming multiple times per day on weekends. How can a trail that requires grooming in order to be operable meet the “minimal maintenance” test?

Response: The 2009 Management Guidance: Snowmobile Trail Siting, Construction and Maintenance on Forest Preserve Lands in the Adirondack Park was determined by APA to be in compliance with the APSLMP.

Comment: Basic Guideline 2 (Motor Vehicles, Motorized Equipment and Aircraft) states “All management and administrative actions and interior facilities in wild forest areas will be designed to emphasize the self-sufficiency of the user to assume a high degree of responsibility for environmentally sound use of such areas for his or her own health, safety and welfare.” Leaving aside concerns of snowmobile “environmentally sound use” with their mileage rates less than most SUVs, PROTECT questions the “self-sufficiency” of the users of class II snowmobile trails because the principal recreational use of snowmobiling can only be accomplished if the trail has been regularly groomed by a multi-ton tracked groomer.

Response: The 2009 Management Guidance: Snowmobile Trail Siting, Construction and Maintenance on Forest Preserve Lands in the Adirondack Park was determined by

APA to be in compliance with the APSLMP.

Comment: Basic Guideline 2 (Structures and Improvements 1C) states that snowmobile trails are allowed in Wild Forest areas and “their maintenance, rehabilitation and construction” is allowable by “snowmobiles on snowmobile trails.” There is a major point here where the DEC and APA brazenly violate the SLMP. The use of a large multi-ton groomer on a class II trail changes everything. This is the key fact obfuscated by APA and DEC in the Guidance. The snowpack on a class II snowmobile trail is groomed by large tracked groomers, not the trail surface. Hence this is not trail

Response: *The 2009 Management Guidance: Snowmobile Trail Siting, Construction and Maintenance on Forest Preserve Lands in the Adirondack Park was determined by APA to be in compliance with the APSLMP.*

Comment: 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.

Response: *The 2015 Community Connector Trail Plan outlined the various alternatives for the trail location. None of the rejected alternatives were as sustainable as the preferred alternative selected in the 2018 Amendment.*

Comment: 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.

Response: *There are numerous terrain and wetland challenges with using Alternative A described in the 2015 Community Connector Trail Plan. Snowmobile trail construction and maintenance along Alternative A will be difficult for long term sustainability, and this is true to a greater extent when considering other multiple users of the trail. Due to private land restrictions, the trail would have to remain along the side of the highway for extended periods which decreases user enjoyment and brings about safety concerns for all user groups. Alternative B provides the ability to construct the most sustainable trail possible while maximizing user experience and safety.*

Comment: 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.

Response: *Other more southern routes were scouted and all were found to have major wetland and terrain constraints.*

Comment: Snowmobiles have tough regulations on noise than any other register vehicle.

Response: *Noted.*

Comment: Snowmobiles have never been quieter.

Response: *Noted.*

Comment: Route the Newcomb-to-North River snowmobile corridor close to the public highway at Boreas Road, in accordance with Alternative A in the Vanderwhacker Mountain UMP. This satisfies the state's goal to keep community connector snowmobile trails near the periphery of the Forest Preserve, and it involves less trail construction than Alternative B, the state's preferred option.

Response: *There are numerous terrain and wetland challenges with using Alternative A described in the 2015 Community Connector Trail Plan. Snowmobile trail construction and maintenance along Alternative A will be difficult for long term sustainability, and this is true to a greater extent when considering other multiple users of the trail. Due to private land restrictions, the trail would have to remain along the side of the highway for extended periods which decreases user enjoyment and brings about safety concerns for all user groups. Alternative B provides the ability to construct the most sustainable trail possible while maximizing user experience and safety.*

Comment: A southerly snowmobile connector trail should be considered from North Hudson to Newcomb. The DEC is not doing anything memorable or brave to protect Rare NYS backcountry.

Response: *There are numerous terrain and wetland challenges with using Alternative A described in the 2015 Community Connector Trail Plan. Snowmobile trail construction and maintenance along Alternative A will be difficult for long term sustainability, and this is true to a greater extent when considering other multiple users of the trail. Due to private land restrictions, the trail would have to remain along the side of the highway for extended periods which decreases user enjoyment and brings about safety concerns for all user groups. Alternative B provides the ability to construct the most sustainable trail possible while maximizing user experience and safety.*

Skiing

Comment: Support the creation of dedicated, safer ski trails which separate skiers from those that snowshoe or hike in the winter. In general, snowshoes and hikers destroy ski tracks and can safely climb/descend at a steeper pitch than backcountry skiers.

Response: *The Department and APA are working to develop a Ski Trail guidance document that will help with the management of Ski Trails across the Forest Preserve. Within any given wildland area there will be many competing uses on the backcountry infrastructure. As new trails are proposed there will need to be a balance to ensure the wilderness experience is not degraded as trail densities increase with duplicative single use trails. Any new trail proposals have the benefit of being purpose-built facilities that follow the latest best management practices, as opposed to most of the trail system that wasn't designed before being built.*

Comment: In many cases, High Peak backcountry skiers are trying to reach the slides and ski trails that help get them there safely would be an asset. In addition, by focusing on use of the slides, fewer ski trails would be needed to give skiers access to a large amount of potential ski acreage.

Response: *The Department and APA are working to develop a Ski Trail guidance document that will help with the management of Ski Trails across the Forest Preserve. In managing a Wilderness Area, the Department needs to balance protecting the natural resources and preserving opportunities for "primitive and unconfined type of recreation", outlined in the APSLMP. Once an approved Ski Trail guidance document is developed the Department will be better informed to address this issue.*

Comment: While the plan to improve ski/hike trails in Adirondack Park is commendable, there is nothing in the proposal that addresses skin track development or the improvement and expansion of backcountry skiing through tree clearing and other improvements.

Response: *Skin Tracks and Open Woods Ski Routes (Skiing in Trees or Glades) are currently not an allowable facility mentioned or defined in the APSLMP. DEC, APA and a group of stakeholders convened a Backcountry Skiing Working Group, which discussed these issues and Backcountry Ski Trails. This process is not complete and still needs to be vetted through legal interpretations of the NYS Constitution, APSLMP and other factors before being presented for public comment.*

Comment: Safer Separate Reroutes of the Marcy Ski Trail and Whales Tail Ski Trails that were both approved by the Conservation Department in the 1930s and were also converted mostly to shared hiking trails in the 1970s.

Response: *Prior to the adoption of the 1972 APSLMP there were many actions or activities approved by the NYS Conservation Department (predecessor to the NYS DEC) which did not align with the Wilderness Classifications of lands that the APSLMP laid out. The original APSLMP identified Nonconforming issues within the Wilderness*

such as Interior Cabins, Truck Roads and other items. Since 1972 DEC has sought to manage the HPWC as a Wilderness. Since that time the understanding of Wilderness Experience has evolved as the landscape has continued to regrow from its logging past. The natural succession of the forest and the reclaiming of the old logging roads has changed.

Comment: Ski trails do not cause the erosive damage seen on the hiking trails, are safer for skiers who otherwise need to avoid hikers and postholes, and safer for hikers and skiers alike when the trails are segregated.

Response: *Ski trails that aren't used as hiking trails, in non-winter months will have less erosion. The challenge of mixing ski trail within a hiking trail network is doing it in a way that will not have unintended use consequences because hikers perceive them as a shortcut. The Whales Tail Ski trail is an example of impacts from shortcutting.*

Comment: Safer Separate Skier Access Trails from ADK Mountain Clubs ADK LOJ to Avalanche Lake and Lake Arnold via Marcy Dam.

Response: *DEC is committed to improving the trail corridor to Avalanche Lake from Adirondack Loj. A more sustainable trail design is being implemented with reroutes, hardening and other trail work. DEC is looking at improving the skiing opportunities on the trails as we undertake this work.*

Comment: Safer Separate Skier Access Trails to the Adirondack Mountain Clubs Johns Brook Lodge Huts from the Garden Parking Lot and extending in the Lower Elevations up the Orebed Trail to the Base of the Orebed /Saddleback Slides.

Response: *Given the terrain constraints of the Johns Brook Valley, snowfall, aspect and other considerations the DEC will work to improve the overall sustainability of the Phelps Trail from the Garden Trailhead. DEC has added a proposal to improve the Klondike Notch Trail to provide improved Skiing Access into the Johns Brook Valley. This trail has many benefits, including; northeast exposure, to hold snow longer; low volume of winter hiker usage; minimal bridges and stream crossings; higher elevation to hold snow and avoids issues with winter maintenance issues and safety concerns of getting people up to the Garden Trailhead.*

Safer Separate Skier Access to the Boquet River Lean-to from the Round Pond Trailhead and extending to the Base of the North Slides of Dix Mountain via a looping Skier Only Ski Trail in the Lower Elevation North Facing Hardwoods.

Response: *DEC will work to improve the overall sustainability of the Dix Mountain Trail and will take steps to make sure work completed does not negatively impact the skiing opportunities along this existing trail. At this time the looping skier only trail would be considered a Backcountry Ski Trail and not allowed in the APSLMP.*

Comment: Safer Separate Skier Access near the ADK Mountain Clubs Johns Brook Lodge Huts via a looping Skier Only Ski Trail in the Lower Elevation North Facing Hardwoods of Short Job Mountain off the Orebed Trail.

Response: *At this time the looping skier only trail would be considered a Backcountry Ski Trail and not allowed in the APSLMP.*

Comment: Safer Separate Skier Access via a looping Skier Only Ski Trail in the Lower Elevation Northern Hardwoods of Phelps Mountain off of the Marcy Dam Truck Trail.

Response: *At this time the looping skier only trail would be considered a Backcountry Ski Trail and not allowed in the APSLMP.*

Comment: Safer Separate Skier Access via a looping Skier Only Ski Trail in the Lower Elevation East Facing Hardwoods of Santanoni Mountain off of the existing logging road.

Response: *At this time the looping skier only trail would be considered a Backcountry Ski Trail and not allowed in the APSLMP.*

Comment: Safer Separate Skier Access via a looping Skier Only Ski Trail in the Lower Elevation North Facing Hardwoods of Ragged Mountain.

Response: *At this time the looping skier only trail would be considered a Backcountry Ski Trail and not allowed in the APSLMP.*

Comment: Safer Separate Skier Access via 3 Looping Skier Only Ski Trails in the Lower Elevation North and East Facing Hardwoods off of the Gulf Brook Road.

Response: *At this time a looping skier-only trail would be considered a Backcountry Ski Trail and not allowed in the APSLMP.*

Comment: Wish to see the high peaks unit management plan reflect winter recreation as it was originally meant to by allowing more skier only trails accessing key areas in the high peaks. The Adirondacks should not cater exclusively to hikers and significant safety concerns for the public should be addressed in a reasonable way.

Response: *The HPWC UMP seeks to provide a recreational infrastructure network that is appropriate for a Wilderness Area. Skiing and Snowshoeing are allowed throughout the unit, with the access and degree of difficulty being dependent on many variables. Given the dense network of trails within the eastern portion of the unit, it is not possible to create duplicative trail networks for each use. DEC acknowledges that the majority of the existing trail network is not sustainable and will continuously work to improve the*

entire trail system to be more sustainable and improve the user experience of all users. Skiing opportunities on trails will be considered as Trail Work Plans are developed.

Comment: APSA would like to thank the NYS DEC for including the Wright Peak Ski Trail / Whales Tail Ski Trail Reroute in the High Peaks UMP Amendments.

Response: *Thank you for your support on this matter.*

Comment: Besides the Safety Issue of Skiers hitting the hidden boulders under the Snow on the lower shared hiking trail section there's also the Safety Issue of Collisions with Snowshoeing or Barebooting Postholing Winter hikers headed to and from Algonquin or Wright Peak on this popular shared hiking trail. It's a Safety Issue for both Skiers and Winter Hikers and the APSA applauds the NYS DEC for including our simple solution proposal of rerouting the Wright Peak Ski Trail off of the shared Hiking Trail. This Proposal is unfortunately also Conditional on the Passing of the BackCountry Ski Trail Standards and Maintenance Guidance MOU Document and Accompanying State Land Master Plan Amendments defining BackCountry Ski Trails, Skin Tracks, and Open Woods Ski Routes. We encourage the NYS DEC, NYS APA, and the Office of Governor Andrew Cuomo to move these Documents and Amendments, which were completed in the Winter of 2014-15, swiftly through the approval process with the goal of Winter 2018-19 Safer Separate Skier Access Trail Opportunities Available on NYS Forest Preserve Lands for BackCountry Skiers who reside within or visit this amazing Adirondack Park!

Response: *Thank you for your support on this issue. DEC, APA and a group of stakeholders convened a Backcountry Skiing Working Group, which discussed these issues and Backcountry Ski Trails. This process is not complete and still needs to be vetted through legal interpretations of the NYS Constitution, APSLMP and other factors before being presented for public comment.*

Comment: The Wright Peak Ski Trail is a great idea that will be a great benefit to skiers while pretty much eliminating any incentive for hikers to use this trail in the non-winter season.

Response: *Thank you for your support on this matter.*

Comment: I agree with the dual-designation of more trails for both skiing and hiking. The proposed standards appear reasonable.

Response: *Thank you for your support on this matter.*

The East River Trail probably cannot be made skiable all the way to Flowed Lands.

Response: *During the development of the Trail Work Plan for the East River Trail reroutes and upgrades will be considered to make the trail sustainable and provide for an improved user experience for hikers and skiers.*

Comment: Backcountry skiing is a growing trend in the Adirondacks, and represents a low-impact use of surrounding trails. There are numerous benefits to increasing ski trails and ski access, many of which have been expressed by the Adirondack Powder Skier Association. Vermont and New Hampshire have acted as leaders in backcountry skiing development, and there is tremendous potential for the Adirondacks to rival these trail systems.

Response: *DEC and APA have interacted with Federal and State Agencies in other states that have pioneered the development of backcountry skiing opportunities in the northeast. NYS Constitutional protection of the Forest Preserve, along with the Wilderness and Wild Forest classifications through the APSLMP differ from land protections in other states. DEC, APA and a group of stakeholders convened a Backcountry Skiing Working Group, which discussed these issues and Backcountry Ski Trails. This process is not complete and still needs to be vetted through legal interpretations of the NYS Constitution, APSLMP and other factors before being presented for public comment.*

Comment: Support the applicable amendments to UMP as it relates to the Wright Mountain Ski Trail and Whale's Tale Ski Trail being separate from the hiking trail.

Response: *Thank you for your support on this matter.*

Comment: The Adirondack Ski Powder Association has drafted proposals for separate safer re-routes of many well-known ski trails and proposals to define ski trails, skin tracks, and OPEN WOODS KI ROUTES. These proposals should be incorporated and approved.

Response: *DEC, APA and a group of stakeholders convened a Backcountry Skiing Working Group, which discussed these issues and Backcountry Ski Trails. This process is not complete and still needs to be vetted through legal interpretations of the NYS Constitution, APSLMP and other factors before being presented for public comment.*

Comment: Not only have the available ski trails shrunk to an almost unskiable width, but the fact is that we have very few trails and glades to enjoy sliding down our mountains compared to the states of Vermont and New Hampshire. With an increase in popularity of backcountry skiing, skiers are coming to our mountains in increasing numbers. Providing safer routes for both skiers and snowshoers and more open terrain in our mountains would be in my opinion a welcomed change to the Unit Management Plan and a nice shift in the variety of sustainable, low impact recreational usage that our state supports.

Response: DEC, APA and a group of stakeholders convened a Backcountry Skiing Working Group, which discussed these issues and Backcountry Ski Trails. This process is not complete and still needs to be vetted through legal interpretations of the NYS Constitution, APSLMP and other factors before being presented for public comment.

Comment: In addition to this, I see the benefit and fully support adopting the proposed backcountry ski trail standards and maintenance guidance MOU Document and accompanying state Land Master Plan Amendment defining backcountry Ski Trails, Skin Tracks and Open Woods Ski Routes. I hope that these changes can make their way through the amendment process in a timely manner.

Response: DEC, APA and a group of stakeholders convened a Backcountry Skiing Working Group, which discussed these issues and Backcountry Ski Trails. This process is not complete and still needs to be vetted through legal interpretations of the NYS Constitution, APSLMP and other factors before being presented for public comment.

Comment: Backcountry skiing opportunities are limited in the Adirondacks and so many of us within the community end up taking trips back and forth to Vermont and New Hampshire. I believe this is a huge piece missing from the outdoors paradise in the Adirondacks. One only needs to look at the success and community engagement of the Rochester/Randolph Area Sports Trail Alliance in Vermont to see how such plans can be implemented responsibly, and how passionate skiers will go the distance to ensure it is done correctly.

Response: DEC and APA have interacted with Federal and State Agencies in other states that have pioneered the development backcountry skiing opportunities in the northeast. NYS Constitutional protection of the Forest Preserve, along with the Wilderness and Wild Forest classifications through the APSLMP differ from land protections in other states. DEC, APA and a group of stakeholders convened a Backcountry Skiing Working Group, which discussed these issues and Backcountry Ski Trails. This process is not complete and still needs to be vetted through legal interpretations of the NYS Constitution, APSLMP and other factors before being presented for public comment.

Comment: We ask that APA expediently approve the NY SLMP Amendments for backcountry Ski trails.

Response: This is beyond the scope of this UMP Amendment and subject to action of the Adirondack Park Agency in consultation with the NYS DEC.

Comment: Supports a change in the ski and snowshoe use regulation to a standard of depth of snow to 12” off trail surface.

Response: Thank you for your support in this matter.

Comment: For trails with dual-designation (i.e. hiking & skiing) it is imperative that any trail work/improvements are done with summer and winter use in mind. Avoid using trail design or features that impair skier use of the trail. Proper trail layout is critical for creating an all-season trail that is conducive to a safe and enjoyable experience.

Response: *DEC is committed to any new trail development being purpose built trails, which are laid out in the most stainable manner possible. Work on existing trails that are upgraded or rerouted will follow this practice as well. Any trail that carries dual-designation will have skiing in mind during layout to avoid trail tread development practices that conflict with skiing.*

Comment: Although additional trails suitable for nordic skiing are proposed, it is not clear when that may happen. The Boreas River Trail may be difficult to both construct and maintain. The existing Gulf Brook Road provides an excellent resource for skiing to the Boreas Ponds and beyond. This use should be maintained. We enjoyed a 15-mile ski into the ponds this past winter and I hope to be able to continue that activity for many years to come.

Response: *Skiing is allowed on all the trails discussed in the UMP Amendments. Skiers will still be able to ski on the Gulf Brook Rd. The development of the Boreas River Trail provides an opportunity for those who want to be separate from snowmobiles an opportunity to access the Boreas Ponds Area.*

Comment: DEC/APA need to expedite the approval of the Backcountry Ski Trail Guidance Document. Backcountry skiing is more popular than ever and there is a demand for user-friendly ski trails including skin tracks and open woods ski routes.

Response: *DEC, APA and a group of stakeholders convened a Backcountry Skiing Working Group, which discussed these issues and Backcountry Ski Trails. This process is not complete and still needs to be vetted through legal interpretations of the NYS Constitution, APSLMP and other factors before being presented for public comment.*

Comment: There are examples of successful ski trail development in Vermont (open glades in the Green Mt National Forest in partnership with Rochester Area Ski Trail Alliance) and New Hampshire (rehabilitation of ski trails that were built by CCC and glades in White Mt National Forest in partnership with Granite Backcountry Alliance). Another example is the reopening of ski trails at the former Scotts Cobble Ski Hill on Town of North Elba land in partnership with BarkEater Trails Alliance. The Adirondack Powder Skiers Association is trying to get similar approval here in the Adirondacks, but have seen a lot of administrative stalling to date. It is time to allow for glade development and work with backcountry skiers to ensure proper design for this low impact activity.

Response: *DEC and APA have interacted with Federal and State Agencies in other states that have pioneered the development backcountry skiing opportunities in the*

northeast. NYS Constitutional protection of the Forest Preserve, along with the Wilderness and Wild Forest classifications through the APSLMP differ from land protections in other states. DEC, APA and a group of stakeholders convened a Backcountry Skiing Working Group, which discussed these issues and Backcountry Ski Trails. This process is not complete and still needs to be vetted through legal interpretations of the NYS Constitution, APSLMP and other factors before being presented for public comment.

Comment: Dedicated routes for Adirondack backcountry skiing are many years overdue. Backcountry downhill skiing was a recognized sport before WWII since lifts were small and primitive. Marcy and Wright both had ski trails in those days. Postwar, large lift served areas developed and the sport declined to extinction, so the rigid State Land Master Plan created too many years ago has no provision for skiing other than nordic.

Response: *DEC, APA and a group of stakeholders convened a Backcountry Skiing Working Group, which discussed these issues and Backcountry Ski Trails. This process is not complete and still needs to be vetted through legal interpretations of the NYS Constitution, APSLMP and other factors before being presented for public comment.*

Comment: Backcountry downhill has come back in recent years – lightweight gear is available, lift ticket prices are high, and many people prefer the quality of the experience. New York is far behind neighboring states, and the mountain west, in waking up to present reality, and is doing a gross disservice to skiers whose taxes support the Forest Preserve.

Response: *DEC and APA have interacted with Federal and State Agencies in other states that have pioneered the development backcountry skiing opportunities in the northeast. NYS Constitutional protection of the Forest Preserve, along with the Wilderness and Wild Forest classifications through the APSLMP differ from land protections in other states. DEC, APA and a group of stakeholders convened a Backcountry Skiing Working Group, which discussed these issues and Backcountry Ski Trails. This process is not complete and still needs to be vetted through legal interpretations of the NYS Constitution, APSLMP and other factors before being presented for public comment.*

Comment: Given increased winter trail usage by both skiers and snowshoers, it's past time to have some dedicated ski routes which will lessen conflict and increase safety by separating the groups. It's also unfair to require skiers to risk themselves and their equipment on badly eroded summer hiking trails. Dedicated ski routes not used for summer hiking are without erosion problems and are thus better for skiing as well as environmental preservation.

Response: *The Department and APA are working to develop a Ski Trail guidance document that will help with the management of Ski Trails across the Forest Preserve.*

Within any given wildland area there will be many competing uses on the backcountry infrastructure. As new trails are proposed there will need to be a balance to ensure the wilderness experience is not degraded as trail densities increase with duplicative single use trails. Any new trail proposals have the benefit of being purpose-built facilities that follow the latest best management practices, as oppose to most of the trail system that wasn't designed before being built.

Comment: The baby steps now being proposed are welcome. I hope they represent a beginning.

Response: *Thank you for your support on this matter.*

Comment: I support the Backcountry Ski Trail Standards and Maintenance Guidance MOU Document and Accompanying State Land Master Plan Amendment defining Backcountry Ski Trails, Skin Tracks, and Open Woods Ski Routes.

Response: *Noted.*

Comment: There are a handful of backcountry ski trails in the High Peaks and they need to be maintained to a width that is appropriate for skiing. Expanding the number of ski trails will encourage more regional skiers to come to the High Peaks region.

Response: *The Department and APA are working to develop a Ski Trail guidance document that will help with the management of Ski Trails across the Forest Preserve. Within any given wildland area there will be many competing uses on the backcountry infrastructure. As new trails are proposed there will need to be a balance to ensure the wilderness experience is not degraded as trail densities increase with duplicative single use trails. Any new trail proposals have the benefit of being purpose-built facilities that follow the latest best management practices, as oppose to most of the trail system that wasn't designed before being built.*

Comment: Skin Tracks are necessary to accessing the landslides that make for excellent ski terrain. Many times the skin tracks are just a short extension beyond an existing trail, i.e. Angel Slides above Marcy Dam.

Response: *The Department and APA are working to develop a Ski Trail guidance document that will help with the management of Ski Trails across the Forest Preserve. In managing a Wilderness Area, the Department needs to balance protecting the natural resources and preserving opportunities for "primitive and unconfined type of recreation", outlined in the APSLMP. Once an approved Ski Trail guidance document is developed the Department will be better informed to address this issue.*

Comment: Having this option will provide an option for skiers looking for an experience that is 'less groomed' than what they would get at a commercial resort. Having a network of areas to participate in backcountry skiing will keep NY on the forefront of winter activities and on par with the western states as well as Vermont and New

Hampshire. I hope that you will see the benefits and allow the APSA the opportunity to bring this niche activity to NY

Response: *Noted.*

Comment: Open Woods Ski Routes have proven to be popular, as shown by the RASTA glades in Vermont. The snowpack, trailhead access, and terrain are readily found in the High Peaks and would encourage backcountry skiers to plan outings here.

Response: *DEC and APA have interacted with Federal and State Agencies in other states that have pioneered the development backcountry skiing opportunities in the northeast. NYS Constitutional protection of the Forest Preserve, along with the Wilderness and Wild Forest classifications through the APSLMP differ from land protections in other states. DEC, APA and a group of stakeholders convened a Backcountry Skiing Working Group, which discussed these issues and Backcountry Ski Trails. This process is not complete and still needs to be vetted through legal interpretations of the NYS Constitution, APSLMP and other factors before being presented for public comment*

Comment: I have skied in the Adirondack Park for the past four years, both at Whiteface Mountain Ski Center and on wooded trails. I can assure all involved in this matter that the two are extremely different experiences requiring an altogether different skill set, and different equipment; which incidentally can be rented or purchased in the Adirondack Park, thereby supporting the local businesses.

Response: *DEC, APA and a group of stakeholders convened a Backcountry Skiing Working Group, which discussed these issues and Backcountry Ski Trails. This process is not complete and still needs to be vetted through legal interpretations of the NYS Constitution, APSLMP and other factors before being presented for public comment.*

Comment: Even the comparatively small rocks on the Jack Rabbit Trail terrain require ample snow coverage and upkeep before That trail can be truly enjoyed by a skier.

Response: *Noted.*

Comment: As I'm sure you are all aware, post holing by hikers without snowshoes causes another layer of shared trail complications and potential injuries to both skiers and hikers.

Response: *Noted. Currently in the High Peaks Wilderness there is a regulation requiring the use of skis or snowshoes when there is more than 8" of snow. This UMP Amendment extends that regulation to all the new lands within the High Peaks Wilderness Complex and increases the snow depth to 12" off the trail.*

Comment: Your support of safe human powered recreation in the Adirondacks is essential to furthering awareness of and therefore appreciation for our wild lands. As

backcountry skiing proliferates, enabling our trail network to support such traffic is an important step to ensuring the safety of those venturing into the mountains.

Response: *Noted.*

Comment: Responsible creation and maintenance of ski trails and zones has proven to be very successful in neighboring states (see RASTA in Vermont and Granite BC in New Hampshire), as communities find a healthy balance both protecting and exploring nature.

Response: *DEC and APA have interacted with Federal and State Agencies in other states that have pioneered the development backcountry skiing opportunities in the northeast. NYS Constitutional protection of the Forest Preserve, along with the Wilderness and Wild Forest classifications through the APSLMP differ from land protections in other states. DEC, APA and a group of stakeholders convened a Backcountry Skiing Working Group, which discussed these issues and Backcountry Ski Trails. This process is not complete and still needs to be vetted through legal interpretations of the NYS Constitution, APSLMP and other factors before being presented for public comment.*

Comment: It is also important that the cross country trail ski trail areas be clearly defined. The exact area, the type of trails, the type of regular maintenance and use should be clearly defined in the early stages of planning.

Response: *The skiing proposals within the Amendments describe the connections and trail classification. The Trail Classification Chart in the Appendix outlines the specific criteria for constructing and maintaining the trails.*

Comment: 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.

Response: *Noted.*

Comment: We are not offering much to the numerous backcountry ski community.

Response: *There are over 79 miles of dual-designated trails in these UMP Amendments, a major reroute of the Wright Peak Ski Trail, an upgrade of the Klondike Notch Trail to allow safe and reliable skier access into the Johns Brook Valley.*

Comment: P.90 – Glad to hear that the Boreas Ponds Trail will be built with

cross-country skiing in mind. This will allow a non-motorized alternative for access to Boreas Ponds.

Response: Thank you for your support in this matter.

Comment: Need for broadening access for backcountry skiers within the High Peaks. Most of my adult life has been dedicated to helping nurture appropriate opportunities to develop sustainable rural communities. This has ranged from developing and running a light manufacturing business that worked well inside the APA's Hamlet Model as a way to create meaningful job security for local families for over 20 years, to my current role helping to create and promote recreational opportunities in the outlying communities in the park - to stem overuse in the High Peaks while hopefully reversing the negative trends in our less fortunate communities.

Response: The Department recognizes the ability of the Forest Preserve to economically benefit local communities within the park, through tourism and recreational opportunities. DEC, APA and a group of stakeholders convened a Backcountry Skiing Working Group, which discussed these issues and Backcountry Ski Trails. This process is not complete and still needs to be vetted through legal interpretations of the NYS Constitution, APSLMP and other factors before being presented for public comment.

Comment: To me, times have changed a lot since the original charter for the Park was developed, and I believe we need to stay relevant while still being able to ensure the most important goals of protection and expansion of state-owned property within the blue line. I believe there is also a balancing act required though, to also ensure economic sustainability of the small rural communities surrounding the High Peaks and I do not believe we have been as considerate of the latter goal. Broadening access to ski terrain on Wilderness-designated lands "checks both of the boxes", I believe, and I fully support that idea and will help where I can.

Response: Thank you for your support on this matter.

Comment: The Board requests that any necessary SLMP amendments to allow further backcountry ski trails, as requested by the Adirondack Powder Skiers, be approved as soon as possible, and that additional backcountry ski trails be added to the High Peaks Wilderness and Vanderwhacker Mountain Wild Forest, because it may be many years before new amendments to those plans are proposed.

Response: Noted

Comment: APSA Suggest that we distinguish the alpine ski trails—which will require wider skis, climbing skins and routes—from cross country ski trails.

Response: This suggestion will be forwarded to the group working on the discussion about backcountry skiing.

Paddling

Comment: The state's acquisition of this 6,200-acre tract creates an opportunity for a wilderness paddle on the Hudson River, the Opalescent River.

Response: Noted.

Comment: ADK is pleased with the designation and siting of a canoe and kayak parking lot for access to the Hudson and Opalescent Rivers. An additional parking area could be considered on conservation easement lands at or near the junction of Tahawus Road and the Upper Works Road (see map below). This opens about five miles of the Hudson River including Sandford Lake and five to seven miles of the Opalescent River depending on water level and current.

Response: The Department does not own the right to install a launch on the Conservation Easement in this location.

Comment: DEC's proposed southern parking area is a great take-out a point where the Hudson touches the Tahawus Road about 3 miles south of the junction of the Tahawus and Upper Works Roads (see map below).⁸ There is generous off the pavement parking at this take-out location. The proposed carry trail from this location should only have to be about 200 feet long.

Response: Thank you for the support in this matter.

Comment: If canoes and kayaks are available for the public at Camp Santanoni, why can't the same arrangement be made at Boreas Ponds? This would eliminate the need for Four Corners parking and better preserve the wilderness.

Response: Due to a variety of reasons The Department does not supply canoes and kayaks for public use.

Day Use Areas

Comment: The proposed 'Day Use' concept for some parking areas, especially if it results in additional parking, is useful for climbers. Some climbing days can start very early and/or end late in any given day so hopefully establishing such 'day use hours' will take this into consideration.

Response: Noted.

Comment: Both amendments refer to limiting overnight usage of certain areas by the creation of Day Use Areas. The goal is laudable but confusing. As the plans

acknowledge, the term “Day Use Area” is specifically defined in the Master Plan as a type of Intensive Use Area. No clarifying language in a UMP will reach the actual user of a particular location particularly if the signage uses the term. We understand the goal is to provide greater restrictions than the general guidelines and criteria of the Master Plan might allow. DEC already has the authority to limit camping and overnight uses and could adopt Special Management Guidelines to prevent overuse, protect special resources and provide, “special management to reflect unusual resource or public use factors.” (Master Plan, p.55) Another more simple and direct way to convey the limitations on overnight use would be to call and place signs informing users that these special areas are, “For Daytime Access Only-no overnight parking or camping.” This approach is consistent with the DEC’s goal as stated in the High Peaks amendment, “intend to restrict overnight usage.” It is unclear why the plan needs to state that no picnic tables would be allowed in these areas. Picnic tables already are not permitted in Wilderness, Primitive and Canoe; therefore, no reference to the negative intention is necessary. However, if the Day Use Area as defined in the amendments is being created to allow more intense uses than permitted by the underlying classification, those proposals do not conform with the guidelines and criteria of the SLMP.

Response: The proposed day use-only areas are proposed regulations to protect the resource, not to allow more intensive uses. The Department has jurisdiction to implement additional protections on lands it manages and past management planning supports the use of Day-Use Areas across all land classifications and in numerous UMP’s since 1994. Stating that picnic tables will not be allowed is a point of clarification.

Comment: The Boreas Ponds Day Use Area should be abandoned because it runs contrary to the wilderness setting.

Response: The purpose of the day-use designation in the Boreas Ponds Primitive Area is to prohibit overnight camping. Because of the ease of access to this area, allowing camping is likely to cause unacceptable natural resource damage. Picnic tables, which are often associated with day-use areas, are not proposed for this area.

Comment: three designated day use areas would seem to just add complexity to an already complex plan. Wouldn't just a few "No camping" signs suffice.

Response: The primary reason for the proposed day use areas is for increased environmental protection. A regulation for these day use only areas offers better environmental protection than signing against camping.

Comment: P.84 – I support the creation of the Blue Ridge Day Use Area. I would recommend a vault toilet facility at this location rather than a pit privy.

Response: Thank you for your support in this matter.

Comment: 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.

Response: The intent in the UMP Amendment is for this area to have not overnight usage, in order to avoid negative impacts to those that are coming there. This is not an intensive use Day Use area, but the title does make it easier for the public to understand what is expected. There will be no picnic tables at these day use areas.

Education and Outreach

Comment: We're pleased to see the emphasis on educational outreach and working with partners in the draft UMPs. DEC should consider Leave No Trace Outdoor Skills and Ethics educational programming and messaging throughout the Forest Preserve, especially in popular areas like the High Peaks Wilderness which are experiencing recreational impacts of high use. 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. This would ensure consistent Leave No Trace Messaging at every trailhead.

Response: The Department is putting strong emphasis on the need for education and outreach throughout these amendments, and they will be doing so for a variety of topics including Leave No Trace.

Comment: 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.

Response: The type of promotional materials and efforts for Adirondack Tourism is outside of the scope of these Amendments, but the suggestion is noted.

Comment: We also urges DEC to commit to integrated training of Leave No Trace skills and ethics on the Trainer or Master Educator Level for DEC staff and Forest Rangers.

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. NOLS Northeast, another provider located in Gabriels, New York, could also serve as a resource in developing a plan.

Response: Leave No Trace training has been and will likely continue to be available for staff to participate in. However, committing staff time to specific trainings in these Amendments is outside of their scope, but the suggestion is noted.

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

Response: Suggesting the use of specific agencies and software is outside of the scope of these Amendments.

Comment: Today, many of our new visitors no longer buy and read a guidebook, or learn about the Adirondacks by hiking with experienced folks on ADK outings. They get a little bit of information from social media, and then they come visit. Experience has shown that most people also do not read signs; and the more signs that are posted, the more they are ignored.

Response: DEC is committed to improving education and outreach efforts at trailheads, on the internet and working with partners to reach visitors on many levels.

Comment: Hiker Education can only be effective through face-to-face interaction. The 46ers have taken an excellent step in this direction with the Trailhead Steward program at Cascade. But a tiny volunteer organization cannot fund a full time, paid Trailhead Steward program for the 8 or 9 major High Peaks trailheads.

Response: Noted.

Comment: There is nothing in the amendment about full time trail head stewards, or hiker education. Instead, the amendment relies on the obviously failed strategy of "putting up more signs in addition to the forest of signs that are already there, and are being ignored."

Response: The UMP Amendment is not the mechanism for requesting more resources like staff and funding, but it does emphasize the need for increased education of various forms including signage, The Departments website, and stakeholder involvement.

Comment: There is nothing in the amendment about restoring the Ranger Force.

Response: The UMP Amendment is not the mechanism for requesting more staff.

Comment: The plan is correct that educational efforts need to be ongoing. Consistent information is important and needs to start with making sure that all trailhead signage is up to date. For instance, there are still trailheads where the posted regulations state that one must fill out and carry a permit for day hikes.

Response: Education is a large portion of the management discussed in these amendments. Improved and prevalent information will be supplied at various facilities throughout the tracts and on our website.

Specific Trail Comments

Comment: I am writing with a concern about the total elimination of ALL parking on Cascade Road for starting on hikes up Cascade, Porter and Pitchoff. As a lifelong resident of Lake Placid, and one whom enjoys the out of doors and hiking, I have seen the impact firsthand of the congestion and dangerous situation with cars parked up and down the shoulder of the narrow passage on Rt. 73. There are more and more people crowding the trails and the parking areas, which is bittersweet as we all know. It is almost unbelievable how much the numbers of hikers have increased in the last 15 years!

Response: Noted.

Comment: I now have grandchildren that are just old enough to start doing short hikes and walks in the woods. It seems unnecessary to have to add on miles to the hikes, especially for folks that want to do them with young children. I am hopeful that you will keep parking available so that we can still do the hike up to the Balanced Rocks and Pitchoff from the shortest trailhead.

Response: Access to Pitchoff and Balanced Rocks will still be available from 2 parking lots on the west side of Cascade Lakes, this will be formalized in the Draft Sentinel Wilderness Area UMP.

Comment: P.92 – DEC should decide which trail up Boreas Mtn. is preferable (i.e. more sustainable) and only build one. There is already a trail up Boreas Mtn. from Elk Lake Lodge. It would be redundant to have 3 trails to the peak.

Response: A westerly approach from the High Peaks Wilderness Area offers the best alternative for a new sustainably built trail. The new eastern approach, which is the location outlined in the Conservation Easement Terms, will not be constructed unless the criteria outlined in the Amendment is met.

Comment: The HPWUMP proposes a series of new trails designed to integrate newly acquired lands with the High Peaks. Trails from the Boreas Ponds will connect to White

Lily Pond and Panther Gorge, and from Boreas Ponds to Calamity Brook. Other trails connect Henderson Lake to Newcomb Lake. PROTECT supports these new trails.

Response: *Thank you for your support in this matter.*

Comment: Trail up Allen Mountain will change character of experience.

Response: *When DEC accesses the current route up Allen Mountain and develops a Trail Work Plan for the future route, natural resource protection will lead the decision making. While the character of mud and erosion may change along the trail, it is unlikely that the trail would become any shorter, so hikers will have similar experiences as they hike the most remote single peak in the HPWC.*

Comment: P.63 – I believe there is a woods road that leads to the Vanderwhacker Brook Tract from 28N. This should be maintained as a trail to access the brook. DEC should develop a primitive campsite on the parcel since the prior owner had a camp there.

Response: *Thank you for the suggestion.*

Comment: Cascade provides a unique opportunity to accommodate High Peak users on a well hardened trail, with an open summit that is not alpine, and is almost entirely day use without conflicts of overnight backcountry users. I believe managing use at this site, within defined resource protection limits, is preferable to trying to evenly disperse use to other peaks that do not have the infrastructure and trail work in place to withstand the use.

Response: *Noted.*

Comment: The VMWFUMP proposes a series of new foot trails. PROTECT supports all of them. We support the hiking trails planned for Ragged Mountain, the Boreas River, Wolf Pond, and Andrew Brook.

Response: *Thank you for your support on these proposals.*

Comment: The state's acquisition of new lands along the Hudson River south of the Tahawus Mine opened up a terrific new canoe route. The VMWFUMP proposes new put-in and take-out locations that will vastly improve public access. PROTECT supports the proposals for public access to the Hudson River.

Response: *Thank you for your support on these proposals.*

Comment: I agree with the general objectives as stated on page 80. It is time to deal with the historic problems of trails built in the 19th or early 20th Centuries. The need for additional staffing should be obvious as today's trail crews try to mitigate the problems of many years of poor design and maintenance of the current trail system. Granted,

much progress has been made in the past 40 years, but the effort should be accelerated.

Response: *Thank you for your support on this matter.*

Comment: Lake Andrew Trail, I see this as a low priority. It would be an interesting ski, but a very extended one that, in my opinion would rarely be skied. I think access to Lake Andrew from the north would be nice, but still not a high priority.

Response: *Noted.*

Comment: Black Ermine Connector Trail, I see this as an even lower priority than the Lake Andrew Trail. When the Santanoni Preserve was added to the Forest Preserve in the mid-70s, a trail was cut to a similar destination. It was never used, never maintained, and ultimately abandoned.

Response: *The Black Ermine Trail is in the latter part of the schedule of implementation.*

Comment: Bradley Pond Trail, I agree with the reroutes off of the old road that has become so hard to maintain. Beyond Bradley Pond I agree that the first mile of trail is one of the worst stretches of trail in the Adirondacks. That should be bypassed at some point, but after that mile the rest of the way to Duck Hole is a very pleasant walk. Yes, there can be a problem crossing the outlet to the Duck Hole, but the reality is that most users accessing the Duck Hole come via the easier approach via Preston Ponds. I think the route as proposed to Preston Ponds would require significant resources to build and then only be very lightly used.

Response: *The trail will be located in the most sustainable location.*

Comment: Henderson Lake trails, perfectly reasonable way to use this easy access.

Response: *Thank you for your support on this matter.*

Comment: Calamity Brook Trail, I approve of the plan for this trail

Response: *Thank you for your support on this matter.*

Comment: The proposed Ragged Mountain trail is shown running only to the bottom of the cliffs and not to the top of them.

Response: *The Ragged Mountain Trail will proceed from the parking area to the overlook.*

Comment: Indian Pass Trail, maybe it is worth the new trail construction to eliminate one bridge, but it doesn't seem to be a priority.

Response: *The proposal for the Indian Pass and Preston Ponds trail concerning the bridge is not one just about reducing another facility to maintain, it is about slowly*

shifting the focus of the trail system within the HPWC to one which is sustainable (including reduce maintenance efforts) and one that provides more of a Wilderness experience, including less manmade facilities and accommodations.

Comment: Preston Ponds Trail, A good plan for this trail. The reroutes done to date to bypass wet areas seem to take in a few slopes that are a bit too steep, but overall this is a good plan for that trail.

Response: *Thank you for your support on this matter.*

Comment: Henderson Lake South Trail, perhaps a useful trail for those starting a Bradley Pond and coming out at Upper Works (or vice-versa), but I question whether the numbers doing such justify the resources to build and maintain the trail.

Response: *Noted.*

Comment: Mount Adams Trail, definitely do what is possible to mitigate this steep eroded trail.

Response: *Thank you for your support on this matter.*

Comment: East River Trail, Seems like a good solution.

Response: *Thank you for your support on this matter.*

Comment: Dudley Brook Connector Trail, an interesting idea, but I don't believe this trail would actually be used enough to justify its construction and ongoing maintenance. The Elk Lake-Marcy Trail is only lightly used; this trail would likely see even less use.

Response: *Noted.*

Comment: Cheney Cobble is very steep at its top, so a sustainable trail to the summit will not be easy. Additionally, there are no views unless the plan includes significant cutting.

Response: *The Cheney Cobble trail proposal is not included in the Final Amendment.*

Comment: White Lily Trail, seems that a more direct approach to White Lily Pond from the south would be a better route if the goal is to provide access to the pond.

Response: *The final trail layout for the White Lily Trail will seek to follow a route that avoids wet areas, minimize bridging and be situated in the best location available. Consideration will be taken on the most appropriate place to bring users to the shoreline, which will create the least amount of impact. Being on the eastern shoreline should provide unique views of Cheney Cobble and westerly.*

Comment: Casey Brook Connector Trail as a connection to the Elk Lake-Marcy Trail, the route adds considerable distance and elevation gain. I suspect that there will be a temptation to short cut via the old roads that stay lower and connect more directly. I would think that a better connection to the Elk Lake-Marcy Trail would be via White Lily Pond and to then hit the Elk Lake-Marcy Trail above the private land.

Response: *The decision to route the main connection trail for Boreas to the Elk Lake-Marcy Trail above or below Marcy Swamp was an involved process. Ultimately there were several reasons that make the Casey Brook Connector Trail the best long-term approach for this access. North of Marcy Swamp both Sand Brook and Marcy Brook would need to be bridged, which would involve long span bridges in remote locations, when compared to the current bridge over Casey Brook on the route proposed, it is less impact. The lands to the northeast of Moose Mtn present a wet hillside, when combined with the drainage from there to White Lily Pond provide for some long-term challenges. The Elk Lake-Marcy Trail and the Marcy Swamp Bog Bridging provide an existing crossing. In addition to the long approach to Mt. Marcy the low usage of the EL-M Trail could be the result of the difficult camping opportunities, given past landownership patterns. With the Casey Brook Tract there is a larger area to “aim for” when planning hikes from the south or trying to come from the Dix Range to the west. Several groups that conduct multi week trips in the Adirondacks expressed an interest in ways to start trips in the Elizabethtown area, travel thru the Giant Mountain Wilderness and finish their trips on the Corey’s Road or on the Raquette River, without having to traverse the top of the High Peaks. This connection provides opportunities for backpackers to enjoy the trail network of the High Peaks Wilderness, without being on top of Mt. Marcy.*

Comment: Boreas Ponds Trail won’t receive much use especially the southern end between Blue Ridge Rd. and Gulf Brook Rd.

Response: *DEC is seeking to provide an opportunity for hikers and skiers to gain access to Boreas Ponds and the High Peaks Wilderness from the Blue Ridge Road which doesn’t involve traveling along motorized trails. In addition to the access to the north this trail will provide opportunities for hunters and hikers to enter and explore the lands east of the Boreas River.*

Comment: Boreas Mountain Trail, this should be a popular trail and should be built - even if Boreas Ponds Trail is not built as planned.

Response: *Thank you for your support on this matter.*

Comment: RNT Loop Trail would not provide any useful access and therefore not be worth the effort to construct and maintain it.

Response: *The RNT Loop Trail is in the 3rd phase of implementation in the UMP Amendment and works in with the Carrying Capacity and data driven method of decision making DEC is seeking to follow in this plan. DEC will be monitoring usage of*

the Boreas Mtn Trail, camping on Boreas Ponds and usage patterns of users that are staying on the Boreas Ponds tract to see if this trail opportunity would provide a positive experience. At that point DEC could choose to develop the trail or wait for an appropriate time.

Comment: Boreas Ponds Dam Trail, Boreas Ponds Accessible Water Access Trail, and MC Lean-to Accessible Trail, obviously all are needed to fulfill the promise for some handicapped access to the ponds.

Response: *Thank you for your support on this matter.*

Comment: Elk Lake-Marcy Trail, not sure exactly what 1.7 miles will be upgraded to Class V. Trail will remain lightly used even with any new connection from the Boreas Tract.

Response: *As a Class V trail, the Elk Lake-Marcy Trail will have a Trail Work Plan developed that will layout a long-term improvement and maintenance plan, which will guide the DEC in working on that trail. As resources become available, DEC will work on phased implementation of that plan throughout the life of the trail.*

Comment: Pinnacle South Trail is an interesting idea. However, even though this will shorten the approach to a traverse of the Colvin Range, I don't foresee many hikers choosing this route to Blake and Colvin. The southern and eastern slopes of Pinnacle are quite steep; so actual construction of a sustainable trail will be a challenge.

Response: *Noted.*

Comment: LeClaire Hill Trail, Great idea that should be popular- especially if the Frontier Town "gateway" becomes well-patronized.

Response: *Thank you for your support on this matter.*

Comment: Build hiking trails to Vanderwhacker pond and ragged mountain

Response: *The plan proposes both of these trails.*

Comment: *Chapel Pond Connector Trail*, this trail will be a benefit for rock climbers, but there's not enough detail in the proposal to really understand how this will affect hikers on the Giant Ridge Trail.

Response: *This trail will be developed along with the Work Plan that will specifically locate the proposed parking lots and in addition to the reroute of the Giant Ridge Trail, within the Giant Mountain Wilderness Area.*

Comment: Trailless Peaks Access Routes, Yes, it's time to finally recognize that the existing "herd paths" are now essentially trails and that they should be treated as such.

Response: Thank you for your support on this matter.

Comment: Cascade Mountain Trail Reroute, I have already commented above on why I don't believe moving the Cascade Mountain parking to Mt. Van Hoevenberg is good idea. I do believe that an improved trail to Mt. Van Hoevenberg as proposed is a good idea. This trail must be very well-graded so that hikers are not tempted to use the smooth, grassy ski trails instead of the hiking trail.

Response: Noted.

Comment: I do not believe this is a viable proposal. The proposed new route will more than double the distance while also adding additional vertical ascent as the trail goes over a ridge of Mt. Van Hoevenberg and down before starting its climb to the peak. Experience during the Columbus Day weekend closure of the usual parking areas showed that hikers would find the next closest place to park and walk the highway from there. There were, for example, those who chose to park between the two Cascade Lakes and walk that exceedingly narrow and dangerous stretch of highway rather than taking the longer (but not as long as the proposed route) route from Mt. Van Hoevenberg. Unless the lower part of the existing trail is totally closed by dropping numerous trees across it, I foresee hikers parking at more distant locations and walking the highway from there.

Response: *DEC is committed to making a world class trail up Cascade Mountain, which wasn't decided on by distance of trail alone. The history of Adirondack hiking has been one of direct fall-line ascents and subsequent eroded trails that come with that. The new trail up Cascade Mountain will enhance the users experience while on the hike versus focusing on getting to the summit in the shortest distance. Once the new trail is built up Cascade Mountain there will be considerable efforts to naturalize the old trail. While hikers could still bushwhack in this area the available parking will be limited.*

Comment: One must also consider the "jello effect". Now Giant Mt. via the Ridge Trail becomes the shortest route to a 4,000-foot peak; and considerable use will likely just shift there. I do not see any easy solution to this problem, but two possibilities come to mind.

- i. Build additional parking on a portion of the piece of the Mt. Van Hoevenberg X-C Area that adjoins Rt. 73. The ski loop on that property is no longer needed for any international competition and could be shortened or abandoned without any significant loss to either recreational skiers or competitors. As a purpose-built parking area for hikers, there could be a charge for parking there.
- ii. Put stripes on the existing parking areas to clearly define how many vehicles can park there. There would then need to be a "weekend manager" to monitor when the parking spots were all taken and then start directing hikers to a shuttle from the Mt. Van Hoevenberg parking lots. The wide parking area just below the actual trailhead would become the drop-off/pick-up point because the shuttle could

turn around there. A short piece of new trail could then lead down to the register.

Response: *Public education, trail sustainability, natural resource protection and safer parking are all benefits of the trail relocation. While there maybe shifts in the usage of first time users to other areas perceived to be “easier”, DEC believes a robust education and outreach campaign, coupled with the benefits of the trail relocation and alternative Mt. Van Hoevenberg East Trail hike, will improve the experience of first time users are providing mechanisms for increasing overall education and awareness of users.*

Comment: Ampersand Mountain Trail Reroute Sounds like a good idea.

Response: *Thank you for your support on this matter.*

Comment: Hiking and snowshoe trails, I agree that the heavily-used trails listed need additional work and reroutes where that is the best way to create a sustainable, lower-maintenance route.

Response: *Thank you for your support on this matter.*

Comment: As noted above, I have reservations about the proposals for the following trails: Bradley Pond north of the lean-to; Boreas Ponds Trail except for access to Boreas Mt.; Chapel Pond Connector; Cascade Mt. parking change and reroute; Lake Andrew; Black Ermine Connector; RNT Loop.

Response: *Noted.*

Comment: The state’s acquisition of MacIntyre tract creates camping opportunities on the trail to Allen Mountain. ADK is pleased with the proposed and much needed formal trail designation for the former herd paths up to the summit of Allen Mountain. This will ensure that this popular route gets the trail maintenance that it needs to be sustainable and protect the steep sections of the trail from soil and water erosion.

Response: *Noted.*

Comment: I support new hiking trails planned for Ragged Mountain, the Boreas River, Wolf Pond, and Andrew Brook.

Response: *Thank you for your support in this matter.*

Comment: In the context of trail construction, determining what is detrimental to the user experience is subjective, and may lead to inconsistency in work standards and expectations of land managers. Sometimes the most sustainable and best solution in terms of resource protection may be at odds with user experience. DEC should more clearly define the term user experience and the role it plays in determining best practices, especially in the High Peaks. In the context of trail or recreation infrastructure

construction, design, and maintenance, ADK urges that there be explicit language in the UMP that makes it clear that the management actions and deteriorating conditions can be assessed in collaboration with outside experts. It is imperative that DEC land managers collaborate on trail and recreation infrastructure construction design and maintenance decisions with professional contractors who implement management decisions on the ground.

Response: The UMP Amendment now includes a clarification: “Improve the overall wilderness experience and user enjoyment of the trail system within the High Peak Wilderness Complex. This includes a trail system which is not dominated by visual trail structures that stand out in contrast to the surrounding landscape.” Forest Preserve Land Managers have educational and professional backgrounds in natural resource and recreational management. DEC is committed to continuing education and investing in the professional development of the Forest Preserve Land Managers. During 2018 Region 5 Lands and Forests staff began what is anticipated as an ongoing sustainable trails training program with a Master Trail Builder. As opportunities arise for contractors to work on the trail system within the High Peaks Wilderness Complex, the Land Manager will take into consideration specifics of projects being implemented at that time.

Comment: Supports the proposed hiking trail from the main parking lot to the Boreas Ponds dam to provide a woods alternative to the lengthy and unattractive road walk along the Gulf Brook Road. ADK also supports the proposed properly designed and switch-backed trail up to the Boreas Mountain ridge, the Pinnacle Trail, and the Casey Brook Connector and RNT Loop. We also support the trails that connect the Boreas Ponds to western trails and ultimately the Northville-Placid Trail.

Response: Thank you for your support in this matter.

Comment: DEC should consider using part of the existing logging road network for the Lake Andrew Trail. A portion of the Deerland Rd would provide an easy route back across Sucker Brook about 0.75 miles South of Lake Andrew. The Santanoni Rd about 0.7 miles Northwest of Lake Andrew would provide easy access back to the Bradley Pond Trail.

Response: DEC is committed to creating a purpose-built trail system that will be sustainable with minimal maintenance and improved overall user experience. Utilizing old roads as trails presents long-term maintenance challenges, examples of this can be seen on trails radiating out from the Upper Works Trailhead and in the western High Peaks.

Comment: DEC should avoid installing rock-based turnpike features on the Calamity Brook Trail or any other trail where skiing is identified as a primary use. Rock features (including water bars) limit the use as a ski trail when there is insufficient snow cover.

Response: Any trail that has dual-designation will be built, maintained or upgraded to be sustainable for all uses. Rock-based turnpike features on trails will have low profiles

to avoid issues with skiing. The use of rock-based turnpike provides for the longest lasting trail tread in areas where trail hardening is needed.

Comment: DEC should consider using the existing logging road network to reroute the East River Trail by crossing Dudley Brook just South of the suspension bridge on the Opalescent River. The reroute could follow former roads (Twin Trailer and East River Rds.) to Lower and Upper Twin Brooks. This would be a lower cost and more sustainable option. The road network gets hiking traffic off the poorly drained areas and would still be provide an opportunity to avoid the washed-out sections.

Response: *Thank you for the edit. DEC is committed to creating a purpose-built trail system that will be sustainable with minimal maintenance and improved overall user experience. Utilizing old roads as trails presents long-term maintenance challenges, examples of this can be seen on trails radiating out from the Upper Works Trailhead and in the western High Peaks.*

Comment: DEC should consider using the existing logging road network for part of the Dudley Brook Connector. Twin Trailer, East River, and Duane's Rds. would provide a sustainable option that heads Easterly towards White Lily Pond. It would also require less mileage of new trail construction.

Response: *DEC is committed to creating a purpose-built trail system that will be sustainable with minimal maintenance and improved overall user experience. Utilizing old roads as trails presents long-term maintenance challenges, examples of this can be seen on trails radiating out from the Upper Works Trailhead and in the western High Peaks.*

Comment: The hiking trail proposed for Cascade Mt should be separate from any of the existing or proposed cross-country ski trails including the Mr. Van Trail to avoid degradation of the ski trails. The other option would be to allow use of the old trail for winter use only.

Response: *The proposed trail will be separate from all the cross-country ski trails.*

Comment: The current trail up Cascade Mountain is a well-trodden trail that is already down to bedrock so it is not likely to be eroded further. In those areas where some improvement can be made, resources should be directed immediately. With the current ADK Summit Steward Program and the Adirondack 46ers Trailhead Steward Program, new users are encouraged to climb this short trail and benefit from huge amounts of information at the same time.

Response: *While there are portions of the current Cascade Mountain trail down to bedrock, much of the trail is still susceptible to expansion and erosion. In the bigger picture this trail will take more work to bring back up to a sustainable standard and maintain it, than to start from scratch. In starting over the DEC has a chance to build a new world class trail. The Partners that provide education at the trailhead and on the summit are critical components of educating users.*

Comment: We recommend the following trails be built in order to complete future hut-to-hut routes as part of the 2018 amendments to the Vanderwhacker Unit Management Plan:

- The North Creek-North Hudson Traverse (ACTLS Route #9): Four sections of trail totaling approximately ten miles of trail that connect North Creek to Loch Muller.
- The Chestertown Circuit via Brant Lake & Pottersville (ACTLS Route #35): Approximately 7 miles of trail from I-87 Ext 27 West to the Vanderwhacker Wild Forest down to the Stone Bridge Road.
- The Corinth-Tahawus Traverse (ACTLS Route #52): A trail from North Creek to the summit of Moxham Mountain and on into the hamlet of Minerva.

Response: *Noted, much of the proposals above are located on private lands and thereby outside of the scope of this UMP Amendment. Additional analysis and private land connections need to be sought before a proposal can be described in a UMP Amendment.*

Equestrian Trails

Comment: We are pleased that DEC has considered the designation of horseback riding trails on some old roads in both the HPWC and the VMWF. However, DEC must ensure that there is an invasive species spread prevention plan and regulations in place for equestrian users.

Response: *Thank you for your support in this matter. As part of the monitoring efforts for equestrian trails, DEC will survey for the presence of invasive species.*

Comment: Equestrian services represent business opportunities.

Response: *The amendments address several equestrian opportunities.*

Rock Climbing

Comment: I will let currently active technical climbers comment on these proposals, but I do favor a strict limitation on fixed anchors except where such an anchor is the only way to protect the resource.

Response: *Noted.*

Comment: Activities allowed at large in the newly acquired areas and the existing areas managed under the Plan presently include, without limitation, hiking/snowshoeing on trails and this concept is integrated by frequent references throughout the Plan. It could

be helpful to expressly integrate climbing activities throughout this Plan in the same way, especially as climbing routes are likely to be off trails and so subject to questioning, perhaps by those visitors who do not understand such a use.

Response: Climbing along with hiking to climbing routes is allowed at large in the same way hiking and snowshoeing is.

Comment: I support the construction of a parking area for Ragged Mountain on Gulf Brook Road. The cliff on Ragged Mountain is sure to become a top destination. However, this road is gated until late in the spring. It would be ideal if there was a new gate installed just beyond this proposed parking area, allowing the outermost gate to be open earlier, providing hiker and climber access to Ragged Mountain earlier in the year.

Response: The longest running slope on Gulf Brook Road and the section that is typically most easily degraded through weather and public motor vehicle use is the ascent from the Blue Ridge Parking Area to the Ragged Mountain Parking Area, therefore this section of Gulf Brook Road will not be opened prior to the rest of the road.

Comment: The high peaks, group limitations are a fact of life, and I see that as a possible reality at the crags as well. Unfortunately, this would impact beginner climbers the most, when they come out in guided groups or with academic institutions. Perhaps the most durable areas could be designated group climbing sites?

Response: Group size limitations have been in regulation in all areas of the Adirondack Park for years and they are used to manage resource protection. Designating specific routes for groups infringes on others rights to access and use the area.

Comment: The pull-off/lot at the Spider's web trail should be reopened so that climbers can avoid having to cross/walk on the highway.

Response: This location is along Rt 73 and sits on the Giant Mountain Wilderness Area side of the highway and outside the scope of this UMP Amendment. DEC is committed to working with various agencies, local government and user groups to make sure the overall parking situation along Rt 73 in the vicinity of Chapel Pond and Roaring Brook Falls is both safe and suitable for the amazing recreational assets in the area.

Comment: Removing lots will increase the amount of walking along route 73, which is dangerous, especially in winter. All lots should be plowed in the winter to minimize this hazard.

Response: As parking changes happen on Rt 73 there will be education and outreach to help inform users. Roadside parking has been part of the use of the Chapel Pond area for as long as people have been enjoying this area. This UMP Amendment proposes an alternative to the status quo that provides overall net benefits to the area and experience of those traveling through the area. Natural resource protection, safety and aesthetics will all be elevated with this plan. A connecting trail will parallel Rt 73 on the west side of the highway to allow safe, off highway access from parking lots to

Chapel Pond, Rocking Climbing and hiking locations. These lots will be plowed in the winter and DEC encourages climbers to snowshoe on the trails in the winter time to gain access.

Comment: Moving the hiking trailhead and limiting the parking there, while providing adequate parking for climbers who are a small, involved group willing to work cooperatively with the DEC and APA seems a more reasonable plan

Response: *DEC is trying to balance safe off highway parking, that enhances the aesthetics along the Chapel Pond corridor with access for all users. Climbing Kiosks being installed will help better track the usage of climbing areas and give more information to help adjust this plan in the future.*

Comment: Rock climbing, being confined to a relatively small area, most of which is a cliff, has a much lower environmental impact than hiking. The parking currently around Chapel pond is inadequate and should be increased, not decreased.

Response: *The formal parking capacity south of Chapel Pond to Round Pond does not decrease in numbers from what was proposed in the 2004 Giant Mountain and Dix Mountain Wilderness UMPs.*

Comment: Chapel Pond remains a primary hub for rock and ice climbers. The climbing resources are close to the road (both sides), span all climbing disciplines (summer rock, ice, mixed, and bouldering), and appeal to beginners and experts alike. Climbers share the roadside parking with hikers, sight-seers, boaters, and swimmers, but without question, the greatest number of cars—and the most problematic parking spots—are for those hiking Giant Mountain.

Response: *Noted.*

Comment: As a climber, I applaud that climbing is finally being recognized as legitimate recreational pursuit in the high peaks, alongside hiking, skiing, and other recreation.

Response: *Noted.*

Comment: Climbing has long suffered in the dark, simply because the APSLMP is based on the 1950's writings of Edward Zahniser. To date, the state's philosophy has been "If Zahniser didn't know about an activity, then that activity must be bad, and should be banned." Thank heavens this benighted era is coming to an end.

Response: *Noted.*

These climbing areas see a lot of early season climbing rock/ice conditions so incorporating the approach trails into the list of those permanent trails that will be maintained in all seasons, including snowplowing in winter, would makes sense. Some approach trails that are heavily used may warrant more care maintenance to mitigate the damage of using them in muddy seasons (which the Plan notes can cause more damage even on the permanent trails).

Response: The Amendments propose designating and maintaining sustainable approach trails to a Class II or III standard. Parking areas will be designed to allow for multi-season access.

Comment: It might be helpful for all visitors to understand that climbing is an allowed at large activity for users and therefore perhaps a new icon for signage purposes in the various areas where there is planned to be signage would be an easy way to educate users.

Response: DEC will be working to improve signage and information available via the internet, this is a great point to add.

Comment: I support the stabilization of soils on cliff tops, bases, and approach trails.

Response: Noted.

Comment: Our sport requires that we need access to cliffs. We would like our opinions to be considered before regulations are implemented. All we ask is to be able to practice our sport in a low impact manner which will not negatively impact the land or other land users

Response: The Amendments propose convening a focus group with The Department, climbing groups, and other stakeholders in order to develop park-wide policies for climbing routes.

Comment: The Pages 105-106 description of rock and ice activities could be clarified to include rock, ice and mixed climbing because some climbing area 'routes' will show both rock and ice portions in varying degrees in various weather conditions, especially in transition season, and even during in -season climbing periods when melt-freeze cycles are bound to occur that then affect the ratio of rock to ice sections on climbing routes. By including mixed climbing, users will be more educated about what is allowed.

Response: Please take a look at the updated section in Climbing in the HPWC UMP Amendment.

The Plan discussion on the fixed anchors and bolting controversy is well described as a local climbing culture philosophy and its principles and 'rules of the game' should be balanced with safety issues for all kinds of climbers. The philosophy is held by many other local climbing groups as well.

Response: Noted.

Please consider installing climber kiosks at climbing area trailheads in the High Peaks Wilderness and Vanderwhacker Wild Forest with Leave No Trace messages and other relevant information for climbers.

Response: DEC will be working to improve educational and informational signage in the climbing areas.

Comment: I support the ongoing efforts by the DEC to work with climbing organizations like Access Fund and Adirondack Climbers Coalition to monitor and protect cliff-nesting species utilizing modern best practices and management strategies.

Response: *Noted.*

Comment: I appreciate your plan to work with groups representing technical climbers, such as the Access Fund and the Adirondack Climber's Coalition. Technical climbing has a long and storied history in the 'Daks, and efforts should be made to insure that it has a robust spot in the future of these mountains. Robert Marshall, to name one famous Adirondack figure, found his passion for wilderness through adventure, and he would fully appreciate what climbers are seeking

Response: *Noted.*

Comment: I do support the size limit for groups to 10. The month of August is terrible with the many school groups invading the Adirondacks with large groups. I know for certain that they do not keep the group size down.

Response: *Thank you for your support in this matter.*

Comment: What introduced me to the Adirondacks in the first place is the incredible and truly endless recreational opportunities one can have here. This combination of recreational activity with superb natural setting is what fuels my love for these mountains, and what keeps bringing me back here. Most often I engage in climbing at the Adirondacks, and it is extremely important that I and my friends and climbing partners can continue practicing responsible rock and ice climbing here. For this to happen access is the first and foremost need.

Response: *Noted.*

Comment: Before placing limitations on daily visitation I would like to see more climber education take place using these kiosks and other signage.

Response: *Noted.*

Comment: I also support the ongoing efforts by the DEC to work with climbing organizations to best use and manage the climbing resource throughout the park and mainly in the High Peaks Wilderness area.

Response: *Thank you for your support in this matter.*

Comment: I also propose creation of a shuttle service, with the fees collected going towards professional maintenance of the hiking trails. To eliminate negative impact on locals, a parking sticker system could be used to allow priority at existing lots. Similarly, a sticker for "climbers only", be they rock or ice, might be required for parking along Chapel Pond.

Response: *While a shuttle is outside the scope of this UMP Amendment, DEC and a group of stakeholders are discussing overuse issues along the Rt. 73 corridor, which include multiple different Forest Preserve Units, other public lands, private lands and business.*

Comment: Please move forward with the fixed anchor focus group comprised of Adirondack Park stakeholders, including Access Fund and Adirondack Climbers Coalition. There have been many times when I've seen anchor setups that are dangerous to the users or cause unnecessary erosion on cliff tops (if accessible). Stainless steel anchors in certain climbing areas (taking into consideration the opinions of the Adirondack Climbers Coalition members and other Adirondack Climbers) would last a long time and allow climbers to be safe. However, not all areas are suitable for anchors, so much discussion is needed to come to a conclusion on this matter. This important step in the process of determining where fixed anchors should be installed is a direction that can help save areas like the practice wall of the Beer Walls along with other heavily used crags of the Chapel Pond region and Adirondack park.

Response: *Noted.*

Comment: Climbing is a viable usage wilderness in Yosemite, and it should be considered viable in the Adirondacks. Please consider all these points.

Response: *Noted.*

Comment: In some areas, small map signs may be helpful to clarify the correct approach trail —over the years, many offshoot trails have been created through the forest and it can be disorienting for a new visitor to stay on the correct path.

Response: *DEC will be working to identify the most sustainable routes to climbing locations, maintaining them and taking action to mitigate social trails that develop.*

Comment: Eliminating the Pitchoff West TH would result in the loss of parking for Cascade Falls in the winter months. Climbers would need to walk on RT 73 from Pitchoff Walls. This option would be both dangerous and inconvenient for climbers. Winter maintenance of the Lakes Picnic area might address this problem.

Response: *Following the relocation of the Cascade Mountain Trailhead 3 of the 5 existing parking lots will be removed from the south side of Route 73. Stage Coach rock and the parking area furthest to the west will remain for access to Pitchoff. In the winter climbers would be able to use these lots to park. Given the steep grade of the access road down to the day use area at Cascade Lakes and the challenges of winter maintenance, there could be considerable safety concerns with winter maintenance.*

Comment: Provide fair and equitable access to rock and ice climbing resources.

Response: *Noted.*

Comment: As a guide and recreational climber, parking has become a significant concern where climber and hiker parking overlap. Climber numbers have not noticeably increased in decades while hiker numbers are increasing at a high rate.

Response: *DEC is trying to balance safe off highway parking, that enhances the aesthetics along the Chapel Pond corridor with access for all users. Climbing Kiosks being installed will help better track the usage of climbing areas and give more information to help adjust this plan in the future.*

Comment: Manage rock climbing sites to minimize environmental impacts. Climbing is a primitive form of recreation that mostly occurs in low numbers and in dispersed areas. Camping is rarely done while climbing. Herd paths are lightly used.

Response: *Noted.*

Comment: The use of fixed anchors for this purpose in some areas has fundamentally altered the sport of climbing, resulting in a "climbing gym" atmosphere where numerous bolts are used to create a route where none previously existed. This statement does not accurately reflect the nature of climbing in the HPWA. Although there are several popular cliffs that are appropriate for groups of climbers, they do not resemble indoor climbing walls, i.e. gym atmosphere, high density of bolt protected routes, routes artificially created.

Response: *Noted.*

Comment: Recently rock climbing has seen a gain in popularity throughout the Adirondacks. Mountaineering groups have formed and various publications are describing more local climbing routes. Increased interest in and information on rock climbing can provide new and positive recreational opportunities but could potentially have some negative effects if not handled properly. Currently, informal trails lead to the climbing locations. As popularity increases and climbing routes are published through different media outlets, informal trails may increase in number and impact. Evidence is needed to validate the statements made here. My experience has been the contrary in the HPWA where climber usage has stagnated. Perhaps winter climber numbers have increased somewhat. Although the HPWA has a high density of cliffs, this area is not gaining new routes at a notable rate. Guidebooks have become more detailed and historical, and accurate directions keep climbers on herd paths and help to disperse climbers to other regions of the Park. Mountaineering groups, with the exception of the ADK are small and focused upon stewardship, not outings.

Response: *DEC will be working to improve the accuracy of climbing usage within the High Peaks Wilderness and other areas, particularly in the Chapel Pond area. The climbing community is reaching out to DEC to work on issues concerning access, education and other issues, which will improve the overall understanding the complex nature of usage and wilderness management considerations.*

Comment: Relocation of the Ridge Trail may negatively impact Jewels and Gems Cliff which already suffers from erosion/overuse. Non-climbers may not be aware of the objective hazards associated with cliffs, may build fires, camp, add garbage and human waste.

Response: *When the Work Plan is developed for the relocation of the Giant Ridge Trail, DEC will take into consideration adjacent uses, sustainable routes and access needs. Extensive education and outreach will be associated with any work done in this area to ensure that users are well informed.*

Comment: Climber numbers are a small fraction of the number of day users at Chapel Pond. Our climbing resources are centered around the Pond, (i.e. Spiders Web, Creature Wall, Chounards Gully, Chapel Pond Canyon) and these resources are not clustered near the proposed parking areas. If hikers and boaters are getting their parking areas improved, climbers deserve the same.

Response: *The parking issues along Rt 73 provide many challenges to the State Agencies, Local governments, highway users and forest preserve users. Safety, aesthetics, backcountry use management and economic considerations are all important aspects of decisions on parking lot development. DEC is committed to trying to put more parking off the highways to provide safe parking that doesn't impact the wonderful visual resources we have in the Adirondacks.*

Comment: Maintain all of the existing parking areas, install trailhead signs and install or replace a privies and kiosks.

Response: *Noted.*

Comment: Chapel Pond beach needs a privy. The proposed parking area will need a privy. Climber trailhead signs will reduce the number of herd paths.

Response: *DEC will work to place a privy at an appropriate location near Chapel Pond Beach. New parking lots will have appropriate methods to deal with human waste.*

Comment: If roadside parking become restricted, then these parking areas will need to be plowed and maintained for ice climbers.

Response: *Any new parking lots proposed along Rt 73 by DEC will be sited and constructed to allow for year round maintenance and use.*

Comment: I hope that you're able to find a good balance between protecting the Adirondacks for generations to come and providing access to the hiking and climbing enthusiasts that love the area.

Response: *Noted.*

Comment: There is nothing better than sitting on the shore of chapel pond after a long day in the woods, just enjoying the view and having a quick swim!

Response: Noted.

Comment: Roaring Brook Falls / AMR parking: Used to access backcountry climbs in the High Peaks, as well as popular roadside ice climbs such as Haggis and Roaring Brook Falls. Large parking area, filled to overflowing on busy weekends.

Response: DEC will be working with parties to address this area of access for the High Peaks and Giant Mountain Wilderness Areas.

Comment: Case Wall and lower Beer Wall Canyon: Used mostly in the summer. Large pullout.

Response: DEC will be working with DOT to stripe parking spots on this lot to facilitate safe and efficient parking.

Comment: Lower Beer Wall and overflow for the regular Beer Walls: Used in both winter and summer. Large pullout.

Response: DEC will be working with DOT to stripe parking spots on this lot to facilitate safe and efficient parking.

Comment: Beer Walls: Used in both winter and summer. Large pullout.

Response: DEC will be working with DOT to stripe parking spots on this lot to facilitate safe and efficient parking.

Comment: Chapel Pond Pullout: Used by sight seers, swimmers, and boaters. In the winter, this is the primary parking for ice climbers, and is usually packed. Used by summer rock climbers only as overflow.

Response: DEC will be working with DOT to stripe parking spots on this lot to facilitate safe and efficient parking.

Comment: Chapel Pond Gully Cliff: Dirt shoulder used by swimmers, and summer climbers.

Response: Noted.

Comment: Giant Mountain Trailhead: Used by summer and winter climbers for access to Chapel Pond Canyon, Gully Cliff, Aquarium, Creature Wall, Upper Washbowl, and Washbowl Pond areas.

Response: Noted.

Comment: Giant Mountain Trailhead: Overflow used for all the same reasons.

Response: Noted.

Comment: Chapel Pond Slab: Dirt shoulder used by climbers, campers (to access the Camp Here sites), and boulders (to access the Chapel Pond Boulders). Other nearby parking spots work also.

Response: *Noted.*

Comment: Jewels and Gem, King Wall, Emperor Slab: Wide dirt shoulder, used both summer and winter. Room for 10+ cars.

Response: *Noted.*

Comment: Round Mountain Trailhead: Used by boulderers to access the Round Pond Boulders, summer climbers to access the Bikini Atoll, and winter climbers to access random ice routes on the north side of the road. Usually full to overflowing with hiker vehicles.

Response: *DEC will be working with DOT to stripe parking spots on this lot to facilitate safe and efficient parking.*

Comment: Spanky's Area: Large pullout, used by summer and winter climbers.

Response: *Noted.*

Comment: I am strongly opposed to the closure of any roadside parking, as doing so will put pedestrians in danger. Closing any of these roadside areas will significantly impact climbers, regardless of whether overall parking is increased. The shortest approach always begins from the road, and moving parking further away will require climbers to simply walk on the road. This is especially dangerous in the winter when snowbanks narrow the road.

Response: *The shortest distance between two points is a straight line and the first trails in the High Peaks followed that practice. Over a 100 years later we are challenged with managing use on a trail system that wasn't developed for the long term. Roadside parking has been part of the use of the Chapel Pond area for as long as people have been enjoying this area. This UMP Amendment proposes an alternative to the status quo that provides overall net benefits to the area and experience of those traveling through the area. Natural resource protection, safety and aesthetics will all be elevated with this plan. A connecting trail will parallel Rt 73 on the west side of the highway to allow safe, off highway access from parking lots to Chapel Pond, Rocking Climbing and hiking locations. These lots will be plowed in the winter and DEC encourages climbers to snowshoe on the trails in the winter time to gain access.*

Comment: The draft proposal describes adding new parking, and I like this idea, especially if the Giant Mountain Trail can be rerouted to that new lot(s). The positioning of this lot(s) should preserve the unique natural features of the pass, such as the boulder field alongside the road near Chapel Pond Slab or the wetlands near the Round Pond Trailhead.

Response: *Noted.*

Comment: Adding new lots works for climbers only if the existing roadside parking is maintained.

Response: *Noted.*

Comment: 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.

Response: *Thank you for your support on this proposal. DEC looks forward to working with the Council on these issues.*

Camping

Comment: I agree with the proposals to construct more sustainable campsites using built-up and well-drained tent pads where necessary. I realize that preserving water quality is important, but I believe that there can be site-specific determinations of places where the 150' setback is not required. That setback should be retained for any at-large camping, but a careful, professional evaluation of the actual slopes, drainage, and anticipated use levels would permit a campsite or lean-to to be closer to water.

Response: *Designated tent sites are allowed to be located less than 150 feet from water and final evaluations by staff may determine this.*

Comment: While it may not apply directly to all Adirondack situations, recent experience canoeing in the Boundary Waters and Algonquin Park (both widely considered to be well-managed) has been that many campsites are quite close to the water without any apparent loss of water quality.

Response: *Noted.*

Comment: On the Hanging Spear Falls trail, there is an existing clearing just northeast of the Upper Twin Brook crossing about 100 meters north of the Allen Mountain herd path junction that could make a suitable primitive tenting area.

Response: *Thank you. This will be taken into consideration as DEC develops the Work Plan for the trail improvements for the East River Trail, White Lily Connector Trail, access to Allen Mtn and the appropriate camping locations adjacent to these routes.*

Comment: Any campsites developed should have water views and allow campfires.

Response: *Features that enhance user enjoyment such as views are taken into consideration when determining tent site locations. Campfires will be allowed throughout except where High Peaks regulations prohibit their use.*

Comment: I think a reservation system and a fee would be completely appropriate. First come first serve does people with jobs or that live far away a great disservice. The Essex Chain campsites are lousy and that's why they don't get much use.

Response: *Noted.*

Comment: Support campsites along gulf brook road.

Response: *Thank you for your support on this matter.*

Comment: We appreciate that DEC designated several campsites in the vicinity of the Santanoni Range.

Response: *Thank you for the support in this matter.*

Comment: I recommend that the character of the Chapel Pond Outlet remain primitive and open to car camping. These are coveted sites and extremely convenient for climbers. Similarly, the sites at the base of Chapel Pond Slab should be maintained.

Comment: DEC needs to do a better job of creating primitive campsites. There are too many instances of poor site development in past efforts that get little if any use due to the lack of site preparation. Proper siting, clearing of trees and brush, leveling and hardening a tent pad, providing a fire ring are all necessary ingredients to campsite development. Once an obvious and desirable tent site is established, it will focus the impacts to a specific location that will be more sustainable and create a more enjoyable user experience.

Response: *All proposed tent sites within these Amendments will be developed in a sustainable manner that promotes user enjoyment, and will include hardened tent pads, privies and where permitted, fire rings.*

Comment: In addition to the proposed water access sites on Sanford Lake, DEC should create a primitive tent site along the Opalescent River or the Hudson River. DEC should include a map showing the location of the proposed primitive tent sites along the Newcomb Lake to Lake Harris Trail.

Response: *The area along the Hudson and Opalescent Rivers on the MacIntyre East Tract is a large and broad flood plain that lacks area for sustainably build facilities. In addition to this the flashy nature of these rivers in this area pose a safety concern if tent sites were developed here.*

Comment: The UMPs call for a number of new campsites at places like Lake Andrew, Bradley Pond, along the Adirondack Canoe Route, Lake Jimmy, Preston Pond, Henderson Lake, Boreas Ponds, White Lily Pond, and the Opalescent River, among other areas. The DEC is pro- posing the conduct a field analysis about the viability of

campsites at these locations and develop a list of priority areas. The DEC will also determine campsites in the High Peaks that need to be closed in order to let the area around it recover. PROTECT supports these new campsites.

Response: *Thank you for your support on these proposals.*

Comment: P.117 – I strongly urge DEC to build and maintain high quality primitive tent sites. Many of the previous sites have lacked proper siting and prep work (clearing, leveling, fire ring) to create a desirable place to camp. More effort should be put into making a sustainable tent pad.

Response: *As outlined in the Amendments, all facilities will be purpose and sustainably designed and constructed.*

Comment: Increased designated camping sites is appropriate in concentrating visitor impact in some of the highest use areas within the High Peaks.

Response: *Thank you for your support on this proposal.*

Regulations

Comment: Should include an action step to codify in regulation the 3 new designated Day Use Areas just as was mentioned for the 2 new designated Day Use Areas for the Vanderwhacker WF UMP amendment.

Response: *Noted.*

Comment: Although the Department encourages the use of bear canisters in all Adirondack backcountry areas, it seems unnecessary to mandate their use in areas with little history of bear problems such as the Western High Peaks. In addition, this proposal will affect the Northern Section of the Northville Placid Trail. A consequence of this is that thru hikers may end up carrying a canister the entire 133 miles length of the trail even though they are only required on the northern 35 miles of the corridor. For backpackers trying to travel lightly and plan food for 7 to 14 days this will be a detriment. I am requesting that the proposal to require the use of bear canisters in the Western High Peaks be removed from the final amendment. An alternative to this would be to exempt the Northville Placid Trail corridor from this requirement.

Response: *Bear Canisters are being required throughout the unit due to increasing bear populations and a rise in bear-human interactions. The use of canisters throughout the unit increases wildlife protection and user safety. The new regulation also minimizes user confusion as to where canisters are required.*

Comment: We do not support changing the names from Eastern and Western High Peaks to Central and Outer High Peaks. This new nomenclature is likely to confuse the public and will result in less compliance with zone-specific regulations. It would be far

easier in terms of communicating with the public if the management regulations and actions proposed in the HPW UMP for the “Central High Peaks” would be applied across the entire HPW unit. This strategy would also provide the maximum benefit to the resource. Currently, the Western High Peaks are also experiencing high use with impacts to trails and to habitat from campfires and from camping in non-designated sites. ADK would support a DEC decision to have one set of regulations across the High Peaks Wilderness Unit.

Response: Changing the names is intended to reduce user confusion, especially given the geographic layout of the unit now that it includes the former Dix Mountain Wilderness Area, the Casey Brook Tract, and Boreas Ponds. The outer High Peaks Zone experiences less use than the central High Peaks Zone, therefore The Department does not feel all of the Central Zone regulations are necessary to protect the resource.

Comment: If DEC feels that such an approach is impossible currently, we strongly urge DEC to consider a configuration where the new parcels of Boreas Ponds, Casey Brook and MacIntyre East, and the former Dix Mountain Wilderness be incorporated into the Eastern High Peaks with the management strategy defined in the draft HPWC UMP for the proposed Central High Peaks. In this case, we also suggest that the line between the Eastern High Peaks and the Western High Peaks be moved to the west and run along the Northville Placid Trail from Lake Placid to Duck Hole, and then following Duck Hole via Bradley Pond Trail to the proposed Andrew Lake Trail south to the edge of the wilderness area. The public will understand the boundaries better if the boundaries are represented by trails. In the Western High Peaks monitoring could be used and management triggers established to upgrade the regulations to the Eastern High Peaks standard when needed.

Response: See above comment.

Comment: We support new regulation that limits camping to designated sites only in the proposed Central High Peaks and should evaluate whether this rule should apply also to the proposed Outer High Peaks zone. Site conditions should be monitored annually and evaluated to assess a need to change the management strategy. We support a ban on glass containers in the entire High Peaks Wilderness Unit. We support mandatory use of bear canisters from the beginning of May until the end of October throughout the entire High Peaks Wilderness Unit. Campfires should be prohibited anywhere in the proposed Central High Peaks zone and should be considered for the entire High Peaks Wilderness Unit. ADK supports a fire ban across the entire High Peaks Wilderness Unit. If this is impossible currently, DEC must quantify the existing condition and current impact of campfires in the High Peaks Wilderness. Areas such as the former Dix Wilderness are currently extensively impacted by campfires.

Response: Thank you for your support in these matters. The proposals in the Amendment rely very heavily on monitoring and data driven management decisions. The Department will continually monitor use and impacts and if in the future a

prohibition on fires is warranted throughout the High Peaks Wilderness then it will be addressed at that time.

Comment: Ideally, dogs should be leashed and under an owners control at all times throughout the entire High Peaks unit. ADK supports the proposed regulations that require dogs to be leashed, at campsites and lean-tos, and anywhere above 4,000 feet in the proposed Outer High Peaks zone. However, leashing across the entire High Peaks Unit should be considered given the popularity of the area. DEC should provide Leave No Trace messaging that explains the potential impact of dogs on wildlife, and other users, if not under control, leashed, picked up after, and cared for properly in all zones.

Response: *DEC will work to expand education and outreach efforts to that encompass Leave No Trace messages concerning impacts of dog in wilderness areas.*

Comment: ADK supports mandatory user registration for the entire High Peaks Wilderness Area. The means of registration should be designed to burden the user to the minimum extent possible consistent with the Department acquiring user controls and information needed for search and rescue operations.

Response: *Thank you for your support in this matter.*

Comment: believe that the intent is to require DEC approved bear canisters in both Central and Outer High Peaks Zone. If so, DEC should state it more clearly than referring to the Western High Peaks Zone. Is this change necessary? Unless there is a significant bear issue in the Outer High Peak Zone, it would be preferable to remove that requirement.

Response: *Bear Canisters are being required throughout the unit due to increasing bear populations and a rise in bear-human interactions. The use of canisters throughout the unit increases wildlife protection and user safety. The new regulation also eliminates user confusion as to where canisters are required.*

Comment: I strongly urge DEC to reconsider the ski/snowshoe regulation change to 12 inches. Post- holing is already a problem, so increasing the snow depth only exacerbates the number of hikers who choose to walk on the trail without snowshoes. Wouldn't it be better to lower it to 6 inches so that if you find that the snow is ankle deep you need to wear snowshoes or skis?

Response: *In moving to a depth of 12" of snow off trail as the requirement for skis and snowshoes, DEC is hoping to end confusion and interpretation as to when skis or snowshoes need to be worn. DEC will work to promote more awareness through education and outreach efforts.*

Comment: We support a change in the ski and snowshoe use regulation to a standard depth of snow to 12" off trail surface.

Response: *Thank you for your support in this matter.*

Comment: ADK supports the extension of the group size regulations to the proposed Outer High Peaks zone with a group size of 8 people for overnight and 15 people for day use for the entire High Peaks Wilderness Area.

Response: *Thank you for your support in this matter.*

Comment: I am concerned that the group size and daily visitation limits will unnecessarily restrict access and increase overhead to monitor compliance. Group size and daily visitation limitations should be used as a last resort after less severe management options, such as education and signage, have been exhausted, which I do not believe they have.

Response: *Group size limitations have been in regulation in all areas of the Adirondack Park for years. These Amendments align with this regulation and use it as a management tool. Daily visitation limits are not proposed within these Amendments.*

Comment: The many school groups should have to register and they should have designated camping areas. Last year we were there in August and meet 5 school groups with anywhere from 10-20 students including the guides.

Response: *The Forest Preserve provides equal access opportunities for everyone.*

Comment: I have read that you propose limiting group size and imposing limitations on visits to the Chapel Pond area. Please, for your sake as well as that of the many who hold that place sacred, make that a policy of last resort.

Response: *Group size limitations have been in regulation in all areas of the Adirondack Park for years. These Amendments align with this regulation and use it as a management tool. Daily visitation limits are not proposed within these Amendments.*

Comment: The 1999 plan mentions limiting cell phone use in the forest areas and perhaps this should be addressed again almost 20 years later, with a lot more people using the areas, in terms of keeping the human noise down on trails, for all users generally.

Comment: I agree with all of the proposed changes in zone boundaries, name change, and the snowshoe depth threshold.

Response: *Noted*

Comment: Finally, the regulation prohibiting the pitching of a tent next to a lean-to to add capacity (while still within the groups size of eight) needs to be spelled out more clearly. Currently, it is merely the absence of a "Camp Here" disk on the lean-to that prevents one pitching a tent.

Response: *Noted.*

Comment: I support special rules for expansion of the use of bear canisters and a prohibition on campfires in order to allow places to revegetate.

Response: *Thank you for your support on these proposals.*

Comment: Dogs do not belong in the High Peaks Wilderness Area.

Response: *Noted.*

Comment: Who is enforcing leash requirements in the Eastern High Peaks Wilderness.

Response: *NYS DEC Forest Rangers enforce regulations in the Eastern High Peaks Wilderness.*

Comment: 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.

Response: *Thank you for your support on this proposal.*

Comment: The evidence is clear that natural resource, social and psychological aspects of the HPW have been degraded and continue to be degraded by overuse. The SLMP imposes a clear obligation on both DEC and APA to address the overuse problem. In addition, the numerous documented ecologically sensitive resources in the Boreas Ponds addition to the HPW need user controls to avoid damage to these rare and easily damaged wilderness resources. The time to implement direct user controls including a permit reservation system for day use and overnight camping during peak use periods is now. It is particularly timely and important to implement such a system at the new Boreas Ponds entrance to the High Peaks, but it is also urgently needed, as it has been for 20+ years, in the heavily used trail corridors of the eastern High Peaks.

Response: *Given the Boreas Ponds Tract lack of past public recreation usage and an infrastructure designed around removing forest products materials, the Department feels that providing initial access and formalized, purpose built facilities will aid in determining the overall best carrying capacity of the area. Trails and campsites that are purpose built will provide drastically different levels of capacity vs an adopted trail system or using a forest road system. Through this portion of the initial access development, as planned, we will provide a baseline of use and its impacts on a purpose-built trail. Beyond the physical measures of capacity there will be a need to establish baselines of volume of usage and use patterns particularly around the ponds, to help inform the intangibles in the carrying capacity suite. With a good data set that indicates the quantity of visitors, the timing of their visitation and the chosen activities we can make decisions concerning limiting access on these newly added lands to the HPWC.*

Comment: Justification for a Permit System: As both of your agencies know, heavy public use of the HPW and resulting degradation of the wilderness resource is not a recent phenomenon. The threats posed by overuse were recognized as early as 1961

by the Joint Legislative Committee on Natural Resources. In proposing a High Peaks Wilderness, that Committee noted the challenge of how to “accommodate large numbers of people without a simultaneous destruction of the wilderness character of the area” (Annual Report of the JLCNR, 1961). In 1970, the final report of the Temporary Study Commission on the Future of the Adirondacks noted that “the decision to limit use by appropriate means will have to be made in the very near future...(and)...the creation of some sort of permit system to limit visitors in certain fragile areas of the Preserve seems unavoidable.” Since 1972, the SLMP has maintained that “the heavy public use near Marcy Dam, Lake Colden and in the Johns Brook Valley threaten to destroy the wilderness character of these sections if appropriate management systems are not promptly applied...Future measures to control or limit public use in particular areas and at given times of the year are inevitable” (SLMP, page 58).

Response: *Noted.*

Comment: One of the most important of those management systems referenced in the SLMP is a permit reservation system. Indeed, a permit system was included in DEC’s 1974, 1978 and 1994 drafts of a HPW UMP. The 1978 draft UMP stated: “Through past experience the U.S. Forest Service has found that a permit system is one of the best ways of gathering user information concerning a management area. A free permit system should be initiated in the eastern High Peaks with no effort to limit numbers of people using the area for at least three years. Data will be analyzed...if at some time in the future it is determined that numbers of people using the area will have to be controlled, even just for certain high use weekends, the mechanism will already be in place to do so.”

Response: *The main scope of this UMP Amendment is to address new lands. The considerations for permit system is one DEC feels has to happen when we look at the entire Unit. While the previous Drafts of the HPWC UMP may have had provisions in the document mentioned above, DEC follows the 1999 Final UMP that was approved by the APA Board and has been guiding management of the HPWC since then.*

Comment: The 1994 Draft UMP stated: “Wilderness permits are a key management tool for protecting wilderness resources and ensuring high quality visitor experiences.” It cited the extensive use of such permit systems by the National Park Service, U.S. Forest Service and Parks Canada.

Response: *The main scope of this UMP Amendment is to address new lands and minimal other proposals. The consideration of a permit system is one DEC feels has to happen when we look at the entire Unit. While the previous Drafts of the HPWC UMP may have had provisions in the document mentioned above, DEC follows the 1999 Final UMP that was approved by the APA Board and has been guiding management of the HPWC since then.*

Comment: The 1999 adopted HPW UMP called for the DEC to “form a working group in year three to develop the structure and implementation process for a camping permit

system. The working group will afford opportunity for public input and comment. Final recommendations to the Commissioner of Environmental Conservation will be made no later than year five. The decision to implement a permit system will require an amendment to this plan and will afford opportunity for public review and comment” (pg. 154, HPW UMP). The DEC has failed to implement this directive of the UMP. DEC has instead opted to implement a series of indirect controls. Overall, these have failed to protect the HPW from overuse, as the data clearly demonstrates:

Between 2005 and 2015 the numbers of hikers signing the Mt. Van Hoevenberg trail register soared by 62 percent; During the same period, the number of hikers on Cascade Mountain doubled from 16000 to 33000; Between 2007 and 2017, the number of hikers contacted by the Summit Stewards has grown from 14000 per year to more than 31000 per year; In 2017 close to 80 percent of all trailheads leading into the High Peaks and surrounding wilderness areas were routinely above capacity. Thirty-five parking lots designed for fewer than 1000 cars frequently had more than 2000 cars trying to park in them.

This huge influx of hikers and campers has been catastrophic to both natural resources and to the social and psychological carrying capacity of the HPW. Overuse of trails, campsites and summits has caused widespread and serious erosion, damaged and destroyed fragile alpine vegetation despite the heroic efforts of the Summit Stewards, and left areas littered with trash and human waste. Hordes of users eliminate the chance in many places that a hiker can experience “outstanding opportunities for solitude” – one of the key aspects of Wilderness defined in the SLMP.

Adirondack Wild contends that it is a violation of DEC’s responsibilities for care, custody and control of the Forest Preserve that, after failing to comply with the 1999 HPW UMP directive to evaluate a permit system, the first significant amendment in twenty years fails to consider or even discuss implementation of a permit system despite the clear evidence of ongoing damage to the HPW.

Indirect controls are necessary, but have clearly been proven insufficient to address severe overuse of the HPW, and will be proven insufficient to prevent damage to the fragile Boreas Ponds addition.

Response: During the winter of 2018 the DEC held 4 discussion groups to address the overuse in the High Peaks Region. Multiple stakeholders from local government, NGOs, academia and other partners partook in this process. This represents the beginning of a multi-pronged approach to addressing overuse not only within the HPWC but surrounding units, highways and local issues. The main scope of this UMP Amendment is to address new lands and minimal other proposals. DEC is looking forward to working with a diverse group of stakeholders to develop the Wildland Monitoring Plan which will help better inform DEC on specific challenges facing the HPWC in 2018 and beyond. The solution to the overuse issue will not be one single action, but rather a series of actions across a broad spectrum, with education and

outreach efforts being the most effective and most cost-efficient method to improve at every level.

Comment: Consideration of a day use and overnight camping permit reservation system at Boreas Ponds and in the eastern High Peaks needs to be incorporated in this UMP amendment. DEC is already very familiar with a permit system, having just established one at Roundout Creek (“Blue Hole”) in the Sundown Wild Forest (Catskill Park) in order to control overuse. There, years of indirect user controls and education proved insufficient in protecting the Forest Preserve from persistent overuse. DEC came to the right decision this year to institute a day use permit system using Reserve America in order to limit access to no more than 40 groups of 6 people per day, or 240 persons per day.

Response: *Noted. Please see comment above*

Invasive Species

Comment: We support the retention of the cabin at Four Corners for use by forest rangers and assistant forest rangers (AFRs) to police the special CP-3 and canoe/kayak parking lots to ensure that no members of the public drive past the main parking lot without the required permits. A gate just north of the main parking lot supervised by an AFR or ESF student would be an ideal way to limit vehicular access to the Boreas Ponds lake area. The AFR could also check cars with kayaks and canoes for aquatic invasive species on the boats.

Response: *The Amendments outline several alternatives for the historic cabin. The preferred alternatives are for administrative and interpretive use, which would allow for actions similar to your suggestion.*

Comment: We support the installation of a boat inspection and washing station at Exit 29 of the Northway.

Response: *This is outside of the scope of these Amendments.*

Comment: DEC should consider providing canoes at the Boreas Ponds that can be reserved and used by the public. DEC should consider having seasonal trail stewards (professional and volunteer) for educational outreach to visitors.

Response: *The Department does not supply canoes for public access for various reasons including public safety and liability.*

Comment: We request the addition of at least one watercraft inspection and decontamination station at the Frontier Town Visitors Center, or near the Gulf Brook Road, to prevent the introduction of aquatic invasive species.

Response: *Noted.*