



July 18, 2017

Basil Seggos, Commissioner
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233-1010

RE: Recreational Overuse, Degradation of the High Peaks Wilderness, and Need to Convene a Citizen Advisory Committee

Dear Commissioner Seggos:

Adirondack Wild: Friends of the Forest Preserve submitted the attached letter to NYS DEC last September documenting our serious concerns over degradation of wilderness conditions in the High Peaks Wilderness due to recreational overuse. Our letter requested that DEC reconvene a citizen advisory committee (or CAC) to help DEC and APA to review and update the 1999 Unit Management Plan (UMP) for the High Peaks. To date we've received no written response to our request from the Department.

We reiterated our request to convene a CAC in a meeting with DEC Division of Lands and Forests staff on March 3, 2017. We and others also raised it at the June meeting of the Forest Preserve Advisory Committee. DEC responded that a "think tank" comprised of millennials had been meeting with DEC to discuss overuse of the High Peaks and that it will at some future date submit those ideas to an unidentified "higher-level group." Exactly who would be part of that higher-level group was not mentioned, nor was a timeframe for convening such a group.

We are now well into a second summer in which DEC and area towns are wrestling with severe overuse in the eastern High Peaks and its associated exterior roads and parking areas. We applaud the Department's educational efforts including those with the Summit Stewards and the hiring of a dedicated trail crew for the unit, and we also appreciate the importance of DEC reaching out to younger Forest Preserve users. However, these actions cannot adequately address and respond in a comprehensive way to the serious overuse issues in the eastern High Peaks, nor can they supplant the benefits of a broader CAC working with the two agencies to help craft amendments to the High Peaks UMP necessary to implement a comprehensive management response to overuse. As

you know, Adirondack Wild is by no means the only group asking that DEC reconvene a CAC.

In order to deal with the ongoing overuse problem in the High Peaks. we ask that DEC promptly convene a CAC so that the process of addressing this crucial issue through the UMP can get underway as soon as possible. As always, we stand ready to assist the Department in any way possible to address the ongoing threats to the High Peaks Wilderness Area and to help DEC discharge its responsibilities for Wilderness protection and management. We look forward to hearing from you. Thank you.

Sincerely,

Dan Plumley

Dan Plumley, Staff Partner

Dave Gibson

David Gibson, Staff Partner

Attachment

cc:

R. Stegemann, Regional Director

Rob Davies, Lands and Forests

Kathy Moser, Natural Resources

Tom Martin, Region 5

Kris Alberga, Region 5

Sherman Craig, APA

Karen Feldman, APA

Chad Dawson, APA

Terry Martino, APA

Kathy Regan, APA

Kevin Prickett, APA



September 27, 2016

Robert Stegemann, Regional Director
NYS Department of Environmental Conservation – Region 5
1115 State Route 86, P.O. Box 296
Ray Brook, NY 12977

RE: **High Peaks Wilderness Area: Re-establish Citizen Advisory Committee**

Dear Bob:

Given serious, reoccurring user pressure on the Park's largest and most visited Wilderness area, particularly the eastern zone of the High Peaks, Adirondack Wild: Friends of the Forest Preserve recommends that the DEC convene a stakeholders meeting process or a citizen advisory committee (CAC) to reassess and update fully the existing Unit Management Plan (UMP) and to make critical recommendations for enhancing and restoring wilderness conditions in advance of next summer's hiking season.

We recognize the DEC for implementing immediate and badly needed perimeter controls (and outreach, information and education that comes with it) on the Adirondack Loj Road in the coming days. This emergency measure and the outreach you are making to Canadian and American hikers is an absolutely necessary short-term measure. Redirecting heavy use to the region's smaller peaks (like Owl's Head, Baxter Mountain, Baker Mountain and others) only adds to those peak's overuse and erosion woes. A far more comprehensive approach is required long-term, thus requiring a full, focused CAC process. Moreover, it has been 24 years since a High Peaks CAC was last convened, and 18 years since the UMP was adopted.

We believe, therefore, the time is ripe, and current pressures serious enough to benefit from a constructive exchange with informed High Peaks stakeholders prepared to help the DEC and Adirondack Park Agency tackle current user management challenges. Our mutual objective, of course, is to sustain and enhance wilderness quality and conditions, particularly in the eastern High Peaks zone. More comprehensive discussion of the entire Complex area and amendments to the UMP are clearly warranted.

We appreciate that DEC is struggling with a trend in user pressures on our Forest Preserve not just here, but in certain areas of the Catskills as well. Further, we appreciate that the

department has put together a working group to make recommendations and to address overuse in both Parks. However, we think that the current and future challenges facing the High Peaks Wilderness Complex Area requires the establishment of a new Citizen Advisory Committee (CAC) to address comprehensive and integrated user management and wilderness resource protection for the High Peaks.

The current user pressures are nothing new for DEC, as you know. In 1978 the first draft of a High Peaks UMP included a section on Individual User Controls ranging from mandatory registration, reservation permit systems, user fees, indirect controls through parking restrictions to no controls at all. In 1994, given the growth in user pressures another draft UMP was prepared to implement an overnight camping reservation system for the eastern zone, with extensive study and discussion of the use of such systems elsewhere in the country. However, even that recommendation was pulled back and in 1999 the adopted UMP put in place a voluntary trip ticket system and a recommendation for a working group to develop the structure and implementation process of a camping permit system in Year 3. The trip tickets have long since been abandoned and to our knowledge no working group to develop a camping reservation permit system was ever formed.

Conditions in the Eastern High Peaks continue to exceed wilderness carrying capacity. Regional media have documented in recent multiple stories the ongoing impact of high user numbers and large group sizes in the eastern High Peaks zone, citing:

- The increasing day user numbers – in some cases over 62 percent higher than even a decade ago on some trail heads leading to crowded conditions on mountain summits, loss of wilderness character and experiences. Cascade Peak is a prime example where trail registers recorded 16,091 hikers in 2006 and 33,149 in 2015;
- Disturbing sanitary conditions despoiling the wilderness, creating potential health hazards and unsightly conditions – even with some hikers defecating directly on trails themselves severely impacting the user experience and polluting the resource itself; and,
- Increasing trail erosion given the resultant high number of users with more challenging management implications for DEC and volunteer trail crews with a serious backlog expanding year by year both in the High Peaks and on smaller, local peaks that have become a new trend in user interest; and,
- Often a minimal presence – or no presence at all - even on high use weekends of NYS-DEC Forest Rangers and Assistant Forest Rangers in the impacted backcountry wilderness lands of the Eastern High Peaks and other areas – due in part to the serious spike in rescues of a growing number of ill-prepared users needing assistance or rescue, taking Forest Rangers away from basic backcountry management and enforcement duties;
- Summit Stewards being overwhelmed in trying to educate and reduce high user impacts on the 82 acres of ultra-sensitive alpine ecology of statewide and regional significance;

- User conflicts due to high use numbers on peak weekends typified by recent accounts of animosity between hiker groups, or individuals with Canadian and other large tour groups impacting the High Peak trails en masse;
- Threats to health and safety of unskilled users taking access to dangerous hiking and climbing routes – such as the Trap Dike on Mount Colden without adequate gear, clothing, training or knowledge leading to accidents and further impinging on the time and work constraints of the Forest Rangers and local EMS search and rescue personnel.

As you know, the Adirondack Park State Land Master Plan (APSLMP) directs the DEC to manage wilderness as “an enduring resource”...”which is a fundamental directive that DEC takes as its primary responsibility in the HPWC” (pg. 103, HPWC UMP). The UMP further states that “an inherent goal of this plan is to attain the highest level of purity of its wilderness character within the legal constraints of the APSLMP.”

Given the increased user impacts and numbers in the eastern High Peaks zone in particular, this critical “enduring resource” is under serious threat. It is time to re-establish a focused stakeholder or CAC process to reassess the UMP goals, strategies and management directives to protect the wilderness character of the High Peaks Wilderness Complex going forward.

Adirondack Wild: Friends of the Forest Preserve stands ready to assist. We were designees on the prior CAC in the 1990’s and were very active in the development of the current High Peaks UMP. Thus, we and so many others have a keen interest in sustaining wilderness and ecological integrity in the High Peaks Wilderness Complex.

We also recommend that the DEC undertake needed Limits of Acceptable Change (LAC) assessment of critical issues in the Eastern High Peaks – issue by issue – management challenge by management challenge – which could significantly inform any CAC in its deliberations. True, forthright LAC assessments on issues facing the High Peaks Wilderness would automatically benefit from the public stakeholder participation of a re-established CAC process.

Thank you for your consideration of this request and we would be pleased to come in to discuss it and to address it at upcoming meetings of the APA, DEC Forest Preserve Advisory Committee, and in other forums.

Sincerely,

Dan Plumley, Staff Partner

Dave Gibson, Staff Partner

CC: Basil Seggos, Commissioner
Peter Walke, Chief of Staff
Rob Davies, Lands and Forests
Kathy Moser, Natural Resources
Tom Martin, Region 5
Kris Alberga, Region 5
Sherman Craig, Chair, APA
Chad Dawson, APA
Terry Martino, APA
Kathy Regan, APA