



September 12, 2016

Hon. Basil Seggos, Commissioner
NYS Dept. of Environmental Conservation
625 Broadway
Albany, NY 12233

Dear Commissioner Seggos:

Adirondack Wild: Friends of the Forest Preserve has serious concerns about the **DEC Interim Access Plan for Forest Preserve Land at Boreas Ponds** which, for the reasons set forth below, is inconsistent with the Adirondack Park State Land Master Plan ("SLMP"). We request a meeting to discuss our concerns.

We appreciate that during an interim period prior to its classification, careful, conservative regulated public access and use of a magnificent new tract of Forest Preserve like this is needed. As you state, consistent with State Land Master Plan language the DEC's intent is to administer Boreas Ponds during this interim period "in a manner consistent with the character of the land and its capacity to withstand use which will not foreclose options for eventual classification."

However, the Interim Access Plan does not appear to be consistent with the character of the Boreas Ponds tract, and does appear to foreclose future classification options. Furthermore, there are potential health and safety concerns associated with the Interim Plan. Our concerns are detailed here.

Background and Use History: The Interim Plan states that "there are 53 miles of roads on the Boreas tract," and that "the land has supported a significant amount of mechanized and motor vehicle use prior to acquisition." The Plan fails to note that significant sections of the former road mileage, particularly around and north of the Ponds, were seasonal (winter only), go across wetlands, have been closed for years, and/or are disappearing rapidly. Much of this mileage has not been driven on for many years, is growing in thickly with spruce and fir, and is far more accurately described as grown-in trails. The character of these former roads is nothing like the Gulf Brook Road. Thus, the characterization of the Boreas tract as having "supported a significant amount of mechanized and motor vehicle use prior to acquisition" is inaccurate and unsupported. Accurate descriptions in this Interim Plan are important, especially when it comes to creating impressions and influencing future classification and management direction.

Camping: The Interim Plan allows camping to occur anywhere on the Boreas tract, subject to standard DEC camping regulations. This needlessly risks creating negative impacts on sensitive natural resources. The Interim Plan should prohibit camping in identified sensitive areas and vulnerable ecosystems. The Plan should also limit camping to designated sites and/or 150' away from road, trail, stream, pond, wetland or other surface water. Interim camping may otherwise end up impacting a number of locations and creating sites by use, instead of having sites determined by State Land professionals in this sensitive wetland and shoreline environment.

Biking: Authorizing public bicycling on the entire Gulf Brook Road and all way to Boreas Dam establishes patterns of mechanized use that, contrary to your intent, will foreclose options for or at a minimum build in bias against eventual Wilderness classification.

Public Motor Vehicle Access and Parking: The Interim Plan should not allow public parking anywhere along the Blue Ridge Road (Rt. 2B) that does not block a private road or gate without addressing public health and safety hazards.

We also disagree with the Plan's provision allowing interim public motorized use of the Gulf Brook Road in advance of the Adirondack Park Agency recommending and the Governor approving classification. The Wilderness classification boundary should be established first, following SLMP classification guidelines with appropriate analysis, consideration of the science, and assessment by Park Agency staff and members (including DEC).

Horse and Wagons: The Interim Plan states that horse and wagons will be allowed on existing roads and on former roads signed as open for horses and wagons. This language could be read to authorize DEC to open any former road to this use. This may have not been the intent. A clarification is needed. The Plan fails to mention that in several of the areas proposed for horse and wagons and related public parking there appears to be little to no historical use by horses, and the existing trails are only a few miles long and appear to be more trail-like than roads. Also, horse trailer parking lots 1 and 2 present potentially serious public health and safety concerns along the county highway as heavy trucks may confront visitors driving horse trailers or crossing Rt. 2B (the Blue Ridge Road) on horseback. We and the public should have an opportunity to see and comment on the data your agency must have to support horse and horse and wagon use on Ragged Mountain track (Parking area 3) and the former "Sand Pond Road" (Parking area 1) as consistent with the character of the area and its capacity to withstand use in a safe manner.

Furthermore, horse use needs to be well managed for conditions and surface conditions in the interior of the tract. Certainly at LaBier Flow and beyond to the Boreas Ponds, DEC should be keeping horses out

of vulnerable, wet terrain and paddock, grazing and watering areas need to be set aside far away from the ponds, river and streams. There is no mention of such resource concerns in the Interim Plan.

Evaluation of Alternatives: The Evaluation of Alternatives section lacks analysis and assessment, and clearly does not reflect all reasonable alternative courses of action. It is entirely focused on recreational use and access, and is not in any way a serious analysis of alternatives which avoid or minimize damage to natural resources of the State Lands, which is the paramount objective under the SLMP and DEC's own regulations.

Comparison with William C. Whitney Interim Stewardship Plan: To draw a contrast with the Boreas Interim Access Plan, the William C. Whitney Interim Stewardship Plan of 1998 was explicit in not permitting recreational activity that would foreclose its eventual classification. That interim plan prohibited motorized uses beyond the Headquarters parcel and bicycling on the old woods roads beyond, and limited camping to designated sites only. In addition, the Whitney interim stewardship plan incorporated emergency regulations protective of natural resources and contained a lot of natural resource information backing it up. This information is not found in the Boreas Interim Access Plan despite an abundance of resource information available from DEC and APA staff and staff from the Adirondack Nature Conservancy, to say nothing of other resource reports about the Boreas Ponds tract issued this year.

Conclusion: In the rush to open the Boreas Ponds tract to public recreational use, DEC appears not to have thought through a number of serious issues. The Interim Access Plan places recreational access ahead of resource analysis and protection, creates public safety concerns, and appears to seriously bias if not foreclose classification options. .

We thank you, the Governor, and the Adirondack Nature Conservancy for completing this historic acquisition on behalf of all current and future generations of New Yorkers. Given all of our concerns, and the signature importance of this tract, we ask for a meeting with you to discuss the Interim Access Plan and ways in which it can be modified or amended prior to the classification process.

Thank you very much for your attention to our concerns and to our request for a meeting.

Sincerely,

David Gibson & Dan Plumley

David Gibson & Dan Plumley, Staff Partners

Cc: Rob Davies
Karyn Richards
Kathy Moser
Bob Stegemann

Adirondack Wild: Friends of the Forest Preserve

P.O. Box 9247, Niskayuna, NY 12309
www.adirondackwild.org