



August 10, 2017

Steve Guglielmi, Forester and Unit Planner
NYS DEC Region 5
P.O. Box 296
Ray Brook, NY 12977

Re. Saranac Lakes Wild Forest Draft Unit Management Plan

Dear Steve,

Adirondack Wild: Friends of the Forest Preserve is pleased to offer comments about this long-awaited draft UMP and its compliance with the State Land Master Plan (SLMP). We congratulate you and the entire DEC team for the many years of effort that went into the drafting of this significant, complex UMP affecting so many residents in the Tri-Lakes area and the many, diverse recreational enthusiasts who visit this region of the Park.

Overall comment:

In many ways this UMP positively addresses many key issues raised by the citizen advisory committee in 2002-03. We note in particular that it addresses the severe recreational crowding, or overuse and damage to natural resources at popular camping places such as Little Green Pond, Hoel Pond, Polliwog Pond and Follensby Clear Pond.

Also, we note with appreciation the recommendation to bring the unit's 250 primitive tent sites into compliance with the master plan's quarter-mile site distance and separation guidelines either by site closure or re-location of sites.

The closure of certain unused or little used snowmobile trails is appropriate and reduces unneeded and redundant motorized pressure on the unit.

Also, the designation of a trail-less area in the unit will be appreciated by hunters, anglers and many others seeking the assurance that they may experience solitude and remoteness in this otherwise often crowded unit of Forest Preserve.

However, we also find that the draft UMP does not go nearly far enough in giving the protection of natural resources the priority demanded by the SLMP. We note that DEC's response to key points raised by the 2002-03 citizen advisory committee members is that "natural resources were one of the factors considered in developing the proposed actions." Natural resource protection cannot be just one of the factors DEC must consider; it must be the overriding, paramount purpose to be SLMP compliant.

DEC should, for example, manage recreational use of the unit's many waterways and campsites in order to comply with the SLMP overriding priority to avoid damaging natural resources. If natural resource protection is not afforded the priority demanded by the SLMP, then the public cannot have much confidence, for instance, that DEC will actually undertake recommended carrying capacity studies for waterway access and recreational use of the unit's often overused, heavily motorized ponds and lakes.

Roadside camping at primitive tent sites:

We are very supportive of the UMP's proposed closing of heavily used and impacted primitive tent sites at Hoel Pond (3 out of 4 sites to close), Little Green Pond (6 of nine sites to close) and along Floodwood Road. Like DEC, we have observed that these sites have never complied with mandated separation distances. We've noticed the severe natural resource damage on and around these sites that has persisted for years. We also appreciate the draft's recommended best management actions to reduce erosion into these lakes at waterway access sites and delineating parking areas further away from the water.

However, given the DEC's chronic personnel shortage we question the wisdom of creating seven new roadside sites on Floodwood Road and the building of six other roadside sites elsewhere in the unit. While we appreciate that it is DEC's intent to locate these sites to comply with the site and sound distance requirements of the SLMP, these new sites may quickly become as degraded as the sites you are proposing to close. Overall, the draft proposes just seven fewer roadside camping sites when this UMP is implemented than the unit has now. DEC's capacity to undertake the needed limits of acceptable change studies on these sites, including monitoring of campsite conditions should be considered before taking this action.

Boat launching:

As the UMP recognizes, the unit is full of fishing and waterway access that are being misused for trailored launching of powerful motor boats. Fourteen such sites are being used for trailored boat launching when just six of these are on lakes of sufficient size to comply with the SLMP 1000+-acre threshold for boat launches. We appreciate that DEC intends to restrict trailored launching at a majority of these. However we strongly disagree with the draft's recommendation that such restrictions at Lake Colby, Moose Pond and Follensby Clear Pond be delayed until such time as a carrying capacity studies are completed. Such studies are needed now, but are no excuse for delaying the closing of these boat launches onto small lakes. For over 40 years the SLMP has called for "a comprehensive study of Adirondack lakes and ponds to

determine each water body's capacity to withstand various uses, particularly motorized uses and to maintain and enhance its biological, natural and aesthetic qualities." However, the UMP lends no timeline for completion of these studies at the three ponds indicated. Given documented problems caused by trailored boat launching at all three, they too should be closed as a boat launch and made fishing and waterway access only.

Gas-powered motors:

The UMP's reliance on speed or horsepower limits or a combination of both on waterways that cry out for quiet water, nonpolluting treatment, while commendable, is inadequate and insufficient as a management action. Weller Pond is one of those that demand more. To allow gas powered motorboats up that narrow channel from Middle Saranac Lake to Weller Pond for years, if not decades into the future, even restricted to 5 MPH cannot be justified under the SLMP. Given its remoteness and natural resources, DEC must restrict Weller Pond to electric motors only.

DEC's persistence in maintaining gas-powered motors wherever they now exist on unit waterways does not comply with the paramount purpose of the SLMP. Electric motors are widely available and in use throughout North America. Demand for them is driven by electric motor only requirements in certain prescribed places that make sense in order to conserve particularly wild, natural trout ponds and remote settings. Those settings exist in the Saranac Lake Wild Forest and DEC should be taking active measures to conserve them where they exist. This draft UMP places 15 MPH limits on motoring in many of these ponds near the St. Regis Canoe Area. That is inadequate and unenforceable. It is past time to impose electric motor only requirements on Weller Pond and on other ponds which immediately adjoin the St. Regis Canoe Area. These include Rollins, Whey, Follensby Clear, Horseshoe, Polliwog, Little Square, Middle, Rock and East Pine Ponds. Given their qualities, DEC should be moving immediately to require electric motors only on these special ponds.

Raquette River:

This draft UMP relies on enforcement of the public Navigation Law to impose a 5 MPH speed limit on the Raquette River inside the unit's boundaries. This is inadequate and has been proven unenforceable for a very long time. The conflicts of use and the damage to natural resources imposed by powerful motors and high speeds on the river and its shores are demonstrable. It is time to impose an electric motor only requirement on the Raquette River.

Off-road camping at primitive tent sites:

While we are very supportive the difficult decision to close 64 tent sites, including 14 at Follensby Clear Pond in order to comply with the required separation distance, we question the greater than 1:1 replacement (construction of 68 sites) elsewhere in the unit for the

reasons stated above. We urge DEC to carefully review each of the new proposed sites to avoid harm to terrestrial, wildlife and aquatic resources, as well as wild forest scenery and character.

Group campsites:

We strongly support the UMP proposed changes that will bring group campsites into compliance with the SLMP.

Saranac Lake Islands Campground:

We strongly support the UMP expanding of campsite regulations to include Middle Saranac and Weller Pond and the related monitoring of impacts and enforcement at these and other campsites in the designated Saranac Lake Islands Campground. This expansion of the regulated area should, as stated, move the Islands Campground more rapidly into SLMP compliance because of the dedicated staffing paid for by the Campground user fees.

Averyville Road Extension – Pine Pond Road:

While the draft UMP cannot, as stated, resolve legal issues resulting in longstanding natural resource damage along this old road bordering the SLWF and High Peaks Wilderness, the UMP can document the damage that has been created over many years. Whether Saranac Lake Wild Forest or High Peaks Wilderness, the route, more appropriately a trail, is all Forest Preserve. The gullying and erosion, and impacts to wildlife that has been caused by ATVs and trucks using this lovely interior route has been very significant and well documented and discussed by the citizen advisory committee and others. This UMP should not ignore these matters.

Wildlife Resources:

We commend this draft UMP's attention to the bird conservation area on Scarface Mountain, particularly with respect to the endangered Bicknell's thrush, and to DEC's efforts throughout the unit to work with other wildlife professionals to monitor and protect the area's breeding population of Common loon. We also note the draft's awareness of the 17,000-acres of wetlands in the unit, including some very important low-elevation boreal habitats like the Bloomingdale Bog. The draft could do a better job at describing and recommending management actions protective of some rapidly declining populations of birds, so-called Adirondack "responsibility species," dependent upon the unit's (and adjacent units) large, unfragmented low elevation boreal habitats such as Bloomingdale Bog. These species include Rusty blackbird, Gray jay, Olive-side flycatcher, Yellow-bellied flycatcher, Three-toed woodpecker and others. These species in decline are noted in many recent reports as are their reliance on Adirondack habitats found nowhere else in the State and rarely in the northeast. Recent studies show that these habitats are extremely vulnerable to climate change and to human disturbance. These species are not only important in their own right, they also draw many people to visit and birdwatch in the Tri-Lakes area of the Adirondacks. We ask the DEC to incorporate discussion of these species and any partnerships needed for their conservation and

protection. Management actions in the UMP should be included that reflect the importance of this suite of avian species to the Park's and the Northeast's biological diversity, as well as to the significant and growing birdwatching segment of Adirondack tourists.

Thank you for considering our comments.

Sincerely,

David Gibson

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Dan Plumley

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