



June 15, 2015

Kathy Regan, Deputy Director of Regional Planning
Adirondack Park Agency
P.O. Box 99
Ray Brook, New York 12977

RE: Comments on the Community Connector – North Hudson to Newcomb Trail Plan Unit Management Plan (UMP) and Final Supplemental Environmental Impact Statement (FSEIS)

Dear Ms. Regan and Park Agency Colleagues:

Adirondack Wild: Friends of the Forest Preserve submits these comments in regards to the above listed Community Connector UMP and FSEIS. The critical foundation of our review and commentary lies in the essential responsibility facing the Adirondack Park Agency, the NY State Department of Environmental Conservation and the State of New York to safeguard the Forest Preserve, its natural resource and wilderness character of the Adirondack Park for all New York residents and future generations – not merely for one user group’s interest that would, ultimately, involve only a minor fraction of the citizenry statewide.

While we found the UMP/FSEIS valuable in initially laying out the scope and facets of law and regulation which govern both the APA and DEC in decision making in line with so called Class II Community Connector Trails (under the State Land Master Plan, NYS Snowmobile Plan and, more recently, the APA’s Snowmobile Trail Maintenance Guidance Document) we believe the document holds very serious shortcomings with respect to overall public process, and product in general and specific issue areas of critical importance.

Critical Process and General Challenges and Needs Regarding the Proposed UMP/FSEIS:

Non-Transparent Origins of the Proposal: The proposal to establish the Newcomb to North Hudson Class II Community Connector Trail system grew out of the largely “back door” negotiations between the 5 core Park Towns, The Nature Conservancy as owner of the former Finch Pruyn lands, the NYS-DEC and the Office of the Governor. These agreements did not include stakeholders park-wide or statewide and have, generally, failed to consider the true State’s interest in adequate review and sustaining the high ideals of the NY State Adirondack Park State Land Master Plan, specifically. In which the overwhelming theme is to protect the wild and natural resource character and land resources owned by All the People of the State.

While Adirondack Wild recognizes and has applauded the 5 Towns involved, DEC and The Nature Conservancy, as well as the Governor in the tremendous gain of the protection of the former Finch Pruyn lands over time, we believe it to be critical to fully transparent and public procedures going forward towards implementation that support and enhance the State Land Master Plan over time.

SLMP Onus to Preserve Options for Classification of Lands First: The Park Agency, DDC and the State are bound under the force of law in the State Land Master Plan to sustain and preserve all options towards Wilderness in lands classification, to wit as described in the SLMP

“...prior to classification by the Agency, lands acquired by the Department of Environmental Conservation or any other state agency will be administered on an interim basis in a manner consistent with the character of the land and its capacity to withstand use and which will not foreclose options for eventual classification.”

As large portions of the proposed West to East trail sections cross lands still in private hands and unclassified as yet, we contend that the APA and DEC can not preempt their process by approving a UMP/FSEIS finalizing a plan for a Class II Community Connector Snowmobile Trail – or any snowmobile trail for that matter, unless and until those lands are in state ownership and fully assessed for their ability to withstand use and wild land character and other factors.

Foreclosing “Wilderness” classification options for existing private lands not now under State ownership is putting the cart before the horse and violating this critical provision of the SLMP.

Detail of the UMP/FSEIS Warrants Better, Wider and Longer Public Dialogue, Discussion and Review Timelines Statewide and In-Park: This plan representing potentially one of the longest and most significant development scenarios for Class II Community Connector Trails in the history of such trails warrants far more public evaluation, review and comment opportunities.

Adirondack Wild is certain that stakeholders state-wide remain largely uninformed about this proposal and, furthermore, many local residents along the route have had no advance knowledge or review ability sufficient to the true need for this important inter-regional proposal.

Adirondack Wild urges, therefore, that the Park Agency and NYS-DEC agree to at minimum an additional 30 days for public comment on this important, but controversial and detailed proposal.

Ecological, Environmentally Fragmenting and Wild Forest/Wilderness Impacts from Class II Community Connector Snowmobile Trail Development and Maintenance:

Adirondack Wild: Friends of the Forest Preserve has found that the Class II Community Connector Snowmobile Trail design standards as typified by new such trails within, for example, the Moose River Plains Wild Forest Area, represent a significantly larger and more impacting recreational development footprint than permitted under the original SLMP for trails having the character of a foot trail.”

The trail design and maintenance standards which were established as an Agency “guidance” absent statewide public hearings for true SLMP conformance have caused significant public concern because of these facts that ecologically, the excessive 9 to 12 foot (or wider in some case especially on turns) creates more of a fragmenting, impacting roadway development rather than a historically lower impact snowmobile trails. This and the fact that the State now foresees the use of extremely heavy (6,000 plus pounds or more) snow groomers raises serious constitutional issues, as well, and, in our view, confront “wild forest” conditions in practice.

While Adirondack Wild can generally support the use of existing roads and logging trails for snowmobile trail development where appropriate, we are very concerned about the following potential impacts that may result in Class II snowmobile trail development on otherwise, previously wild forest landscapes both public and private:

- Fragmentation of critical forest and terrestrial habitats with the forest preserve and across private lands in Resource Management and Rural Use zones that play a vital role in ecological connectivity,
- Contribute to serious soil erosion and potential water deterioration for surrounding streams, wetlands and other surface water resources from heavily engineered clear-paths as represented in the Class II Community Connector trail design,
- Loss or deterioration of the sense of solitude and natural quietude of wild forest and adjacent wilderness lands where the sense of remoteness is a key factor in recreational enjoyment,
- The same concern as it relates to quality of life impacts for local and nearby residents both permanent and seasonal from the noise of numerous snowmobiles running at high speeds and at all hours of the day and night,

- Real impacts to clean mountain air from the engine exhaust of snowmobiles and its potential impacts on human, terrestrial plant and wildlife health long-term from trails that receive constant use across a winter season,
- Impacts to large and roaming fauna from noise and fragmentation impacts including whitetail deer seeking “yarding” habitat and low-stress environments in order to survive the long, bitter cold winters,

Specific Concerns and Needs Regarding the Proposed UMP/FSEIS

In addition to our generic concerns on process and product above, Adirondack Wild: Friends of the Forest Preserve cite the following concerns and needs to specifics of the Community Connector Newcomb to North Hudson UMP/FSEIS which fully warrant the Agency’s evaluation and assessment in any final action:

- Adirondack Wild: Friends of the Forest Preserve is fundamentally opposed to UMP/FSEIS proposals that suggest subverting the NY State Wild, Scenic and Recreational Rivers Act (WSRR) by calling for snowmobile bridging over designated “Scenic” rivers, such as the suggestion of same for the Boreas River.
- Adirondack Wild expressed concern that wild forest and historic character of the Camp Santanoni area not be overly compromised or transformed to illegitimate intensive use in the siting of the proposed Class II Community Connector snowmobile trail as proposed.
- Adirondack Wild finds the Final Supplemental Environmental Impact Statement portion of the document in its main body and appendices wholly insufficient to meet the letter, spirit and tests of the law under the State Environmental Quality Review Act (SEQRA) for actual site-based environmental impact assessment and impact evaluation, much less alternatives ecologically and environmentally due to the fact that the FSEIS findings fail to provide true site analysis along the proposed corridors. A true SEQRA FSEIS would offer factual site and corridor site-based analysis all along the length of the proposed action and impact zones and, as it stands now, this cannot be easily done because significant portions of the trail are owned by private entities that have yet to hold cooperative agreements with DEC on trail development.
- We find that the FSEIS is also wholly insufficient with respect to truly evaluating, assessing and seeking to control impacts of noise and trail development to private landowners in communities all along the trails proposed pathways. Far more deliberative stakeholder outreach directly with landowners needs to be undertaken by the NYS-DEC where sounds and visual impacts of the proposed Class II Community Connector snowmobile trail may have clearly undue adverse impacts on their historical home and camp use and quality of life. In this, and on the ecological impact assessment front, the current FSEIS is, in fact, only a generic assessment and does not sufficiently approach a true EIS in its assessment, evaluation of alternatives or prescription.

- The UMP/FSEIS to be SEQRA sufficient must identify and assess the actual degree of impact and extent of potentially impacted ecosystems and unique or vulnerable natural habitats, factual acreage of impacted wetlands, distant and (lengths and widths) of side cut impacts along the length of the trail, full number of trees to be removed on private and public lands along with site by site mitigation procedures to eliminate or mitigate said impacts.
- In terms of economic analysis, we do not find any factual data or survey information or economic prognosis based on facts that relate to the true need or economic demand, benefit or cost analysis for the proposed Class II Community Connector snowmobile trail.
- While we do support the closing of duplicative or underused snowmobile trail mileage across the interior and state land units as proposed to meet “no material increase” goals generally, these decisions must be looked at comprehensively with true environmental impact analysis of all serious alternatives, especially the proposed alternative routes.

Adirondack Wild generally supports both the Towns of Minerva, Newcomb and North Hudson to benefit from new recreational trail development, including snowmobile trails, that can foster increased recreational use that is sustainable of private and public lands and conservation easements. Specifically, however, it is clear to Adirondack Wild that the current UMP/FSEIS does not at this time contain sufficient site ecological and environmental data for impact and alternative assessment, nor the requisite public and private land stakeholder involvement and deliberation to formally decide one way or the other as to whether this proposal conforms to the SLMP or SEQRA.

Thank you for the opportunity to comment on this UMP/FSEIS. Adirondack Wild looks forward to participating as an involved stakeholder in future deliberations on this matter before the NYS-DEC and the Adirondack Park Agency.

Sincerely,

Daniel R. Plumley
Partner

David Gibson,
Partner

C 325c:

R. Stegemann, DEC Region 5
T. Martino, APA
J. Townsend, APA
J. Martens, NYS-DEC