



STATE OF NEW YORK CONSERVATION FUND ADVISORY BOARD
625 Broadway, Albany, NY 12233-4800

July 17, 2013

James E. Connolly
Adirondack Park Agency
PO Box 99
Ray Brook, NY 12977

RE: APA Classification for Essex Chain of Lakes

Dear Mr. Connolly,

The New York State Conservation Fund Advisory Board would like to thank the Adirondack Park Agency for the public hearing process that was held as part of this classification of the lands. The large number of public hearings and varied locations allowed for a diverse group of stakeholders to participate in the public hearing process. In addition, the NYS Dept. of Environmental Conservation held meetings early on during this process with the sporting community and other interest groups to garner their comments.

It is estimated that over \$2 billion generated to the state economy on a yearly basis by residents and visitors coming to New York to hunt, fish and trap. That economy supports thousands of jobs across New York. More so the economy supported by those that hunt, fish and trap is especially critical to the rural communities within the Adirondack Park.

Existing Features of the Site

The CFAB has reviewed all the documentation presented to the public as part of this process and combined that with firsthand knowledge of what currently exists on the site. The information that has been presented to the public seriously distorts the true characteristics of this site. The "Structures and Improvements" section of the DGEIS contains a few short paragraphs on the existing network of roads, bridges and gravel pits. In addition all of the alternatives and presentations that were shown at the APA public hearing conveniently show all roads ending at the border to this recently acquired parcel. Why was there not a table clearly depicting the roads and the characteristics associated with those roads such as width, construction material, seasonal, etc.? For the individual who hasn't visited this site it could be assumed that these features are minimal, when in reality it is this infrastructure and the human impact that will forever be present on this parcel that needs to be first and foremost in any discussion on land classification.

I encourage the staff at DEC, APA as well as the APA Board Members to overlay the road network that exists in this site to any other Wilderness or Primitive area in the Adirondack Park and try to find a Wilderness or Primitive Area that has or has had at any point in the past a network of roads such as those present on the Essex Chain of Lakes. It is very discouraging that with the hundreds perhaps thousands of staff hours put into this proposal between the APA and DEC that the existing conditions have been so under mentioned and basically ignored.

As spelled out in the Draft Environmental Impact Statement the definition of Wild Forest "and area where the resources permit a somewhat higher degree of human use than in wilderness, primitive or canoe areas, while retaining an essentially wild character. A wild forest is further defined as an area that lacks the sense of

remoteness, of wilderness, primitive or canoe areas and that permits a wide variety of outdoor recreation". As stated earlier the amount of existing infrastructure on this site lends itself only to a classification of Wild Forest.

The Essex Chain of Lakes will NEVER really be Wilderness

During the public hearing process for the Essex Chain of Lakes numerous organizations and individuals commented on the remoteness of this parcel and the fact that will be able to offer a truly wilderness experience. As I stated earlier, the general public has been lead to believe this parcel is truly a secluded wilderness setting when in reality it contains a vast road network, numerous gravel pits, culverts, bridges and numerous other man-made structures. The Essex Chain of Lakes is more similar in characteristics to the Moose River Plains Wild Forest than any other wilderness or primitive area.

The Moose River Plains UMP was probably the most recent and hotly debated UMP to be completed within the last 10-15 years. When the UMP was finally approved the Moose River Plains Wild Forest and Special Management Area and the land that would be combined with other wilderness areas encompassed approximately 82,000 acres. The approx. 65,000 acres that ultimately ended up in the Moose River Plains Wild Forest and Special Management Area (the remaining lands were combined with neighboring wilderness areas) contains approximately 35 miles of road networks. To put it into perspective the Essex Chain of Lakes acquisition totals approximately 18,000 acres. No matter what special interest group you represent it is fair to say that almost everyone would agree that there is a complex road system in the Moose River Plains. The area being considered for Wild Forest Classification in the Essex Chain of Lakes contains approximately 35 miles of existing well used roads that can be travelled with a two wheel drive vehicle. When the "winter roads" and 4 wheel drive roads on the parcel are taken into consideration there is over 65 miles of existing roads on the parcel. It is astonishing that this parcel is 1/4 the size of the Moose River Plains, contains more miles of roads than the Moose River Plains and it is being considered for something other than Wild Forest?

Furthermore, the Wilderness, Primitive, and Canoe area designations all clearly indicate that human impact from the past is fairly unnoticeable on the landscape. On the Essex Chain Tract of land no matter where you start from if you were to travel in a straight line in a North, South, East or West direction the maximum distance you can travel in the same direction without crossing a major roadway is under 2 miles. On the majority of the parcel you cant travel more than 1/2 mile in any direction without crossing a major roadway. By comparison in most of other areas designated as wilderness within the Adirondack Park you will travel several miles in a single direction without crossing a foot trail, let alone a major roadway.

In reviewing page 13 of the DEIS prepared for this acquisition and reclassification process a Wilderness Area is briefly described as "area of state land or water having a primeval character, without significant improvement or permanent human habitation" and goes on to state that "generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable. The below picture was taken in an area that will be considered wilderness under all alternatives presented by the Adirondack Park Agency.

It should be further added that Alternative 4A which is considered by everyone to contain the most wild forest still contains over 11,000 acres of land to be classified as Wilderness and another 22, 713 acres to be reclassified from Primitive and Wild Forest to Wilderness for a total of almost 34,000 acres with the Wilderness classification. The most amount of Wild Forest in any of the alternatives is 10,098 acres. The argument could be very easily made that there are no proposed alternatives that provide an adequate amount of Wild Forest considering the human impact that has occurred on these parcels and will forever be visible on the Essex Chain of Lakes landscape.

In doing some research for this comment letter I tried to locate a road that was in place when the State of New York took possession and that road was closed to public motor vehicle use. I found a good example in the Saint

Regis Canoe Area. The State of New York prohibited the use of motor vehicles in the Saint Regis Canoe Area in 1972. For those of you that are familiar with the canoe area, the existing "Fish Pond Truck Trail" is approximately 5 miles long and has received very little maintenance in over 40 years and is still passable via a two wheel drive vehicle to this day. In the 41 years since public motor vehicle use has been prohibited the Fish Pond Truck Trail has retained almost all of its original character as a roadway. In addition, the existing roadways in the Essex Chain of Lakes were constructed to withstand significant more vehicular traffic. Once again, the infrastructure that is on the ground in the Essex Chain of Lakes will NEVER disappear. The classification of this vast network of existing roads to anything that would prevent vehicular access would be a disservice to the municipalities that surround this parcel and limit the economic gain to be realized from these parcels.

As Governor Cuomo has stated numerous times that this land purchase will provide significant economic benefit to the Towns adjacent to the Essex Chain and allow access by ALL user groups. In reviewing the parcels to have and will be acquired by the State of New York from TNC, the Essex Chain of Lakes is significantly different because of the vast array of existing well travelled roads that exist on the parcel. To my knowledge, within the last 20 years the state has not acquired a piece of property that has the amount of infrastructure in place that this property has. If classified correctly the existing network of roads on this parcel will allow for the greatest amount of public access as well as protecting the environmentally sensitive areas of the property. The amount of public access will have a direct impact on the economic benefits that the municipalities that border this project will see.

During the Unit Management Plan process for the Moose River Plains it was well documented that the recreational opportunities provided in the Moose River Plains accounted for up to 20% of the economies to the municipalities that surround this area. It can be argued that the economic impact to those communities is a direct result of the vehicular access that is permitted in the Moose River Plains and the wide array of user groups and varying abilities that can be accommodated there.

The CFAB is regularly updated on capital projects being undertaken by DEC on various parcels throughout the state. The Board is constantly being reminded that because of the staff shortages there is a long list of projects that need to be completed and every year that list continues to grow. No matter what land classification is assigned to these parcels there needs to be a commitment made by the State of New York to maintain these areas. Without that commitment these properties will not be able to achieve their full recreation potential.

It should also be mentioned that it did not go unnoticed that hunting, fishing, and trapping is an industry that brings in over \$2Billion to the state annually however none of those activities are mentioned anywhere in the DGEIS but interestingly enough mountain biking, canoeing, skiing, horse riding, horse and wagon riding, etc. are all mentioned as possible recreation uses on the site. This despite the fact that hunting, fishing, and trapping have been the main recreation opportunities that have occurred on these lands in the past and the main reason the Gooley Club and other clubs that existed on this parcel have had a financial impact on the surrounding Towns.

For these reasons, the NYS Conservation Fund Advisory Board recommends approval of Land Classification 4A. The Conservation Fund Advisory Board would not be in favor of restrictions that further hinder the sporting communities access to these parcels including float plane use and seasonal use of highways.

There are additional parcels that will be coming up for classification in the near future as the State of New York purchases those properties from Nature Conservancy that will be much more suitable for wilderness classification as they do not contain the amount of infrastructure that that is on the Essex Chain parcels.

Sincerely,

Jason Kemper
Chairman, Conservation Fund Advisory Board

Cc: Anne Tarpinian, Asst. Secretary for Environment, Governor's Office
Joe Martens, NYSDEC
Kathleen Moser, NYSDEC

Exhibit 1

(taken from www.google.com)

Fish Pond Truck Road (St. Regis Canoe Area) 42 Years After it Was Closed to Motor Vehicle Use, When these roads were acquired they were jeep trails, Essex Chain of Lakes Roads significantly more developed than those were in the St. Regis Canoe Area





Exhibit 2

Existing Roads in Essex Chain to be Designated Wilderness under Every Alternative





Exhibit 3

Existing Roads on Lands being Considered for Wilderness, Primitive, Canoe, and Wild Forest







