



Department of
Environmental
Conservation

HIGH PEAKS WILDERNESS COMPLEX

Including

AMPERSAND PRIMITIVE AREA
JOHNS BROOK PRIMITIVE AREA
TAHAWUS PRIMITIVE AREA
MACINTYRE PRIMITIVE AREA

and Hiking Trail Portions of the

MT. VAN HOEVENBERG INTENSIVE USE AREA

Amendment

to the

1999 High Peaks Wilderness Complex Unit Management Plan

and

2004 Dix Mountain Wilderness Area Unit Management Plan

River Area Management Plan

for the

Opalescent River

NYS DEC, REGION 5, DIVISION OF LANDS AND FORESTS

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OFFICE OF THE COMMISSIONER

New York State Department of Environmental Conservation

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MEMORANDUM

JUL 26 2018

TO: The Record

FROM: Basil Seggos

SUBJECT: High Peaks Wilderness Complex Unit Management Plan Amendment

The Amendment to the 1999 High Peaks Wilderness Complex Unit Management Plan has been completed. The Adirondack Park Agency has found the Amendment to be in conformance with the Adirondack Park State Land Master Plan.

The Amendment is consistent with Environmental Conservation Law, and Department Rules, Regulations and Policies and is hereby approved and adopted.



Basil Seggos

Commissioner

New York State Department of Environmental Conservation

Date: _____

7/26/18

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Adirondack Park Agency

SHERMAN CRAIG
Chairman

TERRY MARTINO
Executive Director

RESOLUTION ADOPTED BY THE ADIRONDACK PARK AGENCY WITH RESPECT TO THE HIGH PEAKS WILDERNESS COMPLEX UNIT MANAGEMENT PLAN AMENDMENT

July 13, 2018

WHEREAS, Section 816 of the Adirondack Park Agency Act (APA Act) directs the Department of Environmental Conservation (Department) to develop, in consultation with the Adirondack Park Agency (Agency), individual management plans for units of land classified in the Adirondack Park State Land Master (APSLMP) and requires such management plans to conform to the guidelines and criteria of the APSLMP; and

WHEREAS, in addition to such guidelines and criteria, the APSLMP prescribes the contents of unit management plans (UMPs) and provides that the Agency will determine whether a proposed individual UMP complies with such guidelines and criteria; and

WHEREAS, the Department prepared a UMP for the High Peaks Wilderness Complex (HPWC) in 1999; and

WHEREAS, the Department has prepared an amendment to the 1999 UMP, dated July 2018 (HPWC UMP Amendment); and

WHEREAS, the HPWC UMP Amendment proposes "additional recreational opportunities and facilities on these recently-classified wilderness lands in a manner that maximizes the protection of the wilderness resource and public enjoyment and appreciation of the Forest Preserve," along with several proposals related to accessing the HPWC from the north at locations "that have special safety and natural resource protection issues;" and

WHEREAS, on May 10, 2018 the Department presented a draft of the HPWC UMP Amendment to the Agency; and

WHEREAS, the Agency and the Department established a concurrent 45-day public comment period on the draft UMP amendment and its conformance with the

APSLMP, which ran through June 27, 2018, and the Department held three public meetings during the comment period in Albany, Newcomb and Lake Placid; and

WHEREAS, the Agency and the Department received a substantial number of oral and written comments during the public comment period; and

WHEREAS, the Department revised the draft HPWC UMP Amendment in response to some of the public comments received, and the Agency has considered those revisions; and

WHEREAS, the public comments raised several points with respect to conformance of the HPWC UMP Amendment with the APSLMP guidelines and criteria for the management and use of Wilderness lands and Agency staff have provided responses to those public comments for Agency consideration; and

WHEREAS, the Agency and the Department have recommitted to form a working group focused on developing management recommendations for technical climbing access within the Adirondack Forest Preserve including the use of fixed anchors, climbing access trails, and other best practices that can aid in the protection of sensitive resources where technical rock and ice climbing are taking place; and

WHEREAS, to ensure protection of natural resources and the wilderness character of the HPWC lands, the HPWC UMP Amendment proposes a phased approach for the implementation of facilities, guided by a Wildland Monitoring Program; and

WHEREAS, the Agency and the Department are committed to immediately forming a working group which will develop a Wildland Monitoring Plan within two years with an opportunity for public involvement; and

WHEREAS, pursuant to the State Environmental Quality Review Act, the Department has determined that the HPWC UMP Amendment will not have a significant adverse impact on the environment and filed notice thereof in the Environmental Notice Bulletin on July 11, 2018; and

WHEREAS, the Agency has considered the foregoing recitals, the proposed HPWC UMP Amendment, the July 5, 2018 Memorandum from Kathy Regan to Terry Martino, Agency and Department staffs' July 12, 2018 presentation, public comment and Agency and Department staffs' responses, and the deliberations of Agency Board Members and Designees at the Agency's July 12-13, 2018 meeting.

NOW, THEREFORE, BE IT RESOLVED that pursuant to Section 816 of the Adirondack Park Agency Act, the Agency finds the proposed HPWC UMP Amendment,

Resolution
High Peaks Wilderness Complex UMP Amendment
July 13, 2018
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dated July 2018 conforms with the APSLMP guidelines and criteria for Wilderness lands; and

BE IT FINALLY RESOLVED that the Agency Board authorizes its Executive Director to advise the Commissioner of Environmental Conservation of the Agency's determination in this matter.

Ayes: Sherm Craig, Chad Dawson, Karen Feldman, Art Lussi, Dan Wilt, Lynne Mahoney, Brad Austin, and Bob Stegemann

Nays: None

Abstentions: John Ernst

Absent: William Thomas

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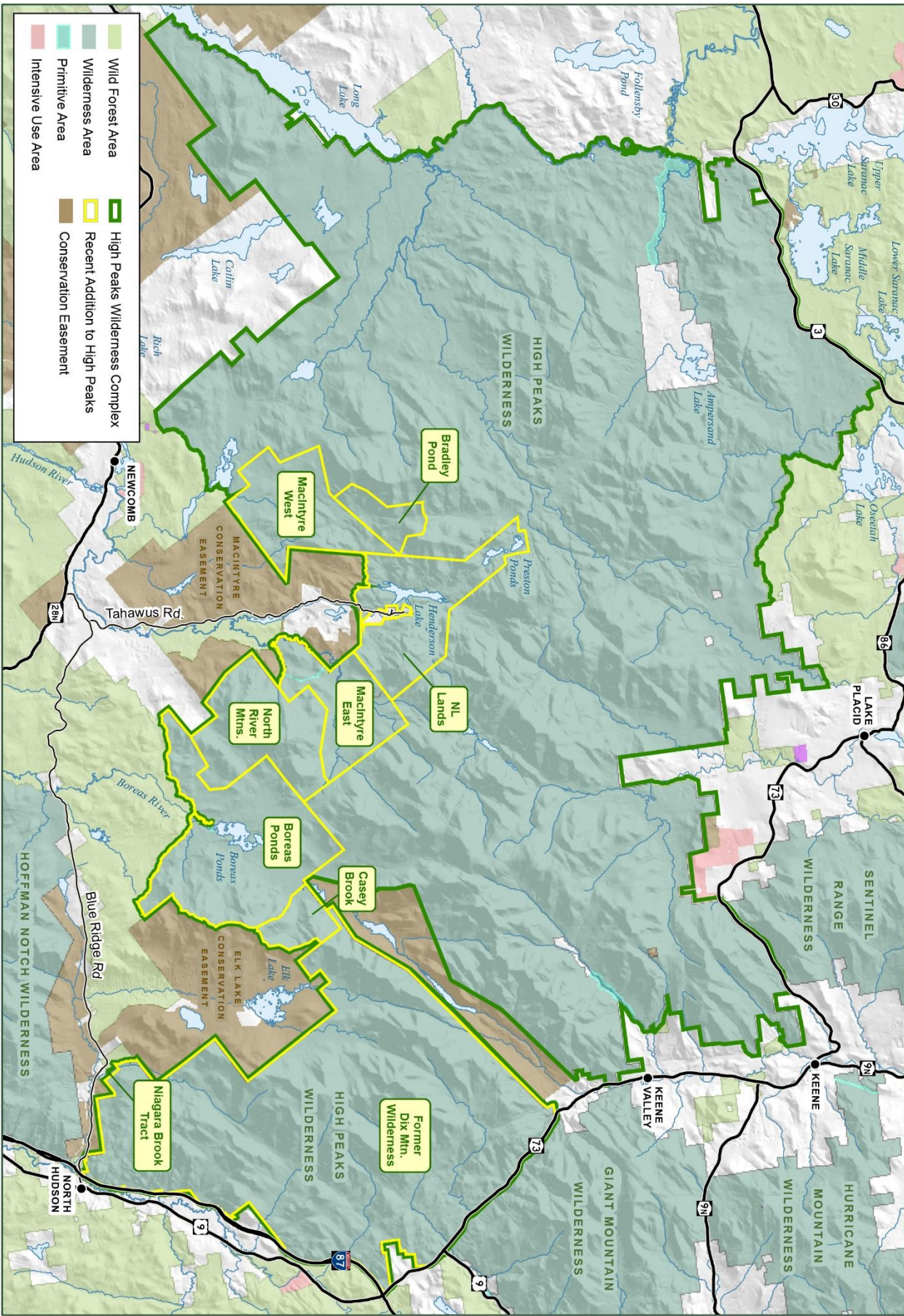
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High Peaks Wilderness

Overview



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I. Introduction

A. Purpose of the Amendment

Since the adoption of the High Peaks Wilderness Complex Unit Management Plan (UMP) in 1999, over 84,000 acres of land have been added to the High Peaks Wilderness Area. This comprises 33,200 acres of lands acquired by the State of New York since 1999—including the Boreas Ponds Tract—as well as nearly 51,000 acres of exiting Forest Preserve lands that were previously part of different management units.

The most recent additions to the unit occurred in March 2018, when Governor Andrew Cuomo approved a land classification package that added all or portions of the Boreas Ponds, MacIntyre East, MacIntyre West, and Casey Brook Tracts to the High Peaks Wilderness Complex. In the same classification package, the previously named Dix Mountain Wilderness was merged with the High Peaks Wilderness Complex due to its newly formed connection to the original High Peaks via the acquisitions of the Boreas Ponds and Casey Brook Tracts. A UMP for the Dix Mountain Wilderness was adopted in 2004 and continues to guide the New York State Department of Environmental Conservation (Department) management of the area and is incorporated into this document by references. Additionally, this UMP amendment provides proposals to connect existing recreational facilities to new facilities on the recently acquired lands.

As both the largest and most recent parcel to come into public ownership, and because of the allure of the property's namesake, the Boreas Ponds Tract has garnered significant attention from local government, interest groups and the public alike. To accommodate this public interest in a manner that protected the property's natural resources, the Department provided limited public access to the tract soon after it was acquired by New York State. This included parking in several locations, bicycle and equestrian opportunities on a limited number of existing roads, and informal camping, hiking and paddling throughout the tract.

The purpose of this UMP amendment is to propose additional recreational opportunities and facilities on these recently classified wilderness lands in a manner that maximizes the protection of the wilderness resource and public enjoyment and appreciation of the Forest Preserve. The amendment also contains several proposals related to accessing from the north at locations that have special safety and natural resource protection issues.

I. Introduction

The designation of Wilderness Area lands requires the management proposals to be consistent with the definition of “wilderness” found in the Adirondack Park State Land Management Plan (APSLMP). The 1999 High Peaks Wilderness Complex UMP also makes clear the importance of having a UMP:

Without a UMP, wilderness area management can easily become a series of uncoordinated reactions to immediate problems. When this happens, unplanned management actions often cause a shift in focus that is inconsistent and often in conflict with wilderness preservation goals and objectives. A prime objective of wilderness planning is to use environmental and social science to replace nostalgia and politics. Comprehensive planning allows for the exchange of ideas and information before actions, that can have long-term effects, are taken. A written plan stabilizes management despite changes in personnel or the influences of multiple administrative units where several managers and/or disciplines have different perceptions on how wilderness should be managed. In view of tight budgets and competition for monetary resources, plans that clearly identify management objectives and actions have demonstrated greater potential for securing needed funding.

Proposals in this UMP amendment, their implementation, and ongoing management of the unit will continue to allow the High Peaks Wilderness Complex to become a wilder and naturally driven place while enhancing the public’s wilderness experience.

As explained in further detail in the following sections of this plan, these management actions are proposed:

- Establishing hiking and skiing opportunities within the newer tracts as well as providing connections to portions of the existing High Peaks wilderness lands;
- Establishing rules and outreach efforts to effectively educate and inform the public about the High Peaks wilderness and all the new lands added, including the former Dix Mountain Wilderness Area lands, so that both the natural resources and wilderness experience of the users can be protected;
- Providing access for persons with disabilities to hand-carry launches and designated primitive campsites at several locations;
- Enhancing paddling opportunities, including providing a hand-carry launch on Boreas Ponds, Henderson Lake and Chapel Pond;

- Designation of various primitive camping opportunities throughout the tract including roadside, backcountry, and water access.

The High Peaks Wilderness Complex includes the core connected lands classified as wilderness, in addition to Primitive Areas mentioned in the 1999 HPWC UMP, in addition to several Primitive Areas added since then including:

- Tahawus Primitive Area, which is approximately 1.3 acres and includes Henderson Lake Dam, the access road and lands adjacent to the river.
- MacIntyre Primitive Area (west) which is approximately 3 acres and includes a 50' Right of Way "jug handle" road that leaves the conservation easement lands and then reenters it.
- MacIntyre Primitive Area (east) which is approximately 8 acres and includes a right of way over the conservation easement lands, connecting to a second conservation easement that is landlocked by wilderness and the Opalescent River.

This UMP Amendment also proposes the construction, upgrades and management of the hiking trails that will be built on the Mt. Van Hoevenberg Intensive Use Area, accessing Mt. Van Hoevenberg from the north and east as well as the Cascade Mountain Trail. Given the access to these wilderness locations across the Intensive Use Area, the Department wants to ensure that the user experience is consistently managed. The Department will work with the Olympic Regional Development Authority (ORDA) to manage these trail segments.

Across the southern boundary of the High Peaks Wilderness Complex, there are interfaces with the Vanderwhacker Mountain Wild Forest, Camp Santanoni Historic Area and five major conservation easements. This UMP Amendment does not dictate management on those adjacent lands, however DEC land managers work together to help achieve a spectrum of recreational opportunities and wilderness experiences that interact across classification boundaries. For example, the 2018 Vanderwhacker Mountain Wild Forest UMP Amendment incorporates multiple access points and connections that were also planned in this UMP Amendment.

The adjacent conservation easement lands are critical components of the complex planning approach for these public lands and provide for enhanced public access and preservation of natural resources. The Department's land managers will work with conservation easement landowners, through the development of Recreation Management Plans (RMPs), to develop proposals on those lands.

I. Introduction

This document also serves as a River Area Management Plan pursuant to the New York State Wild, Scenic and Recreational Rivers System Act (WSRRA) and its implementing regulations (6 NYCRR Part 666). The Opalescent River is designated as a “Wild River” where it passes through the High Peaks Wilderness Complex. Any proposals found in this amendment that fall within the river areas (½ mile from the bank of each designated river) are compliant with the WSRRA and its implementing regulations.

B. Planning Area Overview

Description of Unit

The High Peaks Wilderness Complex lies within the counties of Essex, Franklin and Hamilton in the Adirondacks. Including the recently classified Forest Preserve parcels, the unit is made up of approximately 275,460 acres.

In the 2018 land classification package, approximately 9,118 acres of the southern portion of the Boreas Ponds Tract were classified as Wild Forest and added to the Vanderwhacker Mountain Wild Forest, while the remaining 11,411 acres of the northern lands, along with the Casey Brook Tract’s 1,490 acres, were added to the High Peaks Wilderness Area. The Wilderness and Wild Forest boundary is generally 500 feet north of Gulf Brook and Boreas roads. A 75-foot wide corridor that follows the northern spur of Boreas Road to within 0.1 miles of the Boreas Ponds Dam was classified as Wild Forest. Located in the towns of North Hudson, Newcomb and Elizabethtown in Essex County, this newly classified portion of the HPWC is bounded largely on the south by the Vanderwhacker Mountain Wild Forest and Elk Lake Conservation Easement, to the east by the Adirondack Mountain Reserve Conservation Easement and the former Dix Mountain Wilderness Area (now part of the High Peaks Wilderness Complex) and to the north by the existing High Peaks Wilderness.

The MacIntyre East tract was also classified in a manner similar to the Boreas Ponds Tract, with approximately 1,604 acres of the southern part of the parcel classified as Wild Forest and added to the Vanderwhacker Mountain Wild Forest, while the remaining 4,418 acres to the north was classified as Wilderness and added to the High Peaks Wilderness Complex. The entire Wilderness section is bounded on the east by the existing High Peaks Wilderness Area, to the south by Upper Hudson Woodlands Conservation Easement. To the west, it is bounded by private lands and to the north the High Peaks Wilderness.

The MacIntyre West Tract is bound on the east by the Tahawus Conservation Easement, to the north, west and south by High Peaks Wilderness lands.

Both the MacIntyre East and West Tracts have a primitive corridor to preserve deeded private access.

Portions or all of eight other acquisitions and one reclassification were also added to the High Peaks Wilderness Area in the 2018 land classification package. Only minimal recreational facilities are proposed for these tracts at this time. The following acreages indicate how much of each tract was added to the High Peaks Wilderness only:

- The 4,445-acre **MacIntyre West Tract** was purchased in 2015 and is located in Essex County, Town of Newcomb, west of the Tahawus Road and borders conservation easement to the east and High Peaks Wilderness to the south and west. To the north is the Bradley Pond Tract that was also added to Wilderness.
- The 12-acre **Niagara Brook Tract** was part of the larger Finch acquisition and was sold to the State of New York in 2009. This tract is located on both the north and south side of Blue Ridge Road approximately 3.5 miles west of the Adirondack Northway in the Town of North Hudson, County of Essex. The tract is bounded by Vanderwhacker Mountain Wild Forest and the former Dix Mountain Wilderness Area (now High Peaks Wilderness) to the north and private lands to the south.
- The 1,717-acre OSI Bradley Pond Tract, formerly a Finch parcel, was purchased by the State of New York in 2013 from The Open Space Institute. The parcel is located in Essex County, Town of Newcomb. The tract located south of Bradley Pond on the south eastern flank of Santanoni Mountain. It is bordered on the south by the MacIntyre West Tract and to the east the NL Property.
- The 6,816-acre **NL Lands**, formerly a National Lead parcel, was purchased from the Open Space Conservancy in 2007. The tract is in Essex County in the town of Newcomb and includes Henderson Lake and the Preston Ponds as well as lands to the northwest of Mt. Adams and Lake Jimmy. It is bordered by the High Peaks Wilderness on the west, north and east. The MacIntyre East tract to the southeast, Mountain Endeavors LLC (Former Tahawus Mine) to the south and OSI lands to the south.
- The 4,510-acre **MacIntyre East Tract** is located in Essex County, towns of Newcomb and North Hudson straddling the Opalescent River. The parcel is bordered to the northwest by the NL Lands Tract, north and east by High Peaks Wilderness and to south by the North River Mountains Tract. To the southwest, it is bordered by conservation easement and Mountain Endeavors LLC (Former Tahawus Mine) to the east.

I. Introduction

- The 6,261-acre **North River Mountains Tract** is between the MacIntyre East Tract and Boreas Ponds Tract. It is bordered to the east by conservation easements in Essex County towns of Newcomb and North Hudson. This tract was previously part of the Vanderwhacker Mountain Wild Forest.
- The 11,399-acre **Boreas Ponds Tract** is located in the Town of North Hudson in Essex County south of the High Peaks with the Adirondack Mountain Reserve (AMR) bordering it to the north east and Casey Brook Tract and Elk Lake Conservation easement to the east. The southern boundary is 500' north of the Gulf Brook Rd in the Vanderwhacker Mountain Wild Forest. To the west, it is bordered by the North River Mountains Tract.
- The 1,450-acre **Casey Brook Tract** located at the southeastern end of the Pinnacle Mountain Range in the Town of North Hudson, Essex County. It is bordered to the north and east by the former Dix Mountain Wilderness Lands, to the south by the Elk Lake Conservation easement and to the west by Boreas Ponds tract and to the northwest by the Adirondack Mountain Reserve.
- The former Dix Mountain Wilderness consists of 45,208 acres of Forest Preserve in the towns of Elizabethtown, Keene and North Hudson, Essex County. The unit is roughly bounded on the north by State Route 73, on the east by the Adirondack Northway (Interstate Route 87), on the south by Blue Ridge Road (County Route 2) and on the west by Elk Lake Preserve and AMR lands.

Location and Access

Boreas Ponds Tract:

The main access to Boreas Ponds is via Gulf Brook Road, which extends from Blue Ridge Road to the vicinity of LaBier Flow. This Forest Preserve entrance is approximately 5.5 miles from Northway exit 29, and approximately 17 miles from the hamlet of Newcomb. The Blue Ridge Parking Area is located about 300' in from Blue Ridge Road and can accommodate trailered vehicles or up to 10 cars. This lot also serves as overflow parking for the Fly Brook Parking Area and is the only open parking area on Gulf Brook Road during the winter months and mud season. The Fly Brook parking area is located approximately 3.4 miles from Blue Ridge Road and can accommodate trailered vehicles or up to 20 cars.

Andrew Brook Road is located on the north side of Blue Ridge Road approximately 6.5 miles from Northway exit 29 and 16 miles from the hamlet of Newcomb. The parking area here is located approximately 500 feet up Andrew Brook Road and can accommodate trailered vehicles or up to 5 cars.

The eastern side of the Boreas Ponds Tract is bounded by Elk Lake Road, which is a town-maintained road. Two parking areas exist here, the first one being north of Blue Ridge Road approximately 1.8 miles and the second being 2.6 miles. The first parking area can support three cars, and the second can support trailed vehicles and up to eight cars.

MacIntyre Tract, OSI Bradley Pond Tract and former NL Lands:

The main entrance to the MacIntyre East Tract and portions of the NL Lands is via East River Trailhead, located off the Upper Works Road in Newcomb, approximately 3 miles north of the junction with the Tahawus Road. The trailhead and first 0.4 miles of the existing East River Trail are on the OSI-owned lands, for which the Department is currently working with OSI on a Conservation Easement.

The main entrance to MacIntyre West Tract and OSI Bradley Pond Tract is via the Bradley Pond Trail, which is located off the Upper Works Road in Newcomb, approximately 2 miles north of the junction with the Tahawus Road. The existing Bradley Pond Trailhead serves hikers going to the Santanoni Mountains. This trail goes about 2 miles to a gate at the Forest Preserve boundary and access into the MacIntyre West Tract. The trail to Bradley Pond turns off 1.8 miles from the parking lot and provides access to the OSI Bradley Pond Tract.

The main entrance to the former NL Lands Tract is via the Upper Works Trailhead at the end of the Upper Works Road in Newcomb. The trailhead and first 0.4 miles of existing Calamity Brook Trail are on the OSI Easement lands. North of Henderson Lake outlet access on existing trails can bring you to Henderson Lake or north toward Preston Ponds.

C. Public Participation and Planning Process

Article 27, Section 816 of the Executive Law (known as the Adirondack Park Agency Act) mandates the Department to develop, in consultation with the Adirondack Park Agency (APA), individual unit management plans for each unit of land under its jurisdiction classified in the Adirondack Park State Land Master Plan (APSLMP).

The Department began work on this UMP Amendment for High Peaks Wilderness Complex in 2018. A planning team, appointed by the Regional Director including staff from Fisheries, Wildlife, Forest Rangers, Lands and Forests, Operations, and staff from the Adirondack Park Agency has gathered and tracked information on various resources and areas over the years.

Unit Management Plan and Amendment

This document is the second amendment to the original March 1999 High Peaks Wilderness Complex Unit Management Plan. The previous amendment, adopted in 2000, proposed a trail to Little Porter Mountain.

Interim Access Plan

In August 2016, the Department released an Interim Access Plan for the entire Boreas Ponds Tract, including lands that would later become part of the High Peaks Wilderness Area. The purpose of this plan was to provide limited public access to the property during the interim period between state acquisition and the adoption of a UMP amendment that will authorize additional recreational opportunities.

Scoping/Kickoff Meeting

A public scoping meeting was held on Tuesday April 3, 2018 at the Newcomb Central School in Newcomb NY. Several stations were set up where the public provided sketched proposals on maps and written comments. There was also an opportunity for interested persons to present their thoughts publicly to the Department and the attendees of the meeting. The public comment period following the meeting was open until April 20, 2018. Various ideas were submitted to the Department, both at the meeting and through written comments during the public comment period. Several comments about environmental protection and potential recreational opportunities of the area were submitted and considered.

Draft Unit Management Plan Amendment

The Department released the High Peaks Wilderness Complex Draft Unit Management Plan Amendment May 10, 2018 at the Adirondack Park Agency meeting. During the public comment period from May 10 to June 27 three public comment meetings were held. The first was held on May 23, 2018 at 10:00 AM at the DEC headquarters, 625 Broadway, Albany NY; the second was May 23, 2018 at 6:00 PM at the Newcomb Central School in Newcomb, NY; and the third was June 21, 2018 at 6:00 PM at the Olympic Conference Center in Lake Placid, NY. During these meetings, a presentation summarizing the major proposals within the Vanderwhacker Mountain Wild Forest and High Peaks Wilderness Area was given, followed by an opportunity for interested persons to present their thoughts on the plans publicly to The Department and the

attendees of the meeting. Several stations were also set up where the public had an opportunity to provide sketched proposals on maps and written comments.

D. General Guidelines and Objectives for Management of the Unit

All land covered by this Unit Management Plan Amendment is Forest Preserve, and as such, must be managed in a manner consistent with Article XIV, Section 1 of the New York State Constitution. The UMP, and the management recommendations found within, have also been developed pursuant to and consistent with relevant provisions of the following:

- Adirondack Park State Land Master Plan (APSLMP),
- Environmental Conservation Law (ECL),
- Executive Law,
- Department rules, regulations, policies and procedures,
- State Environmental Quality Review Act (SEQRA),
- Wild, Scenic and Recreational Rivers Act (WSRRA)

Each subsection of this UMP amendment contains objectives related to specific uses and/or subjects. The following objectives will apply to the implementation of this UMP as a whole:

- Prepare a work plan for each construction project.
- Consult the Adirondack Park Agency (APA) on projects in accordance with the current DEC/APA Memorandum of Understanding.
- Comply with all applicable laws, regulations, and policies.
- Develop long-term partnerships with communities and other stakeholders for the stewardship of the unit.
- Monitor impacts to natural resources within the unit, and where needed, develop appropriate measures to address those impacts.

This UMP Amendment will provide the guidance necessary for staff to manage the area in a manner that protects the environment while at the same time providing for suitable outdoor recreation opportunities for the public. Without the development and future implementation of the UMP amendment, sensitive environmental resources of the unit could be impacted negatively which would result in a decrease in the public enjoyment of such resources. Management of the unit pursuant to a UMP allows the Department

I. Introduction

to improve public use and enjoyment of the area, avoid user conflicts and prevent overuse of the resource.

What the UMP Amendment Does Not Do

The proposed management actions identified in this UMP Amendment are primarily with some limited exceptions, confined to lands and waters that have been added to the High Peaks Wilderness Complex since the completion of the original UMP in 1999, in addition to portions of hiking trail proposals that start on the Mt. Van Hoevenberg Intensive Use Area, which primarily serve the High Peaks Wilderness Complex. Activities on private property or nearby state lands that are not in the High Peaks Wilderness Complex are beyond the scope of this document and will generally be discussed only as they relate to uses and impacts in the High Peaks Wilderness Complex.

In addition, this UMP cannot suggest changes to Article XIV, Section 1 of the New York State Constitution or conflict with statutory mandates or DEC policies. All proposals must conform to the guidelines and criteria set forth in the APSLMP and cannot amend the APSLMP itself.

II. Natural Resources

A. Soils

From a management perspective, the key characteristic of soil is its erodibility. Highly erodible soils that are subject to intensive use or modified to remove stabilizing elements, such as vegetation, can result in significant soil loss, downslope/downstream sedimentation, and poor trail conditions. All facilities will be laid out to avoid running slopes, and will be constructed and hardened in a manner to avoid erosion to the greatest degree possible.

The vast majority of the soils in the Boreas Ponds Tract are very well drained, rocky, boulder soils that can be susceptible to erosion. Some of the low-lying areas are poorly drained. The soils in the area are an important factor to consider when developing trails. When constructing trails, well-drained soils are preferred while long, running slopes should be avoided to minimize erosion. The bouldery nature of these soils can sometimes hinder bicycle and snowmobile trail layout, but this further emphasizes the need for proper trail placement and sustainable construction.

The northern portion of the MacIntyre tracts and along the outside perimeter of the property is well-drained soil of various types. The bulk of the property lies in the river bottom and is comprised of the Rumney-Burnt Vly Complex and Podunk very fine sandy loam. Both of these are poorly drained and prone to flooding, making trail layout and construction challenging.

B. Topography

The northern portions of the MacIntyre tracts, Boreas Ponds Tract, former NL Lands and the Casey Brook tracts are rolling terrain that generally gains in elevation as you move north. The lowest section is where the Opalescent River crosses into Wild Forest, starting at around 1,775 feet in elevation with Henderson Lake at 1,814 feet and Boreas Ponds at 1,975 feet in elevation. Rist Mountain rises to 3,858 feet in elevation between the Opalescent and Boreas drainages with 3,776 foot Boreas Mountain to the



II. Natural Resources

east. On the western side of the new lands, the eastern slopes of the Santanoni Mountains rise to 3,500 feet at the old boundary to 4,606 foot Santanoni Peak. Overall, the topography lends itself well to having a balance of upland hardwood forests as the elevation gains and lowland boreal wetland forests in the drainages and low-lying areas throughout the tract.

C. Water Resources

Watercourses

Across the new lands added to the High Peaks Wilderness Complex, there are five large watersheds represented. In the northwest, the Cold River, which feeds into the Raquette River, comes from Upper Preston Ponds flowing north. The MacIntyre and most of the Boreas ponds tracts are both part of the Hudson River Watershed, which includes the Opalescent and Boreas Rivers. Casey Brook Tract, a small portion of Boreas, and the northern portion of the Dix Mountain Wilderness are part of the Ausable River Watershed while the eastern Dix Wilderness is the source of the Boquet River watershed and west of the range includes the Branch River, which feeds into the Schroon River.



Santanoni Brook on MacIntyre West

As mentioned in the introduction, pursuant to the Wild, Scenic and Recreational Rivers System Act (WSRRA), the Opalescent River is designated as a Wild River where it passes through the HPWC.

Ponded Waters

Boreas Ponds Tract:

The High Peaks Wilderness Complex portion of the Boreas Ponds Tract includes the northern half of LaBier Flow. This, in its natural state, is the Boreas River, however in the late 1800s a flush dam was constructed on the southern end of what is now LaBier Flow by Finch Pruyn. Firm records of an exact year the dam was constructed do not seem to exist, but anecdotal information suggests it may have been in place and used as early as 1889, 27 years prior to the construction of the better-known Boreas Dam. The flush dam was used many times over the years to help flush logs down the Boreas

River, eventually bringing them to Glens Falls, where they were utilized by the Finch Pruyn mill. This was eventually replaced with the more permanent steel dam present today. The water level fluctuates throughout the year, but LaBier Flow consists of approximately 25 acres of ponded water on the Boreas River.

Originally three distinct ponds prior to any impoundments, Boreas Ponds now covers 350 acres and provides stunning views of the mountains from the water and impressive wetland buffers along its shores. In 1915-1916 the Boreas Ponds Dam was built by Finch Pruyn to move logs down the river. Loggers would use Boreas Dam and LaBier Dam together, with logs loaded on the ice above both. When the time was right, both dams would be opened at the same time, so by the time LaBier was almost flushed, the Boreas flush would come through. Boreas Dam was reconstructed in 1935 and used into the late 1940s and early 1950s for floating logs.

North of Boreas Ponds is White Lily Pond, which is a shallow 15-acre pond. This heavily wooded pond provides a nice view of Cheney Cobble.

MacIntyre Tract:

Lake Andrew sits to the west of Mount Andrew and, at 16 acres is the source of Sucker Brook which flows into Newcomb Lake to the south.

Nine-acre Bradley Pond and its wooded shoreline can be viewed as hikers go up to the Santanoni Range from the Bradley Pond Trail. Dramatic rises along the wooded slopes above the pond provide amazing views.

Former NL Lands:

Henderson Lake is a 235-acre impoundment with a maximum depth of 70 feet. The dam is of earthen construction with a concrete spillway. The outlet stream flows into the Hudson River. From the lake, the views to the north are spectacular.

The 72-acre Upper Preston Pond and 55-acre Lower Preston Pond provide a similar feel to Henderson Lake but are more remote and smaller in size. Prior to the Duck Hole Dam failure, paddlers would portage from Henderson Lake to Upper Preston Ponds to Duck Hole to paddle the three bodies of water.

Lake Jimmy:

At 33 acres, Lake Jimmy is not the largest pond in the area, but it boasts a unique story of the trail that crossed it. For years, the wooden causeway on Lake Jimmy brought hikers to Mount Adams, Allen Mountain, Hanging Spear Falls and beyond to Upper

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Twin Brooks Trail and Uphill Lean-to. The trail now skirts north of the pond, and time will slowly reclaim the wooden walkway.

Wetlands

The APSLMP (2016, page 20) defines a wetland as:

“...any land that is annually subject to periodic or continual inundation by water and commonly referred to as a bog, swamp, or marsh, which is (i) one acre or more in size, or (ii) located adjacent to a body of water, including a permanent stream, with which there is a free interchange of water at the surface, in which case there is no size limitation, and which (iii) meets the technical definition of 578.3(r) of the Adirondack Park Agency Rules and Regulations.”

As is true for much of the Adirondack Park, wetlands in the unit are common in the low-lying, flat areas between hills and mountains where runoff from steep slopes and groundwater seepage collects and is sometimes confined before entering drainage systems. These areas are commonly referred to as headwater wetlands and are often the origins of streams. Many of these headwater wetlands have been created, expanded, and modified by beaver dams. In most cases, the dams raise the water level, flooding adjacent upland areas. Depending on the length of time the dams are maintained, these upland areas can eventually become wetlands, creating hydric soils and supporting water-tolerant vegetation. Remnants of the upland community are often apparent in these wetlands and may include dead trees such as spruce and fir. Other wetlands within the tract occur along the floodplains of streams and rivers and within and adjacent to deep-water habitats of ponds.

Forested evergreen wetlands, typically dominated by balsam fir and spruce, are the most prevalent wetland cover type on the Boreas Ponds and MacIntyre tracts of the High Peaks Wilderness Complex. Significant examples of these lowland boreal communities are along the Opalescent and Boreas Rivers.

The largest high-elevation peatland in New York State, Marcy Swamp is located on the Boreas Ponds Tract upstream of Boreas Ponds. The headwaters of the Hudson River and Ausable River start in the middle of this five-mile wetland that lies between Boreas Ponds and Upper Ausable Lake.

Additionally, there is a wetland complex that extends along the entire length of White Lily Brook.

On MacIntyre West, drainages of Santanoni Brook and Sucker Brook have extensive wetland networks.

On MacIntyre East, Dudley Brook flows through a high-elevation wetland saddled between Allen Mountain and Cheney Cobble. It sits above 2,000 feet in elevation.

Wetlands of the High Peaks Wilderness Complex present both opportunities and challenges to the public. They have great aesthetic value and offer considerable opportunity for study and general education. For visitors, the expanses of open space provided by wetlands supply much-needed visual contrast to the heavily forested settings that dominate much of the unit. Because they constitute one of the most productive habitats for fish and wildlife, wetlands afford abundant opportunities for fishing, hunting, trapping, and wildlife observation and photography. On the other hand, wetland areas are generally ecologically sensitive and are not conducive to heavy recreational use. Trails placed adjacent to wetlands are often plagued by seasonal wet spots, and locations for new facility development (e.g. trails, primitive campsites, and lean-tos) are often limited by the presence of wetlands.

Other important ecological functions of wetlands include water quality improvement, stormwater attenuation, nutrient cycling, and habitat for threatened and endangered species. In their capacity to receive, store, and slowly release rainwater and meltwater, wetlands protect water resources by stabilizing flow rates and minimizing erosion and sedimentation. Many natural and man-made pollutants are removed from water when it enters wetland areas. Some of the threatened and endangered species and species of special concern which may occur in wetlands in the unit include the common loon, bald eagle, osprey, tiger beetle, snaketail and clubtail dragonflies and bog turtle. Wetlands also may contain a number of rare, threatened and endangered plants, including the swamp pink and numerous sedges.

Aquatic Invasive Species

With over 2,300 lakes and ponds, 1,500 miles of rivers, 30,000 miles of brooks and streams, the Adirondack region is particularly vulnerable to the introduction of aquatic invasive species (AIS). AIS can cause harm to the environment, human health, and the economy of a region, and can arrive via many pathways, including intentional introduction (aquaria dumping), cargo transport, and shipping ballast. Once established, AIS can spread rapidly through connecting waterways or by “hitchhiking,” not only on the propellers, trailers, rudders, motors, etc. of the vessels of recreational boaters and anglers but also on equipment (trailers, waders) and non-motorized watercraft (kayaks, canoes, and floats).

II. Natural Resources

In 2010, the Department and the Adirondack Park Agency developed Inter-Agency Guidelines for Implementing Best Management Practices for the Control of Terrestrial and Aquatic Invasive Species on Forest Preserve Lands in the Adirondack Park (see Appendix A). These guidelines provide a template for the process through which comprehensive active terrestrial and aquatic invasive species management will take place on Forest Preserve lands in the Adirondack Park. The Department shall be responsible for management of terrestrial and aquatic invasive species on Forest Preserve lands while the Agency will be responsible for providing review of, and advice on, APSLMP compliance and permit jurisdiction. The Guidelines are a dynamic document and are periodically revised to reflect new invasive species threats, continuing inventory of the Forest Preserve, and evolving invasive species management techniques.

Efforts should be made to restore and protect the native ecological communities in the High Peaks Wilderness through early detection and rapid response efforts to eradicate or control existing or newly identified invasive species populations. Adoption of the guidelines and implementation through the UMP and site-specific work planning process gives the Department the basic tools needed to preserve, protect and restore the natural native ecosystems of the Forest Preserve.

This UMP proposes several water access sites for the launching of non-motorized watercraft.

Proposed Management

Objectives

- Prevent the introduction and spread of AIS into and within the Adirondack region.
- Protect native aquatic species and their habitats.
- Protect water-based recreational resources and economy.
- Educate recreational watercraft operators on steps they need to take to prevent the spread of AIS, and help them understand new regulations requiring them to take such precautions at all public waters.
- Foster a sense of responsibility in watercraft operators so they take steps to help stop the spread of AIS.
- Protect New York citizens' investment in publicly owned waters.

Action Steps

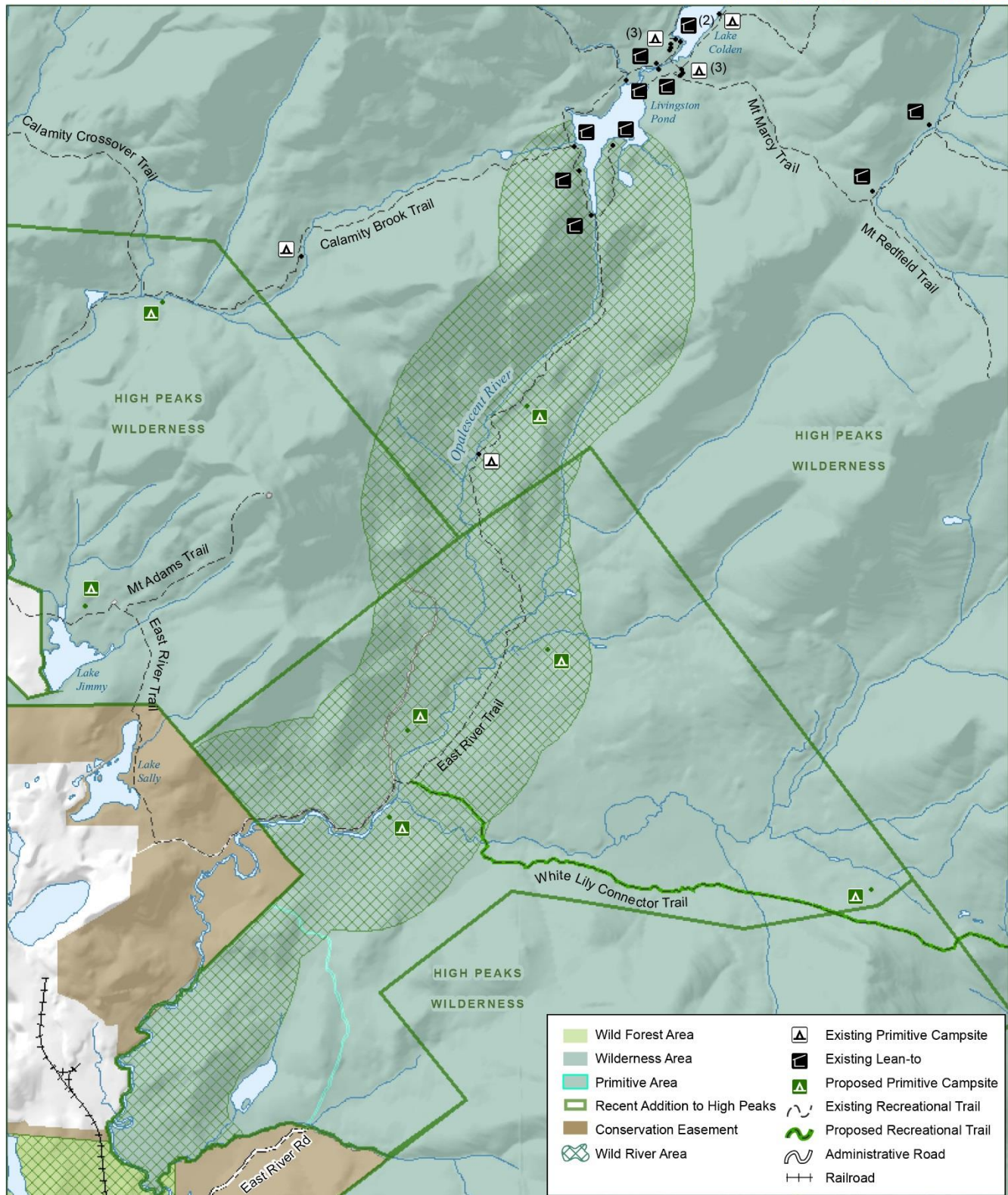
- Take aquatic invasive species spread-prevention actions within the unit. These measures will vary based on location within the following spectrum:

- Make printed materials available at water access locations.
- Post signs about the dangers of spreading AIS.
- Provide information regarding nearby boat decontamination stations.
- Manage aquatic invasive species pursuant to *Inter-Agency Guidelines for Implementing Best Management Practices for the Control of Terrestrial and Aquatic Invasive Species on Forest Preserve Lands in the Adirondack Park*.
- Partner with those organizations involved in fighting invasive species on Forest Preserve lands.
- Train Department staff to identify and document the location of aquatic invasive species.
- When Department staff or partner organizations are engaged in on-site outreach and education, ensure they have proper training for the prevention of AIS.
- Work towards a comprehensive inventory of the presence and extent of aquatic invasive species in the unit.

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High Peaks Wilderness

Wild, Scenic,
and Recreational Rivers



D. Vegetation

General Inventory

The lands within the tracts are mostly forested. Plant communities vary depending on past timber harvesting and environmental factors. The historical management of these tracts for a sustainable supply of timber is apparent throughout.



The tracts lie in the ecological transition zone between the temperate deciduous forest and the true boreal forest. The predominant naturally occurring vegetative types include northern hardwoods, mixed hardwoods, and lowland boreal communities. The influence of logging over the past century has brought visible effects on the vegetative cover.

Rare, Threatened and Endangered Plants and Ecological Communities

In 2000-2001, scientist Jerry Jenkins was commissioned by The Nature Conservancy for Finch, Pruyn & Co. to complete a biological survey (mainly flora) on Finch-owned lands in the Adirondack Park. Several sites along the Opalescent and Hudson rivers were inventoried, revealing several notable communities and species. The upland sites above the river banks are alluvial forests, while the majority of the lowlands along the river bottom are lowland boreal forests. Open wetland complexes ranging from 5 to 50 acres are scattered throughout the lowland forests as well. The floodplain here is generally 0.2 to 0.5 miles wide, well developed, and has several oxbows. Most wetland communities were sedge-shrub-sphagnum, but one was a low-nutrient white cedar-delicate sedge bog, which is a rare wetland type in the Adirondacks, and was noted as being the most unusual wetland examined in the Jenkins Survey. Some of the most notable species were arethusa (*Arethusa bulbosa*), pickerings reedgrass (*Calamagrostis pickeringii*), two-seeded sedge (*Carex disperma*), Michaux's sedge (*Carex michauxiana*), few-flowered sedge (*Carex pauciflora*), low sedge (*Carex paupercula*), slender-flowered sedge (*Carex tenuiflora*), bog honeysuckle (*Lonicera villosa*), alder buckthorn (*Rhamnus alnifolia*), and pylaes sphagnum (*Sphagnum pylaesii*).

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The survey also lists a significant “spruce swamp” on the western side of the Boreas Ponds tract as having a moderately high diversity of bryophytes and some significant mosses and liverworts. These include the NYS-rare *Campylium radicale* and uncommon *Hylocomnium umbratum* and *Rhytidiadelphus squarrosus*.

Terrestrial Invasive Species

The negative impacts of invasive species on natural forests, terrestrial and aquatic communities are well documented. Colonization and unrestrained growth of invasive species cause the loss of biodiversity; interruption of normal hydrology; suppression of native vegetation; and significant aesthetic; human safety and economic impacts. Terrestrial and aquatic invasive species have been identified at increasing rates of colonization along roadsides in campgrounds; and in water bodies of the Forest Preserve. Some of these species have the potential to colonize backcountry lands, lakes and ponds and degrade natural resources of the Forest Preserve.

The Department is a member and will continue to collaborate with other partners of the Adirondack Park Invasive Plant Program (APIPP) (Adirondack PRISM) to support education, inventory, research, control protocols, and control of invasive species. An inventory and analysis of the current distribution of invasive species on Forest Preserve lands will provide the necessary information on the present extent of invasive exotics and provide the basis for long-term decision making.

As mentioned under the Aquatic Invasive Species section, the Department and the APA have developed Inter-Agency Guidelines for Implementing Best Management Practices for the Control of Terrestrial and Aquatic Invasive Species on Forest Preserve Lands in the Adirondack Park (see Appendix A). The guidelines are a dynamic document and are periodically revised to reflect new invasive species threats, continuing inventory of the Forest Preserve, and evolving invasive species management techniques.

Efforts should be made to restore and protect the native ecological communities in the High Peaks Wilderness through early detection and rapid response efforts to eradicate or control existing or newly identified invasive species populations. Adoption of the guidelines and implementation through the UMP and site-specific work planning process, give the Department the basic tools needed to preserve, protect and restore the natural native ecosystems of the Forest Preserve.

Forest Health

A combination of many factors can influence the health of a plant community. Physical factors tend to be weather related with notable examples being lightning fires, ice

damage, severe winds, and flooding. Biological factors are variable and include the effects of disease and insects on the forest environment. Insects and diseases that affect trees are constant natural forces that shape the forest. While many insects and diseases have negligible or beneficial impacts on forest health, some, especially those involving invasive exotic species, can be especially damaging.

Several insects and diseases have impacted forest communities within the region and/or New York State in recent years and continue to pose a threat the health of forests within unit:

Beech bark disease – Beech bark disease is an important insect-fungus complex that has caused extensive mortality of American beech throughout portions of the Adirondacks. The primary vector, a scale insect, *Cryptococcus fagi*, attacks the tree, creating entry sites for the fungus, *Nectria coccinea var. faginata*. Changes in the percent of beech in the cover type can stimulate shifts in animal populations that utilize beech mast extensively as a food source. On the other hand, dead and/or dying beech trees may benefit other wildlife species by providing abundant nesting, feeding, and potential den locations.

Emerald ash borer (*Agrilus planipennis*) – This exotic introduced beetle bores into and kills otherwise healthy ash trees. White ash trees in the forest are a minor component although their value to wildlife and scenic quality should be evaluated to improve interpretations of value loss following EAB infestations which currently seem inevitable.

Hemlock woolly adelgid (*Adelges tsugae*) – This aphid-like insect attacks North American hemlocks, and can be easily identified by the white woolly masses they form on the underside of branches at the base of the needles. Juvenile hemlock woolly adelgid feed on the tree's stored starches, and remain in the same spot for the rest of their lives, continually feeding and developing into adults. Their feeding severely damages the canopy of the host tree by disrupting the flow of nutrients to its twigs and needles. Tree health declines, and mortality usually occurs within 4 to 10 years.

Native to Asia, hemlock woolly adelgid was introduced to the western United States in the 1920s. It was first observed in the eastern U.S. in 1951 near Richmond, Virginia after an accidental introduction from Japan. Hemlock woolly adelgid has since spread along the East Coast from Georgia to Maine and now occupies nearly half the eastern range of native hemlocks. Hemlock woolly adelgid was first discovered in New York State in 1985 in the lower Hudson Valley and on Long Island. Since the initial infestation, hemlock woolly adelgid has continued to spread north to the Capitol Region and west, through the Catskill Mountains and the Finger Lakes Region, into western New York State.

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In the summer of 2017, hemlock woolly adelgid was discovered on the Forest Preserve in the Town of Lake George, the first known occurrence in the Adirondack Park. Due to the limited extent of the infestation, the Department and its partners were able to eradicate the insect in this location. As a result of the Lake George infestation, monitoring efforts have increased throughout the southern Adirondacks.

Balsam woolly adelgid (*Adelgaes piceae*) - The balsam woolly adelgid, a pest of true firs, was introduced into the United States from Europe or Asia around the turn of the century. Since that time, it has spread throughout the United States and Canada.

Forest tent caterpillar (*Malacosoma disstria*) - The forest tent caterpillar, a native insect, may be found wherever hardwoods grow. Outbreaks have occurred at 10 to 15 year intervals with the last widespread outbreak in the late 1970s. Portions of St. Lawrence County were moderately to severely defoliated in 2003 through 2005, with additional outbreaks reported in northeast Jefferson, Herkimer, Fulton and Hamilton counties. Favored hosts are sugar maple and aspen, with birch, cherry, and ash also affected.

Gypsy moth (*Lymantria dispar*) – This introduced invasive insect forest defoliator has been a resident of the region for over a century. The insect periodically causes extreme defoliation in red oaks and has caused some scattered mortality. Heavy infestations of caterpillars can be a severe nuisance to forest users, and the hairs on the caterpillars can be a serious human health risk due to allergic reactions.

Oakwilt (*Ceratocystis fagacearum*) - This fungus develops in the xylem, the water-carrying cells of trees. All oaks are susceptible to the fungus, but the red oak group (with pointed leaf tips) often die much faster than white oaks (rounded leaf tips). Red oaks can take from a few weeks to six months to die, and they spread the disease quickly. White oaks can take years to die and have a lower risk of spreading the disease.

White pine decline – This disease is caused by several agents of which the most notable are white pine blister rust (WPBR), *Caliciopsis* canker, *Armillaria* root disease, and several needle casts and blights. White pine decline has recently been listed as a northeastern forest decline priority, as several mature and maturing pine stands are suffering significant levels of decline on sites from Maine to Pennsylvania. Transition forests around wetlands seem particularly vulnerable to white pine decline agents as these stands seem to suffer more from seasonal droughts.

Spruce decline – There are several insects and diseases that can contribute to severe decline symptoms in spruce stands following drought, competition, extreme weather or other site-related stressors. These agents rarely cause severe decline or mortality,

although bark beetles can be found in local outbreaks that may expand to a few acres of tree mortality.

Proposed Management

Objectives

- Allow natural processes to operate freely to ensure that the succession of native plant communities is not altered by human use.
- Prevent the establishment of non-native invasive vegetation.
- Educate natural resource managers, elected officials and the public about the threat of invasive species and ways to prevent their introduction and transport.
- Incorporate information in staff training and citizen licensing programs for hunting, fishing, and boating; and through signage, brochures, and educational materials; and included in information centers, campgrounds, community workshops, and press releases.
- Protect known locations of sensitive, rare, threatened, and endangered plant species.
- Promote programs and studies that identify rare ecological communities.

Action Steps

- Where applicable, manage invasive species and forest pests pursuant to Inter-Agency Guidelines for Implementing Best Management Practices for the Control of Terrestrial and Aquatic Invasive Species on Forest Preserve Lands in the Adirondack Park.
- For beech bark disease, conduct aerial surveys with periodic ground checks to determine the extent and expansion of beech decline and mortality.
- For emerald ash borer, survey every three years via aerial reconnaissance for the presence of symptoms and, when appropriate, conduct ground surveys to verify presence. Collect photographic and/or bark sample evidence and forward to the Forest Health Diagnostic Laboratory for confirmation.
- For hemlock woolly adelgid, survey high priority hemlock stands annually by employing citizen science surveys and influencing existing professional survey activities. Develop a priority plan for any potential mitigation efforts needed to preserve specific hemlock stands. The plan should prepare for potential mitigation impacts on local and regional forests after the hemlock woolly adelgid presence has been confirmed.

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- For balsam woolly adelgid, periodically survey for the extent and expansion of true fir decline symptoms, and where symptoms are evident, collect damaged twig samples and/or photographs and forward them to the Forest Health Diagnostic Laboratory.
- For forest tent caterpillar, assess the population by evaluating visible defoliation as part of annual surveys. Develop a maple regeneration value inventory to assign priorities for further monitoring or more intensive sampling to predict defoliation and subsequent maple regeneration impacts.
- For white pine decline, assess the population by evaluating visible defoliation as part of annual surveys. Collect damage evidence materials from impacted sites and forward to the Forest Health Diagnostic Laboratory for evaluation. Prepare damage agent evaluation and prognosis reports for specific white pine stands.
- For spruce decline, periodically survey for the extent and expansion of spruce decline symptoms and, where symptoms are evident, collect damaged twig samples and/or photographs and forward them to the Forest Health Diagnostic Laboratory.

E. Wildlife

Existing Conditions

Mammals

A wide variety of mammal species inhabit the Boreas Ponds and MacIntyre tracts, which are representative of the High Peaks region and central Adirondacks. However, survey data are mostly lacking for mammals in these tracts. The Department has conducted moose and carnivore surveys in the Boreas Ponds area, and results of these efforts are summarized below.

Large and Medium-sized Mammals:

Large and medium-sized mammals known to occur within these tracts include white-tailed deer, moose, black bear, coyote, raccoon, red fox, gray fox, bobcat, fisher, American marten, river otter, mink, striped skunk, long-tailed weasel, short-tailed weasel, beaver, muskrat, porcupine, and snowshoe hare (Saunders 1988). Of these species, white-tailed deer, black bear, coyote, raccoon, red fox, gray fox, long-tailed weasel, short-tailed weasel, bobcat, and snowshoe hare can be hunted. Additionally, these species (with the exception of white-tailed deer, black bear, and snowshoe hare)

along with fisher, American marten, mink, muskrat, beaver, and river otter can be trapped. Hunting and trapping activities are highly regulated by NYS, and the Department's Bureau of Wildlife collects annual harvest and survey data on many of these species.

White-tailed deer

Important big game species within the area include white-tailed deer and black bear. Relative abundance of white-tailed deer is generally low in the High Peaks and central Adirondacks. This is related to decreased productivity in mature second-growth forests and harsher winter conditions (temperature, snow depth) at higher elevations. From early spring (April) to late fall (November), deer are distributed generally on their "summer range." When snow accumulates to depths of 20 inches or more, deer travel to their traditional wintering areas. This winter range is characteristically composed of lowland spruce-fir, cedar or hemlock forests, and to a lesser degree, a combination of mixed deciduous and coniferous cover types. Often found at lower elevations along water courses, this habitat provides deer with protective cover from adverse weather and easier mobility in deep snows (see Critical Habitat section).

Black bear

Black bears are essentially solitary animals and tend to be dispersed throughout the High Peaks region. The Adirondacks support the largest black bear population in New York State (4,000 to 5,000 bears). Hikers and campers in this region are likely to encounter a bear, and negative interactions between black bears and humans, mainly related to bears stealing food from humans, have been a regular occurrence in the High Peaks for at least twenty years. In 2005, a new regulation was enacted, requiring all overnight campers in the Eastern High Peaks Management Zone (Zone C; <https://www.dec.ny.gov/outdoor/33889.html>) to use bear-resistant canisters for food, toiletries, and garbage. In other areas of the Adirondacks, the DEC recommends the use of bear-resistant canisters as well.

Moose

Moose entered the state on a continuous basis in the 1980s, after having been absent since the 1860s. Currently, the moose population in the Adirondacks is estimated to be approximately 400. In the northeastern United States, moose use seasonal habitats within boreal and mixed coniferous/deciduous forests. The southern distribution of moose is limited by summer temperatures that make the regulation of body temperature difficult. Moose select habitat primarily for the most abundant and highest quality forage (Peek 1997). Disturbances such as wind, fire, logging, tree diseases, and insects create

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openings in the forest that result in regeneration of important hardwood browse species such as white birch, aspen, red maple, and red oak. Typical patterns in moose habitat selection during the summer include the use of open upland and aquatic areas in early summer followed by the use of more closed canopy areas (such as upland stands of mature aspen and white birch) that provide higher quality forage in late summer and early autumn. After the fall rut and into winter, moose intensively use open areas where the highest biomass of woody browse exists (i.e., dormant shrubs). In late winter when browse quantity and quality are lowest, moose will use closed canopy areas that represent the best cover available within the range (e.g., closed canopy conifers in boreal forest). From late spring through fall, moose commonly are associated with aquatic habitats such as lakes, ponds, and streams. However, use of aquatic habitats can vary geographically over their range. It is believed that moose use aquatic habitats primarily to forage on highly palatable plants; however, moose may also use these areas for relief from insects and high temperatures.

The Bureau of Wildlife conducted aerial moose surveys in the Adirondacks during the winters of 2015-2018. During the winters of 2015 and 2016, staff surveyed 11 transects that were partially within the Boreas Ponds and MacIntyre tracts; however, no moose were observed during these surveys.

American marten

American marten populations in New York State are geographically isolated within the higher elevations of the central Adirondacks (in general, $\geq 2,000$ ft.). In this area,

martens use a variety of second-growth and old-growth forest stand types (deciduous, mixed, and coniferous) that are structurally complex (heavy canopy cover, downed woody debris). Structural complexity influences all aspects of marten life history, including acquisition of prey, rearing kits, escaping avian and mammalian predators, and thermoregulation. Additionally,



American marten detected with a camera trap near Boreas Ponds, 2015.

these higher elevations are characterized by harsh abiotic conditions (low temperatures, deep snowpack) and low productivity that favor martens over other carnivores that prey on and compete with them (for example, fisher, coyote, and fox). Recent research using species distribution models have revealed that most of the central Adirondacks (approximately 3,500 mi²) represent suitable marten habitat. Moreover, the High Peaks and West Canada Lakes region contained the largest core areas of high-quality marten habitat (i.e., greatest probability of use). Bureau of Wildlife staff have conducted carnivore surveys using track plates and camera traps within the Boreas Ponds tract and detected American martens, fishers, weasels, and coyotes.

Small Mammals

The variety of habitats that occur within the Adirondack region are home to an impressive diversity of small mammals. These mammals inhabit the lowest elevations to those as high as 4,400 feet (southern bog lemming). Most species are found in forested habitat (coniferous, deciduous, mixed forest) with damp soils, organic muck, or soils with damp leaf mold. However, some species (e.g., hairy-tailed mole) like dry to moist sandy loam soils and others (e.g., white-footed mouse) prefer the drier soils of oak-hickory, coniferous, or mixed forests. Small mammals of the Adirondack region are found in alpine meadows (e.g., long-tailed shrew), talus slides and rocky outcrops (e.g., rock vole), grassy meadows (e.g., meadow vole, meadow jumping mouse), and riparian habitats (e.g., water shrew). It is likely that many, if not most, of the small mammal species listed below inhabit the Boreas and MacIntyre tracts (Table 1). An exception

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may be the northern bog lemming, a species whose southernmost range extends just into the northern portion of the Adirondack Park. Only one recently verified specimen exists (Saunders 1988). All listed species are known to occur within Adirondack Park.

Table 1. Small mammal species recorded within Adirondack Park (data based on museum specimens; Saunders 1988). Number of towns represents the number of towns in which each species was recorded.

Common Name	Scientific Name	Number of Towns
Star-nosed mole	<i>Condylura crestata</i>	6
Hairy-tailed mole	<i>Parascalops breweri</i>	11
Short-tailed shrew	<i>Blarina brevicauda</i>	31
Pygmy shrew	<i>Sorex hoyi</i>	1
Long-tailed shrew	<i>Sorex dispar</i>	7
Smoky shrew	<i>Sorex fumeus</i>	18
Water shrew	<i>Sorex palustris</i>	10
Masked shrew	<i>Sorex cinereus</i>	25
Deer mouse	<i>Peromyscus maniculatus</i>	26
White-footed mouse	<i>Peromyscus leucopus</i>	14
Southern red-backed vole	<i>Clethrionomys gapperi</i>	32
Meadow vole	<i>Microtus pennsylvanicus</i>	31
Yellownose vole	<i>Microtus chrotorrhinus</i>	6
Woodland vole	<i>Microtus pinetorum</i>	1
Southern bog lemming	<i>Synaptomys cooperi</i>	12
Northern bog lemming	<i>Synaptomys borealis</i>	1
Meadow jumping mouse	<i>Zapus hudsonicus</i>	22
Woodland jumping mouse	<i>Napaeozapus insignis</i>	25

Birds

The avian community of the Boreas Ponds and MacIntyre tracts varies seasonally. Some species remain within the area year-round, but the majority of species utilize the area during the breeding season and for migration. The first Breeding Bird Atlas Project (BBA) conducted during 1980-1985 (Andrle and Carroll, 1988) and the Breeding Bird Atlas 2000 Project (2000-2005) documented 129 and 128 species, respectively, in atlas blocks within or partially within these tracts. It is important to recognize that atlas blocks overlap and extend beyond the boundaries of the Boreas Ponds and MacIntyre tracts. Therefore, these data do not necessarily reflect what is found on the tracts, but on the atlas blocks. It is probable that some species were detected only on private lands adjacent to the state lands. However, the BBA data should provide a good indication of the species found throughout these tracts and adjacent region. Species that were detected were similar to those described for the Vanderwhacker Mountain Wild Forest.

Birds Associated with Boreal Forest

These tracts contain high-elevation and lowland boreal forest habitats that are significant for a variety of birds. In total, boreal forest comprises approximately 3,964 acres of these tracts. This acreage includes approximately 1,200 acres of lowland boreal forest, which occurs primarily along the Hudson River south of Tahawus. The New York State-endangered spruce grouse prefers lowland boreal forests, where it selects immature or uneven-aged spruce-fir habitats. Potential spruce grouse habitat closely aligns with lowland boreal forest within these tracts; however, contemporary data (1984) indicate that the single occurrence record for this species was from a BBA survey block along Blue Ridge Road and between the Elk Lake and Gulf Brook roads. This area contains limited lowland boreal forest.

The Boreas Ponds and MacIntyre tracts contain approximately 2,764 acres of high elevation boreal forest ($\geq 2,800$ feet elevation) which are mostly contiguous with higher elevations in the High Peaks and former Dix Mountain Wilderness Areas. Most of this area exists within the Boreas Range (1,466 acres) and Santanoni Mountains (972 acres). High-elevation spruce-fir forest is especially important as breeding habitat for Bicknell's thrush, a special concern species in New York that has been documented in BBA survey blocks within both tracts. Throughout the range of this species, montane forest between 2,900 feet and 4,700 feet that is dominated by stunted balsam fir and red spruce is the primary breeding habitat for this species (Atwood et al. 1996). Bicknell's thrush also utilize fir waves and natural disturbances as well as areas of dense regeneration along the edges of ski slopes. The species is most common on the highest ridges of the Adirondacks, preferring young or stunted dense stands of balsam

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fir up to 9 feet. in height. Here they lay their eggs above the ground in the dense conifer thickets.

In an effort designed to protect birds associated with high-elevation boreal forest and their habitats, New York State designated the Adirondack mountain summits above 2,800 feet in Essex, Franklin, and Hamilton counties as the Adirondack Subalpine Forest Bird Conservation Area (BCA) in November 2001. The New York State Bird Conservation Area Program, established in September 1997, was designed to safeguard and enhance bird populations and their habitats on selected state lands and waters.

Of 27 bird species associated with boreal forest that occur in New York State, 25 have been documented in BBA survey blocks within, or partially within, these tracts. During the two BBA projects, 16 species of lowland boreal forest birds, 4 species of high-elevation boreal forest birds, and 5 species commonly associated with boreal forest have been documented in survey blocks within or partially within the unit (Table 2). Some notable differences in boreal bird species composition were recorded between the two atlas periods: spruce grouse were documented in the first atlas project but not the second, and Cape May warbler, palm warbler, and pine siskin were documented in the second atlas project but not the first. American three-toed woodpecker and Connecticut warbler were not detected during either BBA project.

Table 2. Bird species associated with boreal forest as documented by the New York State Breeding Bird Atlas projects (1980-1985 and 2000-2005) and occurring in atlas blocks within, or partially within, the Boreas and MacIntyre tracts.

Common Name	Scientific Name
Lowland Boreal Forest Species	
Spruce grouse ^a	<i>Falcipennis canadensis</i>
Black-backed woodpecker	<i>Picoides acticus</i>
Olive-sided flycatcher	<i>Contopus cooperi</i>
Boreal chickadee	<i>Poecile hudsonicus</i>
Ruby-crowned kinglet	<i>Regulus calendula</i>
Cape May warbler	<i>Dendroica tigrina</i>

Common Name	Scientific Name
Bay-breasted warbler	<i>Dendroica castanea</i>
Rusty blackbird	<i>Euphagus carolinus</i>
White-throated sparrow	<i>Zonotrichia albicollis</i>
Yellow-bellied flycatcher	<i>Empidonax flaviventris</i>
Gray jay	<i>Persisoreus canadensis</i>
Palm warbler	<i>Dendroica palmarum</i>
Lincoln's sparrow	<i>Melospiza lincolnii</i>
White-winged crossbill	<i>Loxia leucoptera</i>
Red crossbill	<i>Loxia curvirostra</i>
Pine siskin	<i>Carduelis pinus</i>
High Elevation Boreal Forest Species	
Bicknell's thrush ^b	<i>Catharus bicknelli</i>
Blackpoll warbler	<i>Dendroica striata</i>
Winter wren	<i>Troglodytes</i>
Swainson's thrush	<i>Catharus ustulatus</i>
Species Commonly Associated with Boreal Forest	
Evening grosbeak	<i>Coccothraustes vespertinus</i>
Blackburnian warbler	<i>Dendroica fusca</i>
Magnolia warbler	<i>Dendroica magnolia</i>
Northern parula	<i>Parula americana</i>
Tennessee warbler	<i>Vermivora peregrina</i>

^aEndangered species.

^bSpecial Concern species.

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Other Bird-Habitat Associations

In addition to boreal and mixed-boreal forests, other habitats types of importance include deciduous forests, lakes, ponds, streams, bogs, beaver meadows, and shrub swamps.

Birds associated with marshes, ponds, lakes, and streams include: common loon, pied-billed grebe, great blue heron, green-backed heron, American bittern, and a variety of waterfowl. The most common ducks include the mallard, American black duck, wood duck, hooded merganser, and common merganser. Other species of waterfowl migrate through the region following the Atlantic Flyway.

Bogs, beaver meadows, shrub swamps, and any areas of natural disturbance provide important habitat for species that require or prefer openings and early successional habitats. Species such as alder and olive-sided flycatchers, American woodcock, Lincoln sparrow, Nashville warbler, Chestnut-sided warbler, brown thrasher, blue-winged warbler, Yellow warbler, common yellowthroat, indigo bunting, eastern towhee, and field sparrow rely on these habitats and are rarely found in mature forests. These species, as a suite, are declining more rapidly throughout the Northeast than species that utilize more mature forest habitat. Habitat for these species is, and will be, very limited within these tracts.

Birds that prefer forest habitat are numerous, including many neotropical migrants. Some species prefer large blocks of contiguous forest (e.g., northern goshawk); others prefer blocks of forest with adjacent openings, and many prefer forest with a relatively thick shrub layer. The forest currently is maturing, and will eventually become old growth forest dominated by large trees.

Songbirds are a diverse group filling different niches in the Adirondacks. The most common species found throughout the deciduous or mixed forest include the ovenbird, red-eyed vireo, yellow-bellied sapsucker, black-capped chickadee, blue jay, downy woodpecker, brown creeper, wood thrush, black-throated blue warbler, pileated woodpecker, and black and white warbler. The golden-crowned kinglet, purple finch, pine siskin, red and white-winged crossbill and black-throated green warbler are additional species found in the coniferous forest and exhibit preference for this habitat. Birds of prey common to the area include the barred owl, great horned owl, eastern screech-owl, northern goshawk, red-tailed hawk, sharp-shinned hawk, and broad-winged hawk.

Game birds include upland species such as turkey, ruffed grouse and woodcock, as well as a variety of waterfowl. Ruffed grouse and woodcock prefer early successional habitats and their habitat within the area is limited due to the limited amount of timber

harvesting. Turkey are present in low numbers and provide some hunting opportunities. Waterfowl are common along the waterways and marshes and provide hunting opportunities.

Amphibians and Reptiles

The New York State Amphibian and Reptile Atlas Project (1990-1999) confirmed the presence of 23 species of reptiles and amphibians in USGS quadrangles within, or partially within the Boreas and MacIntyre tracts. It is important to note that quadrangles (the survey sample unit) overlap and extend beyond the land boundaries of these tracts. Therefore, recorded species do not necessarily reflect what was found on the tracts, but on the quadrangles. Some species may have been found on private lands adjacent to the state lands. However, these data should provide a good indication of the species found throughout the area. These included three species of turtles, four species of snakes, nine species of frogs and toads, and seven species of salamanders (Table 3). These species are classified as protected wildlife, and some may be harvested during open hunting seasons. Of the 23 confirmed species, one was classified as special concern (wood turtle) and none were classified as endangered or threatened. Three occurrences of wood turtle were documented in quadrangles within, or partially within, the tracts.

Table 3. Amphibian and reptile species recorded in USGS quadrangles within, or partially within, the Boreas and MacIntyre tracts during the New York State Amphibian and Reptile Atlas Project, 1990-1999.

Common Name	Scientific Name
Spotted salamander	<i>Ambystoma maculatum</i>
Red-spotted newt	<i>Notophthalmus v. viridescens</i>
Northern dusky salamander	<i>Desmognathus fuscus</i>
Allegheny dusky salamander	<i>Desmognathus ochrophaeus</i>
Northern redback salamander	<i>Plethodon cinereus</i>
Northern spring salamander	<i>Gyrinophilus p. porphyriticus</i>
Northern two-lined salamander	<i>Eurycea bislineata</i>
Eastern american toad	<i>Bufo a. americanus</i>

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Common Name	Scientific Name
Northern spring peeper	<i>Pseudacris c. crucifer</i>
Gray treefrog	<i>Hyla versicolor</i>
Bullfrog	<i>Rana catesbeiana</i>
Green frog	<i>Rana clamitans melanota</i>
Mink frog	<i>Rana septentrionalis</i>
Wood frog	<i>Rana sylvatica</i>
Northern Leopard frog	<i>Rana pipiens</i>
Pickerel frog	<i>Rana palustris</i>
Common snapping turtle	<i>Chelydra s. serpentina</i>
Wood turtle ^a	<i>Glyptemys insculpta</i>
Painted turtle	<i>Chrysemys picta</i>
Northern redbelly snake	<i>Storeria o. occiptomaculata</i>
Common garter snake	<i>Thamnophis sirtalis</i>
Northern Ringneck Snake	<i>Diadophis punctatus edwardsi</i>
Smooth Green Snake	<i>Liochlorophis vernalis</i>

^bSpecial Concern species.

Endangered, Threatened, and Special Concern Species

New York has classified species at risk into three categories: endangered, threatened, and species of special concern (6 NYCRR § 182). The following section indicates the protective status of some vertebrates that may be in the unit:

Endangered: Any species that is either native and in imminent danger of extirpation or extinction in New York; or is listed as endangered by the U.S. Department of Interior.

Threatened: Any species that is native and likely to become endangered within the foreseeable future in New York, or is listed as threatened by the U.S. Department of the Interior.

Special Concern: Native species not yet recognized as endangered or threatened, but for which documented concern exists for their continued welfare in New York. Unlike the first two categories, they receive no additional legal protection under the Environmental Conservation Law; but, they could become endangered or threatened in the future and should be closely monitored.

Table 4. New York State-listed endangered, threatened, and special concern species documented in survey blocks within, or partially within, the Boreas Ponds and MacIntyre tracts. Bird data were collected during the 1980-1985 and 2000-2005 Breeding Bird Atlas projects. Amphibian and reptile data were collected during the New York State Amphibian and Reptile Atlas Project (1990-1999). Species detected through other surveys are noted.

		Breeding Bird Atlas Project	
Common Name	Scientific Name	1980-1985	2000-2005
<i>Endangered</i>			
Peregrine falcon	<i>Falco peregrinus</i>	x	
Spruce grouse	<i>Falcipennis canadensis</i>	x	
<i>Threatened</i>			
Northern harrier	<i>Circus cyaneus</i>	x	x
Bald eagle	<i>Haliaeetus leucocephalus</i>		x
<i>Special Concern</i>			
American bittern	<i>Botaurus lentiginosus</i>	x	x
Common loon ^a	<i>Gavia immer</i>	x	x
Cooper's hawk	<i>Accipiter cooperii</i>	x	x
Osprey	<i>Pandion haliaetus</i>	x	x

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Sharp-shinned hawk	<i>Accipiter striatus</i>	x	x
Northern goshawk	<i>Accipiter gentilis</i>	x	x
Common nighthawk	<i>Chordeiles minor</i>	x	
Red-shouldered hawk	<i>Buteo lineatus</i>	x	x
Horned lark	<i>Eremophila alpestris</i>	x	
Golden-winged warbler	<i>Vermivora chrysoptera</i>		x
Bicknell's thrush ^a	<i>Catharus bicknelli</i>	x	x
Wood turtle ^b	<i>Clemmys insculpta</i>	x	

^aAlso documented by New York Natural Heritage Program (NYNHP) staff. Bicknell's thrush were detected just to the east of the Boreas Ponds Tract on private lands.

^bSpecial Concern species.

Extirpated and Formerly Extirpated Species

Moose, elk, wolf, cougar, Canada lynx, bald eagle, golden eagle, and peregrine falcon all inhabited the Adirondacks prior to European settlement. All of these species were extirpated from the Adirondacks, mostly as a result of large-scale landscape changes during the nineteenth century. Unregulated harvest also led to the decline of some species, such as moose, wolf, elk, beaver, American marten, and fisher. More recently some birds fell victim to the widespread use of DDT.

Projects to re-establish the peregrine falcon, bald eagle, and Canada lynx have been implemented. Efforts to reintroduce the peregrine falcon and the bald eagle through "hacking" programs began in 1981 and 1983, respectively. These projects have been remarkably successful within New York State. Bald Eagles are becoming more common, and peregrines are recovering. Both species are now found in portions of the Adirondacks. Golden eagles are generally considered to have always been rare breeders within the state. A total of 83 Canada lynx were released into Adirondack Park from 1989 to 1991 by the SUNY College of Environmental Science and Forestry as part of their Adirondack Wildlife Program. The Lynx dispersed widely from the release area and mortality was high, especially mortality caused by vehicle-animal collisions. The

Wildlife Conservation Society conducted lynx surveys in the High Peaks region in 1998-99; however, these surveys failed to detect this species. It is generally accepted that the lynx restoration effort was not successful and that no lynx from the initial releases or through natural reproduction of released animals remain in the Adirondacks. Lynx are legally protected as a game species with no open season as well as being listed as threatened on both the federal and state levels.

The wolf and eastern cougar are still considered to be extirpated from New York State. Reports of wolves are generally considered to be misidentified coyotes; however, recent genetic evidence indicates that coyotes in New York are hybrids comprised of western coyote, gray wolf, eastern wolf, and domestic dog. This hybridization likely occurred as western coyotes dispersed north of the Great Lakes and past the Adirondack region of Canada at some point prior to entering New York State in the 1920s and 1930s. Periodic sightings of cougars are reported from the Adirondacks, but the source of these individuals is believed to be from released captive individuals. An exception to this general consensus occurred in 2010, when a wild male subadult cougar dispersed from South Dakota through New York (Lake George) and was killed by a collision with a vehicle in Connecticut (see Kerwin, 2012; http://www.dec.ny.gov/docs/administration_pdf/1012consmagweb.pdf and Hawley et al., 2016; https://www.fs.fed.us/rm/pubs_journals/2016/rmrs_2016_hawley_i001.pdf).

Critical Habitat

Deer Wintering Areas

The maintenance and protection of deer wintering areas (or deer yards) are important in maintaining northern deer populations. These areas provide deer with relief from the energetic demands of deep snow and cold temperatures at a time when limited fat reserves are being used to offset reduced energy intake (i.e., nutritionally, winter browse is poor). Previous researchers have demonstrated that deer consistently choose wintering areas which provide relief from environmental extremes over areas that may provide more abundant forage (Severinghaus, 1953; Verme, 1965). These observations are consistent with the fact that the nutritional value of winter browse is poor due to low digestibility and that deer can expend more energy obtaining browse than the energy gained by its consumption (Mautz, 1978).

Severinghaus (1953) outlined several habitat components of deer yards, including topography and forest cover type (i.e., presence of conifers). The most important characteristic of an Adirondack deer yard is the habitat configuration making up a “core” and travel corridors to and from the core. The core is typically an area, or areas, of dense conifer cover used by deer during severe winter weather conditions. Travel

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corridors are dense but narrow components which allow access to food resources (hardwood browse) in milder conditions. Use of wintering areas by deer can vary over time depending on winter severity and deer population density. Although Severinghaus (1953) reported that some Adirondack deer yards have been used since the early 1800s, recent research suggests that the location of some current deer yards may overlap very little (or not at all) with their historical counterparts mapped in the 1950s and 1960s by the Department (Hurst 2004). Therefore, planning for the protection of deer wintering areas relative to recreational activities in the unit should consider the dynamic nature of these areas (not the static representation of historical boundaries) and seek to update our understanding of wintering areas currently used by deer.

Historical Deer Wintering Habitat

Potential deer wintering areas have been identified within the tracts from historical aerial surveys conducted by the Department in the 1950s and 1960s; one area was verified via field surveys in the 1970s and 1980s (indicated below). These general areas were located within extensive wetland complexes and riparian forest and include:

1. To the east of Boreas Ponds and LaBier Flow and along Casey Brook and extending north to Upper Ausable Lake,
2. Adjacent to the Hudson River south of Tahawus (verified via field surveys), and
3. Adjacent to the branch, in the Andrew Brook/Fly Pond region, and in the Brant Brook and Dudley Brook areas.

Guidelines for Protection of Deer Wintering Areas

Research on wildlife responses to winter recreation (e.g., cross-country skiing, foot travel, and snowmobiling) is limited. Studies conducted on mule deer (Freddy et al., 1986) and elk (Cassirer, et al.1992) suggest that these species can be disturbed by these activities. However, when planning the location of recreational trails, general guidelines for protecting deer wintering areas can be followed, which should reduce the potential for disturbance.

Activities which substantially diminish the quality or characteristics of the site should be avoided, but this does not mean human use is always detrimental. Pass-through trails, and other recreational uses can be compatible with deer wintering areas if they are carefully considered. Recreational planning which affords protection of core sections and avoids fragmenting travel corridors is acceptable in many situations. Certain types of recreation such as cross-country skiing are not presently considered to significantly impact deer yards, particularly if the traffic along trails is not prone to stopping or off-trail excursions. These types of trails in or adjacent to deer wintering areas can provide a firm, packed surface readily used by deer for travel during periods of deep snow. They

can also create access for free-roaming dogs if the location is close to human habitation; thus trails should avoid deer yards in these situations. High levels of cross-country ski use can increase the energy demands of deer within the yard due to increased movement.

Proposed Management

Wildlife Management Guidelines

The legal foundation for wildlife and fisheries management in New York State is embodied in Article 11 of the Environmental Conservation Law (ECL). Article 11 authorizes the Department to insure the perpetuation of fish and wildlife species and their habitats and to regulate hunting and trapping through the issuance of licenses, the establishment of hunting and trapping seasons and manner of taking, and the setting of harvest limits. Game species will continue to be managed by appropriate regional or statewide hunting or trapping seasons.

Objectives

While all the objectives and management actions outlined below are important, a priority should be placed on increasing our understanding of the occurrence and distribution of several wildlife species and critical habitats within these tracts. This priority is reflected under the management action projects outlined below.

- Perpetuate, support, and expand a variety of wildlife recreational opportunities, including sustainable hunting, trapping, wildlife observation and photography as desirable uses of wildlife resources.
- Meet the public's desire for information about wildlife and its conservation, use, and enjoyment.
- Ensure that wildlife populations are of appropriate size and adequately protected to meet the demands placed on them, including consumptive and non-consumptive uses.
- Increase our understanding of the occurrence, distribution, and ecology of game and non-game wildlife species and their habitats.

Action Steps

- Manage and protect wildlife through enforcement of the Environmental Conservation Law and applicable rules and regulations.
- Support traditional use of the tract's wildlife resources, particularly activities designed to perpetuate hunting and trapping programs and education efforts.

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- Active management of wildlife populations will be accomplished primarily through hunting and trapping regulations developed by the Department's Bureau of Wildlife for individual or aggregate Wildlife Management Units.
- Regulations will be based on data collected from hunters and trappers, wildlife surveys, and research, as well as input from our constituents.
- Monitor critical habitats for potential human disturbance. Human disturbance impacts to critical habitats will be mitigated through appropriate measures (e.g., temporary closing of climbing routes, posting and/or gating entrances to caves that serve as bat hibernacula, and implementing standard guidelines for protecting deer wintering yards).
- Continue to monitor and inventory wildlife populations and their habitats, particularly species classified as endangered, threatened, special concern, rare, or game. Examples of important wildlife monitoring programs that we should continue include those for peregrine falcons, American martens, and boreal birds.
- Continue aerial surveys for moose, monitor existing radio-collared moose, and continue collaring new individuals on an opportunistic basis.
- Provide information to user groups on avoiding problems associated with black bears.
- Adopt and enforce the current bear canister regulation across all the High Peaks Wilderness, aside from the Adirondack Canoe Route. Encourage the voluntary use of bear-resistant food canisters in other areas.
- Assess problems associated with beaver-flooded trails and roads. Work with area trappers and encourage trapping at nuisance sites during the open beaver trapping season.

F. Fisheries

Existing Conditions

The 1999 High Peaks Wilderness Complex and 2004 Dix Mountain Wilderness Area UMPs provided an inventory of the fisheries resource in these areas and recommendations for their management. This UMP Amendment describes what the Department knows about these new aquatic resources and outlines our plans to study and manage their fish populations.

This UMP Amendment focuses on 11 new bodies of water, all of which have been in private ownership with differing amounts of fisheries management by the previous

owners. DEC fisheries staff have had the opportunity to survey some of these waters in the past, and former owners like The Nature Conservancy have done some studies.

There has been ongoing research into the taxonomy of suckers of the genus *Catostomus* in the Adirondacks. Much of this work has been done by Doug Carlson of the NYSDEC Rare Fish Unit, Richard Morse of the New York State Museum, and Evon Hekkala of Fordham University. Their work was recently published in *American Currents*, the publication of the North American Native Fishes Association. These researchers have found that sucker "...samples from Elk Lake were genetically distinct from both *C. commersonii* and *C. utawana* populations to the west." Additionally, in a recent DEC Boreas Ponds fisheries survey, it is stated that "sucker tissue samples were analyzed with MtDNA techniques by a geneticist from Fordham University to show that there were similarities (haplotype G of cytochrome B) to Elk Lake and Lower Ausable suckers that are known for late spawning." The Elk Lake sucker variant is currently thought to exist in eight waters of eastern Adirondack watersheds, including the Upper Hudson, Champlain, Raquette and St. Regis of St. Lawrence Canada. The Boreas Ponds is one of those eight waters. The summer sucker and the "unknown sucker variant", or "Elk Lake" suckers, are currently listed as Species of Greatest Conservation Need by the Department in the high priority category. Additional genetic work is needed to resolve the taxonomy and biogeography of "Elk Lake suckers."

Of additional interest is the status of round whitefish within the area's waters. Round whitefish (*Prosopium cylindraceum*), also called frost fish, were once found in over 80 lakes in New York State. However, most round whitefish populations have been extirpated, and by 2006, there were only six known endemic populations. Consequently, the species is listed as Endangered in New York State. To increase the number of waters containing this species, the Department has introduced round whitefish into new waters that contain the requisite habitat. Upper Preston Pond was selected as a candidate water, and round whitefish were stocked there in 2016 and 2017. It is hoped the stockings will lead to establishment of a self-sustaining round whitefish population. The success of the stockings will be evaluated within eight years of the last planting.

Appendix C has the list of pond narratives where specific information for the ponds can be obtained.

Proposed Management

Objectives

- Restore native fish communities with emphasis on native species that have declined due to man's influences. This goal is consistent with the primary

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wilderness management guidelines in the APSLMP. Implementation may include reclamations, liming, stocking and other activities as per the “Fishery Management Policy in Wilderness, Primitive and Canoe Areas.”

- Protect native fish communities from the addition of undesirable non-native fishes. This goal is also consistent with the primary wilderness management guidelines in the APSLMP.
- Protect the fishless state of naturally barren waters that have not been stocked.
- Provide recreational angling as part of a larger wilderness experience emphasizing quality over quantity.

Action Steps

- Conduct fisheries surveys of the following waterbodies:
 - LaBier Flow (UH563)
 - Deer Pond (UH565)
 - Lake Andrew (UH698)
 - Bradley Pond (UH717)
 - Lake Jimmy (UH713)
- Conduct biological surveys of waters within the unit as required.
- Continue to stock Henderson Lake with brook trout and lake trout.
- Continue to stock Lower Preston Pond and Upper Preston Pond with brook trout.
- Conduct an assessment of round whitefish in Upper Preston Pond to determine if the experimental stockings have established a self-sustaining population.
- Conduct additional genetic analyses to resolve the taxonomy of white sucker from Boreas Ponds.
- Maintain and enforce regulations that prohibit the use of fish as bait within the unit. The use baitfish is a vector for potential introductions of disruptive non-native fish species.

III. Recreational Resources and Human Uses

This Unit Management Plan Amendment proposes the development of wildland recreational facilities in the High Peaks Wilderness Complex, working in concert with the Vanderwhacker Mountain Wild Forest UMP Amendment. Each section below builds on the planning process as well as the recreational experience of the user. In addition to official documents, which inform the UMP process, the planning team applied principles and strategies that are currently considered norms in the field of wildland recreation management.

There are six best management practices that are identified as essential in successful wildland management. Essentials for wildlands management include:

1. Planning- Includes the UMP process (with public participation), work planning, development of guidelines and other supportive materials and process and building partnerships with stakeholders.
2. Education and Outreach- Includes providing effective education and outreach for visitors, local government and communities and partners. Utilizing all mediums available and covering topics from preparedness to stewardship.
3. Front country infrastructure- Includes roadside access points, human waste facilities, visitor information and other support facilities.
4. Backcountry infrastructure- Includes trails, campsites and support facilities appropriate to educate and protect the natural resource.
5. Limits on use when all else fails- When education and outreach along with appropriate infrastructure improvements cannot support the carrying capacity, different methods of permits, limits on use or fees should be utilized.
6. Resources both personnel and funding- Includes staff to facilitate management, maintenance and safety concerns and appropriate funds to maintain and educate and expand opportunities for partnerships.

As part of the comprehensive process of managing the High Peaks Wilderness Complex and adjacent units, many of the proposals in this amendment will follow a process of conditional implementation, which is done through a data-based phasing process. Where these conditional management actions are listed, the Department will evaluate current conditions as part of considering the implementation of these proposals. While authorization for these conditional proposals is being sought at this

III. Recreational Resources and Human Uses

time, some may never move forward if the natural resource conditions or human use patterns do not support their implementation. The Department will adhere to the six wildland management BMPs and successfully build and manage recreation facilities that do not negatively impact the natural resources or experience of the user.

A. Carrying Capacity

The High Peaks Wilderness Complex, like any other natural area in our Forest Preserve, cannot withstand ever-increasing and unlimited visitor use without suffering the eventual loss of its essential natural and wild character. However, the underlying question of how much use and of what type the whole area - or any particular site or area within it - can withstand before the impacts of such use cause degradation of the very resource or experience, remains. Such understanding and determinations are a wildland manager's most important and challenging responsibility. Our primary goal throughout this amendment is to strike and maintain a proper balance of making sure a natural area's "carrying capacity" is not exceeded while concurrently providing for visitor use and enjoyment.

DEC is committed to providing a framework that allows an informed and evolving process to help guide the management of the lands in and surrounding the newly classified Boreas Ponds and MacIntyre tracts. Utilizing a phased approach for developing access points and recreational infrastructure that is tied to monitoring the carrying capacity through utilizing the Limits of Acceptable Change (LAC) framework will ensure that the wild character of the area and user experience is kept intact.

Proposed management action steps outlined in this plan will follow a phased approach (Section Q Phases of Implementation) with decisions to implement successive phases informed by wilderness monitoring, planning and utilization of the LAC framework. Monitoring will inform land managers on the need to address any unacceptable changes in the current phase, or the benefits that can be seen by proceeding to the next phase.

Background

Defining the amount and type of use that an area can withstand before negative impacts occur to the resource or user experience is a significant challenge. Relative differences in ecosystem sensitivities to disturbances need to be considered in recreational planning. Avoiding sensitive sites or taking precautions in the layout and design of any facility can drastically reduce negative impacts associated with use. Individual locations

that can withstand more usage should be considered to help balance the overall carrying capacity of the unit.

The term "carrying capacity" in public lands management, where public recreation is the leading use, means the amount of use that any single facility or the entire complex can handle without degrading the resource or the perceived experience of the user. Given the many variables associated with measuring carrying capacity, it can be a challenging concept to both understand and measure. While it can be helpful to establish upper-level thresholds for use, there is not an exact science on how to consistently set these thresholds across all variables. Taking steps to address the micro-level of carrying capacity, such as addressing erosion and compaction of trails and campsites, may not always address the user-experience component of carrying capacity that occurs at the whole-unit level.

Essentially, this is because the relationship between the amount of use and the resultant amount of impact is not linear. For some types of activities, for instance, most of the impact occurs with only low levels of use. In the case of trail erosion, once soil starts to wash away, additional foot travel does not cause the impact upon the trail to increase proportionately. It has been discovered that visitor behavior, site resistance/resiliency, type of use, etc. may actually be more important in determining the amount of impact than the amount of use, although the total amount of use is certainly still a factor.

More recent carrying capacity studies have relied on the social aspect of recreation, in that users often have a pre-conceived idea of what type and level of use they want to experience on a given trip. This could be in the form of number of paddlers on a water body, hikers passed on the way to a destination, or how much solitude they want to experience at a primitive tent site, etc.

This makes the manager's job much more involved than simply counting, redirecting, and (perhaps) restricting the number of visitors in an area. Influencing visitor behavior can require a well-planned, multi-faceted educational program. Determining site resistance/resiliency always requires research (often including much time, legwork and experimentation). Shaping the types of use impacting an area can call not only for education, research and development of facilities, but also the formulation and enforcement of a set of regulations which some users are likely to regard as objectionable.

Nevertheless, the shortcomings of a simple carrying capacity approach have become so apparent that the basic question has changed from the old one "How many is too many?" to the new, more realistic one: "How much change is acceptable?" The

III. Recreational Resources and Human Uses

Department embraces this change in approach while recognizing the tasks it calls for in developing the best foundation for management actions. Professionally-informed judgments must be made such that carrying capacity is given definition in terms of resource and social conditions that are deemed acceptable; these conditions must be compared with real, on-the-ground conditions; certain projections must be made, and management policies and actions must be drafted and enacted with an aim toward maintaining or restoring the conditions desired.

In the case of the Boreas Ponds and Macintyre Tract, public recreation is a new land use. Pre-existing data in the form of facility conditions and use numbers do not exist, so a baseline for which to work from has not been established, therefore we do not know what the actual carrying capacity of the newly acquired lands is. This introduces another layer of complexity in the carrying capacity question. A common way to directly manage the number of recreational users in an area, although varied in success, is through specifically sized parking areas. This often works well when the parking area services only one trail, or one hand carry launch etc. The complexity of the issue increases as multiple facilities are managed through one trailhead. A great example of this is the Four Corners Parking Area on the Boreas Tract in the Vanderwhacker Mountain Wild Forest. This parking area could service several user groups simultaneously, like paddlers for LaBier Flow and Boreas Ponds, hikers for White Lilly Pond or Allen Mountain, equestrian use along Boreas Road, and primitive camping throughout the area. This also introduces another consideration, in that management of the Vanderwhacker Mountain Wild Forest not only has to take into account the carrying capacity of the lands within the unit itself, but also the neighboring lands like the High Peaks Wilderness Area.

The motorized access and parking sections in both the Vanderwhacker Mountain Wild Forest and High Peaks Wilderness Complex UMP amendments, along with access points on easement lands, describe the size and locations of the proposed parking areas along with the associated proposals regarding maximum occupancy and roadside parking. These proposals set a baseline from which to allow access during phase 1 of implementation. As stated above, environmental sensitivity directly effects the carrying capacity of an area. Associated hand boat launches, trails and tent sites in phase 1 will be built from these motorized access and parking proposals. Building each facility in the most sustainable manner and location possible, along with balancing the design of each component to enhance the user's experience, will serve to simultaneously protect the natural environment and enhance the user's experience. Upon completion of construction the monitoring mechanisms described later will commence, which will guide management decisions related to the various phases.

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The intent of this approach is to provide a variety of access to the property and to new purpose-built recreational facilities in a way that allows the Department to keep track of use numbers and physical changes on the ground. After data is collected and ground conditions are observed, the recreational carrying capacity can better be measured through several indicators discussed below. Sustainable purpose-built facilities are a key factor in this process, not only to have a strong foundation for recreational use, but also so we can evaluate the known indicators. Once the condition of facilities is measured and evaluated through the LAC framework, the next steps can be determined in accordance with the phases set forth below.

The use of this phased approach to develop facilities allows the Department to provide realistic timelines for the development of sustainable and enjoyable facilities. It also helps to minimize low-quality facilities that are underused in favor of creating locations that will help realize and balance all levels of carrying capacity. In order to further illustrate the succession of the phased approach, the schedule of implementation at the end of this UMP Amendment was developed. The schedule is initially based on providing access to the tracts, followed by the construction of basic recreational facilities tailored to specific types of recreation. Once constructed, each facility will be photo documented to show its original condition, then periodically photo documented to illustrate changes over time. These photos coupled with use data collected from register sheets will be evaluated through the LAC process to illustrate the recreational carrying capacity of specific facilities. From there, the data collected on these individual facilities will be looked at on a larger scale that considers the entire network of facilities and access points regardless of land classification. An example of this is the recreational access that parking areas along Gulf Brook Road provide for facilities like the Boreas Ponds Trail and Boreas Mountain Trail, which serve both the Wild Forest and Wilderness areas.

The phased approach and schedule of implementation integrates and takes into account the complex nature of the area, which will allow for a more balanced and systematic approach to address the carrying capacity of the area as a whole. Phase 1 in the schedule provides the strategy to construct the foundation of facilities. The evaluation of these facilities will guide the phases of this plan, and only after the condition of these facilities is evaluated, can a determination be made to proceed with, maintain current, or retract the phases of the schedule. There are various environmental criteria that can activate the next phases of the plan. These may be site specific or at larger scales and can include things such as campsite compaction and sprawl, vegetation damage, trail erosion, etc. Social criteria like frequent or high levels of tent site or trail use without environmental degradation can also prompt the next phases of the plan. Regardless of the criteria, the main objective is to appropriately

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provide sustainable and desirable facilities without exceeding the carrying capacity of the land on which they are located.

Clearly, a delicate balancing act is called for, and yet just as clearly, the Department's management focus must remain on protecting the resource. A central objective of this amendment is to lay out a strategy for achieving such a balance within the newest additions to the High Peaks Wilderness Complex, the unit as a whole, and the surrounding lands like the Vanderhacker Mountain Wild Forest. This strategy reflects important guidelines and principles, and it, along with the guidelines and principles, has directed the development of the management proposals detailed below and in the following sections of this amendment.

Recreation Research Findings and Management Implications. Any recreational use in the High Peaks Wilderness Complex and Vanderhacker Mountain Wild Forest will have some level of adverse environmental impact. Impacts from hiking and camping typically follow a natural progression. Initial and very light use may only damage particularly fragile soils and vegetation. However, even at low levels of use, the groundcover and surface organic litter are damaged. With moderate use, all but the most resistant plant species are lost on the developed area, and mineral soils may be exposed. High use exposes mineral soils to compaction and erosion, which in turn expose the roots of trees.

Recreation impacts are related to visitor use levels in a curvilinear fashion. For example, a study of wilderness campsites in Minnesota found that only 12 nights of campsite use per year caused substantial impact. However, further increases in use caused little additional change for most forms of impact (Marion, 1998). Considering the popularity of camping in the HPWC and VMWF, most, if not all, campsites show evidence of substantial impact. However, it is also likely that continued use will have little additional adverse impact on those campsites.

One important implication of the curvilinear use/impact relationship is that nearly all use must be eliminated to achieve significant reductions in recreational impact. In other words, the only way to completely eliminate adverse impacts of hiking and camping throughout the tracts would be to close the area to all public use. However, a more realistic approach is to minimize impact by managing other factors to help mitigate adverse environmental impacts. <http://www.cnr.vt.edu/forestry/cpsu/Rececol1.qif>

Use-Related Factors. Many impacts are the result of uninformed or careless behavior. Managers can educate and regulate visitors to reduce high impact behavior (e.g., building fires, chopping trees, cutting through switchbacks) and encourage low-impact behavior such as the "Leave No Trace" program. Large groups have a greater potential to damage resources than the same number of individuals spread across

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smaller groups. Limits on group sizes can be encouraged or required to minimize resource impacts. A defined camping season which only allows camping for a few months, rather than throughout the year, may also have some benefit.

Environmental Factors. Managers can encourage recreational use in impact-resistant locations. For example, trails can be located or relocated to avoid wet areas and steep slopes, and tent sites can be located on flat, well drained areas.

<http://www.cnr.vt.edu/forestry/cpsu/Rececol2.gif> Knowledge of the relative resiliency of different vegetation and soil types can be used to select areas which will quickly recover following recreational trampling. Sites with high resiliency are also desirable because they usually support dense vegetation, which helps confine the use of tent sites and trails to their desired locations.

Managerial Factors. Managers of some protected areas have sought to minimize impacts by encouraging visitor dispersal. However, due to the use/impact relationship and a number of behavioral factors, this impact-minimization strategy has only been successful in areas which receive low use. Therefore, this strategy would not likely to be effective in these new tracts because of the potential for high levels of use.

Other Considerations. Most visitors prefer hiking on established trails and camping at existing campsites. Many visitors enjoy camping close to trails and other groups for social reasons, while others fear getting lost when away from trails. Areas with rugged terrain and/or dense vegetation may limit the ability of visitors to hike off-trail or the number of suitable camping locations necessary to support a dispersed camping policy. Pre-existing trails and campsites are also more convenient and comfortable and require less work to use and maintain. Finally, water and other scenic attractions in the backcountry will always attract larger numbers of visitors than less interesting areas. In general, management efforts to alter these natural tendencies will be unsuccessful without substantial and expensive educational and law enforcement programs (Marion, 1998).

Recreation research shows that visitor containment, or concentration, in the Forest Preserve offers a promising strategy for minimizing recreation impacts. Trails, which concentrate use on their treads, represent one form of containment. Similarly, mandating use of designated campsites also contains visitors to sites that have already been impacted. Campsite rotation programs have also been considered in the past. However, recovery rates on campsites and trails are considerably lower than initial impact rates, which mean that a rest-rotation strategy will generally be ineffective (Marion, 1998).

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Examples of Cause

The most heavily used areas will usually show the most effects from use. However, there are several factors which can mitigate heavy use or amplify the effects of lighter use. One factor is the condition of a facility at the time that the use occurs. For example, a few people walking a trail when the trail is wet and soft will cause more damage than a large number of people using the same trail when it is dry. Another factor to consider is the skill level and behavior of the users. A large group may not leave any evidence that they used an area, while a small group or even an individual can, through willful neglect or ignorance, leave an area permanently altered. A third factor to consider is the design and location of the improvement that is being used. A properly designed and located facility will allow for heavy use without having a negative impact on the resource. Poor facility design or location can lead to amplified deterioration of the resource.

Many land resource problems tend to expand with time if they are not addressed. For example, muddy sections of trails result in an expansion of the muddy area and loss of vegetation as people, trying to stay dry, walk around the wet areas. Another example is when people who visit a tent site which already has a litter problem they are more likely to leave their own trash behind. For this reason, it is important to take action when a problem arises.

The most noticeable recreation impacts (such as trail erosion, trash, and tree injuries) receive most of the management focus. Recreation can also result in impacts to biological communities that are not as noticeable (Larson, et al, 2016), yet these impacts should still be considered. These impacts are not limited to the physical spot where the use occurs but extend for a distance. While major portions of the planning area receive significant recreational use, there are other areas that see little to no use. Areas that receive significant use are generally near lakes, ponds and trails. Little-used areas may have herd paths that pass through them, but generally lack developed facilities. The greater the distance from heavy recreational use, roads, and developed private property, the more wild character the area will have, and impacts to wildlife will be lesser.

Water Resources

Waterbodies in the High Peaks Wilderness Complex and Vanderwhacker Mountain Wild Forest are impacted by recreational use. These impacts come from the use that occurs on the water itself and on the adjacent lands. Primitive tent sites, trails, and parking areas are examples of facilities on land that could impact an adjacent waterbody. Different impacts are associated with different recreational uses.

The Department and the Adirondack Park Agency are currently working on developing carrying capacity guidance for waterbodies. Upon adoption of waterbody carrying capacity guidance, those standards will be adopted and applied in these units. In the interim, this plan calls for monitoring all the recreational land-based uses, and actions will be taken to minimize impacts.

These management concepts form the basis of the proposed management actions presented in this UMP Amendment. This approach will require flexibility, determination and patience. It may not be possible to complete all inventories and assessments called for by this strategy - and by the APSLMP - in this plan's time frame. It will be important to show progress in achieving APSLMP goals and in gaining initial managerial experience and knowledge in applying this strategy to some carrying capacity questions and issues. Knowledge gained as a result of the implementation of these UMP amendments will be useful to: 1) revising and refining management actions if evaluation shows that desired conditions are not being attained or sustained; and 2) creating a foundation upon which this strategy can eventually be built into a fully developed, science-based approach to protecting and managing the resources of the HPWA and VMWF.

Proposed Management

Management and Planning Concepts

The long-term approach for managing the tracts will use a phased approach for the implementation of facilities, guided by monitoring following the Limits of Acceptable Change (LAC). Given the numerous variables impacting the management of a large wildland complex, the Department acknowledges this process will evolve over time and utilize appropriate resources that are emerging across public land management agencies. The U.S. Forest Service White Mountain National Forest Wilderness Appendix is an impressive model that helped inform the Department's planning process. As the Wildland Monitoring Program is developed, the Department will utilize aspects of the recently developed Visitor Use Management Framework (developed by the Interagency Visitor Use Management Council, which is made up of the federal public land agencies.)

Limits of Acceptable Change

This method employs carrying capacity concepts, not as prescriptions of the total number of people who can visit an area, but as prescriptions of the desired resource and social conditions that should be maintained.

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Establishing and maintaining acceptable conditions depends on well-crafted management objectives which are explicit and draw on managerial experience, research, inventory data, assessments and projections, public input, and common sense. When devised in this manner, objectives founded in the LAC Framework models essentially dictate how much change will be allowed (or encouraged) to occur and where, as well as how to respond to changes. Indicators (measurable variables that reflect conditions) are chosen, and standards (representing the bounds of acceptable conditions) are set, all so that management efforts can be effective in addressing unacceptable changes. A particular standard may be chosen so as to act as a simple trigger for management action, or it may be chosen to act as a kind of boundary which -- given certain assessments -- allows for management action before conditions deteriorate to the point of no longer meeting the standard.

Even well-conceived and executed efforts can prove ineffective, but the implementation of LAC will show the land manager if facilities are effectively working in the way that they were designed. If efforts do prove ineffective, management responses must be adjusted. Monitoring of resource and social conditions is absolutely critical. LAC models rely on monitoring to provide systematic and periodic feedback to managers concerning specific conditions.

In outline, the Department's approach applies four factors in identifying potential management actions for an area:

1. The identification of acceptable conditions as defined by measurable indicators;
2. An analysis of the relationship between existing conditions and those desired;
3. Determinations of the necessary management actions needed to achieve desired conditions; and
4. A monitoring program to see if objectives are being met.

A proposed list of management and planning concepts for which measurable indicators and monitoring tools can be developed may be used by the Department for measuring and evaluating acceptable change within the units:

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- Condition of vegetation in camping areas and riparian areas near lakes and streams;
- Extent of soil erosion on trails and at campsites;
- Non-compliant visitor behavior;
- Noise on trails, adjacent campsites and other areas where impacts occur;
- Conflicts between different user groups;
- Diversity and distribution of plant and animal species; and
- Air and water quality.

The adoption of indicators and standards for measuring impacts helps create a consistent and reliable methodology in monitoring impacts. While LAC will be the main methodology to guide management decisions and actions, it is important to note the overall goal is to preserve wilderness conditions. (The White Mountain National Forest Land and Resource Management Plan provides a great example of what the Department is trying to achieve in establishing a well-rounded and useable method of informed decision making through monitoring.) Indicators are tools used to assess the resource or social conditions of a given area and are not always a direct measure of the actual conditions of a facility. The indicators set standards which act as thresholds to determine if and what management action will be taken. It is accepted and assumed that sustainable and purpose-built facilities will experience minimal soil compaction and vegetation loss outside the developed tread or area, and will readily shed water without holding it or causing erosion. These assumptions need to be reassessed over time. If the facilities are maintaining their intended condition, then they can either be maintained as is, or the land manager can proceed to the next phase of the plan. If the condition of the facility is failing and our assumptions are not being met then corrective adjustments need to be made, which could involve anything from hardening and re-routing, to taking a step back to a previous phase of the plan.

Regular and consistent monitoring is critical for this framework to be successful. Without the regular measurements of the indicators and comparison to the established standards, it is not possible to understand the degree to which we are able to achieve wilderness character integrity.

Based on the LAC framework outlined above, we chose four categories of indicators as significant identifiers of resource concerns. Those indicators fall into the categories of biophysical, social, aesthetic, and ecosystem process. Each is described below, along with a short excerpt from the wilderness definition from the SLMP that served as the primary (though not entire) focus in determining the scope of that individual indicator. See Table 1 below for a summary of these indicators.

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Biophysical Indicators

These are measures of the effects of human activity on the biological health and quality of the environment. They are typically largescale and are often influenced most significantly by actions and events outside wilderness. These indicators are distinct from others because the primary concern is for the health and quality of ecosystems and ecosystem components such as watersheds, air quality, wildlife and vegetative populations, rather than for the quality of the human experience.

Social Indicators

These measures are immediate and local, involving direct contact among wilderness users and between wilderness users and agency personnel. These indicators are categorized as distinct from others because they are strictly a measure of how people affect other people, and the primary concern is for the human experience in terms of type, quality, and frequency of interaction with others. For example, do users change their route or destination as a result of other users on a trail, or do users not use a facility like a lean-to or tent site because its overuse is resulting in degradation? These experiences may have a direct link to the quality of the ecosystem or the appearance of the surrounding landscape.

Aesthetic Indicators

These are measures of how direct human effects on the immediate landscape affect the human experience of the area as wilderness. They typically are local in scope, are constrained to an immediate area, and result primarily from recreational use.

These indicators are distinct because the primary concern is for the human experience derived from the immediate, local landscape. These are measures of both human-caused impacts to a biophysical resource and the resulting effects of those impacts on the wilderness experience. However, these types of impacts are unlikely to have lasting, significant effects on the larger-scale health of ecosystem components. As such, the driving force to mitigate them stems from the human experience, which often results in these corrective measures being easily achievable through public will.

Ecosystem Process Indicators

These measures of process and change on the land occur separately from the direct influence of human action. They are usually broad scale and large in scope. These indicators are distinct from others because in many cases there is no direct human involvement in the process affecting change on the land. However, in recognizing the

need for baseline data to inform management decisions, these processes should be monitored closely to understand natural change in the area.

Wilderness Management Process Application

Biophysical Indicators

Indicators may include air quality, water quality, threatened and endangered species, invasive species, and indicator species (see Table 1 below). Though invasive species and indicator species concerns are often part of ecosystem processes (and are listed as such here), they will be treated in this plan as biophysical issues.

Standards will be common to all areas to preserve the wild character of the area.

Management actions may not affect individual sites, depending on the scope and source of the exceeded standard.

Though in many cases the effects and actions available to manage and administer wilderness in terms of these indicators are site specific and within control of managers, they are sometimes beyond the manager's administrative scope (e.g., air quality issues). Standards are set, and methods to measure and ensure that these standards are met involve other federal or state laws, other federal and state agencies, and other disciplines.

Social Indicators

Indicators may include number of contacts per given segment of trail per survey period, number of contacts per given destination point per survey period, assessments of visitor experience, and perception of crowding at determined destination points (see Table 1 below).

Standards are based on use trends as monitored at the same locations and the same times from year to year. A range of survey locations will be determined across the unit.

Management actions triggered by exceeding standards will include a focused examination of management actions, policies, and general recreation trends that may underlie the specific issue. The level of tolerance and restriction represented by management actions may differ by area. There are tools available to manage and administer wilderness in terms of these indicators, however they are sometimes judged to be ineffective. Because of their often seemingly arbitrary nature, numerical standards in these cases are extremely difficult to set and even more challenging to justify; visitors in some areas have indicated a greater acceptance of higher use levels than increased

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managerial regulation. Nevertheless, management actions may involve implementation of use restrictions or limitations.

Aesthetic Indicators

Indicators include campsite density, campsite size, and frequency of litter and exposed human waste (see Table 1 below).

Standards are set for each indicator and often vary by area.

Management actions activated by an excess of standards will often involve direct manipulation of campsites, an increase in managerial presence in the affected area, and, in extreme situations, may involve the implementation of use restrictions or use limitations.

We have many tools to manage and administer wilderness in terms of these indicators. Furthermore, clear standards may be set based on the values used to determine current and desired resource conditions. Management actions to mitigate impacts in these areas are usually justifiable and commonly acceptable to visitors.

Ecosystem Process Indicators

Indicators may include ecological indicator species, natural fire, natural disturbance, and invasive species (see Table 1 below).

The information presented above represents several of the concepts and theories for addressing carrying capacity and developing processes to monitor impacts. This represents the basis for our overall plan. Standards and management actions are largely dictated by a wildland monitoring plan. Upon approval of the UMP Amendments, land managers for the High Peaks Wilderness and Vanderwhacker Mountain Wild Forest will take the concepts discussed to create a wildland monitoring plan that will be used in conjunction with the work planning process to implement proposals. Tools to monitor Wilderness in terms of these indicators are largely based in the natural sciences. These processes must be carefully monitored to increase understanding of wilderness conditions.

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	Wilderness Character	Indicators	Standards	Management Actions
Biophysical- Human effects on the land. Primarily broad scale.	"...an area...having a primeval character ...protected and managed so as to preserve its natural conditions.... generally appears to have been affected primarily by the forces of nature."	<ul style="list-style-type: none"> • Air quality • Water quality • Wildlife/TES • Invasive species • Indicator species 	Standards are often defined by other legislation and measured by specialists other than wilderness managers	Excess of standard may activate action, but most likely will no greatly restrict wilderness recreation opportunities.
Social- Direct and immediate human effects on other humans.	"...outstanding opportunities for solitude or...unconfined type of recreation."	<ul style="list-style-type: none"> • Visitor use, Trail • Visitor use, Destination • Experience quality • Perception of crowding 	Standards are definable and measurable, but can be viewed as subjective and arbitrary.	Excess of standard activate focused examination of management actions and policies. Data informs our decision-making and serves warning that use-related problems may increase
Aesthetic- Human effect on the land that primarily affects the experience by other humans of an area such as Wilderness	"...without significant improvements or permanent human habitation...with the imprint of man's work substantially unnoticeable...outstanding opportunities for primitive...recreation."	<ul style="list-style-type: none"> • Campsite density • Campsite size • Litter and human waste 	Standards are definable and measurable.	Excess of these standards activate controlling actions on wilderness visitors
Ecosystem Process- Change and effects on the land not directly influenced by human action.	"A wilderness area, in contrast with those areas where man and his own works dominate the landscape, is an area where the earth and its community of life ae untrammled by man."	<ul style="list-style-type: none"> • Presence of ecological indicator species • Absence of natural fire/disturbance • Invasive species 	Dictated by wildland monitoring program	Dictated by wildland monitoring program

Objectives

- Utilize a phased approach to facility implementation that is informed by the LAC Framework.
 - Proposals in this document that intended subsequent phases are referred to as conditional actions.
- Collect baseline data related to recreational use and the physical condition of the newly acquired lands.
- Establish and implement a regular and reoccurring monitoring program based on LAC and other available methods to help track changes to the unit over time.
- Use the latest best management practices (BMPs) available in the siting and construction of all facilities

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- Provide consistent messaging with partners to help educate users.
- The Department is committed to implementing a carrying capacity based phased approach through this UMP Amendment. To ensure the success of the proposed process, the Department will devote the necessary staffing resources to make sure all six of the BMPs for wildland management are given the resources needed. Quality data derived through this process will lead the Department in making the best decisions available to protect the resource and user experience.

Action Steps

- Develop the Wildland Monitoring Plan that will be utilized in the High Peaks Wilderness and Vanderwhacker Wild Forest to monitor the implementation process. DEC will convene a focus group following approval of the UMP Amendment to develop the Wildland Monitoring Plan within the first year of the approved UMP Amendment.
 - The Wildland Monitoring Plan will lay out the methodologies for sampling and measuring, specify indicators and provide a framework for processing the data collected during monitoring efforts.
 - Following the adoption of the Wildland Monitoring Plan, the Department will submit a work plan which will layout the timeline and resources needed for the Wildland Monitoring Plan.
 - After five years, the Wildland Monitoring Plan will be reviewed and the effectiveness of the monitored variables will be evaluated. If changes are needed, the Department will make appropriate adjustments to reflect the best methodologies available at the time.
- Develop an annual report including the status of the Wildland Monitoring Plan, implementation progress, usage trends and identify issues impacting the wilderness complex.
- Collect and tally trail register information on an annual basis.
- Monitor facilities like parking areas, tent sites, and high-use trail areas on a periodic basis for comparison over time. These monitoring efforts will involve data collection through photo documentation, visual observations, use number data, etc. Preference will be given to variables that will help guide management decisions.
 - Data that may be sampled (specifics in Wildland Monitoring Plan)
 - Erosion and compaction;
 - Occurrences of litter and human waste;
 - Expansion of use beyond the designed area;
 - Visual and audio sampling during peak and off peak times; and

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- Need for enforcement actions, etc.
- Use a phased approach when constructing new facilities. This allows the Department to evaluate and ensure the social and environmental carrying capacities are not being exceeded, and to ensure there is a public desire for additional facilities before they are constructed. If monitoring efforts show the limits of acceptable change are being exceeded then management adjustments will be made, and the next phases of the plan will not be considered until corrective measures are successfully completed. This could hold or bring the management back to a previous phase.
- Develop a visitor survey that focuses on monitoring the intangibles of user experience. Using various methodologies, develop a survey that discusses user satisfaction, acceptance of crowding, perceived management conditions and other factors to gauge user experience. This survey should be completed on a 3-5-year cycle across the complex.
- Site facilities in locations that provide long-term sustainability, keep overall maintenance to a minimum, and enhance the user experience
- Design, locate, and construct all new structures and improvements in ways that will minimize the potential for soil erosion.
- Monitor the site conditions at all facilities. If unacceptable change occurs, provide restoration to secure the disturbed areas in a manner that prevents erosion.
- Close, relocate, or restrict use of unit facilities, as appropriate, to reduce negative impacts to resources caused by recreational use.
- Provide educational materials the public can find through signage on site and also on the Department's website before their visit.
- Emphasize information and education as the primary means to reduce impacts and slow unacceptable levels of change.
- Provide outreach through on the ground interactions with Department staff, Assistant Forest Rangers, SCA Back Country Stewards, and volunteers.

B. Signage and Education

History

Several of these tracts have a history of public use on hiking trail easements or existing Forest Preserve that were not formally part of the High Peaks Wilderness Complex. For the Boreas Ponds and MacIntyre Tracts, the recent purchases provide the first public access to these lands.

DEC and its partner organizations have tried various methods of educational effort to help visitors understand a variety of topics including rules, preparedness and interpretation. These have included signs, maps, posters, DEC Assistant Forest Rangers, Student Conservation Association (SCA) Backcountry Stewards, Wildlife Conservation Society (WCS), bear stewards, other volunteer education and outreach partners, and direct contact from DEC Forest Rangers.



Type I Register Kiosk

Existing Conditions

Signage on recently purchased lands is sparse. Basic permissive signage has been installed and some boundary signage erected to help inform the public of these new lands.

The former NL lands and previously named Dix Mountain Wilderness Area lands have a history of DEC signage, including directional and educational signage. The Adirondack Mountain Reserve maintains some signage at their boundaries and at access points off the Lake Road.

Currently, Department and the Wildlife Conservation Society (WCS) partner to provide a part-time bear steward working the Upper Works area. WCS also has a bear steward that has worked the northern end of the High Peaks area and in the Beer Walls area of the Dix Mountain Wilderness off Route 73.

Assistant Forest Rangers (3 items) focus on northern access routes to the High Peaks including the Marcy Dam-Flowed Lands corridor and the Johns Brook Valley.

There are currently three Forest Rangers that cover the lands in Newcomb, North Hudson and the Keene side of the Dix Mountain Wilderness lands.

Proposed Management

Objectives

- Provide users with appropriate information at the start of their hikes and at locations in the backcountry covering natural resource protection, personal preparedness and directional assistance as well as rules and regulations.
- Improve the opportunity for on-the-ground, in-person education and information.
- Provide consistent messaging on the ground and with education partners to help educate users.
- Utilize communication technologies to protect the natural resources, educate the public on wilderness values and empower individual preparedness to assure visitors have a wilderness experience.
- Provide appropriate staffing levels so the Department can provide education and outreach messages to users at popular trailheads and in the backcountry.

Action Steps

- Install a location map at each trail register to help orient users.
- Integrate Leave No Trace Principles and wilderness ethics into all messages.
- Provide consistent trailhead signage across all trailheads to help reinforce key educational and informational messages.
- Install trailhead registers or kiosks at the following locations. (**Indicates locations where Dix Mountain Wilderness Signage will be replaced with High Peaks Wilderness signage*)
 - Type 1 Kiosks
 - Bradley Pond
 - East River Trail
 - Upper Works Trail
 - Boreas Dam
 - Fly Brook
 - *Elk Lake to Slide Brook
 - Ampersand Mountain Trail

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- Mt. Van Hoevenberg Complex (If approved in the Mt VanHoevenberg Intensive Use Area UMP)
- Type 2 kiosk
 - Moose Pond Horse Trail
 - *Elk Lake Marcy Trail
 - *Round Pond Trail to Dix
 - *Round Mountain Trail
- Type 3 kiosk with signage
 - *Noonmark Trail
 - Newcomb Lake South Trail
- Install interior educational signboards at key points with the purpose of providing outreach about land ownership changes and land classification changes, including any rules that are applicable and additional educational messages. This consistent signage at trail/boundary interfaces will help educate visitors. Locations will include:
 - Classification or Land Ownership boundaries
 - *Indicates locations where Dix Mountain Wilderness signage will be replaced with High Peaks Wilderness signage
 - Wild Forest to Wilderness Transitions
 - North Shore of Newcomb Lake Trail after Sucker Brook
 - Leclair Hill Trail after Niagara Brook
 - Along Gulf Brook Road
 - Above four corners on old road going north
 - West of four corners there are two major woods roads that head north.
 - Intensive Use to Wilderness
 - Cascade Mountain Trail
 - Mt. Van Hoevenberg East Trail
 - 1932 Trail
 - Easement Lands to Wilderness Transitions
 - Lake Andrew Trail at Boundary

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- Bradley Pond Trail at Boundary
 - Henderson Lake South Trail at Boundary
 - Calamity Brook Trail beyond the Henderson Lake Outlet
 - East River Trail at Boundary by Lake Jimmy
 - Elk Lake Marcy Trail in three places where it crosses boundaries.
 - *Slide Brook Trail at Boundary
 - *Elevator Shaft Trail from Warden's Camp
 - *Fish Hawk Cliffs Trail
 - *Gil Brook Trail
 - *Bear Den Trail
 - Bartlett Ridge Trail
 - Haystack Brook Trail
 - Sawteeth from Warden's Camp
 - Sawteeth Scenic Trail
 - Above Rainbow Falls
 - Trail to Armstrong above Beaver Meadow Falls
 - Wedge Brook Trail
 - WA White Trail
 - Deer Brook Trail
 - Snow Mountain Trail
 - MacIntyre West where primitive road comes in and out
 - MacIntyre West where Newcomb Club Road ends
 - MacIntyre East at LeClaire Brook
- General Roadside or Informal Access Points
 - *Access to Beer Walls
 - *Chapel Pond Campsites
 - *Chapel Pond Parking Area
 - *Chapel Pond climbing access points
 - *North Fork of Boquet access point
 - *South Fork of Boquet access point
 - *Lindsay Brook access
 - *Westmill Brook access
 - *Walker Brook access
 - *North Hudson Dome access

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- Boundaries along the Eastern High Peaks Zone
 - Indian Pass Trail
 - Calamity Trail
 - East River Trail beyond Twin Brooks
- Install and maintain roadside Forest Preserve wilderness boundary signage along any public motor vehicle roads including:
 - Upper Works Road
 - NYS Routes 3, 9 and 73
 - The Adirondack Northway I-87
- Install and maintain boundary lines and signage along all new parcels of Forest Preserve abutting private lands and conservation easements lands.
- Past ownership signage or interior boundary signage will be removed as it is located.
- Install appropriate trail directional signage.
- Install campsite signage that provides educational and rule information.
- Install wilderness summit signage. In 2000, the Adirondack 46ers worked with the Department to remove the canisters from the trailless peaks. An agreement was made that established an official list of trailless peaks that would have signs on the summits. No peaks other than those listed below will have summit signs:
 - Maccomb Mountain
 - Couchsachraga Peak
 - Allen Mountain
 - Cliff Mountain
 - Mount Redfield
 - Gray Peak
 - Mount Marshall
 - MacNaughton Mountain
 - Seymour Mountain
 - Seward Mountain
 - Donaldson Mountain
 - Mount Emmons
 - Street Mountain
 - Nye Mountain

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- Tabletop Mountain
-
- The Department will take the lead and work with partners in local government, tourism and recreation industry, advocacy groups, schools and interested parties, to effectively spread outreach and educational messages to focus improving and engaging public understanding of the following topics:
 - Wilderness and other land classifications of the Forest Preserve;
 - Leave No Trace Principles and wilderness ethics;
 - Rules and regulations pertaining to the High Peaks Wilderness Complex and other wilderness lands;
 - The transition of the lands formally part of the Dix Mountain Wilderness Area to the High Peaks Wilderness Complex; and
 - User preparedness and backcountry safety.
- Lands and Forests seasonal staff conduct on- the- ground education and outreach, assist with the implementation of rule and regulation changes, work on implementation of proposals and monitoring of usages and follow-up projects.
 - Covering lands across the southern High Peaks Wilderness Complex and connecting or adjacent lands in both the Vanderwhacker Mountain Wild Forest and Giant Mountain Wilderness Area, covering:
 - 23 major trailheads and 40 additional access points
 - 300+ miles of trails
 - 180 campsites
 - 14 lean-tos
 - 13 major periphery rock-climbing areas
 - 7 Easement access points
 - 7 waterbodies with hand carry launches
- Forest Rangers working in the High Peaks Wilderness Complex and other surrounding units (the Hoffman Notch Wilderness Area, Vanderwhacker Mountain Wild Forest and the Essex Chain of Lakes Complex), providing fulltime

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educational, natural resource protection and human health and safety efforts of these lands.

- With all the new land changes, rules and regulations along with assisting with the implementation over many years, these positions will be important.
- Assistant Forest Rangers working in the southern area of the High Peaks Wilderness Complex and surrounding lands for education, natural resource protection and human health and safety.
 - Assistant Forest Rangers patrolling Forest Preserve lands in the Towns of Newcomb and North Hudson will provide assistant in education and outreach efforts on many changes to land use and help ensure the safe implementations of projects across the following units:
 - High Peaks and Hoffman Notch Wilderness Complexes
 - Vanderhacker Mountain and Hammond Pond Wild Forests
 - Essex Chain of Lakes Complex
 - Including these easements:
 - Tahawus Conservation Easement
 - Adirondac Core Conservation Easement
 - Upper Hudson Woodlands ATP Conservation Easement
 - Elk Lake Conservation Easement
 - Adirondack Mountain Reserve Easement

C. Motorized Access, Trailheads and Parking

History

Past owners like the Bloomingdales, Finch Pruyn, National Lead, The Nature Conservancy and associated recreational lease holders have accessed these tracts at several different locations in the past and for various reasons, including general property management, forest operations and timber sales, and recreation. Most of these entry points are situated in the Vanderhacker Mountain Wild Forest, are

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temporary or seasonal in nature and can be seen along the Blue Ridge, Elk Lake, Upper Works and Tahawus roads.

The majority of motorized access and parking for users of the High Peaks is located either in the Vanderwhacker Mountain Wild Forest or on various conservation easement lands adjacent to the wilderness.

Parking areas for Forest Preserve and conservation easement lands will be addressed below, with discussions of the access they provide the High Peaks Wilderness Complex. Detailed proposals for parking in Wild Forest areas can be found in the Vanderwhacker Mountain Wild Forest Unit Management Plan. Details for any parking on conservation easement lands are addressed in actual easement or Recreation Management Plans (RMPs) or work plans approved by the landowner.



Lower parking lot on Gulf Brook Road

Existing Conditions

MacIntyre West and OSI Bradley Pond Tract

The Bradley Pond Trailhead on the Upper Works Road has been the formal access point for the Bradley Pond Trail for years, with previous use occurring pursuant to a trail easement. Since 2015, it has served as an access point for the MacIntyre West Tract as well. A portion of the parking lot and the roadbed, for about 2.5 miles, is on the Tahawus Conservation Easement.

Former NL Lands and MacIntyre East

The Upper Works Trailhead and East River Trailheads are located on OSI lands (on which DEC and OSI are currently developing a conservation easement). Past use on the former NL lands and Finch lands was limited to trail corridor easements to access Forest Preserve. From the Upper Works trailhead, the Calamity and Indian Pass trails have historically been the major access points from the south. The East River trailhead access to Mount Adams and the East River Trail (to Hanging Spear Falls and Allen Mountain herdpath) have been used for years. This provides the primary access to these tracts.

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North River Mountains Tract

This area was difficult to access until the state purchased the MacIntyre East Tract. Prior to that, a small land connection to the east of Cheney Cobble was the only legal access via bushwhacking.

Boreas Ponds Tract

All existing access points for the Boreas Ponds Tract are in the Vanderwhacker Mountain Wild Forest. In 2016, six parking lots were developed to help facilitate access to the Boreas Ponds Tract: two on Elk Lake Rd, one at the intersection of Branch and Blue Ridge Roads, one on Andrew Brook Rd, and two on Gulf Brook Rd. The majority of wilderness access is via the Gulf Brook Road parking areas or the Upper Elk Lake Road parking lot.

Casey Brook Tract

The Elk Lake Conservation Easement has historically provided access to the Casey Brook Tract via the Elk Lake-Marcy Trail.

Niagara Brook Tract

Currently, parking facilities for the Niagara Brook Tract do not exist, but access can be achieved by parking along the shoulder of Blue Ridge Rd and walking on Niagara Brook Road, which is built to an industrial logging standard. Lands directly north of the Blue Ridge Road are part of the Vanderwhacker Mountain Wild Forest.

Ampersand Mountain, Cascade Mountain and Dix Mountain Wilderness Lands:

The existing parking for the Ampersand Mountain trailhead is situated in the Saranac Lake Wild Forest on the north side of Route 3. Parking issues along Route 3 have been a problem for years and the 2017 Draft Saranac Lake Wild Forest UMP suggests creating a parking area for Ampersand Mountain in the High Peaks Wilderness to help deal with this issue.

Parking for the Cascade Mountain Trail is on the south side of Route 73, with a combination of four parking pull-offs along the highway. In 2017, the Department worked with the Olympic Regional Development Authority (ORDA) and various stakeholders to implement a pilot trailhead relocation of the Cascade Mountain trailhead and reroute of the trail.

The 2004 Dix Mountain Wilderness Area UMP discusses the major access points for that area. The trailhead on Elk Lake Conservation Easement Lands provides the major

southern access to this area. The Round Pond trailhead and parking area serves as a major access point to the unit from Route 73. South of Chapel Pond, the west side of Route 73 is used for access to the adjacent to the Chapel Pond area and the Giant Mountain Wilderness Area's Ridge Trail. Rock climbers access the Chapel Pond Slab and routes in the Giant Mountain Wilderness, hikers going up the Ridge Trail and people accessing Chapel Pond all park in this general area. In recent years, the popularity of this location has led to concerns with safety along Route 73 and subsequent concerns with impacts to the resources in the area.

Desired Conditions for Trailhead Facilities Monitoring

There are numerous parking areas that serve as entry points to the front and backcountry. Properly designed and managed parking areas will maintain their firm and stable surface with minimal maintenance, and allow unencumbered parking for the designed number of vehicles. This not only maximizes environmental protection, but also user safety, function and enjoyment. Appurtenances to the parking areas like privies and gates should also be maintained in a clean and functional working condition. Like roads and other facilities described, parking areas can add to a user's positive experience if it blends well with the natural area and is kept free of trash and human waste. The variables to be monitored in parking areas will be the presence of a firm and stable surface that is smooth and easily accessible by the public, along with clean sanitary conditions including properly maintained privies and an absence of trash. Photo points will be a useful tool to help illustrate potential changes over time.

Proposed Management

Objectives

- Utilize adjacent Forest Preserve land units, conservation easements and public roadways to achieve safe locations where the public can gain access to the High Peaks Wilderness Complex.
- Provide and manage adequate trailhead facilities to protect natural resource values and enhance visitor wilderness experience through education and information messaging.
- Use parking areas to manage interior use by balancing parking lot capacities with resource and recreational carrying capacities.

Action Steps

- Monitoring for the desired conditions of parking areas will help measure and determine impacts to better inform carrying capacity development and long-term

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planning. Final specifics will be detailed in the Wildland Monitoring Plan but generally,

- Desired conditions for parking areas will be a firm and stable surface that has minimal expansion from the designed footprint, well-maintained privies and gates, that is free of occurrences of litter and human waste and adds to the overall user experience.
- Monitoring could include photo point locations, control measuring points, survey of invasive species, surveys of visual occurrences of trash, and user surveys.
- All parking areas will have improved signage and trailhead facilities that will include maps.
- All parking areas will have an appropriate method to deal with human waste.
 - Pit privies will be installed where appropriate and possible.
 - Alternative options like United States Forest Service-style vault toilets, composting toilets, portable toilets or other options will be used where appropriate and allowed.
- Work with OSI to develop terms in the pending Adirondac Core Conservation Easement to provide trailhead facilities at the Upper Works and East River trailheads.
- Work with OSI to develop terms in the pending Adirondac Core Conservation Easement to provide CP-3 motorized access from the Upper Works trailhead to the outlet of Henderson Lake.
- Work within the terms of the Tahawus Conservation Easement to maintain the Bradley Pond Trailhead.
- Proposals in the Vanderwhacker Mountain Wild Forest UMP amendment identify the following parking areas, which will serve as trailheads to the High Peaks Wilderness:
 - South of the Boreas Dam Primitive Area. Trailhead information and facilities will address access in to the High Peaks Wilderness Complex, including a bike rack at the gate so users can walk to Boreas Dam.
 - Fly Pond parking area
 - Branch Road parking area

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- Upper Elk Lake parking area
- LeClair Hill parking area (conditional action)
- Work within the terms of the Elk Lake Conservation Easement to maintain the trailhead, parking and seasonal limitations on access across the property.
 - Begin utilizing the existing parking area at the state land boundary, on Elk Lake Road, to serve as the overflow and winter parking area. Work with Elk Lake and the Town of North Hudson to close the smaller parking area at Clear Pond.
- Work within the terms of the AMR Conservation Easement to maintain the trailheads and parking opportunities.
- Proposal in the Mt. Van Hoevenberg Intensive Use Area UMP amendment calls for the placement of a trailhead to Cascade Mountain and Mt. Van Hoevenberg in the Intensive Use Area. With the approval of that plan and the implementation of the trail reroutes proposed in both that plan and this amendment, the trailhead for Cascade Mountain would be relocated.
 - Once the Cascade Mountain trailhead is relocated, the Department will work with the NYS Department of Transportation, policing agencies, local government, stakeholders and partners to complete the closure of the three parking lots on the south side of Route 73 adjacent to the trailhead (conditional action).
- Construct a 15-car parking lot on Route 3 approximately 0.6 miles west of the existing Ampersand trailhead in the High Peaks Wilderness Complex. Design of the parking lot should accommodate snow removal.
- Construct two new 20-car parking lots on route 73 approximately 0.4 miles south of the existing Ridge Trail parking area in the High Peaks Wilderness Complex. Design of the parking lot should accommodate snow removal. These parking lots and trailheads will serve users accessing Chapel Pond Slab and Chapel pond via a Class V trail (conditional action).
 - Through work planning in the Giant Mountain Wilderness Area the Department will propose realigning the bottom of the Ridge Trail to come out in the vicinity of this new parking lot on the east side of Route 73. The trail realignment combined with the parking lot/ trailhead will allow the

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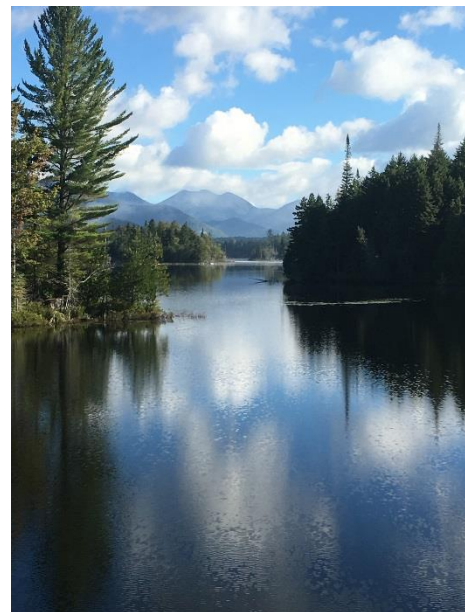
Department to more safely manage the use at this location (conditional action).

- Once the parking lot and trail are built, the Department will work with DOT, policing agencies, local government, stakeholders and partners to close roadside parking on Route 73 (conditional action).
- Expand the size of the Round Pond trailhead and parking area to 25-car capacity. This parking lot and trailhead will serve users accessing Round Pond, the Dix Range, Noonmark and Round Mountains as well as access to multiple rock climbing areas.

D. Dams

History

Given the rich history of logging and mining in this area, there is evidence of existing and past dams over much of this area. Three major dams still in existence owe their origins to past industries. These dams also provide the largest lure to this area with the views that can be attained while plying the waters, or in the case of Boreas Ponds Dam, standing on the structure. Henderson Lake Dam was built around 1900. Prior to the dam being built, the lake was smaller in size. Water from the dam was harnessed in the iron ore processes going on around the Upper Works and was probably utilized in the driving of logs down the Hudson River. One of the most notable structures on the Boreas Ponds Tract is the Boreas Ponds Dam. This was originally constructed by Finch, Pruyn & Co. in 1915-16 as a log flush dam to aid the LaBier Flow Dam downstream. Due to the inefficiency of horse and wagons for large logging operations and the lack of railroads in the area, the logging industry relied heavily on rivers to float logs to the mills where they were processed into various products like lumber and paper. The Boreas Ponds Dam was built to impound the Boreas River and flood Boreas Ponds, which had previously been three separate smaller ponds. The log dam was constructed in such a way that it would substantially block the flow of the



View North from Boreas Ponds Dam

river and also be able to be rapidly broken apart, releasing or “flushing” the ponded water behind it. Trees were cut throughout the area as high as the surrounding mountain summits. Logs were bucked, peeled, and transported down the mountains to Boreas Ponds, LaBier Flow, and the Boreas River by a combination of large log flumes that were constructed up the mountains and horse and sled. These logs would be stockpiled in the ponds and along the river all winter. Once spring arrived and thawed enough ice, typically mid-to-late April, the flush dams at Boreas Ponds and LaBier Flow were breeched, creating a massive flood of water down the Boreas River. The flushing of the ponded areas released enough water to transport in excess of five million board feet of saw logs down the Boreas River. The initial flush of logs was relatively quick, but the entire log drive typically took two months to float all of the logs to the mills in Glens Falls.

Existing Conditions

Currently there are three functioning dams in the High Peaks Wilderness Complex. This UMP Amendment will address the Henderson Lake Dam and Boreas Ponds Dam; the third dam is impounding Lake Colden and is addressed in the 1999 High Peaks Wilderness Complex UMP. The Henderson Lake Dam is located in the Tahawus Primitive Area (OSI retained rights to produce hydropower on the Henderson Lake Dam) and the Boreas Ponds Dam is located in the Boreas Ponds Dam Primitive Area.

The APSLMP allows for the maintenance and rehabilitation of existing dams, where the structures are deemed essential to the administration and/or protection of state lands. As long as the dam is maintained and does not pose a public health and safety risk, it can remain in place. Both the Henderson Lake and Boreas Ponds dams are Class A Hazard (Low Hazard) dams.

Proposed Management

Objective

- Ensure all dams are properly maintained and any bridges, trails or walkways associated with them are safe for travel.

Action Steps

- Manage vegetation on the dams.
- Conduct routine inspections by NYS DEC Dam Safety staff.
- Maintain and repair appurtenances to the dam required under the standards established by DEC’s dam safety guidelines.

E. Day Use Areas

Existing Conditions

The wilderness lands impacted by this UMP provide a spectrum of opportunities for quick trips or endless backcountry adventures. Creating a day-use-only area can help protect the natural resources and improve the overall wilderness experience in areas where visitors are concentrated along a road or near a parking area enjoying scenic views or other activities.

Proposed Management

Objectives

- Provide day use areas in appropriate locations in compliance with APSLMP guidelines.
- Provide parking and a no-camping zone in compliance with APSLMP guidelines for wilderness areas. It is useful to describe this zone as a “Day Use Area” because it conveys to the public the intent to restrict overnight usage, protect resources and improve the visitor experience. These sites should not be confused with areas classified as Intensive Use which also share the term Day Use Areas, but are more highly developed.

Action Steps

- The following locations will be built, designated, signed, and codified in regulation as day use areas.
 - Chapel Pond Day Use area (off Route 73 pond side) parking area and shoreline including beach on the south shore and below the Chapel Pond Slab climbing routes. (This does not impact the designated campsite to the north, near the outlet and the Chapel Pond Slab campsite would remain near). No picnic tables will be installed in this day use area.
 - Boreas Ponds Dam Day Use area, including the lands from Boreas Ponds Dam parking area along the Boreas Ponds Dam Trail and extending across the dam ¼ mile. (*Note – this action is only being mentioned here for reference. Authorization for this day use area is being sought in the Vanderwhacker Mountain UMP amendment.*)

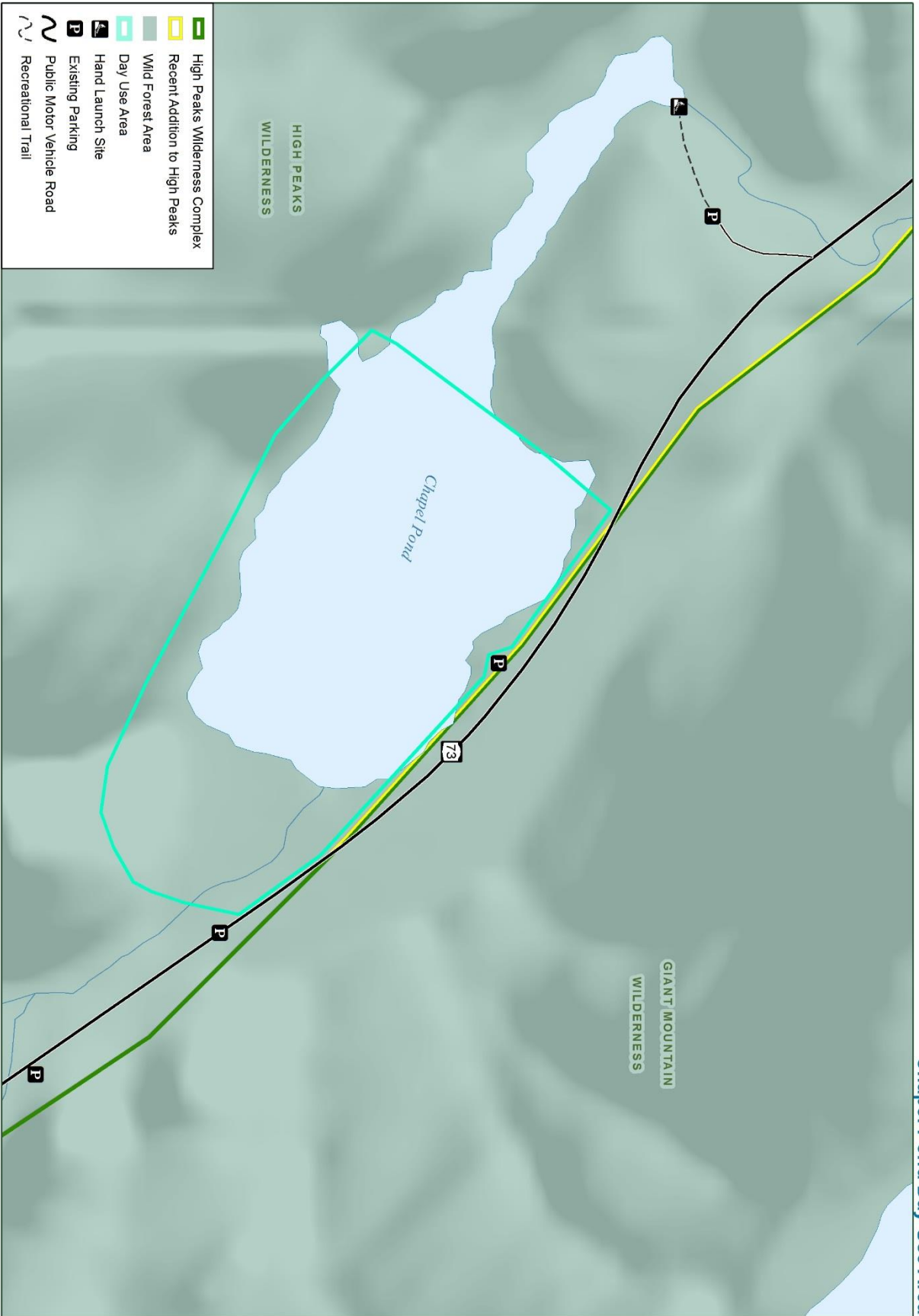
III. Recreational Resources and Human Uses

- Henderson Lake Dam Day Use Area, including the lands from the parking lot along the access trail. No picnic tables will be installed in this day use area.
- Each location will have an accessible privy or similar facility close by. At each location, appropriate signage will be installed to help protect the natural resources.

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High Peaks Wilderness

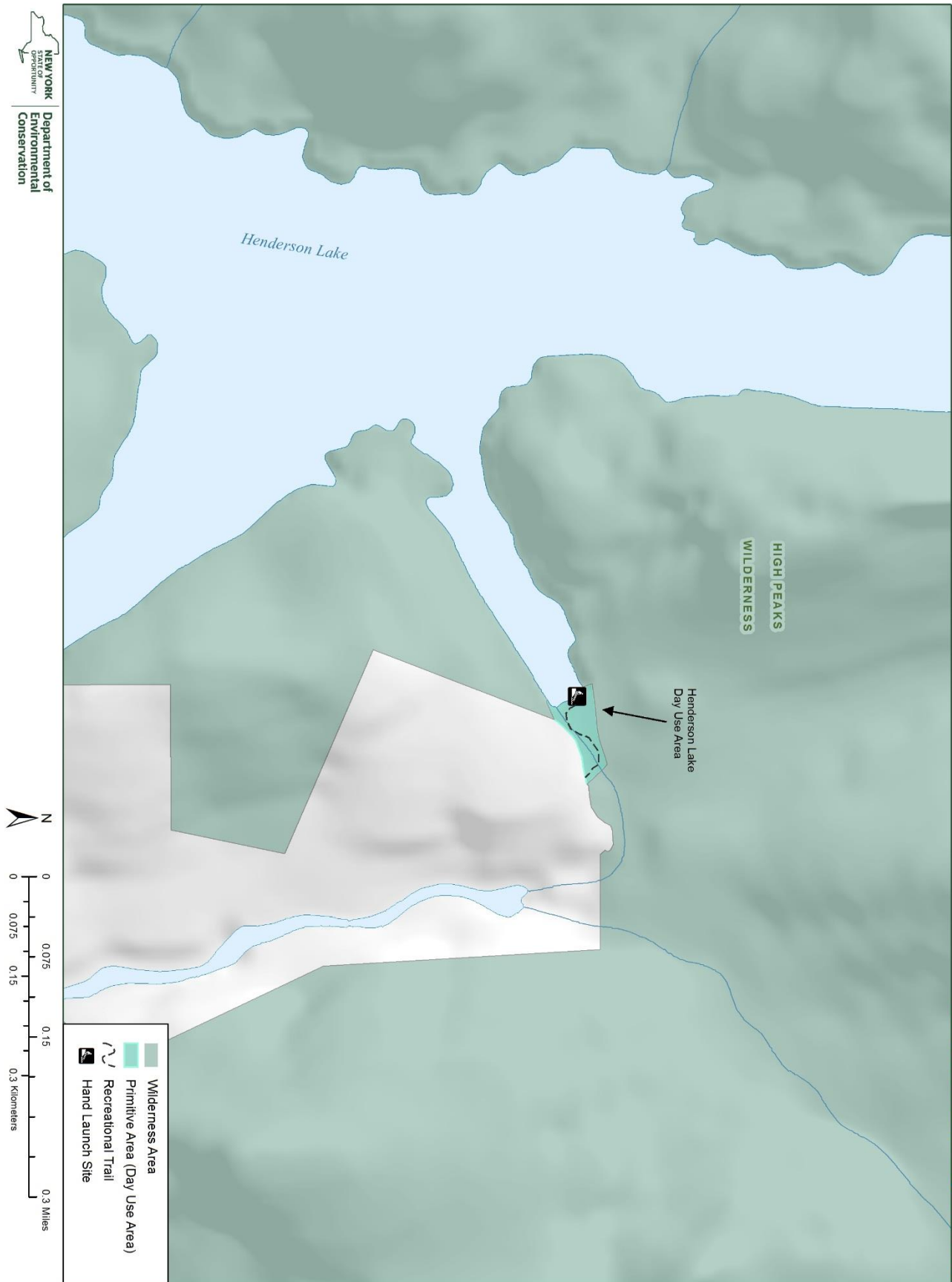
Chapel Pond Day Use Area



III. Recreational Resources and Human Uses

High Peaks Wilderness

Henderson Lake Day Use Area



F. Access for Persons with Disabilities

Existing Conditions

The new parking lots constructed in 2016 are used by people of all abilities. Many people have accessed the property by a variety of means including horseback, especially to LaBier Flow and Boreas Ponds Dam. Several case-by-case permits for accommodations were also granted in 2016 and 2017 for individuals wanting to access a small pull-off near Boreas Ponds Dam via motor vehicle. The proximity to Boreas Ponds Dam made it possible for people to take in the scenery from the dam, and in some cases, even paddle the ponds.

Universal Trail Assessment Process

The Universal Trail Assessment Process (UTAP) is an objective method of measuring such site conditions as average and maximum grade, minimum trail width, cross slope, trail length and surface type. These variables can then be presented to the user at the trailhead and assist them making an informed decision about whether they would like to use the facility or not.

Accessible Camping in the Wilderness

Accessible camping opportunities will be provided at three locations. Camping at these sites will be managed according to general state land backcountry camping regulations. These locations will have stable surfaces and include parking or equestrian access, a hardened tent location, an accessible privy with a hardened access route to it and will comply with the APSLMP. One of these sites will be located adjacent to a motor vehicle road and the other two will be located in the interior. The location of the accessible roadside tent site will be carefully chosen in order to provide attractive facilities in an area that can withstand use. Exact locations of these sites will be provided on maps, at trailheads, on the Department's website and through other appropriate informational pathways. Monitoring use and satisfaction of users will occur to assess and determine long term management of these sites.

Desired Conditions for Accessible Facilities Monitoring

Emphasis is given throughout the plan on well-designed and constructed facilities that promote resource protection and will maximize long-term sustainability. Accessible facilities are a great example of the importance to well-built sustainable facilities beyond the obvious environmental benefits. These facilities need to remain in proper working

order to be fully accessible by people with disabilities. The desired conditions for accessible facilities are also necessary conditions in order for the facility to remain compliant with accessible standards. Each type of facility has its own set of requirements, but for the intent of this amendment, their requirement is to remain in a legally compliant condition. Further discussion of specific facilities like accessible trails or tent sites can be seen in those respective sections. Like the rest of the facilities in this amendment, it is important to construct these facilities in a manner that blends well with the natural surroundings and maximizes user enjoyment. Facilities built to accessible standards will be monitored for the variables described in their respective sections of this amendment and will additionally be monitored for their compliance with their designed accessible standards.

Proposed Management

Objectives

- To provide outdoor recreational opportunities to people of all abilities.
- Increase access opportunities for people with disabilities where such development does not alter the fundamental nature of existing programs, is compliant with Department regulation and policy, and conforms with the guidelines of the APSLMP.
- Comply with the Americans with Disabilities Act (ADA) of 1990 by improving access and creating recreational opportunities for people with disabilities.
- Inform users of the location and condition of facilities in the unit, focusing on such variables as length of trails, average grade, steepest grade, minimum width, etc.,

Action Steps

- Monitoring each location for the desired conditions for a sustainable accessible facility will help measure and determine impacts to better inform carrying capacity development and long-term planning. Final specifics will be detailed in the Wildland Monitoring Plan but generally:
 1. Desired conditions for accessible facilities will vary between the type of facility, and these details are outlined within each specific facility throughout the plan. Additionally, accessible facilities will remain accessible in accordance to their design standard. Like all facilities described throughout this amendment, it is important that accessible facilities remain functional and provide an enjoyable user experience.

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2. Monitoring could include photo point locations, control measuring points, surveys of visual occurrences of trash, user surveys, and evaluation of their accessibility compliance.
- Maintain existing recreational access opportunities for people with disabilities in compliance with the Americans with Disabilities Act (ADA) of 1990.
 - Publicize the locations and details of existing accessible facilities on the Department's public website and through other appropriate informational pathways.
 - Incorporate accessible signage at trailhead access points.
 - Perform a Universal Trail Assessment Process (UTAP) assessment of the hand carry boat launches specified in this plan.
 - Construct new facilities to the most accessible degree possible given site constraints, with the understanding that while many may not meet Americans with Disabilities Act (ADA) standards, the intent is to maximize the degree of accessibility for the widest range of abilities. These hand-carry boat launches, trails, tent sites, etc. would provide opportunities for those seeking more primitive outdoor experiences than those found in traditional intensive-use campground areas.
 - Take an existing tent site or find a new location on Henderson Lake and convert it to an accessible water-access campsite.
 - Provide an accessible lean-to at the site of the former Boreas Lodge.
 - Develop an accessible roadside primitive campsite south of the South Fork of the Boquet River off Route 73 with an improved parking area off the highway and campsite.
 - Build three accessible hand carry boat launches at:
 - Henderson Lake
 - Boreas Ponds
 - Outlet of Chapel Pond
 - Equestrian mounting platforms will be provided at the following locations:
 - Boreas Pond Dam area

G. Paddling/Hand Carry Boat Launches

History

On newly acquired lands, lessees and previous property owners have accessed a variety of waterbodies throughout the tracts, and did so by a variety of means and locations. This was most notable near the dam on LaBier Flow, on Sanford Lake, and where East River Road meets the Hudson River.

On pre-existing Forest Preserve, the Boreas River at its intersection with Blue Ridge Road was often used to access the river for fishing, but water conditions rarely allow for canoe or kayak access.



MacNaughton Mtn. and Wallface via Henderson Lake

Existing Conditions

Currently, Boreas Ponds sees the most hand carry boat use for the tract. An official launch has not been built, but the public and lessees who still have access to the property often use the area around the dam to hand launch boats, kayaks and canoes for fishing and paddling.

On the Former NL lands tract, an informal hand launch exists near the dam on Henderson Lake. Visitors utilize this location for both day trips and to access the water access campsites on Henderson Lake. The northern end of the lake offers spectacular views of Indian Pass.

It will be beneficial for the protection of the soil and water resources, and aid in recreational access, to site and construct water access points and associated parking areas in such a way that allows for use to be distributed across a broad area. This dispersal of use will also promote through-paddling opportunities where a car can be staged at one hand launch site and a vessel can be dropped and launched from another site.

The Opalescent River north of its confluence with the Hudson River is classified as a wild river.

Desired Conditions for Hand Carry Boat Launch Monitoring

There are several hand-carry boat launches described in the Amendment. These launches and their access trails serve as the connection between motorized access and paddling opportunities. These should be stable, erosion free areas that exhibit minimal wear over time and are free of invasive species, human waste and litter. The tread should remain well-developed with minimal expansion. This should also blend well with the natural surroundings to enhance the user experience. Like other facilities, the variables for hand carry launches will include monitoring efforts to look for the presence of eroded areas, trash and human waste. Photo points will be a useful tool to help illustrate potential changes over time.

Proposed Management

Objectives

- Provide hand-carry boat launch facilities, where possible, in areas known to have a demand for water access.
- In the construction of new launches, seek locations that would minimize environmental impacts and ongoing maintenance costs by avoiding wetlands, stream crossings, significant habitats, unstable soils and steep slopes.
- Manage the size and location of launch facilities to prevent user congestion on any one water body or portion of a large water body.
- Provide appropriate sanitary facilities near launch sites.
- Increase public awareness of invasive species threats to unit waters from access sites.

Action Steps

- Monitoring each location for the desired conditions for a sustainable hand carry boat launch will help measure and determine impacts to better inform carrying capacity development and long-term planning. Final specifics will be detailed in the Wildland Monitoring Plan, but generally:
 - Desired conditions for all hand carry boat launch sites will be a site that is free of erosion, invasive species, human waste and litter, has minimal expansion from the designed footprint of the built facility and provides an enjoyable user experience.

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- Monitoring could include photo point locations, control measuring points, surveys of visual occurrences of erosion, trash, invasive species, and user surveys.
- Build an accessible hand-carry boat launch, also suitable for carted boats, on the side of Boreas Ponds Dam. An accessible trail will be developed from the Parking Area in Wild Forest following the existing road to the intersection with the old lodge access road. At this location there will be an intersection where the accessible trail to the lean-to will go north and the accessible water access trail will go east, north of the road and below the roads grade. This trail and water access will be laid out and constructed as an accessible trail to the water's edge. To help preserve the wilderness experience of Boreas Ponds and provide an appropriate transition area, a natural ramp of stone or aggregate (up to ADA specs) will continue into the water upstream of the dam to allow for water transitions. The entry into the water will also be hardened with natural materials to allow accessibility at the site. Adjacent to the parking area, there will be an accessible privy. This action will be handled in the 2018 Vanderwhacker Mountain UMP Amendment. (*Note – this action is only being mentioned here for reference. Authorization for this hand-carry boat launch is being sought in the Vanderwhacker Mountain UMP amendment.*)
- Build an accessible hand-carry boat launch, also suitable for carted boats, on the north side of Henderson Lake Dam. An accessible trail will be developed from a proposed parking area on OSI Easement Lands and go from the bridge crossing the outlet to the dam. This trail and water access will be laid out and constructed as an accessible trail to the water's edge. To help preserve the wilderness experience and provide an appropriate transition area, a natural ramp of stone or aggregate (up to ADA specs) will continue into the water upstream of the dam to allow for water transitions. The entry into the water will also be hardened with natural materials to maximize accessibility at the site. Adjacent to the parking area there will be an accessible privy. This location of this proposed hand carry boat launch location is on the Henderson Lake Day Use Area map.
- Improve the hand carry boat launch site at the north shore of Chapel Pond and access from the highway to provide accessibility for people with disabilities. Close two designated camping sites at this location and convert them into six-car accessible parking area. Provide signage at the Chapel Pond parking area directing users to this launch site.
- A Class III Trail and a hand carry boat launch will be constructed near the northern end of LaBier Flow and will connect the flow to Boreas Road. This will

III. Recreational Resources and Human Uses

allow paddlers to launch on the southern end of the flow, paddle north across the flow and exit to Boreas Road, which will allow for a short carry to Boreas Ponds. The hand-carry launch will be located within the High Peaks Wilderness Area. The portion of the trail adjacent to the Boreas Road will be in the Vanderwhacker Mountain Wild Forest dependent on the approval of the trail in the VMWF UMP Amendment.

H. Trail Recreation

Note: This section contains a discussion and inventory of the proposed trail network and the uses (see icons) associated with each trail. The sections following this one discuss individual uses within the context of the recently-classified lands.

Existing Conditions

Past and existing trails and recreational use on all of these tracts were largely based on forest roads and skid trails. Portions of these lands have had public hiking for many years. Over time without continued road maintenance, old roads become difficult to maintain as foot trails, given that drainage is handled in different ways with trails. Due to this, many of the old logging and lessee hunting roads in the area are not viable as a long-term and sustainable option for public recreational use. An entirely new trail system needs to be developed to maximize environmental protection, sustainability, and user enjoyment. The examples of the Indian Pass Trail, Calamity Brook Trail and Bradley Pond trails all show the result of using existing roadways. Though much work has been done on portions of these trails, they create an annual maintenance cost and effort that is far greater over time than establishing purpose-built trails.







Proposed Management

Objectives

- Provide visitors with a wilderness trail system that offers a range of recreational opportunities in a manner that keeps physical and visual trail and resource impacts to a minimum and complies with APSLMP guidelines.
- Construct and maintain trails in a manner that preserves their classification (see trail classification chart in Appendix D for additional information), and prevents impacts such as sedimentation and erosion.
- Identify the need for trail relocations and/or new trails.
- Provide a unified system of trail signage and markers on the High Peaks Wilderness Complex. Trail marker colors will describe general direction of trails. Red markers will be used on trails that primarily run east-west, Blue markers will be used on trails that primarily run north-south, and Yellow markers will be used on spur trails, connecting trails, and loop trails.
- Allow the previous owner and lessee trails that are not suitable for public recreational use to naturalize.
- Provide appropriate staffing levels so the Department can build and maintain a purpose-built, world-class Wilderness Trail System.

Proposed Trails and Uses

Use Icon Legend

	Hiking		Cross-Country Skiing
	Snowshoeing		Equestrian

III. Recreational Resources and Human Uses

1. Lake Andrew Trail (~6.5 miles of new trail)

Primary Uses:



Description:

This Class IV trail is intended to provide access to Lake Andrew and a connection from Newcomb Lake toward the Santanoni Mountains. The popularity of skiing the Newcomb Lake Road, along with abundant snowfall in this area, will contribute to this being a great extended ski tour. Generally, the trail will head north from the north shore of Newcomb Lake Trail, west of Sucker Brook, taking advantage of the bridge crossing over Sucker Brook. The route will head northwesterly toward Santanoni Brook, staying in the upland forest to a large extent, avoiding the large lowland complex to the north as much as possible. After crossing Santanoni Brook, the trail will head to the north before crossing the brook again east of Black Pond. The trail will then traverse easterly, crossing drainages and side-hilling toward Lake Andrew. From Lake Andrew, the trail will head northerly, then head northeast on the lowest flanks of Mount Andrew toward the Forest Preserve boundary at the end of the easement road. From there the trail will connect with the Bradley Pond Trail to the east.

2. Black Ermine Connector Trail (~3.5 miles of new trail)

Primary Uses:



Description:

A Class IV trail is conditionally proposed to provide access to Black Pond and the forest south of the Santanoni Mountains. This trail will provide loop opportunities associated with the Lake Andrew Trail, Newcomb Lake Trail, Moose Pond Trail and the possibility of combining with the Bradley Pond Trail, and Northville Placid Trail for a large loop backpacking opportunity. Leaving the Lake Andrew Trail east of Black Pond, the trail will head west to the south of Black Pond. From there the trail will head northwesterly toward Ermine Brook and the Moose Pond Trail.

3. Bradley Pond Trail (Upgrading 2.8 miles of the existing 3.5 miles of trail and 1.8 miles on road)

Primary Uses:



Description:

The existing Bradley Pond Trail is a Class IV trail that goes approximately 7.5 miles from the Upper Works Road to Bradley Pond and north to Duck Hole. The first 1.8 miles of the trail is on an easement road, and the vast majority of the old trail, from where it leaves the road to Bradley Pond, is on old skid or tote roads. North of Bradley Pond, the trail follows a brook and old woods road and is typical of a trail that was sited on an old woods road and isn't appropriate for use as a hiking trail. This proposal calls for several reroutes along the existing trail from the easement road to Bradley Pond, combined with a continuation of trail hardening and drainage. North of Bradley Pond, the trail would stay around the 2500'-3000' elevations and head northerly, east of its current location, and contour around the unnamed peaks to the northeast, eventually curling around to the crossing between the Preston Ponds and then meeting with the Preston Ponds Trail. In addition to creating a section of sustainable hiking trail, it will provide connections and opportunities for loop hikes, and avoids hikers having to negotiate the ford of the Cold River below the Old Duck Hole Dam.

4. Henderson Lake Accessible Water Access Trail (~.15 miles of new trail)

Primary Uses:



Description:

A Class VI Accessible Front Country Trail that crosses the outlet of Henderson Lake from the OSI Adirondac Core Conservation Easement and heads toward Henderson Lake Dam. It parallels to the south the Henderson Lake Dam Trail while achieving the proper slopes to bring users to the dam and then down to the water's edge north of the dam.

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5. Henderson Lake Dam Trail (0.2 miles on existing administrative road)

Primary Uses:



Description:

The Class VI Henderson Lake Dam Trail leaves the Calamity Brook Trail north of the outlet of Henderson Lake and follows the access road to Henderson Lake Dam. This allows users to gain access to Henderson Lake.

6. Calamity Brook Trail (2.2 miles of upgrading existing trails)

Primary Uses:



Description:

The Class V Calamity Trail leaves from the Upper Works Trailhead and follows the access road to Henderson Lake on Easement Lands. After crossing the outlet of Henderson Lake, the trail continues easterly toward Flowed Lands. This is the main access trail for users going to the Flowed Lands/Lake Colden and the Mt. Marcy area from the west. Most of the first 2 miles of trail follows old logging skid roads and reroutes from multiple hurricanes and salvage cuts. The existing trail has many tread and drainage issues. The vast majority of these trail issues can be addressed by improving drainage and installing rock-based turnpiking. There will be a few minor reroutes, but generally the existing route will be followed. This route is a popular cross country ski traverse that goes through Avalanche Lake, so the trail will also be maintained and managed as a Class VIII ski trail when it comes to installation of trail features and clearing width.

7. Calamity Cross Over Trail (2.1 miles of existing trails)

Primary Uses:



Secondary Uses:



Description:

The Class III Calamity Crossover Trail provides a connection for those coming from east to west and not wanting to head all the way down toward the Upper Works. For users from the north who are linking an Avalanche Pass- Indian

Pass thru-hike, it is part of the trail. If the crossing of Indian Brook is moved south (See Indian Pass Trail) in the future, abandoning this trail will be considered.

8. Indian Pass Trail (1.6 miles of upgrading existing trails)

Primary Uses:



Description:

The Class IV Indian Pass Trail leaves the Calamity Trail north of the outlet of Henderson Lake and heads north into Indian Pass. The existing trail follows an old woods road with many drainage challenges. Currently, the trail corridor exceeds 30 feet in width, given its history as a skid trail. Tread work since 2015 has focused on building a raised, hardened trail tread and installing drainage to help create firm and durable hiking surfaces. This trail is a popular ski tour and will be managed to Class VIII Ski Trail criteria when it comes to tread features and clearing.

In 2012 (after Hurricane Irene), the Indian Pass Brook Bridge was replaced where the trail crosses Indian Pass Brook, at the junction with the Calamity Crossover Trail. This bridge is a little over .5 miles above another bridge over the same brook on the Preston Ponds Trail. As part of a long-term vision of helping the High Peaks Wilderness become more wild and less dependent of on man's improvements, the Department will seek to eliminate the need for two bridges, by cutting a reroute on the west side of Indian Pass Brook to connect the trails at the end of either of the current bridge's useful life. If the northern crossing is chosen to be the more sustainable crossing, a reroute for the Preston Ponds Trail will be developed that goes west toward Preston Ponds.

9. Preston Ponds Trail (3.7 miles of upgrading existing trails)

Primary Uses:



Description:

The Class IV Preston Ponds Trail starts from the Indian Pass Trail where it crosses Indian Pass Brook on a large span bridge. The trail then goes southwest toward Henderson Lake before heading northerly toward Upper Preston Pond.

III. Recreational Resources and Human Uses

The existing trail follows drainages, and while used more than the Bradley Pond Trail, it has similar issues. Small reroutes, drainage and trail hardening will be needed.

10. Henderson Lake South Trail (1.25 miles of new trail)

Primary Uses:



Description:

A Class IV trail is conditionally proposed to be developed from the Bradley Pond Trail (on a portion of the Easement Road hike) along the southeastern corner of Henderson Lake and continuing to the Upper Works Road in the vicinity of the East River Trailhead. The eastern end of this trail will need to cross the OSI Conservation Easement, which will require approval and planning outside this UMP. This trail will go through mixed forests as it heads north along the inlet of the lake, turning east parallel to the southern bay of the lake, and heading toward the Upper Works Road. This trail will provide a great connection to the Bradley Pond Trail and Upper Works Trailhead, reducing the distance hikers need to walk along the road south of the East River Trailhead to Bradley Pond Trailhead, where the road is narrow with tight turns. It also provides an additional location for hikers to reach the shores of Henderson Lake and access one of the campsites. This will allow centralized parking for those wishing to hike or ski the loop that the new Bradley Pond and Preston Ponds trails make.

11. Mount Adams Trail (1.6 miles of upgrading existing trail)

Primary Uses:



Description:

The Mt. Adams Class IV trail is typical of old fire tower access trails that head straight up the mountain. It leaves the East River Trail at the Observer Cabin and goes directly to the summit. Mt. Adams provides an amazing, unique view of the High Peaks from below, while towering over the historic mining area and looking down at the Hudson River. The footprint of both the Observer Cabin and the fire tower are located on OSI Conservation Easement Lands and any plans associated with public access will be addressed in that easement's plan. The

entire trail will be inventoried, and trail improvements will focus on addressing the overall sustainability of the trail and user experience.

12. East River Trail (5 miles of upgrades to existing trails)

Primary Uses:



Description:

This Class IV trail has seen much impact from natural disasters and logging. It provides access to Mt. Adams, Allen Mountain and the longest approach to Flowed Lands, and Hanging Spear Falls. From the East River Trailhead first 0.4 miles are on an OSI Conservation Easement lands and there is a portion of the trail east of Lake Sally that is on private land, with a trail easement. Much of the trail follows old skid roads or stone haul roads. Where the trail is going to remain on old roadways, the intent is to allow the vegetation to grow from brush into a forest canopy, reducing the width to that of a Class VIII ski trail. North of Upper Twin Brooks, the trail along the Opalescent River was washed away after Hurricane Irene in 2011. A reroute has proved to not be sustainable. East of the crossing of the Opalescent River, the trail will be rerouted in the vicinity of Lower Twin Brooks and connect to the old trail upstream of the washed-out sections.

13. White Lily Connector Trail (~8.2 miles of new trail)

Primary Uses:



Description:

A Class IV Trail will be developed that leaves the East River Trail east of the Opalescent River and proceeds south of Dudley Brook on the lower slopes of the North River Mountains and Cheney Cobble, heading north of White Lily Pond, then heading southerly to connect with the Casey Brook Connector Trail. The existing roadway to White Lily Pond poses several long-term sustainability issues; however, portions of it can be utilized where it crosses the wetland complex east of Boreas Ponds. North of Boreas Ponds, a new trail will traverse up the southern slopes of Moose Mountain and then head east of White Lily Pond, avoiding the wetland complex along the outlet. This trail will provide for east-west connections from the Boreas Ponds area to the Western High Peaks,

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and allow for large multi-day loops in the High Peaks without the need to go over Mt. Marcy.

14. Casey Brook Connector Trail (5 miles of new trail)

Primary Uses:



Description:

A Class V trail will be developed from the Boreas Ponds Dam, east of Boreas Ponds to the Elk Lake-Marcy Trail. This trail will serve as the main route into the High Peaks Wilderness from the Boreas Ponds Dam area. Users can head west via White Lily Brook, east to the Dix Range or north to Panther Gorge. The existing roadway east of Boreas Ponds poses several long-term sustainability issues as a whole, but portions of the corridor could be converted into a trail. Once on the Casey Brook tract, the route will swing to the east away from Marcy Swamp and cross Casey Brook farther to the east before meeting up with the Elk Lake-Marcy Trail.

15. Boreas Ponds Trail ([~4 miles of new trail proposed in VMWF UMP] and ~3.5 miles of new trail)

Primary Uses:



Description:

A Class V trail will be developed from the Andrew Brook Parking Area on the Blue Ridge Road, crossing through Vanderwhacker Mountain Wild Forest to the the Fly Pond Parking Area and then going north, entering the High Peaks Wilderness, going over the low shoulder of Boreas Mountain and to the north of LeClair Brook, and then heading northerly toward Boreas Ponds, converging with the Casey Brook Connector Trail. This trail will also be designated as a Class VIII Ski trail for clearing widths. Combined with the Andrew Brook Trail, this route will serve as access from the Blue Ridge Road to Boreas Ponds, allowing hikers and skiers to avoid motor vehicles on the Gulf Brook Road.

16. Boreas Mountain Trail (2.5 miles of new trail)

Primary Uses:



Secondary Uses:



Description:

A Class IV trail is conditionally proposed to be developed from the Boreas Ponds Trail to the Summit of Boreas Mountain. This trail will be built to sustainable standards.

17. RNT Loop Trail (4.2 miles of new trail)

Primary Uses:



Secondary Uses:



Description:

A Class IV trail is conditionally proposed to be developed, starting at the Boreas Mountain Summit. The trail would follow the Boreas Ridge north and then descend a shoulder to a prominent point before continuing its descent west and meeting up with the Casey Brook Connector Trail. This trail will allow for a loop hike or access to Boreas Mountain from the upper Boreas Ponds area.

18. Boreas Ponds Dam Trail (0.1 miles of trail)

Primary Uses:



Secondary Uses:



Description:

This Class VI Front Country trail will be sited on the administrative road between the parking lot in the Vanderwacker Mountain Wild Forest and the Boreas Ponds Dam. The first half of this trail will be surfaced as an accessible trail to the junction with the Boreas Ponds Water Access Trail. (*Note – this action is only being mentioned here for reference. Authorization for this trail is being sought in the Vanderwacker Mountain UMP amendment.*)

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19. Boreas Ponds Accessible Water Access Trail (0.15 miles of new trail)

Primary Uses:



Description:

Construct a Class VI Accessible Front Country Trail to Boreas Ponds, along with an accessible hand carry boat launch to the west of Boreas Ponds Dam. The accessible route from the Boreas Ponds Dam Access Trail will be constructed to connect the hand carry boat launch to the Boreas Ponds Dam Trail and Parking Area. (*Note – this action is only being mentioned here for reference. Authorization for this trail is being sought in the Vanderwhacker Mountain UMP amendment.*)

20. MC Lean-to Accessible Trail (0.3 miles of new trail)

Primary Uses:



Description:

A Class VI Accessible Front Country Trail will leave the Boreas Ponds Water Access Trail and traverse up an old access road and across the contours to bring users up to the MC Lean-to.

21. Elk Lake-Marcy Trail (1.7 miles of upgrading existing trail)

Primary Uses:



Description:

A Class V trail that crosses the Elk Lake and AMR Easements as well as Forest Preserve. This serves as the major access point to Panther Gorge.

22. Pinnacle South Trail (1.75 miles of new trail)

Primary Uses:



Secondary Uses:



Description:

The existing Class IV trail up Pinnacle from the Elk Lake-Marcy Trail will be relocated to leave the Elk-Lake Marcy Trail farther to the south, near the intersection with the Casey Brook Connector Trail. A new Class IV trail will be built going up the southern and eastern slopes of the mountain, around Elk Lake Conservation Easement lands. This route will have a more sustainable trail tread to handle increased traffic from thru-hikers or hikers accessing Blake and Colvin Mountains.

23. LeClaire Hill Trail (1.5 miles of new trail)

Primary Uses:



Secondary Uses:



Description:

A Class IV trail is conditionally proposed to be developed across the Vanderwhacker Mountain Wild Forest and High Peaks Wilderness to the lookout on LeClaire Hill. This short hike will provide views to the south of the Hoffman Notch Wilderness Area and over the drainage of the Branch River. The trail will start at the Niagara Brook Parking Area in the Vanderwhacker Mountain Wild Forest, head north and then traverse east, crossing Niagara Brook before climbing the northern portion of LeClaire Hill.

24. South Fork of Boquet River Accessible Trail (0.1 miles of new trail)

Primary Uses:



Description:

The Class VI South Fork of Boquet River Accessible Trail will be built to allow users to travel from the proposed parking spots to an accessible campsite near the South Fork of the Boquet River.

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25. Chapel Pond Connector Trail (1.2 miles of new trail)

Primary Uses:



Description:

The class V Chapel Pond Connector Trail will connect the Round Pond Trailhead and southern shoreline of Chapel Pond. This trail will meander between the foot of the mountains and Route 73 as it connects the Round Pond Trailhead to the new parking areas proposed for access to the Chapel Pond Slabs and Chapel Pond and future access to the Ridge Trail in the Giant Mountain Wilderness. Thru-hikers coming from the Giant Mountain will have a safe trail to travel south toward the access to Round Pond and allow rock climbers to safely park and gain access to lesser known rock climbing sites in the valley.

26. Trailless Peaks Access Routes

The 1999 High Peak Wilderness Complex UMP and 2004 Dix Mountain Wilderness Area UMP both discussed the popular 46er trailless peaks. DEC and the Adirondack 46ers reached an agreement on managing a single access path to each of the peaks.

Usage across all the peaks has increased and there are portions of routes up the trailless mountains that are becoming heavily impacted. Each of the peaks has several sections where trail expansion or reroutes has caused natural resource damage. Many times the reroutes are done in the same manner as the original section of trail, mostly up the fall-line.

Historically, these routes involved route finding and pushing through a forest that didn't have a defined path. This is quite a contrast to the present, when most of these paths are well worn and easy to follow in the summer, but where you can see major impacts, including exposed bedrock and mud holes.

DEC will work to identify sustainable routes and start to develop and construct official Class III and Class IV trails up the 21 traditional trailless peaks. Each reroute will focus on resource protection and user experience, trying to address use patterns, but not following historical routes, thereby supporting resource protection.

A written Trail Work Plan will be developed for each of the routes to ensure that work completed to address immediate issues is consistent with the overall plan and routing vision. Over the short-term, DEC will work with the Adirondack 46ers

to provide marking and signage that will address resource protection and human safety. As routes are changed and trail work is conducted, DEC will provide that information to the public.

27. Cascade Mountain Trail Reroute (~5 miles of new trail)

Primary Uses:



Description:

The Class V Cascade Mountain Trail is proposed to be relocated. The trailhead for this trail will be in the Mt. Van Hoevenberg Intensive Use Complex, and is proposed in the 2018 draft UMP for that unit.

As usage in the greater High Peaks area has surged in the last decade, it has caused a number of negative impacts to the area's natural resources, primarily created via trail and user-related issues (i.e. trail expansion and erosion, human waste and litter, and increases in Search and Rescue efforts). Along with negative impacts in the wilderness, there are impacts along interfaces with public roads and private properties. Human safety along Route 73 has become a concern, as parking lot controls are not stopping users from parking on the side of the highways. With the additional parking comes congestion along the roadways, and trailhead facilities are not able to address human waste and trash disposal.

Rerouting the trail up Cascade Mountain will help to address natural resource impacts, improve the wilderness experience and public safety, and increase opportunities for education and outreach to users of this route.

The proposed Class V Cascade Mountain Trail will be longer than the current route, but will be built in a manner that ascends the mountain on lower grades. Using modern contour trail layout and reduced maintenance features, we can provide a trail that will resist natural resource impacts.

The Intensive Use Area will provide DEC and partners a chance to provide more education and outreach to users, facilities to address waste and opportunities to match up users with a Wilderness Opportunity that better matches their interests. The new Mt. VanHoevenberg East Trail will help provide a shorter wilderness experience with world class views of the High Peaks. This will be managed as part of the trail system of the High Peaks Wilderness Complex.

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28. Mt. Van Hoevenberg East Trail (2.3 miles of new trail)

Primary Uses:



Description:

The Class V Mt VanHoevenberg Trail is proposed to be built, bringing hikers to the summit of Mt VanHoevenberg from the northern side. The trailhead will be in the Mt. VanHoevenberg Intensive Use Area and is proposed in the 2018 draft UMP for that unit. The trailhead would be managed as part of the trail system of the High Peaks Wilderness Complex.

Rerouting the trail up Mt. VanHoevenberg is part of a combined effort with the Cascade Mountain Trail reroute to help address natural resource impacts and improve wilderness experience and public safety. This trail will start at the same location as the Cascade Mountain Trail and provide a shorter trip to the top of a mountain, with world-class views of the High Peaks. When combined with education and outreach efforts, the opportunities on the Mt. VanHoevenberg East Trail will allow new wilderness users to have an enjoyable experience. This will be managed as part of the trail system of the High Peaks Wilderness Complex.

The summit of Mt. VanHoevenberg will need work to address natural resource impacts to summit vegetation, while avoiding impacts to the wilderness experience of users. This work will be done prior to the trail development.

29. 1932 Trail (~.75 miles of upgraded trail)

Primary Uses:



Description:

The Class IV 1932 Trail starts by the 1980 start for the Bobsled and follows an old road up to the start of the 1932 Bobsled run on the Mt. VanHoevenberg Intensive Use Area, and then crosses into the High Peaks Wilderness Area up to the summit. This route will be upgraded to provide a looping opportunity for users that want to use the Mt. VanHoevenberg East Trail or wish to hike from the bobsled tracks. This will be managed as part of the trail system of the High Peaks Wilderness Complex.

30. Ampersand Mountain Trail Reroute (3.2 miles of upgrades and new trail)

Primary Uses:



Secondary Uses:



Description:

The Class V Ampersand Mountain Trail has moved several times over its history, and past trail building efforts have worked to address impacts on the current route. Combined with the parking lot proposal in this UMP Amendment, the lower section of the trail will be relocated to connect the new parking area with the summit ridge portions of the trail.

31. Wright Peak Ski Trail (Trail reroute and new trail)

Primary Use:



Description:

A Class VIII Ski Trail is conditionally proposed that will utilize portions of the existing and reroutes to the Wright Peak Ski Trail, to connect the lower section of the trail with the Whale's Tale Ski Trail.

32. Klondike Notch Trail (5.2 miles of trail upgrades and reroute)

Primary Uses:



Description:

The Class IV Klondike Notch Trail will be upgraded along most of its route, with a reroute on the southern end, within the Johns Brook Valley where it meets the Phelps Trail. This trail will be dual-designated to be a Class IV and Class VIII Ski Trail. Given the grade of the trail, its northeasterly aspect and snowpack, it will serve as a ski trail access into the Johns Brook Valley. The reroute on the southerly end will focus on removing the trail from the bottom of the drainage and siting it on the north and eastern aspects of the slopes. This will improve the

III. Recreational Resources and Human Uses

trail's winter and summer sustainability.

33. Trailless Sections in the High Peaks Wilderness Complex

Description:

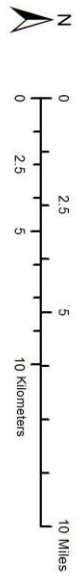
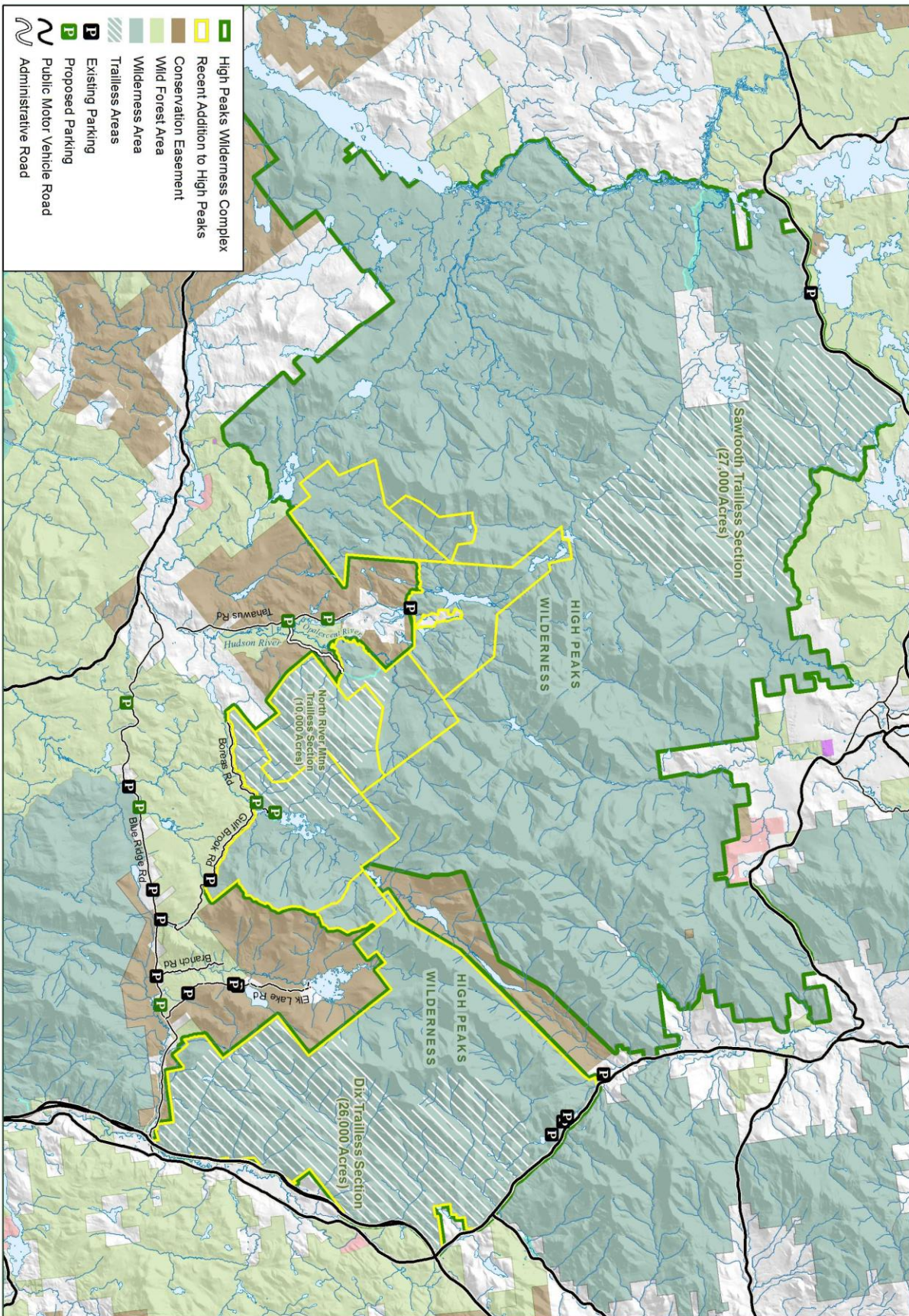
This UMP Amendment lays out a conceptual opportunity for a purpose-built, sustainable trail system that facilitates access and recreational opportunities across these lands. To preserve the opportunity for unconfined wilderness experiences, there are 3 large trailless sections proposed. Each of these areas will share an absence of marked trails or developed facilities. Existing Class 2 access paths will remain unmarked and monitored occasionally for natural resource impacts. Part of the Wildland Monitoring Plan will focus on the Trailless Sections to measure any usage impacts. The three areas include:

- Dix Trailless Section (~26,000 acres), including lands east of the Dix Mountain Range to the State land boundary, adjacent to the Adirondack Northway and lands south, almost to Blue Ridge Road.
- North River Mountains Trailless Section (~10,000 acres), including lands west of Boreas Ponds to the Wilderness Boundary and south of Cheney Cobble.
- Sawtooth Mountains Trailless Section (~27,000 acres), including lands between and north of the Northville-Placid Trail and Ward Brook Trails, extending north to the wilderness boundary.

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Trailless Areas



I. Horse Trails

Existing Conditions

Under the 2016 Boreas Ponds Interim Access Plan, horses are allowed on the Boreas Ponds Tract unless otherwise signed that it is prohibited. The Blue Ridge, Fly Pond, Andrew Brook, Notch, and Upper Elk Lake parking areas currently offer parking for horse trailers, and the Boreas and Gulf Brook roads offer enjoyable equestrian riding, but there are no purpose-built trails in place.

The Vanderhacker Mountain Wild Forest UMP Amendment provides for equestrian opportunities that connect to the Boreas Ponds Primitive area.

Desired Conditions for Equestrian Facilities Monitoring

Properly designed and constructed equestrian trails will maintain their firm and stable surface for their intended use, with minimal maintenance. A sustainable trail ensures environmental protection, user safety, function and enjoyment. Building a well-designed, sustainable trail that blends well with its natural surroundings enhances the user's experience and decreases user conflict. Like other facilities, the variables for equestrian trails will include monitoring efforts to collect data on the presence of eroded areas, the expansion of the tread through vegetation loss, and the occurrence of trash and human waste. It will also be important to monitor for the presence of invasive species on equestrian facilities. Photo points will be a useful tool to help illustrate potential changes over time.

Proposed Management

Objectives

- Provide recreational opportunities for equestrian trail riders in suitable locations.
- Maintain trails to appropriate usable standards, while minimizing environmental impacts.
- Provide information about uses allowed on, and appropriate etiquette for, multiple-use trails.

Actions

- Monitoring for the desired conditions of equestrian trails will help measure and determine impacts to better inform carrying capacity development and long-term

planning. Final specifics will be detailed in the Wildland Monitoring Plan, but generally:

- Desired conditions for equestrian trails will be ones that are free of invasive species, has minimal expansion from the designed footprint of the built facility, does not negatively impact trailside vegetation, are free of occurrences of human waste or litter, and provide an enjoyable user experience.
- Monitoring could include photo point locations, control measuring points, surveys of invasive species, surveys of visual occurrences of trash and user surveys.
- Allow equestrian use on Boreas Ponds Dam Trail to the Boreas Ponds Dam. (*Note – this action is only being mentioned here for reference. Authorization for this use in this location is being sought in the Vanderwhacker Mountain UMP amendment.*)
- Provide an equestrian mounting platform in the vicinity of Boreas Ponds Dam. (*Note – this action is only being mentioned here for reference. Authorization for this use in this location is being sought in the Vanderwhacker Mountain UMP amendment.*)
- Install signage where equestrian trail riding is not allowed.
- Identify locations for equestrians where water is available for horses, and install signage at these locations. Hitching posts or high lines may also be provided adjacent to these locations, with proper separation distance from the water.
- Promulgate a regulation to prevent horses from entering wetlands and waterbodies, except through fords on designated trails.

J. Hiking and Snowshoeing Trails

Existing Conditions

Hiking and snowshoeing are allowed throughout all the tracts. Although hiking and snowshoeing will continue to be allowed at-large, this amendment proposes 28 trail opportunities for hiking and snowshoeing to be constructed or upgraded. These will be purpose-built trails focusing on sustainability and user enjoyment.

Desired Conditions for Hiking and Snowshoe Trail Monitoring

Properly designed and constructed hiking trails will maintain their firm and stable surface for their intended use, and with minimal maintenance. A sustainable trail ensures environmental protection, user safety, function and enjoyment. Building a well-designed, sustainable trail that blends well with its natural surroundings enhances the user's experience and decreases user conflict. Like other facilities, the variables for hiking trails will include monitoring efforts to collect data on the presence of eroded areas, the expansion of the tread through vegetation loss, and the occurrence of trash and human waste. Photo points will be a useful tool to help illustrate potential changes over time.

Proposed Management

Objectives

- Design and locate all trails in accordance with DEC guidance and best management practices that minimize environmental impacts.
- Add and enhance hiking and snowshoe trail opportunities, as appropriate, throughout the area.
- Establish photo point monitoring locations and systematic measuring methodologies to help monitor trail impacts on all newly constructed, rerouted and rehabilitated trails. This data will help inform the decision-making process on future trail decisions.
- Improve the overall wilderness experience and user enjoyment of the trail system within the High Peaks Wilderness Complex. This includes a trail system which is not dominated by visual trail structures that stand out in contrast to the surrounding landscape.

Actions

- DEC trail crews to build and maintain the trail system, working with professional contract trail crews, volunteer trail crews and other assets to have a world-class Wilderness Trail System.
- Monitoring for the desired conditions of hiking trails will help measure and determine impacts to better inform carrying capacity development and long-term

planning. Final specifics will be detailed in the Wildland Monitoring Plan, but generally:

- Desired conditions for hiking trails will be ones that have minimal erosion and expansion from the designed footprint of the built facility, does not negatively impact trailside vegetation, are free of occurrences of human waste or litter, and provide an enjoyable user experience.
- Monitoring could include photo point locations, control measuring points, occurrences of erosion, tread expansion and trash, and user surveys.
- Evaluate, improve and/or reroute portions of the existing Class V Trails:
 - Calamity Brook Trail;
 - Elk Lake Marcy Trail;
 - Henderson Lake Dam Trail;
 - Ampersand Mountain Trail (conditional action).
- Evaluate, improve and/or reroute portions of the existing Class IV Trails:
 - Preston Ponds Trail;
 - Indian Pass Trail;
 - Mt Adams Trail;
 - East River Trail;
 - 1932 Trail [up Mt. VanHoevenberg from the north] from the 1980 Start Track past the 1932 Start
 - This will include the portions of the trail existing on the Mt. VanHoevenberg Intensive Use Area.
 - Klondike Notch Trail.
- Evaluate, improve and/or reroute portions of the Class IV Bradley Pond Trail from the Easement Road to the lean-to. Abandon the trail north of the lean-to.
- Evaluate, maintain, improve, reroute and/or abandon trails identified in the 1999 High Peaks Wilderness Complex UMP and the 2004 Dix Mountain Wilderness Area UMP, as needed, to help shift the trail system to one that is purpose-built and sustainable. All work should focus on reducing maintenance efforts, maximizing the lifespan of trail facilities, and enhancing the wilderness experience.
- Construct and maintain a Class IV trail from Bradley Pond north toward the narrows between Preston Ponds.
- Evaluate, improve and/or reroute portions of the existing Class III Calamity Crossover Trail.
- Construct and maintain the following ADA-compliant Class VI Accessible Front County Trails:
 - Henderson Lake Accessible Water Access Trail;
 - MC Lean-to Access Trail;

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- South Fork of Boquet River Trail.
- Construct and maintain the following Class V Trails:
 - Boreas Ponds Trail;
 - Casey Brook Connector Trail;
 - Chapel Pond Connector Trail;
 - Mt. VanHoevenberg East Trail
 - This will include the portions of the trail that will exist on the Mt. VanHoevenberg Intensive Use Area;
 - Cascade Mountain Trail
 - This will include the portions of the trail that will exist on the Mt. VanHoevenberg Intensive Use Area;
- Construct and maintain the following Class IV Trails:
 - Lake Andrew Trail;
 - White Lily Connector Trail;
 - Boreas Mountain Trail (conditional action);
 - Black Ermine Connector Trail (conditional action);
 - LeClair Hill Trail (conditional action);
 - RNT Loop Trail (conditional action);
 - Henderson Lake South (conditional action).
- Evaluate and compare rehabilitation of the Class IV Pinnacle Trail from Elk Lake Marcy Trail vs. the construction of a new trail from the Elk Lake Marcy Trail near the height of land boundary with Elk Lake conservation easement.
- Evaluate and develop Trail Work Plans for routes up the trail-less peaks. Each of these routes is envisioned to be a Class III Primitive Trail unless the evaluation and work planning process indicated the trail is better served with Class IV designation. The following mountains are part of the list:
 - Gray Peak;
 - Iroquois Peak;
 - Santanoni Peak;
 - Mt. Redfield;
 - Panther Peak;
 - Table Top Mt.;
 - Macomb Mt.;
 - Hough Peak;
 - Seward Mt.;
 - Mt. Marshall;
 - Allen Mt.;
 - Street Mt.;
 - Mt. Donaldson;

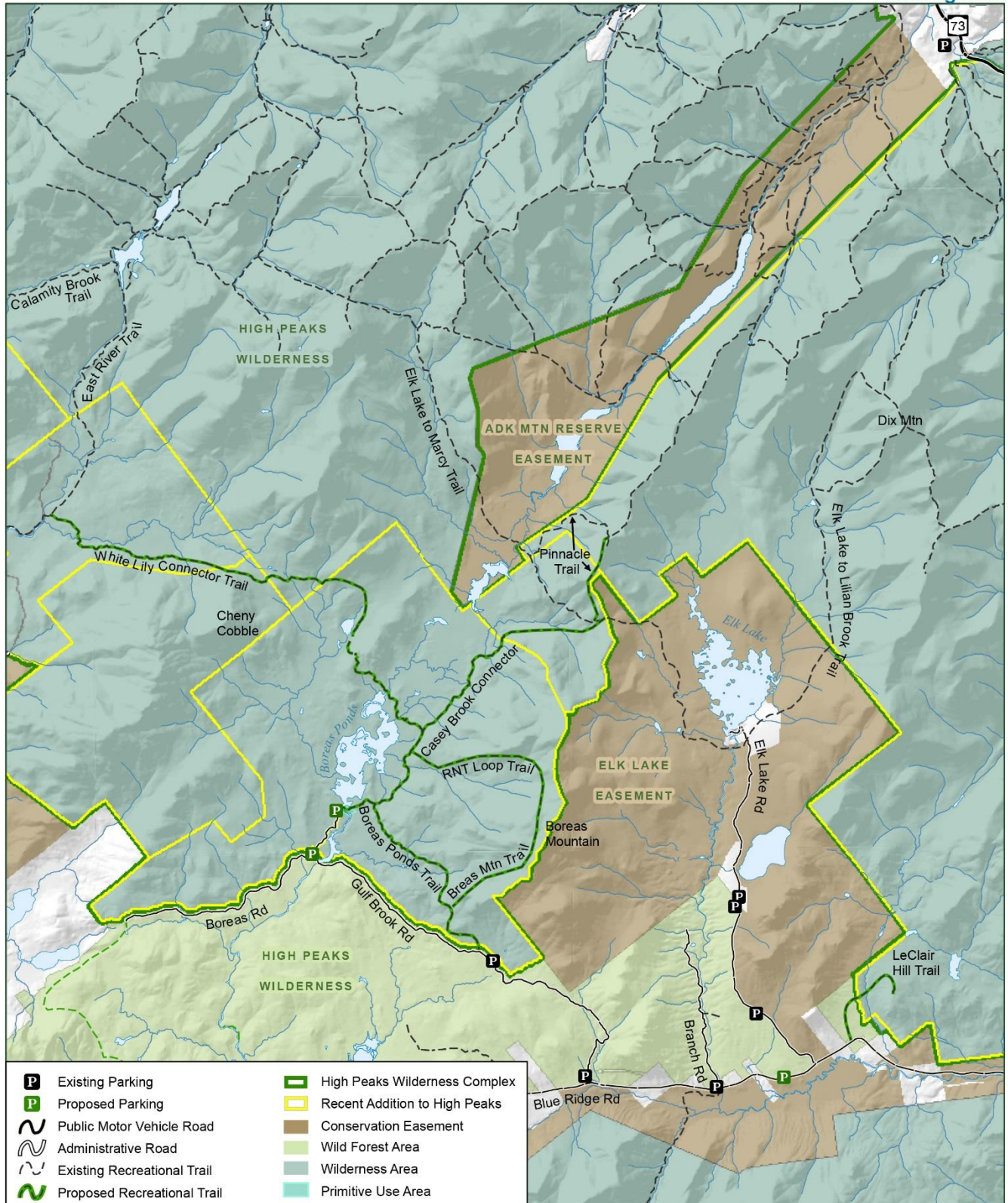
III. Recreational Resources and Human Uses

- Seymour Mt.;
- South Dix;
- Mt. Emmons;
- Grace Peak;
- MacNaughton Mt.;
- Cliff Mt.;
- Nye Mt.;
- Couchsachraga Peak

III. Recreational Resources and Human Uses

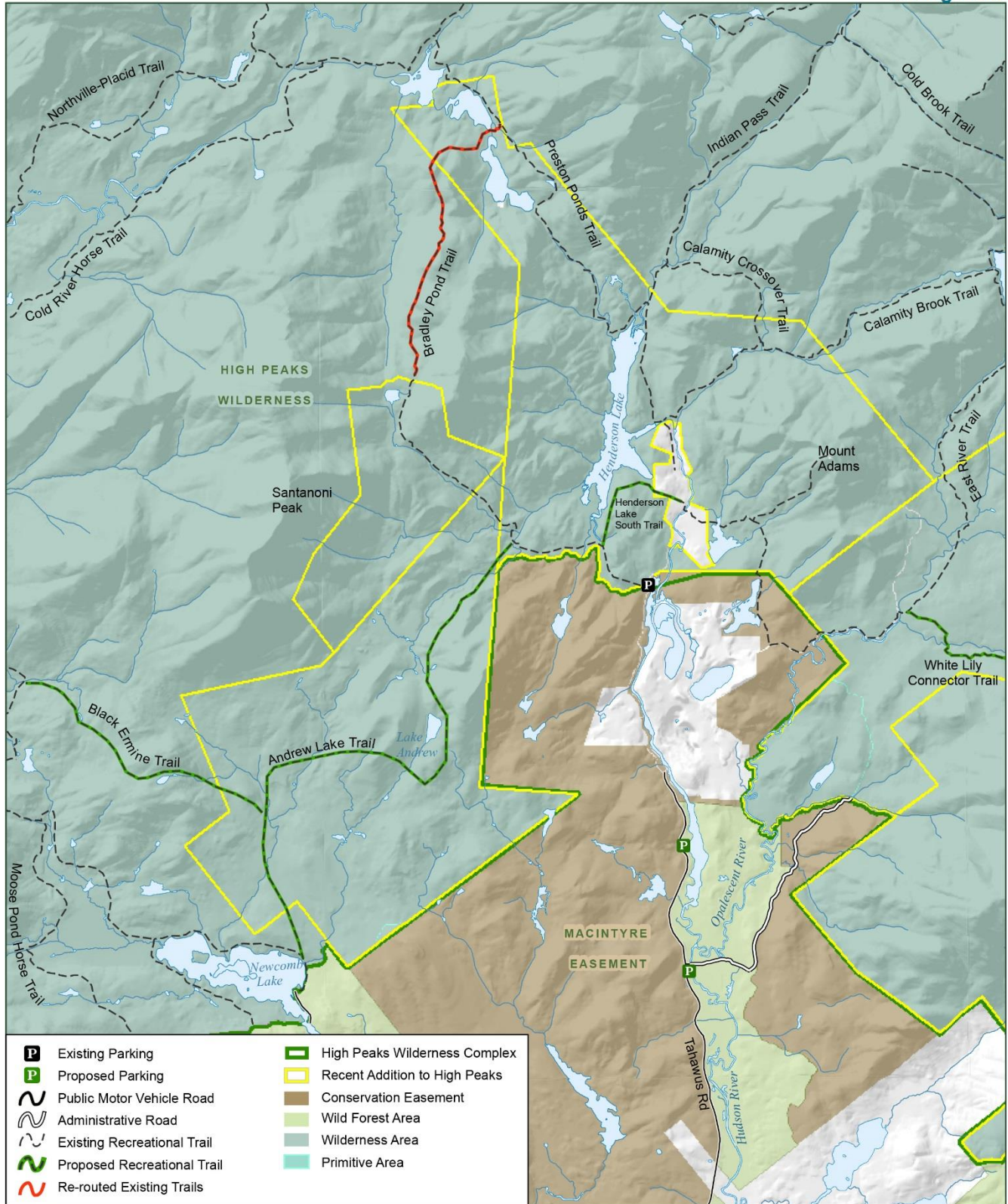
High Peaks Wilderness

Hiking East

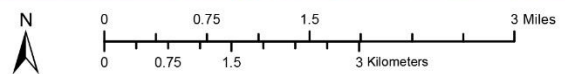


High Peaks Wilderness

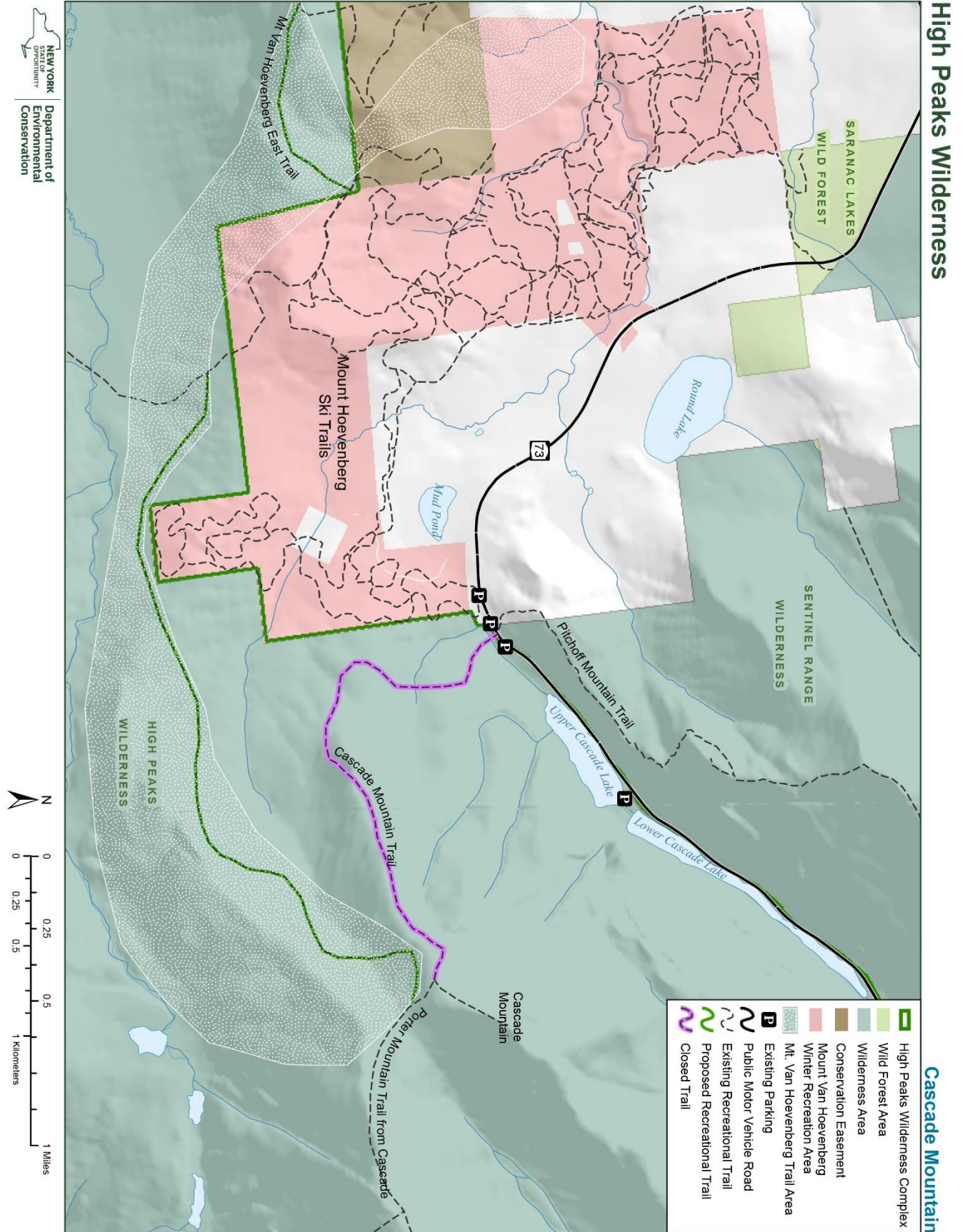
Hiking West



	Existing Parking		High Peaks Wilderness Complex
	Proposed Parking		Recent Addition to High Peaks
	Public Motor Vehicle Road		Conservation Easement
	Administrative Road		Wild Forest Area
	Existing Recreational Trail		Wilderness Area
	Proposed Recreational Trail		Primitive Area
	Re-routed Existing Trails		



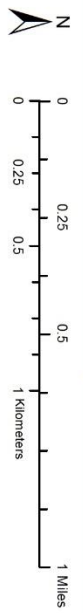
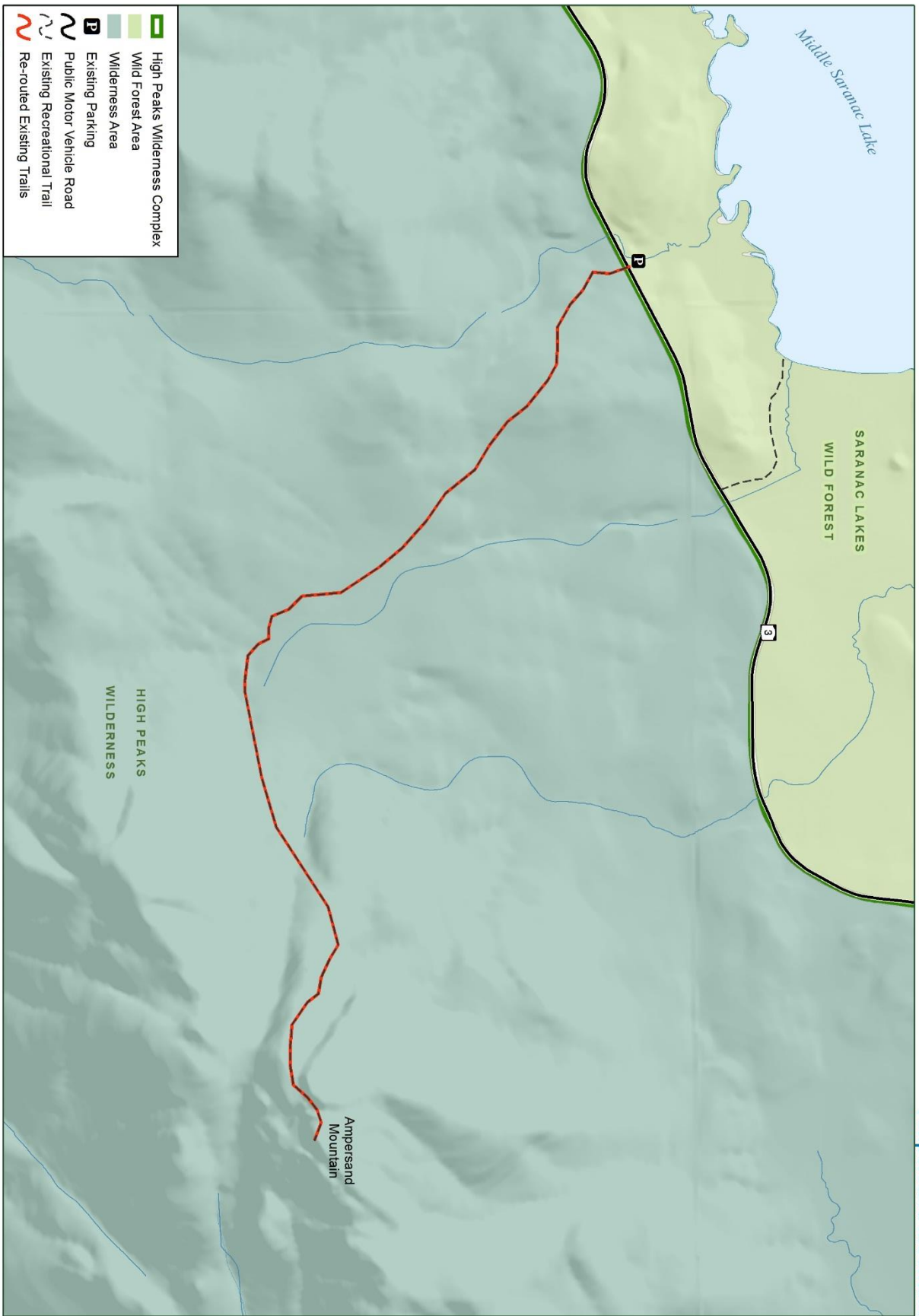
III. Recreational Resources and Human Uses



III. Recreational Resources and Human Uses

High Peaks Wilderness

Ampersand Mountain



K. Skiing Trails

Existing Conditions

Skiing and snowshoeing are allowed at-large throughout the newly acquired tracts as well as on preexisting trails that the public has used since before the tracts became part of the High Peaks Wilderness Complex. Visitors choose to follow old roads, trails and bushwhack on the tracts. Although skiing and snowshoeing will continue to be allowed at-large, this UMP Amendment proposes dual-designation of 16 trails to be included as ski trails. In addition to dual-designation, this UMP Amendment identifies trails that will be managed with skiing in mind, though the cleared width will remain consistent with the trail classification. See Appendix C for the Trail Classification Chart.

Desired Conditions for Ski Trail Monitoring

Desirable conditions are typically easily achievable for cross country ski trails, as long as the weather cooperates. With adequate snow pack, conditions rarely become deteriorated, which shifts the typical tread concerns like erosion to other concerns like corridor expansion through a loss of vegetation. Desirable cross country ski trails maintain safe lines of sight and corridors that are free from vegetative obstructions, along several other features. Cross country skiing is often a secondary use on hiking trails, so when this is the case, trail use will be the primary guide for monitoring variables. When the trails are for skiing only, the monitoring program will assess, in the non-winter months, corridor expansion through vegetation loss and erosion. Photo points will be developed along routes to continually monitor impacts and to ensure corridor expansion through vegetation loss is not occurring.

Proposed Management

Objectives

- Design and locate all trails in accordance with DEC guidance and best management practices that minimize environmental impacts.
- On trails with dual-designation, design trail features with skier safety and enjoyment in mind.
- Establish photo point monitoring locations and systematic measuring methodologies to help monitor trail impacts on all newly constructed, rerouted

and rehabilitated trails. This data will help inform the decision-making process on future trail decisions.

Actions

- Monitoring for the desired conditions of cross country ski trails will help measure and determine impacts to better inform carrying capacity development and long-term planning. Final specifics will be detailed in the Wildland Monitoring Plan but generally:
 - Desired conditions for ski trails will be ones that have minimal expansion from the designed footprint of the built facility, do not negatively impact trailside vegetation and provide an enjoyable user experience.
 - Monitoring could include photo point locations, control measuring points, occurrences of corridor expansion, and visible erosion in non-winter months.
- The following trails will have dual-designation and be constructed and/or maintained with tread and drainage development standards of their first classification (Class III, IV or V) and the clearing width and height of a Class VIII ski trail. Except when impractical, any bridges will be built as ski trail bridges:
 - Lake Andrew Trail;
 - Black Ermine Connector (conditional action);
 - Bradley Pond Trail;
 - Calamity Brook Trail;
 - Preston Pond Trail;
 - Indian Pass Trail;
 - Henderson Lake South Trail (conditional action);
 - Henderson Lake Dam Trail;
 - East River Trail;
 - Dudley Brook Connector Trail;
 - White Lily Trail;
 - Casey Brook Connector Trail;
 - Boreas Ponds Trail;
 - Elk Lake-Marcy Trail;
 - Chapel Pond Connector Trail;
 - Klondike Notch Trail.
- Conditionally propose changes and reroutes to the Wright Peak Ski Trail that would reroute the lower section of the trail to connect with the Whale's Tale Ski Trail. The vision of this proposal is to provide a unique and improved skiing opportunity in the High Peaks Wilderness. The Department will work with the Agency in developing guidelines for backcountry ski trails that define the nature

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of backcountry skiing opportunities. Once SLMP compliant Ski Trail Guidance has been developed, the DEC will develop this trail.

- The following trails will be constructed and/or maintained to their class with consideration in layout given for skiing on slopes and curves:
 - Calamity Crossover Trail;
 - Elk Lake to Lillian Brook Trail;
 - Round Pond to the base of the Dix Slides.

L. Rock, Ice and Mixed Climbing

Background

Climbing, has long been recognized as a legitimate recreational use of public lands. Like hiking and skiing, climbing in the Adirondacks traces its roots to the 1800's, with early technical ascents on Colden in 1850, and on Gothics in 1896. Increased interest 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, and as popularity increases and climbing routes are published through different media outlets, informal trails may increase in number and impact.

The Adirondack region remains one of few areas in the country where the placement of fixed climbing anchors (bolts) is not overly common, but it is an increasing practice and a growing concern. The reputation of the region is one of traditional climbing, where bolts and pitons are the exception rather than the rule.

The use of fixed anchors, particularly fixed expansion bolts, placed in holes drilled into the rock has been an issue of controversy in public land management (Access Fund, 2001). Fixed anchors have long been used by climbers as a method of protection where use of traditional removable protection (camming devices, chocks and nuts) is not possible. Fixed anchors, including bolts and slings



South face of Gothics. Photo by Will Roth

placed around trees, have also been used for rappel anchors. This practice can provide some level of protection to the natural resource by reducing damage to trees from girdling, caused when rappel ropes wrapped around trees are pulled down at the end of a climbing session. When placed indiscriminately, bolts and related fixed anchors can mar cliff faces and result in visibility impacts from the ground. The use of fixed anchors, when properly managed, can be an important management tool to protect the natural resource. Use of fixed anchors for protection on a climb that might not be possible without the placement of fixed or artificial anchors has engendered much more controversy both within and outside of the climbing community. 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. Like other areas of the Forest Preserve, fixed anchors have been documented in the Boreas Ponds Tract on Ragged Mountain. At least five routes are advertised on various climbing websites and publications. Popular climbing locations within the Boreas Ponds Tract and the Vanderwhacker Mountain Wild Forest in general must be further inventoried and monitored.

At this point in time the placement of bolts or other fixed anchors which involve drilling or defacement of the rock is a violation of Department regulations (6 NYCRR §190.8(g) -- "No person shall deface, remove, destroy, or otherwise injure in any manner whatsoever any . . . rock, fossil or mineral . . . excepting under permit from the Commissioner of Environmental Conservation and the Assistant Commissioner for State Museum and State Science Service . . ."). The APSLMP does not discuss the appropriateness of fixed anchors in the Adirondack Forest Preserve.

Existing Conditions

Rock, Ice and Mixed climbing are allowed throughout all the tracts, and with the purchase of the Boreas Ponds Tract in 2016, Ragged Mountain saw an almost immediate use by climbers and has since seen steady use by the rock climbing community.

Because the Boreas Ponds Tract is relatively new to public use, it is difficult to say how popular the climbing routes here will be. Without sufficient data on use and the environmental effects of that use, proposing specific management actions that manage climbing in the area is difficult. The climbing around Chapel Pond and other places within the High Peaks Wilderness has been popular for decades, though DEC has minimal specific data to help guide management. Data regarding the number of users and the environmental impacts of their use needs to be collected and evaluated over time in order to make sound management decisions. This UMP Amendment proposes

III. Recreational Resources and Human Uses

actions to help mitigate natural resource impacts, improve the wilderness experience of climbers and other users, and increase education and outreach in areas where climbing is popular.

Desired Conditions for Climbing Monitoring

Climbing offers a slightly different set of variables for desirable conditions. The access routes are similar to hiking trails in that they will maintain their firm and stable surface for their intended use, with minimal maintenance. A sustainable trail ensures environmental protection, user safety, function and enjoyment. The top and bottom of climbing routes are often located on steep slopes of various types that can be prone to erosion. Desirable conditions for routes are a firm and stable area to prepare for an ascent, a face that accepts removable anchors, and a top that is either firm and stable or that cannot easily be topped out or accessed for the use of slings. Somewhat similar to other facilities, the variables for climbing will include monitoring efforts to collect data on access trails for the presence of eroded areas, the expansion of the tread through vegetation loss, and the occurrence of trash and human waste. Variables to consider for the routes are firm and stable soils at the bottom and top of climbing routes, vegetation loss through both erosion and the use of slings to trees, and the occurrence of fixed anchors. Photo points will be a useful tool to help illustrate potential changes over time.

Proposed Management

Objectives

- Manage visitor use to keep impacts on the resource and experiences of all visitors at an acceptable level, consistent with the concept of wilderness as described by the APSLMP.
- Monitor changes in use and level of use over time.
- Provide fair and equitable access to rock and ice climbing resources.
- Manage rock climbing sites to minimize environmental impacts.
- Keep the effects of visitor use on resources to a minimum.

Action Steps

- As prescribed in the carrying capacity discussion, collect use data through visitor number information, visual observations and photo documentation. DEC will also establish photo point monitoring locations to help monitor impacts at the base and top of climbing routes and on herd paths and approach trails. This data will

III. Recreational Resources and Human Uses

help inform the decision-making process on future management decisions on these facilities.

- Monitoring for the desired conditions of climbing routes will help measure and determine impacts to better inform carrying capacity development and long-term planning. Final specifics will be detailed in the Wildland Monitoring Plan, but generally:
 - Desired conditions for climbing routes will be ones that have minimal impacts to the top and bottom of cliffs and access routes to popular locations, are free of occurrences of human waste or litter, do not have any expansion of fixed anchors and provide an enjoyable user experience.
 - Monitoring could include photo point locations, control measuring points, occurrences of erosion, vegetation loss and trash, and user surveys.
- Stabilize soil at the top and bottom of climbing routes where erosion is identified as a problem. Terracing and other forms of stabilization will be used if erosion begins to occur.
- Monitor popular climbing routes for resource degradation. Design, designate and construct sustainable trails to popular climbing destinations where herd paths are having a negative effect on the resource. These will be sustainably designed, constructed, maintained, rerouted, and improved to a Class III Trail standard.
- A temporary moratorium will be established relative to the establishment of new, or replacement of existing, bolts or fixed pitons. This moratorium will allow the Department to gather use data and monitor the environmental impacts of the area and will aid in making sound decisions for the management of climbing routes and their access facilities in the future.
- The Department will work with the climbing community to undertake an inventory of all existing fixed anchors in the unit.
- The Department will convene a focus group, including Department and Agency staff, members of the climbing community, environmental organizations and other interested parties, to develop a Park-wide policy on the management of fixed anchors on Forest Preserve lands.
- At parking areas near climbing areas, kiosks providing climbing-specific educational materials and LEAVE-NO-TRACE™ information shall be installed.
- Work with climbing interest groups to promote protection of wildlife and wildlife habitats that are found along climbing routes; this may involve temporary closures of specific climbing routes.
- Monitor popularity of climbing routes and numbers of climbers using those routes. Should large groups be causing resource degradation, this UMP supports the establishment of a regulation to limit group size to a maximum size

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of 10 persons and limited to utilizing a maximum of three roped climbing routes at any given time.

M. Fishing

Existing Conditions

DEC angling regulations are designed to conserve fish populations in individual waters by preventing overexploitation. Angling regulations effectively control impacts of angler use. DEC monitors the effectiveness of angling regulations, stocking policies and other management activities by conducting periodic biological and chemical surveys.

Statewide angling and special angling regulations provide the protection necessary to sustain or enhance natural reproduction where it occurs. In addition to angling regulations, factors at work in the unit which serve to limit use include the relative remoteness of some waterbodies/waterways from roads, the seasonal nature of angling in coldwater ponds, and seasonal road closures.

The use of motorized watercraft is prohibited.

Proposed Management

Objectives

- To maintain the diversity of coldwater and warmwater fish populations in the unit.
- To encourage and promote angler use of the waters in the unit through routine fish management practices, including hotlines, correspondence and contact with the public by Department staff.

Action Step

- Enforce current applicable statewide and special fishing regulations in the management areas waters.

N. Hunting and Seasonal Access

Existing Conditions

The tracts provide an opportunity for a variety of wildlife-related recreational pursuits. These include hunting, trapping, birdwatching and wildlife photography. A number of

mammals and birds may be hunted or trapped during seasons set annually by the Department. These species are identified in the Environmental Conservation Law (ECL), Sections 11-0903 and 11-0908. The DEC has the authority to set hunting and trapping season dates and bag limits by regulation for all game species. The Boreas Ponds and MacIntyre tracts are located within Wildlife Management Units (WMU) 5H and 5F.

Wildlife related usage has historically centered around big game hunting, primarily for deer, although bear hunting, small game hunting and furbearer trapping are also prominent. Since the State took ownership of the area, white-tailed deer hunting during the regular big game season has been fairly popular.

Proposed Management

Objective

- Maintain up-to-date public information regarding hunting and trapping opportunities and any associated regulation changes.

Action Step

- Support educational opportunities related to hunting and trapping, and enforce hunting and trapping regulations.

O. Camping

Existing Conditions

Although designated primitive tent sites do not currently exist, primitive camping and campfires are allowed on these tracts pursuant to existing DEC camping regulations (6 NYCRR Section 190.3(b)). Since the acquisition of the tracts several suitable primitive tent site locations have been identified and are discussed below.



Camping on MacIntyre West Tract

Desired Conditions for Tent Site Monitoring

Emphasis is given throughout the plan on well designed and constructed facilities that promote resource protection and will maximize long-term sustainability. Tent sites are a great example of the importance of constructing a well-built, sustainable facility up front. Choosing a suitable location and constructing a tent site with a hardened tent pad ensures initial and long-term environmental protection. These facilities will exhibit a comfortable, well-drained tent pad, usable fire pit, and a sanitary privy. Beyond the obvious environmental benefits, these facilities add to the user's experience as much as a desirable location does. The monitoring variables for tent sites will include efforts to collect data on the expansion of the designated area through vegetation loss, soil compaction, and the occurrence of trash and human waste. Photo points will be a useful tool to help illustrate potential changes over time.

Proposed Management

Objectives

- To build and maintain high quality, sustainable primitive tent sites and lean-tos with associated infrastructure (access trails, privies, fire rings and cleared sustainable areas for tents). Focusing use on a desirable and durable tent site will help lessen the overall impacts on the natural resources.
- To provide scenic camping opportunities throughout the trail system for multi-day camping opportunities and for a variety of recreational methods
- To provide primitive camping opportunities for people with disabilities
- To keep designated campsites properly spaced to maintain the opportunity for solitude in wilderness.
- Provide designated primitive tent sites in a manner which minimizes impact to the site while providing an enjoyable wilderness experience for the user.

Action Steps

- Each primitive campsite will be purpose-built including proper siting, vegetation clearing, hardening of a formal tent pad and other campsite accessories as needed (access trails, privies and fire rings).

III. Recreational Resources and Human Uses

- Monitoring for the desired conditions of campsites will help measure and determine impacts to better inform carrying capacity development and long-term planning. Final specifics will be detailed in the Wildland Monitoring Plan but generally:
 - Desired campsites will have minimal expansion from the designed footprint of the built facility, will not negatively impact adjacent vegetation, will show minimal signs of compaction, are free of occurrences of human waste or litter and provide an enjoyable user experience.
 - Monitoring could include photo point locations, control measuring points, occurrences of trash, vegetation loss, and user surveys.
- ADA campsites will include accessible fire pits, privies and tent pads.
- All of the sites proposed below will follow APSLMP separation distance guidelines; no campsites will be sited to have less than 500' separation distance.
- A designated primitive campsite is one identified by a DEC permissive sign or disk and campers may not camp in excess of 15 feet from such signs or disks. To define proper camp locations, disperse use and limit adverse impacts to resources and other campers, a regulation will be adopted to prohibit camping further than 15 feet from a camping disk throughout the HPWC.
- Inventory and evaluate existing campsites in High Peaks Wilderness Complex. Develop work plans to take action to improve, close or move any site that isn't sustainable or in conformance. Once the site is completed establish a baseline photo monitoring program and periodic monitoring program.
 - As campsites are built, relocated or improved, DEC will post signage at front country and backcountry locations to inform users of changes and maintain a map that is updated annually.
- MacIntyre West Tract Campsite Proposals
 - Build a primitive campsite along the proposed Lake Andrew Trail near Santanoni Brook north of Newcomb Lake (conditional action).
 - Build a primitive campsite near Black Pond adjacent to the proposed Black Ermine Trail (conditional action).
 - Build a primitive campsite near Lake Andrew adjacent to the proposed Lake Andrew Trail.
 - Over time, monitor the usage of this campsite and consider it as a location for a lean-to (conditional action).

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- Build a primitive campsite adjacent to the Bradley Pond Trail just after the crossing of Santanoni Brook.
- Build a primitive campsite near Bradley Pond adjacent to the existing herd path.
- Former NL Lands Tract Campsite Proposals
 - Henderson Lake Campsites
 - Evaluate existing primitive campsites around Henderson Lake for sustainability. Each site will be reconstructed to create a sustainable camping pad and relocated to conform to the setback requirements.
 - There are currently three primitive tent sites.
 - There is currently one lean-to.
 - Build or upgrade an existing site to an accessible water access site on Henderson Lake.
 - Evaluate existing primitive campsite at Preston Pond for sustainability. The site will be reconstructed to create a sustainable camping pad and or relocated to conform with the setback requirements.
 - Build a primitive tent site near the western shore of Preston Pond along the proposed reroute of the Bradley Pond Trail.
 - Build a primitive campsite near the eastern shore of Lower Preston Pond adjacent to the Preston Pond Trail.
 - Build a primitive campsite along the Calamity Brook Trail east of where it meets with the Crossover Trail (near the old Trail Jct.).
 - Build a primitive campsite along the East River Trail near the east side of Lake Jimmy.
 - Build two primitive roadside campsites along Upper Works Road between the Bradley Pond Trailhead and The Blast Furnace.
- MacIntyre East Tract Campsite Proposals

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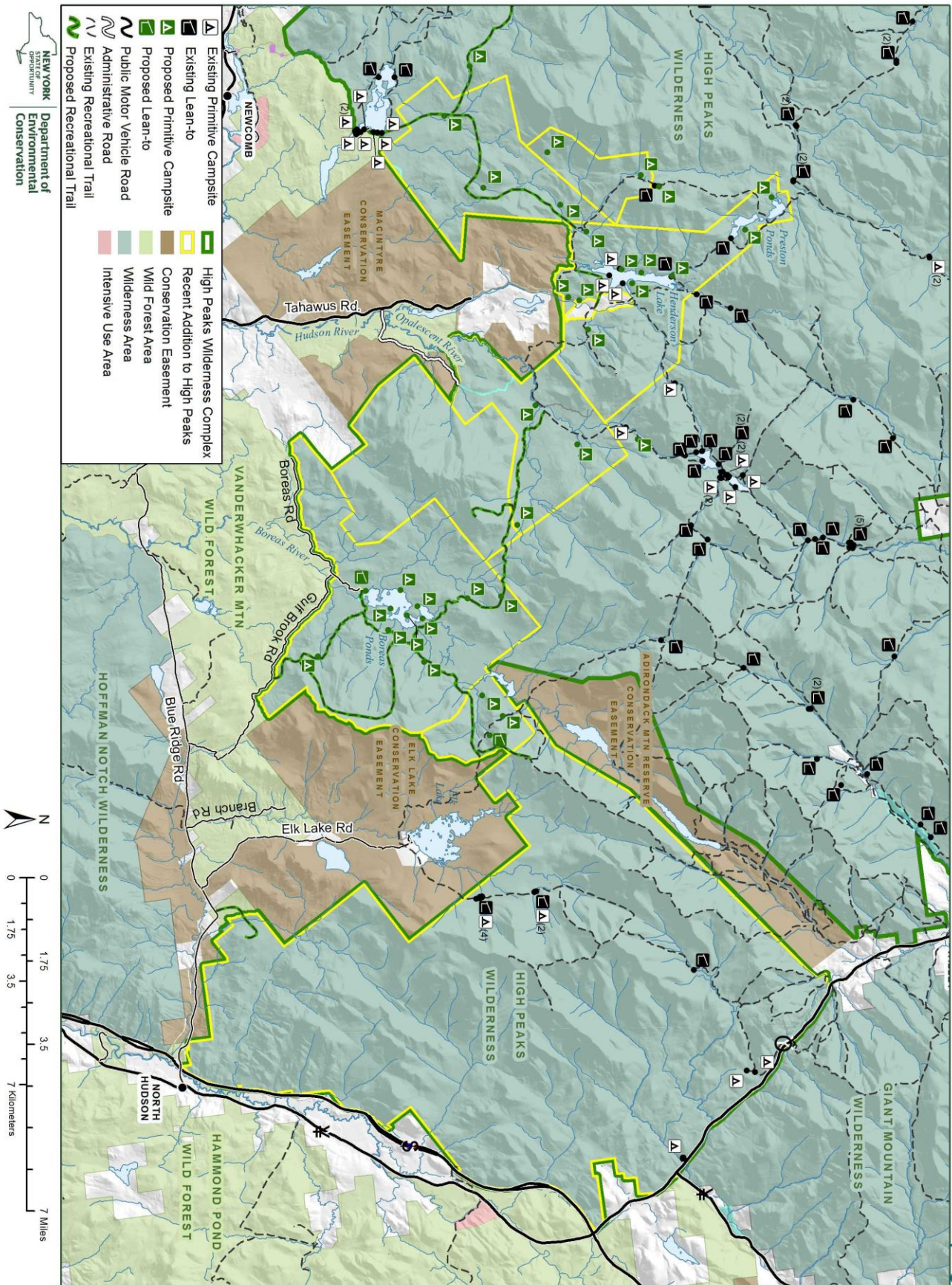
- Build a primitive campsite near the Opalescent River, on the north side of the river north of the bridge on the East River Trail.
- Build a primitive campsite at an existing clearing (and old lease campsite), just south of the Dudley Brook confluence with the Opalescent. The access trail would come south from the East River Trail on the east side of the bridge (conditional action).
- Build a primitive campsite in the vicinity of where Twin Brook comes to the Hanging Spear Falls Trail (conditional action).
- Build a primitive campsite along the proposed Dudley Brook Trail north of Cheney Cobble (conditional action).
- Boreas Tract Campsite Proposals
 - Boreas Ponds tent sites
 - Build up to five primitive tent sites along Boreas Ponds (conditional action).
 - Build a universally accessible lean-to to be located at the site of the former lodge above Boreas Ponds.
 - An accessible access trail will leave the Boreas Ponds Access Trail and traverse the grades, utilizing some of the existing roadbed and surrounding forest, to bring visitors to the lean-to site. Once the trail and lean-to are built, the existing roadbed will be naturalized.
 - Build a primitive campsite near Snyder Brook along the proposed Casey Brook Connector Trail.
 - Build two primitive campsites near White Lily Pond along the proposed White Lily Pond Trail (conditional action).
 - Build two primitive campsites along the Boreas Ponds Trail in the vicinity of LeClair Brook (conditional action).
- Casey Brook Tract Campsite Proposals
 - Build two primitive campsites along the Elk Lake Marcy Trail just north of the boundary line near the first major drainage (conditional action).

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- Build a lean-to on the Elk Lake Marcy Trail.
- Former Dix Mountain Wilderness Lands Campsite Proposals
 - Evaluate the existing primitive campsite near the junction of Elk Lake Marcy Trail and Pinnacle Trail. If necessary, the site will be reconstructed to create a sustainable camping pad and relocated to conform to the setback requirements.
 - Build a primitive tent site near Niagara Brook along the Le Clair Hill Trail (conditional action).
 - Build an accessible primitive campsite north of the South Fork of the Boquet River off of Route 73. This will include an improved drive-in parking location and accessible trail to the campsite.

III. Recreational Resources and Human Uses

High Peaks Wilderness



Camping

P. Visitor Use, Natural Resource Protection Regulations and Use Reservations

Existing Conditions

The 1999 High Peaks Wilderness Complex UMP called for a series of regulations to help implement changes that would help stop some negative environmental impacts in the Eastern High Peaks Zone, while addressing concerns of user experience and safety. Three zones were created dividing up the High Peaks Wilderness Area: the Adirondack Canoe Route, Zone B (the Western High Peaks Zone), and Zone C (the Eastern High Peaks Zone).

A number of benefits to wilderness lands, wildlife, user safety and the wilderness experience have been observed since the regulations were promulgated. The camping areas around Marcy Dam and Lake Colden provide some of the most powerful visuals of the success of these efforts, as trees have recovered and the area is no longer a wide open campsite.

There are seven sporting club leases on the Boreas Ponds and MacIntyre tracts. The clubs have access and use rights under the leases that are different from the general public's access and use provisions. Their leases expire on September 30, 2018, and all lessee camp buildings and property must be removed no later than October 1, 2019.

Proposed Management

Objectives

- Protect the natural resources across the unit while allowing for unconfined recreation that doesn't impact the wilderness experience of users.
- Protect users and wildlife, specifically bears, from negative interactions. Prevent bears from acquiring human food and encouraging additional human-bear conflicts.
- Ensure compliance with Leaseholder Management Agreement.
- Reduce the potential for conflict between lessees and the general public.

Actions

- Changing the Zone Names:
 - Eastern High Peaks Zone to the Central High Peaks Zone.

III. Recreational Resources and Human Uses

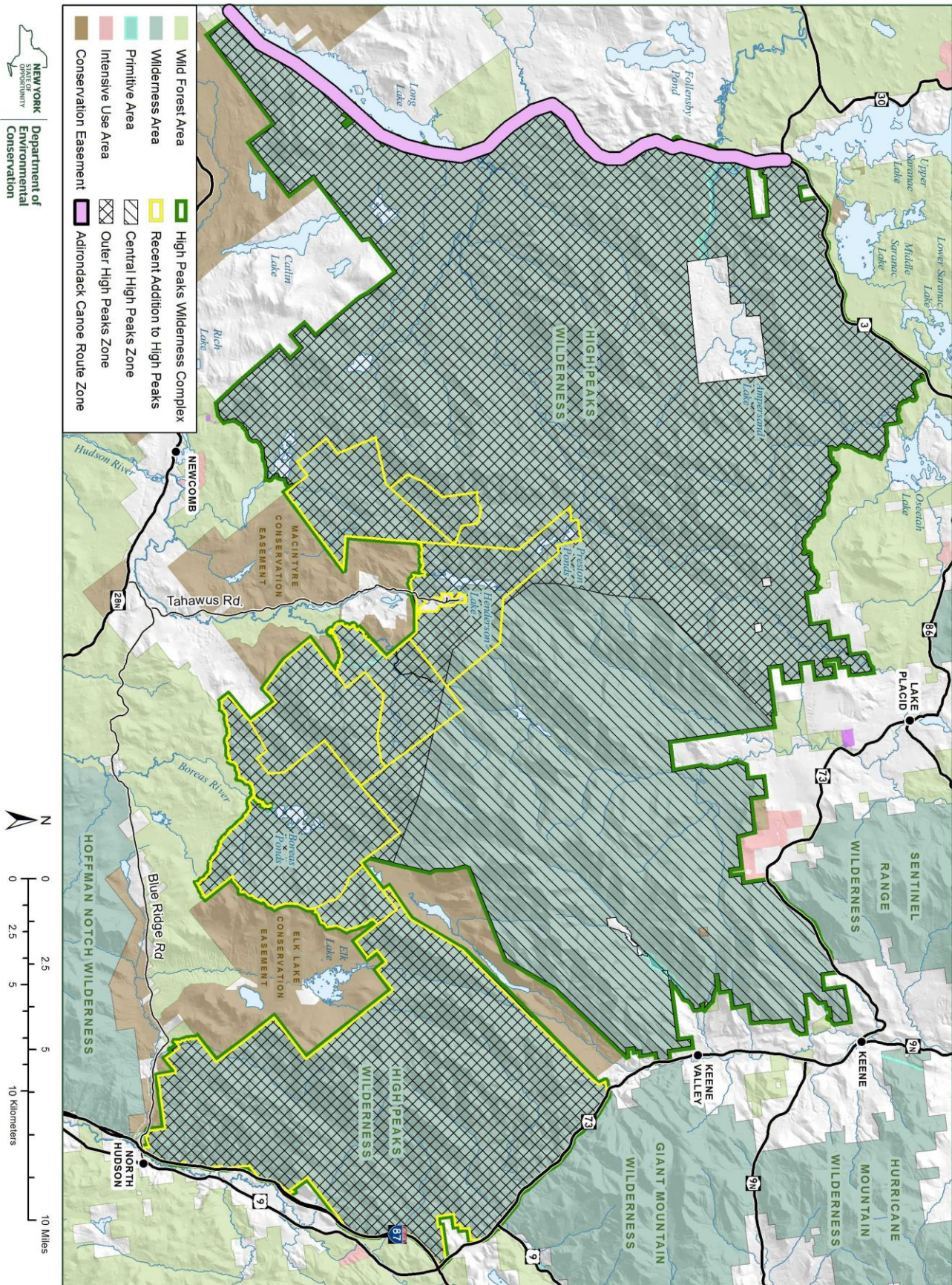
- Western High Peaks Zone to the Outer High Peaks Zone.
 - Includes most of new lands and Dix Mountain Wilderness Area lands.
- The Adirondack Canoe Route would stay the same.
- Adjustment to the boundary between the former East zone and former West zone (Central High Peaks Zone and Outer High Peaks Zone) in the High Peaks Wilderness Complex
 - Prior to the purchase of the former NL Lands, the southern end of the boundary between the zones in the High Peaks was south of MacNaughton Mountain, northwest of Henderson Lean-to. From this location, the line would head southeast to the summit of Mt. Adams and then easterly to the summit of Allen Mountain and then to where the Elk Lake-Marcy Trail crosses the Adirondack Mountain Reserve (AMR) boundary (see High Peaks Wilderness Zones map).
- Include the Ampersand Primitive Area, Johns Brook Primitive Area and Tahawus Primitive Area to the lands covered under the regulations pertaining to the High Peaks Wilderness.
- Group size regulations for Central High Peaks Zone and Outer High Peaks Zone Lands
 - Group size of 8 people for overnight
 - Group size of 15 people for day use.
- Dog regulation
 - In the Outer High Peaks Zone, dogs need to be under owner control and leashed above 4000', at campsites and trailheads.
- Camping at designated sites only
 - The Adirondack Canoe Route and Central High Peaks Zone
- No glass containers
 - Entire High Peaks Wilderness
- Mandatory registration
 - Entire High Peaks Wilderness
- Bear canister regulation
 - Adjust dates of requiring a bear canister to the beginning of May till the end of October
 - Add that bear canisters used by the public must be from a Department-approved list, which will be updated annually on our website.
 - Change bear canisters required in Central High Peaks Zone and Outer High Peaks Zone
- Ski and snowshoe regulation
 - Change depth of snow to 12" off trail surface.

III. Recreational Resources and Human Uses

- Monitor lessees and the general public for compliance with access and use provisions and restrictions on Forest Preserve lands in the unit.
- Maintain facilities in a manner that allows the lessees to remove their camps by September 30, 2018. In the event that the clubs do not comply, continue to maintain the facilities in a manner that allows The Nature Conservancy to remove the camps.

III. Recreational Resources and Human Uses

High Peaks Wilderness



Zones

Q. Phases of Implementation

Background

The overall guidance throughout this UMP Amendment is based on implementing the prescribed management actions in phases that allows land managers to continuously monitor and evaluate the desired conditions of the lands affected. The phases are outlined to provide initial access to facilities, which will then be monitored for use and impacts to the environment. Once ground use data is collected through monitoring it will be evaluated to determine if the specific thresholds of each facility have been met in order to activate the following phase of the plan. With this phased approach, it is understood that the actions in Phase 1 will be constructed, and once the carrying capacity of the area in relation to the Phase 1 facilities is evaluated successive phases may be implemented. Successive phases are conceptual and will need to be activated in order to be constructed. This process will be repeated for each facility outlined below. Monitoring results will determine if successive phases will be started, if the facility will be maintained at its current level of development, or if we need to step back a phase and re-evaluate our management strategy. Through this process we can methodically develop opportunities, monitor them and make decisions to realize the management goals for the area. The full phased schedule of implementation is found below in the action steps.

Proposed Management

Objectives

- Implement the management actions outlined throughout this amendment in accordance with the schedule of implementation below
- Collect baseline data related to recreational use and the physical condition of the newly acquired lands
- Monitor facilities on an ongoing basis and evaluate them through the LAC process
- Use the latest best management practices (BMPs) available in the siting and construction of all facilities

Action Steps

PHASE 1
Planning
Develop the Wildland Monitoring Program that will be used in association with the work planning process to implement the phases of implementation.
Annually collect and tally trail register information.
Begin monitoring program for any new facility built.
In five years, the Wildland Monitoring Plan will be evaluated to make sure variables are correct and adjustments will be made.
Wilderness Conformance
Work to remove nonconforming bridges, culverts and other manmade nonconforming items. Completed by 3/2021
Camp removal completed by 9/30/2019
Begin annual or periodic inspections and maintenance efforts on the Henderson Lake Dam and the Boreas Ponds Dam.
Education and Outreach
Seasonal Education and Outreach. WCS Bear Steward, two Assistant Forest Rangers in towns of Newcomb and North Hudson. Four Assistant Forest Rangers in northern part of High Peaks
Initiate multimedia, broad scale education and outreach program on changes coming to the former Dix Wilderness lands. Messages regarding group size, bear canisters and other issues should be focused on through a minimum two-year grace period prior to enforcement of regulations.
Install interior educational signage across the unit at ownership and classification boundaries.
Provide signage, seasonal education and outreach and internet information regarding the fisheries rules and regulations, specifically the prohibition on baitfish in the unit.

III. Recreational Resources and Human Uses

Special Management
Establish the three day use areas proposed in the UMP Amendment. Provide signage and education-outreach efforts.
Work to promulgate regulations proposed in this UMP Amendment
Work to educate users of the unique zones in the High Peaks including: The Adirondack Canoe Route, Central High Peaks Zone and Outer High Peaks Zone.
Access and Parking
Maintain all of the existing parking areas; install trailhead signs and install or replace privies and kiosks.
Through the Vanderwhacker Mountain Wild Forest UMP planning process, the development of trailhead locations will provide access to the High Peaks Wilderness.
Improve the Bradley Pond Parking Area and Trailhead and all its appurtenances.
Work with OSI through the conservation easement to develop an improved parking and trailhead facility at the Upper Works.
Work with OSI through the conservation easement to develop an improved parking and trailhead facility at the East River Trailhead and all its appurtenances.
Work through the Elk Lake conservation easement and establish the overflow and winter parking facility and Trailhead with all its appurtenances, on the Elk Lake Road at the State land boundary.
Work with ORDA through the Intensive Use Area UMP to establish a new trailhead for Cascade Mountain and VanHoevenberg complex.
Work with stakeholders and the Giant Mountain Wilderness Area UMP to study and develop the Ridge Trailhead relocation on Route 73 south of Chapel Pond. With construction of new year-round parking areas, develop and build the Class V Chapel Pond Connector Trail.
Work with stakeholders to relocate the Ampersand Mountain Trailhead, building an appropriate parking area for year-round use and trailhead with all its appurtenances.
Work with the Adirondack Mountain Reserve (AMR) to maintain trailheads and parking opportunities through the AMR Easement.
Work with partners to build two new year-round parking lots on Route 73, south of Chapel Pond. Once constructed work with all interested parties to address parking issues on Route 73 in this section.

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Expand the size of the Round Pond Trailhead parking lot and add any appurtenances needed.

Water Access

Construct an accessible hand-carry boat launch at Henderson Lake Dam.

Construct an accessible trail hand-carry boat launch at Boreas Ponds Dam.

Construct a Class III trail and a hand-carry boat launch near the northern end of LaBier Flow and connect with the flow to Boreas Road.

Construct an accessible hand-carry boat launch and parking area near the outlet to Chapel Pond.

Work with OSI through the conservation easement to establish a Commissioner Policy (CP) -3 access route from the Upper Works Trailhead to a parking area south of the outlet of Henderson Lake. Upon completion of this work, the Department will build an accessible trail between the parking area and the accessible hand carry launch at Henderson Lake Dam.

Trails

Annually maintain and upgrade trails in the unit, including: Henderson Lake Dam Trail, Preston Ponds Trail, Indian Pass Trail, Calamity Crossover Trail, Calamity Pond Trail, Mt. Adams Trail, East River Trail, Elk Lake-Marcy Trail, 1932 Trail and trails in the former Dix Wilderness and High Peaks Wilderness and any new trails built in the first phase of this plan. Rerouted sections of existing trails should have photo monitoring points established and annual monitoring.

Layout and construct the Casey Brook Connector Trail. Upon completion of the trail, establish photo monitoring points and an annual monitoring program.

Layout and construct the Lake Andrew Trail. Upon completion of the trail, establish photo monitoring points and an annual monitoring program.

Layout and construct the Bradley Pond Trail reroutes. Upon completion of the trail, establish photo monitoring points and an annual monitoring program.

Layout and construct the Klondike Notch Trail reroutes. Upon completion of the trail, establish photo monitoring points and an annual monitoring program.

Layout and construct the White Lily Connector Trail. Upon completion of the trail, establish photo monitoring points and an annual monitoring program.

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Layout and construct the Mt. VanHoevenberg East Trail. Upon completion of the trail, establish photo monitoring points and an annual monitoring program.
Layout and construct the Cascade Mountain Trail, once the Mt. VanHoevenberg Trail is completed. Upon completion of the trail, establish photo monitoring points and an annual monitoring program.
Layout and construct the Ampersand Mountain Trail, once the trailhead relocation is complete. Upon completion of the trail, establish photo monitoring points and an annual monitoring program.
Layout and construct the High Peaks portion of the Boreas Ponds Trail. Work with the VMWF UMP to build and develop the Wild Forest portion of the Boreas Ponds Trail, with both segments built prior to the opening of the Community Connector Trail along the Gulf Brook Road. This will preserve year-round access to Boreas Ponds by a non-motorized corridor. Upon completion of the trail, establish photo monitoring points and an annual monitoring program.
Inventory the Pinnacle Trail from the Elk Lake-Marcy Trail to the ridgeline. Compare the existing trail with the proposed reroute from the southwest portion of the ridge. If data shows a new trail will result in an improved user experience and a more sustainable route, then construct a new trail. Upon completion of the trail, establish photo monitoring points and an annual monitoring program.
Develop trail work plans for each of the trailless peaks listed in the UMP. Once the plans are developed start taking steps to manage the trails for their future layout as possible.
Camping
Inventory and evaluate existing campsites in the primary area covered by this UMP Amendment. Develop work plans to take action to improve, close or move any site that isn't sustainable or in conformance. Once the site is completed, establish a baseline photo monitoring program and periodic monitoring program.
Update the campsite plan for the High Peaks Camping Corridor and expand it to the entire Central High Peaks Zone. Once inventory is complete, create a base map and numbered campsite system for utilization in mapping and outreach efforts. Develop work plans to take action to improve, close or move any site that isn't suitable or in conformance. As sites are addressed, the information and mapping will be updated for the public. Once a site is completed, establish a baseline photo monitoring program and periodic monitoring program.
Develop a campsite plan for the Adirondack Canoe Route Zone. Once inventory is complete, create a base map and numbered campsite system for utilization in mapping and outreach efforts. Develop work plans to take action to improve, close or move any site that isn't suitable or in conformance. As sites are addressed, the

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<p>information and mapping will be updated for the public. Once a site is completed, establish a baseline photo monitoring program and periodic monitoring program.</p>
<p>Build a designated primitive campsite in the vicinity of Lake Andrew. Once the site is completed, establish a baseline photo monitoring program and annual monitoring program.</p>
<p>Build a designated primitive campsite in the vicinity of Santanoni Brook (on Bradley Pond Trail). Once the site is completed, establish a baseline photo monitoring program and annual monitoring program.</p>
<p>Build a designated primitive campsite in the vicinity of Bradley Pond. Once the site is completed, establish a baseline photo monitoring program and annual monitoring program.</p>
<p>Build two designated primitive campsites in the vicinity of Preston Pond. Once a site is completed, establish a baseline photo monitoring program and annual monitoring program.</p>
<p>Evaluate the existing campsites on Henderson Lake and Preston Pond. Develop work plans to take action to improve, close or move any site that isn't suitable or in conformance. Once a site is completed, establish a baseline photo monitoring program and periodic monitoring program.</p>
<p>Convert one existing site, or chose a suitable location for a new site that will be upgraded as an accessible water access site on Henderson Lake. Once the site is completed, establish a baseline photo monitoring program and periodic monitoring program.</p>
<p>Build a designated primitive campsite in the vicinity of Lake Jimmy on the East River Trail. Once the site is completed, establish a baseline photo monitoring program and periodic monitoring program.</p>
<p>Build a designated primitive campsite in the vicinity of Opalescent River. Once the site is completed, establish a baseline photo monitoring program and annual monitoring program.</p>
<p>Build two designated primitive campsites in the vicinity of Boreas Ponds. Once the sites are completed establish a baseline photo monitoring program and annual monitoring program.</p>
<p>Build a designated primitive campsite in the vicinity of White Lily Pond. Once the site is completed, establish a baseline photo monitoring program and annual monitoring program.</p>
<p>Build the MC lean-to on Boreas Ponds including a Class VI accessible front country access trail. Once the lean-to is completed establish a baseline photo monitoring program and annual monitoring program.</p>
<p>Build a lean-to on the Elk Lake-Marcy Trail. Once the lean-to is completed, establish a baseline photo monitoring program and annual monitoring program.</p>
<p>Build a designated primitive campsite on the Calamity Brook Trail east of the intersection with the Calamity Crossover Trail. Once the site is completed establish a baseline photo monitoring program and annual monitoring program.</p>

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Build two roadside designated primitive campsites along the Upper Works Road. Once the sites are completed, establish a baseline photo monitoring program and annual monitoring program.
Evaluate the existing campsite south of Marcy Swamp near the Elk Lake-Marcy Trail. Develop a work plan to take action to improve, close or move any site that isn't suitable or in conformance. Once a site is completed, establish a baseline photo monitoring program and periodic monitoring program.
Build an accessible campsite, Class VI front country accessible trail and improved parking area in the vicinity of the South Fork of the Boquet River. Once the campsite is completed, establish a baseline photo monitoring program and annual monitoring program.

Phase 2
Education and Outreach
Continue seasonal education and outreach: WCS Bear Steward, two Assistant Forest Rangers in towns of Newcomb and North Hudson and four Assistant Forest Rangers in northern part of High Peaks.
Continue multimedia, broad scale education and outreach programs on special wilderness regulations for the High Peaks Wilderness Complex and wilderness ethics. Continue working with partners to ensure bear canister conformance is high. Should issues with bears arise, consider alternative solutions.
Special Management
Monitor usage on Mt. VanHoevenberg and Cascade Mountain. Compare data with previous years' usage and existing usage data on comparable hikes. If usage is beyond thresholds, consider developing a pilot permit system for these trails out of the VanHoevenberg Complex.
If camping capacity is being exceeded on Boreas Ponds, consider implementation of a reservation permit system for overnight camping, working in concert with the possibility of adding additional opportunities.
Through the Vanderwhacker Mountain Wild Forest UMP planning process, develop a trailhead location on the Niagara Brook Tract.

Trails

After monitoring utilization of the Lake Andrew Trail, Moose Pond Trail and Bradley Pond Trail, study register data and survey for on the ground occurrences of informal access to Black Pond, that indicate interest in the Black Ermine Connector Trail as both a day-use or backpacking trail. If results of monitoring and surveys are positive, then consider triggering the layout and construction of the Black Ermine Trail. Upon completion of the trail, establish photo monitoring points and an annual monitoring program.

After monitoring utilization of the Gulf Brook Road, and hiking usage on Boreas Ponds Trail, study register data and survey for on the ground occurrences of informal access to Boreas Mountain, that indicate interest in the Boreas Mountain Trail as both a day-use or backpacking trail. If results of monitoring and surveys are positive, then consider triggering the layout and construction of the Boreas Mountain Trail. Upon completion of the trail, establish photo monitoring points and an annual monitoring program.

After monitoring utilization and use patterns on the Ragged Mountain Trail and other local short view hikes in the North Hudson area, study register data and survey for on the ground occurrences of informal access to LeClair Hill, that indicate interest in the LeClair Hill Trail as both a day-use or backpacking trail. If results of monitoring and surveys are positive, then consider triggering the layout and construction of the LeClair Hill Trail. Upon completion of the trail, establish photo monitoring points and an annual monitoring program.

After monitoring use patterns on the Gulf Brook Road and hiking usage on the trail system north of Boreas Ponds as well as access to Allen Mountain from the east and south, develop and conduct a survey that indicates the interest in the Allen Mountain Trail as both a day-use or backpacking trail. If results of monitoring and surveys are positive, then consider triggering the layout and construct of the Allen Mountain Trail. Upon completion of the trail, establish photo monitoring points and an annual monitoring program.

Once ski trail guidance is developed for the Forest Preserve, develop a work plan and reroute and improve the Wright Peak Ski Trail. Upon completion of the trail, start a leaf on and leaf off photo monitoring points and annual monitoring program.

III. Recreational Resources and Human Uses

Camping
After monitoring the impacts to the two campsites and one lean-to on Boreas Ponds, along with usage, develop and conduct a survey that indicates the interest in adding up to 2 additional campsites on Boreas Ponds. If results of monitoring and surveys are positive, then consider triggering the layout and construction of up to two additional primitive campsites on Boreas Ponds.
After monitoring use patterns on along the Elk Lake-Marcy and Casey Brook Connector Trail and the lean-to, develop and conduct a survey that indicates the interest in adding additional primitive tent sites along the trail corridors. If results of monitoring and surveys are positive, then consider triggering the layout and construction of up to two additional primitive tent sites along these trails.
If the Black Ermine Connector Trail is constructed, build a designated primitive campsite in the vicinity of Black Pond. Once the site is completed, establish a baseline photo monitoring program and annual monitoring program.
Once the East River Trail to Hanging Spear Falls has been relocated and rebuilt, monitor usage patterns on the trail and consider building a campsite in the vicinity of Upper Twin Brooks.
After monitoring utilization and use patterns on the Lake Andrew Trail, campsites on Newcomb Lake and the Lake Andrew Campsite, study register data and survey for on the ground occurrences of informal camping along the trail north of Newcomb Lake. If results of monitoring and surveys are positive, then consider triggering the construction of a designated campsite in the vicinity of Santanoni Brook along the Lake Andrew Trail. Upon completion of the campsite, establish photo monitoring points and an annual monitoring program.
After monitoring utilization and use patterns of the campsite adjacent to the Opalescent River along the East River Trail, study register data and survey for on the ground occurrences of informal camping at the old clearing south of Dudley Brook. If results of monitoring and surveys are positive, then consider triggering the construction of a designated campsite south of Dudley Brook, where it joins the Opalescent River. Upon completion of the campsite, establish photo monitoring points and an annual monitoring program.
After monitoring utilization and use patterns on the White Lily Connector Trail, campsites at White Lily and near the Opalescent River, study register data and survey for on the ground occurrences of informal camping along the White Lily Connector Trail. If results of monitoring and surveys are positive, then consider triggering the construction of a designated campsite along the White Lily Connector Trail and north of Cheney Cobble. Upon completion of the campsite, establish photo monitoring points and an annual monitoring program.
Once the Boreas Ponds Trail is built, monitor utilization and use patterns along the trail, study register data and survey for on the ground occurrences of informal camping along the trail. If results of monitoring and surveys are positive, then consider triggering the construction of up to two primitive campsites along the trail in the vicinity of LeClair Brook. Upon completion of a campsite, establish photo monitoring points and an annual monitoring program.

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After monitoring utilization and use patterns on the White Lily Connector Trail and of the campsite at White Lily Pond, study register data and survey for on the ground occurrences of informal camping in the vicinity of White Lily Pond. If results of monitoring and surveys are positive, then consider triggering the construction of a designated campsite in the vicinity of White Lily Pond. Upon completion of the campsite, establish photo monitoring points and an annual monitoring program.

Phase 3

Trails

After monitoring use patterns on the Gulf Brook Road, hiking usage on the Boreas Ponds Trail, Boreas Mountain Trail and usage east of Boreas Mountain, develop and conduct a survey that indicates the interest in the RNT Loop Trail as both a day-use or backpacking trail. If results of monitoring and surveys are positive, then consider triggering the layout and construction of the RNT Loop Trail. Upon completion of the trail, establish photo monitoring points and an annual monitoring program.

After monitoring use patterns on the Bradley Pond Trail and backpacking and skiing loop usage, develop and conduct a survey that indicates the interest in the Henderson Lake South Trail as both a day-use or backpacking trail. If results of monitoring and surveys are positive, then consider triggering the layout and construction of the Henderson Lake South Trail. Upon completion of the trail, establish photo monitoring points and an annual monitoring program.

Camping

Once the LeClair Hill Trail has been built, monitor usage patterns to indicate if a campsite in the wilderness in the vicinity of Niagara Brook would be appropriate.

After monitoring the impacts to the four campsites and one lean-to on Boreas Ponds, along with usage, study register data and survey for on the ground occurrences of informal camping along Boreas Ponds. If results of monitoring and surveys are positive, then consider triggering the layout and construction of one additional primitive campsite on Boreas Ponds.

III. Recreational Resources and Human Uses

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Appendix A – Management and Policy Considerations

Article XIV of the New York State Constitution

State lands which are the subject of this Unit Management Plan Amendment are Forest Preserve land protected by Article XIV, Section 1 of the New York State Constitution. This Constitutional provision, which became effective on January 1, 1895 provides in relevant part:

“The lands of the state, now owned or hereafter acquired, constituting the Forest Preserve as now fixed by law, shall be forever kept as wild forest lands. They shall not be leased, sold or exchanged, or be taken by any corporation, public or private, or shall the timber thereon be sold, removed or destroyed.”

Environmental Conservation Law

The body of law that established DEC and authorizes its programs is called the Environmental Conservation Law (ECL). DEC is responsible for administration and enforcement of the ECL, and Article 9 of the ECL authorizes, among other things, the management of the Adirondack and Catskill Forest Preserves and the recreational facilities contained thereon.

Adirondack Park State Land Master Plan

The Adirondack Park State Land Master Plan (APSLMP) was initially adopted in 1972 by the Adirondack Park Agency, with advice from and in consultation with the Department, pursuant to Executive Law §807, now re-codified as Executive Law §816. The APSLMP provides the overall general framework for the development and management of State lands in the Adirondack Park, including those State lands which are the subject of this UMP Amendment.

The APSLMP places State land within the Adirondack Park into the following classifications: Wilderness; Primitive; Canoe; Wild Forest; Intensive Use; Historic; State Administrative; Wild, Scenic and Recreational Rivers; and Travel Corridors; and sets

Appendix A – Policy and Management Considerations

forth management guidelines for the lands falling within each major classification. The APSLMP classifies the lands which are the subject of this UMP Amendment as part of the High Peaks Wilderness Complex.

The APSLMP sets forth guidelines for such matters as: structures and improvements; ranger stations; the use of motor vehicles, motorized equipment and aircraft; roads, jeep trails and State truck trails; flora and fauna; recreational use and overuse; boundary structures and improvements and boundary markings.

Executive Law §816 requires the Department to develop, in consultation with the APA, individual UMPs for each unit of land under the Department's jurisdiction which is classified in one of the nine classifications set forth in the APSLMP. The UMPs must conform to the guidelines and criteria set forth in the APSLMP. Thus, UMPs implement and apply the APSLMP's general guidelines for particular areas of land within the Adirondack Park.

Executive Law §816(1) provides in part that “(u)ntil amended, the master plan for management of state lands and the individual management plans shall guide the development and management of state lands in the Adirondack Park.”

APA/DEC Memorandum of Understanding

As agencies of the same New York State Executive Department, the Department and the Agency recognize it is imperative that the specific authorities and program responsibilities of each are administered as cooperative elements of a coordinated State government program for the Adirondack Park. The Department and the Agency each agree that their specific program responsibilities and activities are enhanced by the involvement and participation of the other, including coordinated policy development and implementation, as well as sharing of information, technical and other resources. Revised in 2010, the Memorandum of Understanding between the Adirondack Park Agency and the Department of Environmental Conservation Concerning the Implementation of the State Land Master Plan for the Adirondack Park (MOU) outlines the specific roles and procedures to be followed by each Agency in fulfilling this commitment. Specific topics covered by the MOU include General Coordination and Communication, Adirondack Park State Land Master Plan, State Land Classifications, Unit Management Plans, State Land Project Management, State Land Activity Compliance, and Interpretation of the Adirondack Park State Land Master Plan.

State Environmental Quality Review Act

The State Environmental Quality Review Act (SEQRA) requires that all agencies determine whether the actions they undertake may have a significant impact on the environment. The intent of the legislation is to avoid or minimize adverse impact on the resource. The guidelines established in the APSLMP for developing unit management plans express these same concerns. Any development within the High Peaks Wilderness Complex presented in the plan must take into consideration environmental factors to ensure that such development does not degrade that environment. The overall intent of this UMP Amendment is to identify mitigation measures to avoid or minimize significant adverse environmental impacts to the natural resources of the State within the unit. Any reconstruction or development within the confines of this unit will take environmental factors into account to ensure that such development does not degrade the resource.

SEQRA requires the consideration of environmental factors early in the planning stages of any proposed actions(s) that are undertaken, funded or approved by a local, regional or state agency. A Long Environmental Assessment Form (LEAF) is used to identify and analyze relevant areas of environmental concern based upon the management actions in the draft UMP.

As required by SEQRA, during the planning process a range of alternatives were formulated to evaluate possible management approaches for dealing with certain issues or problem locations. Department staff considered the no-action and other reasonable alternatives, whenever possible. Potential environmental impacts, resource protection, visitor safety, visitor use and enjoyment of natural resources, user conflicts, interests of local communities and groups, as well as short- and long-term cost-effectiveness were important considerations in the selection of proposed actions. Efforts were made to justify reasons for the proposals throughout the body of the UMP Amendment so the public can clearly understand the issues and the rationale of the decision-making.

Wild, Scenic, and Recreational Rivers Act and Regulations

In 1972, the State Legislature passed the Wild, Scenic and Recreational Rivers System Act (Rivers Act) in order to protect and maintain certain designated rivers in their free-flowing condition and natural setting. Pursuant to part 666.6[f] of title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR),

upon the designation of a river in this system and until final boundaries are established, the provisions of 6 NYCRR Part 666 are applicable within one-half mile of each bank of the river. None of the river segments in the High Peaks Wilderness Complex are known to have a current use which is in conflict with either the Rivers Act or its implementing regulations. Section 666.7 provides that *“management plans will be developed by Department of Environmental Conservation for designated river areas to recommend specific actions to protect and enhance all river corridor resources.”* This UMP will also serve as the River Management Plan for those segments of designated rivers located within the High Peaks Wilderness Complex planning area.

A wild river is *“a river or section of river that is free of diversions and impoundments, inaccessible to the general public except by water, foot or horse trail, and with a river area primitive in nature and free of any man-made development except foot bridges.”* (APSLMP, page 49). The Opalescent River is classified as a wild river.

Invasive Species Management Guidance

In 2007, the Department and the Adirondack Park Agency developed Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC Administered Lands of the Adirondack Park (Guidelines). The Guidelines describe the process through which any active invasive species management will take place on DEC-administered lands in the Adirondack Park. The Guidelines provide Best Management Practices (BMPs) that describe what management practices are allowed and when they can be implemented, who is authorized to implement them, and which species can be targeted. Species or techniques that are not included in the guidance may be addressed by the Department on a case-by-case basis in consultation with the Agency. The Guidelines are a living document and are updated periodically.

Reference to the Guidelines are included in UMPs as they are drafted or revised. UMPs also include available inventory information on the distribution of invasive species on or in close proximity to the Unit.

The Guidelines also describe a process by which the Department may enter into partnership agreements with and facilitate individuals or groups to manage invasive species on DEC-administered lands using the listed BMPs. Partnership agreements will be accompanied with a site-specific or Rapid Response Work Plan (Work Plan) for the invasive species management activity and include provisions for monitoring control efficacy and native plant recovery. As noted above, the site-specific or Rapid Response Work Plan will provide detail regarding the selected management options on a site-specific basis.

Americans with Disabilities Act

The Americans with Disabilities Act of 1990 (ADA), along with the Architectural Barriers Act of 1968 (ABA) and the Rehabilitation Act of 1973, Title V, Section 504, have had a profound effect on the manner by which people with disabilities are afforded equality in their recreational pursuits. The ADA is a comprehensive law prohibiting discrimination against people with disabilities in employment practices, use of public transportation, use of telecommunication facilities and use of public accommodations. Title II of the ADA requires, in part, that reasonable modifications must be made to the services and programs of public entities, so that when those services and programs are viewed in their entirety, they are readily accessible to and usable by people with disabilities. This must be done unless such modification would result in a fundamental alteration in the nature of the service, program or activity or an undue financial or administrative burden.

Title II also requires that new facilities, and parts of facilities that are newly constructed for public use, are to be accessible to people with disabilities. In rare circumstances where accessibility is determined to be structurally impracticable due to terrain, the facility, or part of facility is to be accessible to the greatest extent possible and to people with various types of disabilities.

Consistent with ADA requirements, the DEC incorporates accessibility for people with disabilities into the planning, construction and alteration of recreational facilities and assets supporting them. This UMP Amendment incorporates an inventory of all the recreational facilities or assets supporting the programs and services available on the unit, and an assessment of the programs, services and facilities on the unit to determine the level of accessibility provided. In conducting this assessment, DEC employs guidelines which ensure that programs are accessible, including buildings, facilities, and vehicles, in terms of architecture and design, transportation and communication to individuals with disabilities.

Any new facilities, assets and accessibility improvements to existing facilities or assets proposed in this UMP Amendment are identified in the section containing proposed action steps.

The DEC is not required to make each of its existing facilities and assets accessible as long as the DEC programs, taken as a whole, are accessible.

For copies of any of the above mentioned laws or guidelines relating to accessibility, contact the DEC Universal Access Program Coordinator at 518-402-9428 or UniversalAccessProgram@dec.ny.gov.

Partnerships and Volunteers

Temporary Revocable Permits

The DEC issues Temporary Revocable Permits (TRPs) in its sole discretion for the temporary use of State lands and conservation easement lands for activities that have negligible or no permanent impact on the environment. Historically, TRPs have been issued for lean-to construction, cross country races, forest insect research, wildlife research, town road maintenance and utility line right-of-way work, among many other purposes. Through the TRP review process, DEC avoids conflicting uses of State land and situations that could threaten health, public safety, or integrity of natural resources. TRP authorization does not provide exemption to any existing State laws and regulations. To hold any event, a sponsoring organization must request permission in writing at least 30 days in advance of the date of the proposed activity. The TRP applicant or sponsoring organization must provide proof of liability insurance. TRPs often have specific stipulations pertinent to the activity in question and TRPs are authorized by DEC policy.

Volunteer Stewardship Agreements

Many great things are accomplished on State lands through the volunteering of individuals and groups. There are instances where coordinating work through the DEC proves challenging due to logistics, staffing, or funding levels. In some of these instances, great work is able to be accomplished through the generosity of these volunteers.

The current DEC procedure that facilitates the use of volunteers to carry out work on State land is called a Volunteer Stewardship Agreement (VSA). When a work project seems to be a good fit for volunteers and there is an individual or group willing to take on this project, the relevant Department land manager will help the potential volunteers through the VSA process, which consists of an application and a final agreement. This process is necessary, as it lays out the details of the project to make sure that the final project is true to the intent of management of the area. The VSA also provides volunteers with liability and workers compensation insurance coverage while they are working on State land.

Student Conservation Association

DEC has an ongoing partnership with the Student Conservation Association (SCA) for trail crews and backcountry stewards. SCA trail crews provide labor to complete implementation of projects on State lands, including: trail construction, primitive tent site

construction, bridge work, rehabilitation and maintenance of facilities, and much more. These crews allow DEC to accomplish a large amount of work. The backcountry stewards spend their time traversing the backcountry, protecting resources, monitoring usage, and providing public outreach. Both of these programs are indispensable in helping the DEC to accomplish its management objectives.

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Appendix B – Pond Narratives

Boreas Ponds Tract et al - Pond Narratives S

- for amendment to High Peaks UMP

Upper Hudson watershed:

Boreas Ponds (UH564)

Originally three distinct ponds, the Boreas Ponds is currently a single waterbody whose water level is preserved by a concrete dam on its outlet at the southern end of the pond. This point also marks the origin of the Boreas River. Total acreage of the three-pond complex is approximately 350 acres and includes several islands and floating bog mats. The “First Pond” section contains the bulk of the deep water with a maximum depth of nearly 40 feet. The vast majority of the remaining pond is less than 10 feet deep and features large swaths of emergent vegetation.

The most recent fisheries survey was completed in July of 2017 and documented the presence of the following species: brook trout, golden shiner, common shiner, northern redbelly dace, creek chub, pearl dace, white sucker, brown bullhead and pumpkinseed. Though identified to species as white sucker, these fish are a late-spawning variant more closely related to the Elk Lake type of sucker. Genetic analysis is ongoing and the taxonomy of these fish has yet to be fully resolved.

Although much of the pond is shallow and likely becomes too warm for brook trout in the summer, “First Pond” provides about 20 acres of cold, deep water. Catch rates and sizes for brook trout from the 2017 netting were very respectable compared to other Adirondack ponds. The Boreas Ponds were last stocked by the private landowners in 2011 and have not been stocked by the DEC, therefore the trout caught in the 2017 survey were very likely the result of natural reproduction. Water chemistry was outstanding with a pH of 7.3 and an acid neutralizing capacity (ANC) of 116 µeq/l.

In 2015, a genetic study of brook trout from two of the primary tributaries to the Boreas Ponds was completed by Spencer Bruce on the behalf of the Nature Conservancy. His results suggest that the Boreas Ponds and associated tributaries are inhabited by a single, genetically robust, freely dispersing brook trout population. In addition, while this population shares genetic characteristics with nearby brook trout populations in the Upper Hudson watershed, it shows no evidence of genetic influence from brook trout strains previously stocked. From this information, it is reasonable to infer that the brook trout population currently inhabiting the Boreas Ponds complex is better adapted to its environment than the strains that were stocked. We will periodically sample the pond to monitor the brook trout population and gauge recreational fishing pressure. However, based on the genetic information and netting results, stocking does not appear to offer any advantage at the present time.

Management Class: Adirondack Brook Trout

Deer Pond (UH565)

Deer Pond is a small (less than two acres) waterbody located west of the Boreas Ponds. We have no fish or water chemistry data for this pond.

A fisheries survey should be completed in the future to determine species assemblage and water chemistry conditions.

Management Class: Unknown

LaBier Flow (UH563)

LaBier Flow is a 15-acre waterbody located just downstream of the Boreas Ponds. It is a shallow impoundment of the Boreas River whose water level is maintained by a steel and wooden dam. It was last surveyed by the Adirondack Lakes Survey Corporation (ALSC) in 1987 when the following fish species were captured: brook trout, common shiner, northern redbelly dace, creek chub, white sucker, brown bullhead, redbreast sunfish and pumpkinseed. Water chemistry values from that survey were excellent with a pH of 7.2 and an ANC of 177 $\mu\text{eq/l}$. LaBier Flow reportedly received two stockings of rainbow trout in the late 1990's by the previous landowners.

A fisheries survey should be conducted to update our files and determine the current status of the brook trout population.

Management Class: Adirondack Brook Trout

White Lily Pond (UH566)

White Lily Pond is a 15-acre, shallow (approximately 5 feet deep) waterbody located at the north end of the Boreas Ponds tract. No previous data existed for this pond, other than water chemistry data from 1990, so a cursory survey was done in 2017. Although sampling gear was only deployed for a couple of hours, two brook trout were captured. No other fish species were collected, but many small fish were observed in the shallows along the shoreline. Analysis of water samples from the 2017 survey revealed very good chemistry with a pH of 7.4 and an ANC of 186 $\mu\text{eq/l}$ along with high dissolved oxygen (D.O.) levels.

The pond was stocked with brook trout by the previous owners, but we believe that had ceased by 2011, meaning that the trout caught in the 2017 survey were very likely the result of natural reproduction. We have no plans to stock fish at this time, but will periodically sample the pond to monitor the brook trout population and gauge the fishing pressure to determine if stocking is warranted in the future. Collecting water

temperature data will be important since the pond's shallow depth may contribute to warming to a degree that would preclude a brook trout fishery.

Management Class: Adirondack Brook Trout

Lake Andrew (UH698)

No fisheries or water chemistry data exist for this 16-acre waterbody, but the lake has a history of brook trout based on a 1924 report commissioned for the Tahawus Club. The lake was also stocked with brook trout for decades by the private landowners.

A fisheries survey should be conducted to update our files and determine the current status of the brook trout population.

Management Class: Adirondack Brook Trout

Bradley Pond (UH717)

Bradley Pond is a 9-acre waterbody located about two miles west of Henderson Lake. We have no fish or water chemistry data for this pond.

A fisheries survey should be completed in the future to document species assemblage and water chemistry conditions.

Management Class: Unknown

Henderson Lake (UH715)

Henderson is a relatively large (235 acres) and deep (70 feet) lake with a dam on its eastern arm. It is located just west of the Hudson River at the end of the Tahawus Road and is accessed by a short carry from the parking area. The lake was most recently surveyed in 2003 and 2004 when the following species were caught: brook trout, common shiner, creek chub, white sucker, brown bullhead, pumpkinseed and yellow perch. Based on the 2004 survey, water chemistry is very good with a pH of 6.5, an ANC of 27 $\mu\text{eq/l}$ and D.O. levels that are suitable for trout throughout the water column. The lake currently has a stocking policy for brook trout and lake trout.

Henderson Lake will continue to be stocked with brook trout and lake trout and their populations will be assessed through periodic biological surveys.

Management Class: Adirondack Brook Trout

Lake Jimmy (UH713)

Thirty-acre Lake Jimmy is located just east of the Hudson River in the Tahawus area. We have no fish or water chemistry data for this pond, but the lake has a history of brook trout according to a 1924 report commissioned for the Tahawus Club.

A fisheries survey should be conducted to update our files and determine the current status of the brook trout population.

Management Class: Adirondack Brook Trout

Unnamed Water (UH710A)

Pond #710A in the Upper Hudson drainage is located just east of the Opalescent River. It is a seven-acre waterbody that appears to be shallow and heavily vegetated based on aerial photos. We have no fish or water chemistry data for this pond.

This water will be managed to preserve its aquatic community for its intrinsic value.

Management Class: Unknown

Raquette watershed:

Lower Preston Pond (R238)

Lower Preston Pond is the downstream-most of a pair of ponds located about 1.5 miles north of Henderson Lake. The lower pond has a surface area of 55 acres and is 50 feet deep. The most recent survey in 2004 captured only brook trout, the same result as the ALSC netting in 1986. The 2004 water chemistry values were: pH of 6.0, ANC of 13 µeq/l and excellent D.O. readings. This represents a tremendous improvement in the acidity level, as the pH was only 4.9 in 1986. The pond is currently stocked with brook trout.

Lower Preston Pond will continue to be stocked with brook trout and be managed for its brook trout fishery. Trout condition and species composition, along with water chemistry, will be monitored through periodic biological surveys.

Management Class: Adirondack Brook Trout

Upper Preston Pond (R239)

Upper Preston Pond, located just south of Lower Preston, is a 72-acre waterbody with very clear water attaining a maximum depth of 70 feet. The pond is accessed via a foot trail from the south near Henderson Lake. Brook trout were the only fish species caught when the pond was last surveyed in 2004. The previous survey, by ALSC in 1986, found brook trout and creek chubs. Upper Preston received plantings of round whitefish, a species that is endangered in New York State, as part of its restoration plan. More than a thousand round whitefish were stocked in each of the springs of 2016 and 2017 with a goal of establishing a self-sustaining population. Like the lower pond, the

upper pond experienced a significant increase in the pH since the ALSC sampling. Results from the 2004 water samples were: pH of 6.3 (5.6 in 1986), ANC of 21 $\mu\text{eq/l}$ and D.O. levels suitable for trout survival. The pond is currently stocked with brook trout.

Upper Preston Pond will continue to be stocked with brook trout and be managed for its brook trout fishery. The status of round whitefish, trout numbers and condition, species composition, and water chemistry will be monitored through periodic biological surveys.

Management Class: Adirondack Brook Trout

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Appendix C – Trail Classifications

Trail classifications are listed by trail. The table below describes trail corridor and tread dimensions for reference.

<u>Trail Type</u>	<u>Marking</u>	<u>Tread and Tread Width</u>	<u>Trail Corridor</u>	<u>Bridges/Ladders</u>	<u>Design and Maintenance</u>
Class I Unmarked Route	None	Intermittently apparent, relatively undisturbed, organic soil horizon	Intermittently apparent No side cutting	None	Natural obstructions will be present, large logs left and water courses crossed without aid.
Class II Path	Intermittent	Intermittently apparent, compaction of duff, mineral soils occasionally exposed	Visible w/ some obstructions Minimal side cutting, blowdown removal only to define route	None	Same as Class I trails, if social trails develop provide routing and marking to minimize impacts.
Class III Primitive Trail	Trail markers, signs at junctions with other trails	Apparent, soil compaction, minor natural material hardening, 14" – 18" wide	3' wide, 10' high Blowdown removal 2-3 years, side cutting to define trail	Bridges to protect resource, 2'-3' wide. Ladders only to protect exceptionally steep sections if reroute not possible	Purpose-built trails routed and built to shed water. Existing trails drainage installed to halt erosion. Heavily eroded sections of trails considered for reroute vs. hardening in place. Minimize bog bridging through reroutes or turnpiking.
Class IV Secondary Trail	Trail markers, signs at junctions with other trails, basic	Likely worn and possibly eroded. Rocks exposed and little to no duff. Natural material trail hardening. 18" – 24" wide	4' wide, 12' high Annual blowdown removal, side cutting to define trail	Greater allowance for bridges to protect resources, 2'-4' wide. Ladders on exceptionally steep rock faces if reroute not possible.	Purpose-built trails routed and built to shed water and hardened to be sustainable. Existing trails drainage installed to halt erosion. Heavily eroded sections of trails considered for reroute vs hardening in place. Minimize bog bridging through reroutes or turnpiking.

Appendix C – Trail Classifications

<u>Trail Type</u>	<u>Marking</u>	<u>Tread and Tread Width</u>	<u>Trail Corridor</u>	<u>Bridges/Ladders</u>	<u>Design and Maintenance</u>
Class V Trunk Trail	Trail markers, signs at junctions, more information and warnings	Wider tread, worn and very evident. Rock exposed, possibly eroded. Extensive natural material trail hardening allowed, non-native materials as a last resort. 18" – 26" wide	6' wide, 12' high Annual blowdown removal and side cutting allowed	Bridges for difficult high water crossings 2'-6' wide, priority given to streams below concentrations of designated camping. Ladders only if reroute not possible.	Purpose-built trails routed and built to shed water and hardened to be sustainable. Existing trails, drainage installed to halt erosion. Heavily eroded sections of trails considered for reroute vs. hardening in place. Minimize bog bridging through reroutes or turnpiking.
Class VI Front Country	Heavily marked, detailed interpretive signage	Groomed, some paving, bark chips or other accessible materials. 24" – 48" wide	6' wide, 12' high Blowdown removal and side cutting allowed	Bridges 3'-8', made to ADA Standards.	Purpose-built trails using appropriate techniques. To be implemented within 500' of wilderness boundary.
Class VII Horse Trail	Marked as trunk trail or secondary Trail	Wide tread development, must be rather smooth. Use of natural and non-native materials 24" – 48" wide	8' wide, 12' high Same as Trunk Trail	Bridges 6'-10' wide with kick rails, nonnative dimensional materials preferred.	Same as Trunk Trail on larger scale and use equestrian techniques. Use of horse-drawn implements allowed.
Class VIII Ski Trail	Marked high for snow pack, special markers, signs at junctions, usage signs at Junctions of Hiking Trails	Duff remains, discourage summer use.	6' wide, slight wider, depending on grade and curves, 12' high Clearing trail corridor determines tread width	Bridges 4'-8' wide with snow rails.	Purpose-built trails routed to avoid double fall lines and favor skier experience over destination distance. Removal of woody obstacles and low profile features.

Appendix D – Response to Public Comment

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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***

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 Vanderhacker Mountain Wild Forest and Boreas Ponds Primitive Area State Administrative Areas, not mandate the removal of the Fire Tower on Vanderhacker 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 peak 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 be 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 proposed 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 networks 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 oppose 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 Tail, 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.*