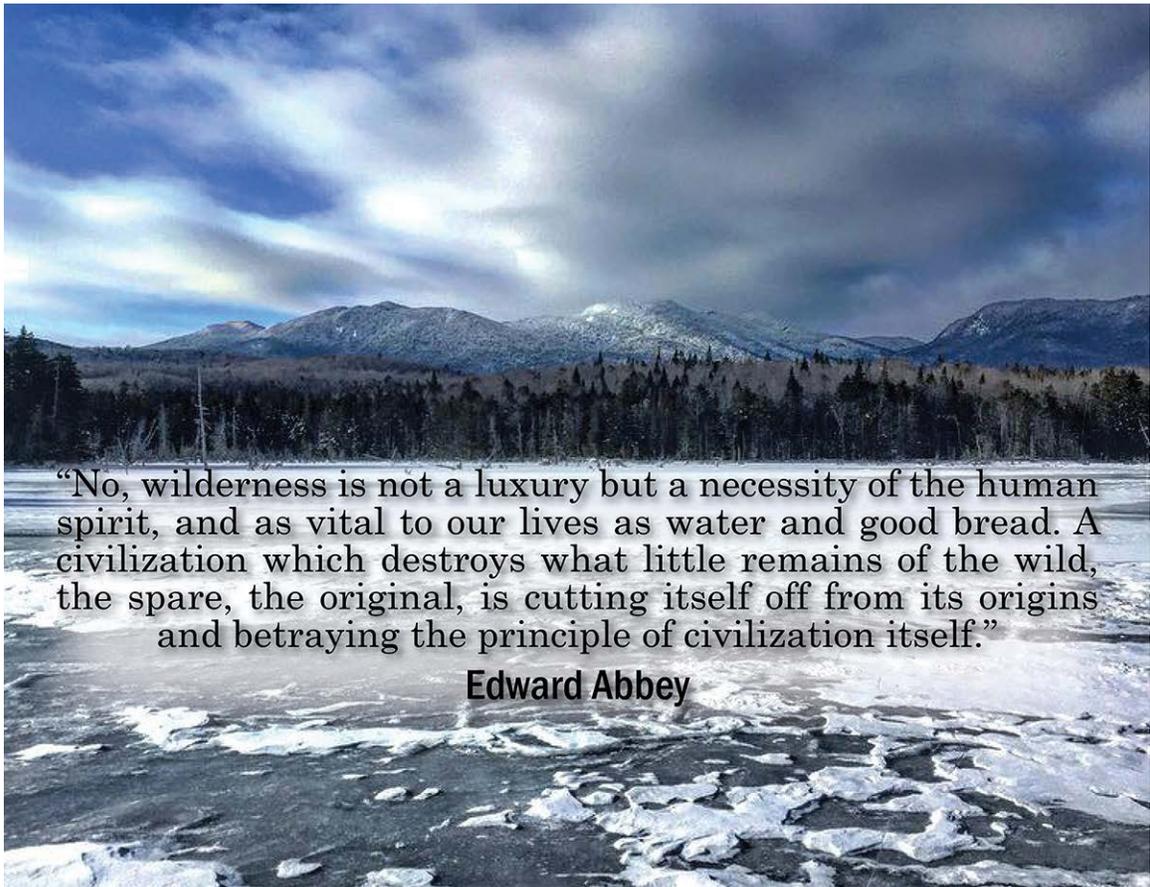


# Adirondack Wilderness Advocates

Official Comments on the 2016 - 2017  
State Land Classification Package



[AdirondackWilderness.org](http://AdirondackWilderness.org)



“No, wilderness is not a luxury but a necessity of the human spirit, and as vital to our lives as water and good bread. A civilization which destroys what little remains of the wild, the spare, the original, is cutting itself off from its origins and betraying the principle of civilization itself.”

**Edward Abbey**



**Adirondack Wilderness Advocates**  
**Main Street**  
**Saranac Lake, NY 12983**  
**AdirondackWilderness.org**

December 30, 2016

Kathy Regan  
Adirondack Park Agency  
1133 NY Rt. 86  
Ray Brook, New York 12977

Re: Official Comments on the 2016-2017 State Land Classification DSEIS

Dear Ms. Regan,

This document represents the official comments of Adirondack Wilderness Advocates on the 2016-2017 state land classification package, as well as the Draft Supplemental Environmental Impact Statement (DSEIS).

We have reviewed the entire set of proposals issued by the Adirondack Park Agency (APA), including the dozens of maps for parcels throughout the park. Boreas Ponds is of course of utmost concern, but we have applied our experience with many of the other tracts in the assessments contained herein.

Our primary concerns and statements are as follows:

- The DSEIS fails to consider all of the potential impacts that would result if the Boreas Ponds Tract was opened to motor vehicle access, including degradation of Value 1 wetlands and the existing state lands adjacent to the tract
- APA has failed to consider all reasonable alternatives when evaluating the Boreas Ponds Tract, including the one option that would eliminate most of the expected environmental impacts: a full Wilderness classification

- APA has failed to consider public recreational uses that have already become established since Boreas Ponds became state property in the spring of 2016
- We endorse Wilderness classifications over most of MacIntyre West and the northern half of MacIntyre East, with the suggestion of some slight modifications
- We endorse the proposed additions to the Blue Ridge Wilderness and West Canada Lake Wilderness located near the Cedar River
- We propose additional Wilderness protections at Stonystep Pond
- We recommend that APA reevaluate its proposal to reclassify the Cathead Mountain Primitive Area as Wilderness, in favor of a broader boundary analysis for the Silver Lake Wilderness
- We suggest that APA does not possess all required data to accurately determine whether West Stony Creek does or does not warrant a Wilderness classification

Thank you for attention to our concerns. We look forward to participating in this process, and are grateful for the opportunity to help shape the future of these new state lands.

Sincerely,

Adirondack Wilderness Advocates

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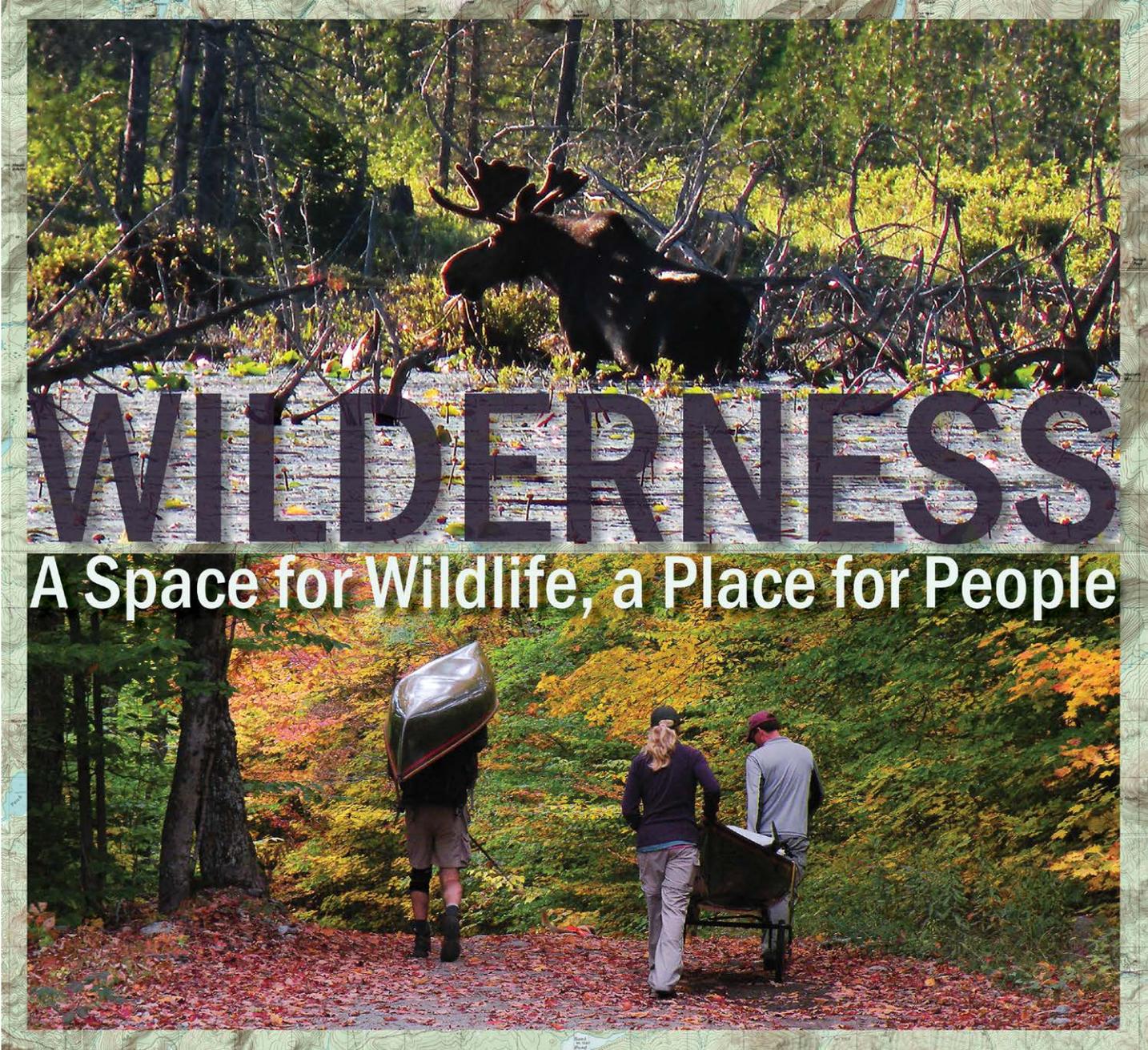
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# Boreas Ponds Comments

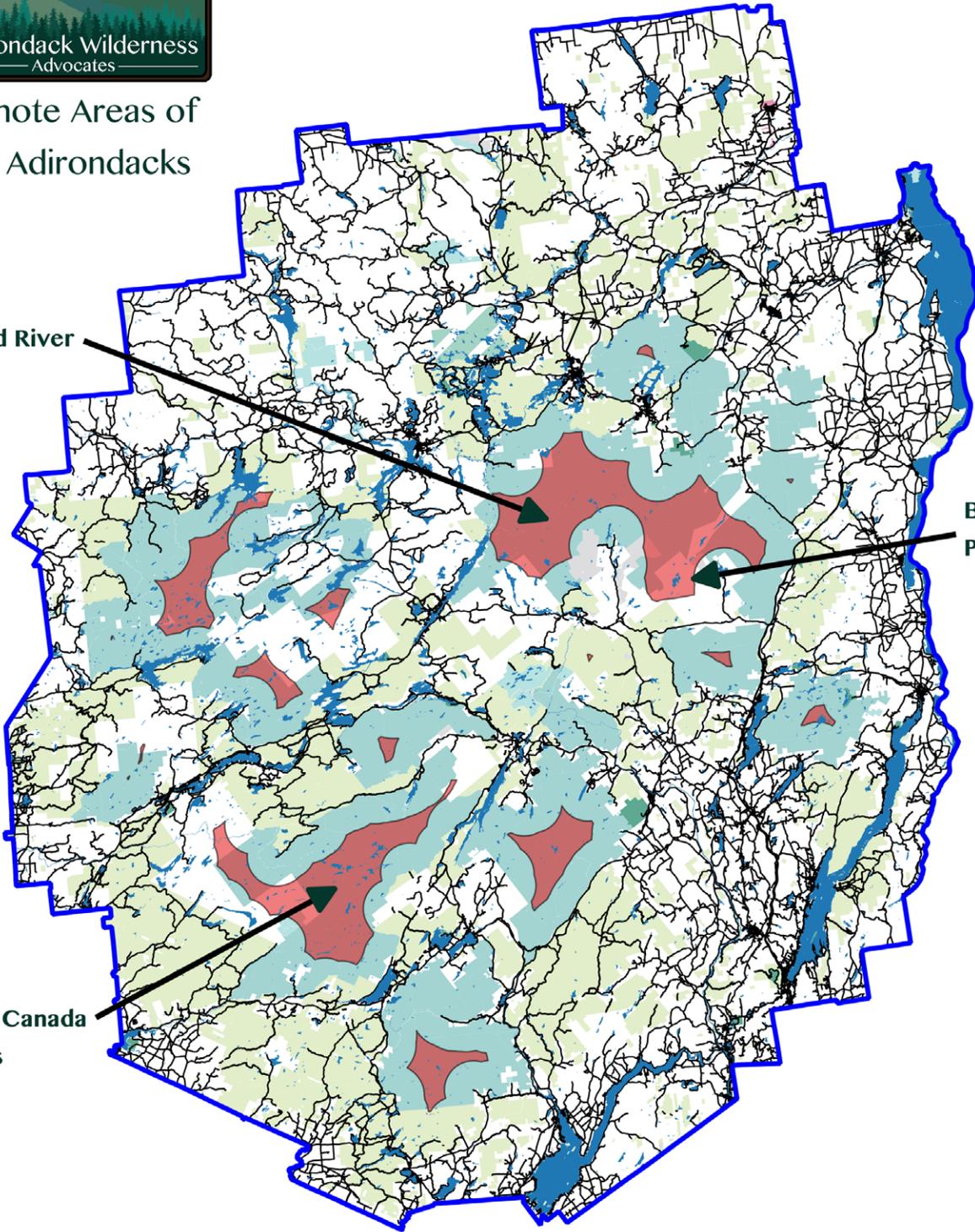


# Remote Areas of the Adirondacks

Cold River

Boreas Ponds

West Canada Lakes



### Motorized Use

>3 Miles from Road

Public Road

### State Land Classification

Wilderness

Canoe Area

Primitive

Wild Forest

Intensive Use

Historic

State Administrative

Pending Classification



Map Sources: APA,  
NYS DEC, NYS  
DOT

Produced by  
Brendan Wiltse

0 10 20 miles



### Remote Areas

The red areas show places that are greater than 3 miles from a public road or snowmobile trail. The total area of this land is 305,328 acres or 5.2% of the total area of the Adirondack Park.

# Boreas Ponds Tract

**A**dironck Wilderness Advocates (AWA) supports a Wilderness classification for the majority of the Boreas Ponds Tract, the adjacent Casey Brook Tract, and the northern half of Totten & Crossfield Township 30 (the so-called “Vanderwhacker Triangle”). We are very disappointed that the Adirondack Park Agency has failed to include such an alternative classification in the Draft Supplemental Environmental Impact Statement (DSEIS), which the State Land Master Plan requires given the tract’s physical, biological, and intangible characteristics.

In regards to the classification alternatives for the Boreas Ponds Tract, AWA finds the agency’s DSEIS to be deficient in several ways:

- 1) The four existing alternatives presented by Adirondack Park Agency (APA) are unacceptable because all allow road access to Boreas Ponds, and none satisfy the requirements of the State Land Master Plan to consider classifying the majority of the Boreas Ponds Tract as Wilderness.
- 2) By allowing motor vehicle and snowmobile use of Gulf Brook Road, the agency will be actively eliminating one of the intrinsic Wilderness values currently found at the Boreas Ponds Tract: its sense of remoteness. Motor vehicle use will also threaten the protection of the natural resources on the tract, principally the large Value 1 wetland that surrounds the ponds.
- 3) The State Land Master Plan clearly identifies Wilderness as our main priority, not the maintenance of dams, roads, and gravel pits.
- 4) Therefore APA must consider additional alternatives that include not only an expanded Wilderness boundary, but also the maintenance of Gulf Brook Road and the dams at Boreas Ponds and LaBier Flow in accordance with Wilderness guidelines. This means that the roads should be treated as trails, and the dams should be treated no differently than other existing dams in Wilderness Areas throughout the Adirondack Park.

## Insufficient Impact Analysis

A key aspect of a DSEIS is an analysis of the potential impacts of the proposed action, in particular how each of the alternatives mitigates the various concerns. However, the current DSEIS provides only a simplistic listing of basic concerns, with no comparative analysis. It fails to include public usage figures for the 2016 season, including trailhead register data. It was therefore inappropriate for the agency to proceed to the public comment phase with so little information to present for discussion.

The DSEIS states:

The newly acquired lands were previously not open to the public and any new recreation taking place on these lands will be new activity on those lands. There will be no diminishment of existing public activity in this action.

The agency is not entirely correct in this assessment. This DSEIS was issued in October 2016. However, by that time public recreation had been occurring on the Boreas Ponds Tract for six months. That was a sufficient amount of time for a pattern of public use to become established—a pattern that was not based on motor vehicle access. During the spring and summer months, the entire length of Gulf Brook Road was closed to motor vehicle access, and yet we observed significant public usage of the property. By Labor Day, the Department of Environmental Conservation (DEC) had placed a trailhead register at the interim trailhead parking area, which should provide a decent amount of data of public visitation levels. With the closure of the road for the winter season, the public is now seeking Gulf Brook Road as a ski touring route.

These are existing public uses that could be displaced if the road is opened to motor vehicles. Snowmobiling on Gulf Brook Road would be especially disruptive to wilderness recreation, as it would likely discourage skiers and snowshoers.<sup>1</sup> As a result, snowmobiles would effectively enjoy exclusive use of the property during

<sup>1</sup> Vittersø J, Chipeniuk R, Skår M, & Vistad OI. 2004. Recreational conflict is affective: The case of cross-country skiers and snowmobiles. *Leisure Sciences*, 26(30): 227-243.

Vaske JJ, Needham MD, Cline Jr RC. 2007. Clarifying interpersonal and social values conflict among recreationists. *Journal of Leisure Research*, 39(1): 182-195.

the winter months, even if such use is restricted to Gulf Brook Road and Boreas Ponds Road.

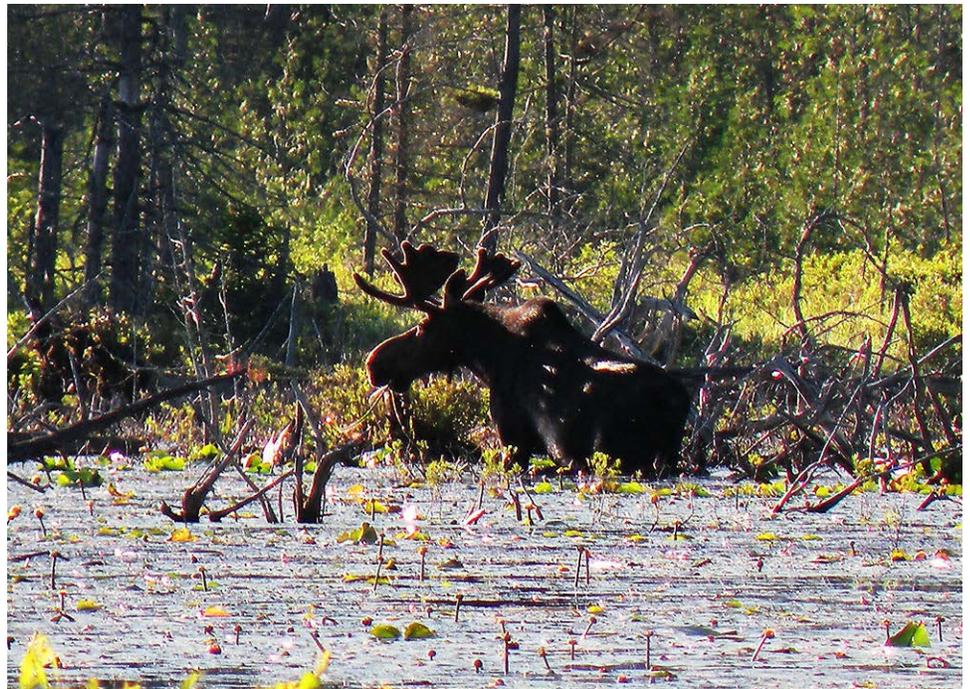
Furthermore, with no terrain features between LaBier Flow and Boreas Ponds to act as sound barriers, noise from the snowmobile trail would extend across the length of Boreas Ponds, further reducing its value to wilderness recreation.<sup>2</sup> Such sounds could conceivably carry to the summits of several nearby High Peaks in certain conditions.

The DSEIS does take pains to identify the extensive network of Value 1 wetlands that stretch across the property, but none of the four alternatives demonstrate ways that these natural assets could be protected, as is legally required. Every alternative envisions public motor vehicle access extending up to this area, if not through it; indeed, each seems engineered to maximize human usage of the property in a consequences-be-damned approach to state land planning.

For instance, none of the alternatives consider the possibility that the presence of the dams at LaBier and Boreas might themselves be negative influences on these sensitive resources. Nor do they account for the fact that approximately 80.7% of the soils within the Boreas Ponds Tract are rated as a severe erosion hazard.<sup>3</sup> Additionally, there are three listed natural community types with the Boreas Ponds Tract: black spruce-tamarack bog, medium fen, and mountain spruce-fir forest. The Boreas Ponds Tract is also home to five waterfowl species, including common loon as well as nine characteristically boreal bird species, including Lincoln's sparrow and bay-breasted warbler. With regards to rare plants, Farewell's milfoil and northern bog aster have been reported. Nine amphibian and reptiles have been documented, and iconic Adirondack animals such as black bear, marten, snowshoe hare, and the recovering



***There are indeed existing public uses of the Boreas Pond Tract that predate the DSEIS***



***Bull moose at Second Pond***

moose have been sighted in the Boreas Ponds Tract as well.<sup>4</sup> The combination of all these factors occurring on this one tract can only bolster the conclusion that the majority of the land area must be Wilderness.

All of these potential impacts would diminish the quality of recreational opportunities requiring vast acreages of open space, and deteriorate the wilderness quality and character of the tract. But they could be mitigated by a Wilderness classification that closes all or most of Gulf Brook and Boreas Ponds roads.

<sup>2</sup> Menge CW & Ross JC. 2000. Measurement and modeling of snowmobile noise and audibility at Yellowstone and Grant Teton National Parks. Noise-Con 2000. North Beach, California.

<sup>3</sup> Schwartzberg, E. G. (2016) Boreas Ponds: Scientific assessment of physical, biological and intangible characteristics.

<sup>4</sup> Ibid.

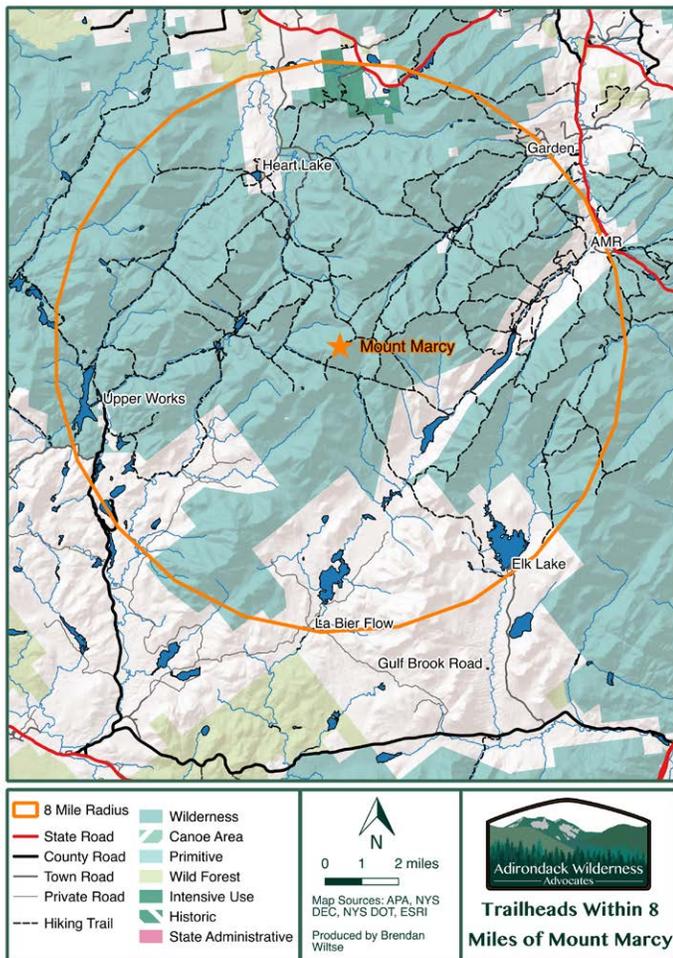
## Proximity to the High Peaks

The APA should be aware that simply adding bulk acreage to a Wilderness does not guarantee resource protection or preserve opportunities for primitive recreation. How the public accesses this new Wilderness matters. Boreas Ponds presents the paradoxical situation in which we could add bulk acreage to the High Peaks Wilderness and still manage to degrade the landscape by allowing motor vehicles to come too close and making access too easy.

Decades of experience inform us that enabling easy access to the High Peaks leads to many management issues, including trail erosion, habituated wildlife, crowded campsites, campfire bans, and so forth.<sup>5</sup> Heavy visitation requires a constant management presence, taxing a ranger service that has been increasingly called upon to save the inexperienced from their own poor decisions.

Boreas Ponds and LaBier Flow—the proposed sites of trailhead parking areas—lie within an 8-mile radius

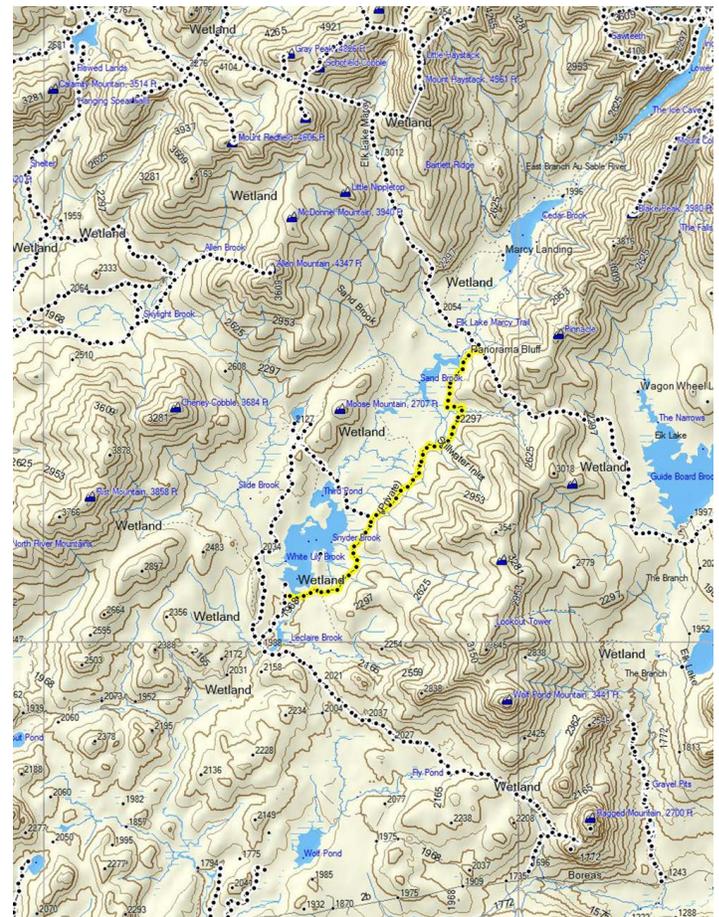
5 High Peaks Wilderness Complex Unit Management Plan, March 1999



of Mount Marcy. Within this same circle you will find the popular trailheads at Heart Lake, the Garden, Saint Huberts, Elk Lake, and Upper Works—all of which are routinely filled beyond their capacity on summer weekends.

Although not inventoried by APA, there is an existing trail on the new property connecting Boreas Ponds with the foot of Mount Marcy. From the Boreas Ponds dam, it is 9.3 miles to the Panther Gorge Lean-to along this trail; by comparison, the state hiking trail from Elk Lake is 9 miles long. The presence of this pre-existing route, and the role it could play in becoming a new trunk trail for the southern slopes of the High Peaks, must be a consideration when weighing the likely consequences of allowing motor vehicle access into the interior of the Boreas Ponds Tract. A parking area that is located close to the ponds will also be located close to Mount Marcy, with all of the highly predictable impacts that will cause.

Likewise, existing logging roads and trails lead to White Lily Pond, an attractive body of water at the foot of Allen Mountain, often ranked among the remotest



Existing trail from Boreas Ponds to Panther Gorge Trail highlighted in yellow

of the High Peaks. The summit is only 2 miles from the pond. In our analysis of the various classification options, we conclude that easy motorized access to Boreas Ponds or even LaBier Flow will make this mountain extremely vulnerable to illegal trail cutting. Only by keeping motor vehicle access far away from Allen can this impact be avoided.

As a tract of private land, Boreas Ponds was a 20,000-acre buffer against the southern foothills of the High Peaks—a buffer that will be eliminated if the road is opened any further than it already is. Therefore the classification of this tract goes far beyond the question of “reasonable access” to a potential paddling destination. The decision made by the APA will have a direct impact on adjacent state lands that have been a remote part of the Forest Preserve since the 1920s. Road access to Boreas Ponds—unnecessary to accommodate an adventurous public, which has already accepted the challenge presented by the closed gates—will come at the expense of the remote quality of the adjacent High Peaks Wilderness.

## Inappropriate Aspects of APA’s Proposals

Regardless of which alternative is ultimately selected as the preferred outcome, there are some aspects of the current DSEIS that we do not want to see implemented:

- **Spot zoning:** Adirondack Wilderness Advocates is opposed to the APA’s growing use of “spot zoning” in its state land classification actions. The SLMP has the clear intent of segregating non-compatible public uses of the Forest Preserve into broadly applied classification categories, whereas spot zoning (which we define as the narrow application of land categories on a facility-by-facility basis) has the clear intent of bypassing the intent of the SLMP



*White Lily Pond*



*Camping at Second Pond*



*LaBier Flow*

by allowing otherwise non-conforming uses to continue within protected areas. This may be acceptable in the case of a private right of way, or in the preservation of a structure with a truly unique historical value. It is unacceptable, however, when a Wild Forest Corridor or Primitive Corridor is applied for the sole purpose of permitting a recreational use through a protected area. The alternatives in the current DSEIS contain spot-zoned road corridors and gravel pits. In our view, these are inappropriate for an area that should be defined by the sensitivity of its natural assets, not the practicality of its roads and gravel pits.

- **Deference of key management decisions to the UMP process:** Several passages in the DSEIS refer to vaguely defined impacts that may be identified and addressed during the Unit Management Plan (UMP) process. Such deference to the UMPs is a dereliction of the APA's responsibilities to assess the character of the land and determine its proper classification. A land classification provides a nearly permanent set of management guidelines that identify priorities and preferred outcomes, albeit on a high-level basis. The UMPs are administrative in nature and carry no guarantees of permanence. A decision to restrict motor vehicle access in one year can be reversed the next. The public is currently being asked to provide input on the management proposals in the current DSEIS, therefore we cannot base our responses on a prediction of what may or may not be included in a hypothetical UMP at an unspecified future date.

## Easement Subject to SLMP Provisions

We have read the terms of the easement for road maintenance that the towns of Newcomb and North Hudson acquired for \$10 from The Nature Conservancy immediately prior to the state's acquisition, and the document is clear that this easement is subject to whatever classification decision the agency chooses to make.

Specifically, we point out this statement:

"...and all Parties recognize that other authorities may establish laws, rules and regulations that may govern the right of the Grantees to access and maintain roads, trails, other infrastructure and

gravel pits, within the property which are conveyed by this easement."<sup>6</sup>

Other provisions also indicate that the towns' rights of way and ability to extract gravel are "subject to all laws, rules and regulations in effect at the time of the issuance of the DEC permit." Therefore it is clearly not the easement that should be setting the limits of the classification options, but the APA's decision that should be defining the limits to which the easement terms may be executed.

In light of this easement language, APA would be operating within its authority to consider classification options that close the roads to motor vehicles and require the restoration of the gravel pits.

## Intangible Qualities

We are convinced that the defining nature of the Boreas Ponds Tract is its remoteness—one of the intangible qualities of a Wilderness that the SLMP identifies as a high priority for preservation. There have been many new state land purchases in the last twenty years, and many of these have become fine additions to the Wilderness Areas of the Adirondack Park. But Boreas Ponds is different because of the sheer size of the tract, and the fact that it is crossed by no public highways. Although it was once bisected by a powerline, that feature has long since been removed. The northern boundary backs up to the High Peaks, making portions of this property as remote as anyplace in New York—or any eastern state, for that matter. Think West Canada Lake. Think Cold River. That's what Boreas Ponds could be!

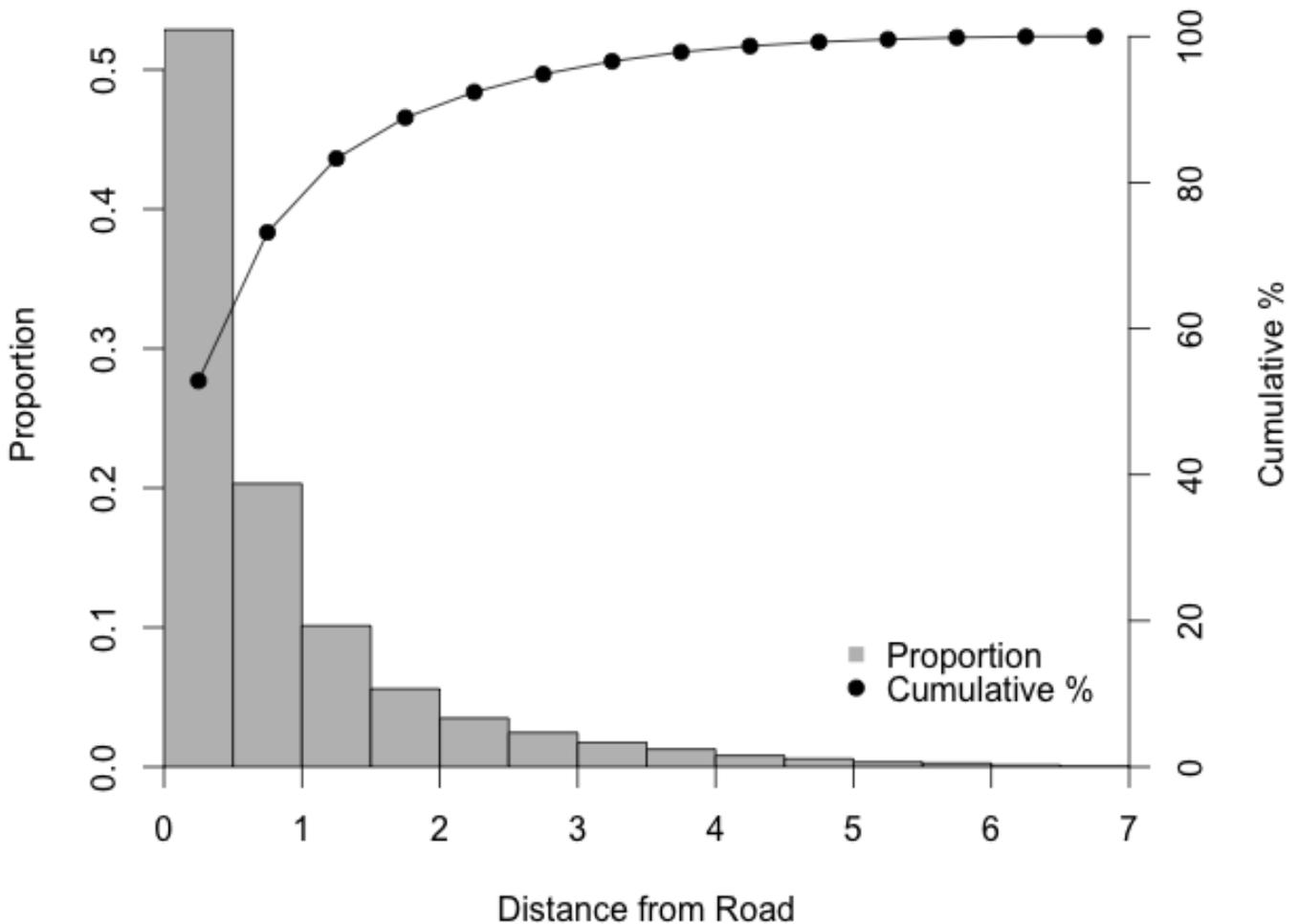
However, the APA has presented the public four classification proposals for the Boreas Ponds Tract that range from bad to unacceptable. All four do include some token amount of Wilderness, but none imagine the place as a wild landscape, solitary and secluded.

The agency has demonstrated more concern for the dams at Boreas Ponds and LaBier Flow than it has for protecting a rare and wild resource. These dams are being used as the pretext for retaining Gulf Brook Road all the way into the heart of the property—not to mention the two interior gravel pits the state plans to use for maintaining the road. Here we have the largest, wildest, remotest new acquisition we may ever see—a place that the State Land Master Plan would clearly

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6 Grant of Conservation Easement Pursuant to ECL Article 49 over Portions of the Boreas Ponds Tract, February 26, 2016

## Adirondack Remoteness



***Distribution of land in the park based on distance to the nearest road or snowmobile trail.***

define as Wilderness. And yet our public officials are preoccupied with roads, gravel pits, and dams!

Wilderness is not just about scenery. It is about re-connecting with humanity’s primeval past, about parking your car and venturing into a place that humbles us with its vast scale, inspires us to seek new challenges, awes us with its sensuous beauty. In a world of artificiality, humans crave the genuine, the natural, because wilderness is where our species began. Many of us will always heed the call to return.

Therefore it is imperative that APA does the most that it can to protect the wilderness values of the Boreas Ponds Tract, not the least.

We also assert that no other property in the Adirondack Park will ever likely be acquired with the same intangible qualities of remoteness as the Boreas Ponds Tract. We have reviewed all of the remaining large tracts

of private land in the Adirondack Park, and the lands of the Adirondack League Club and Adirondack Mountain Reserve represent the only such tracts located more than 3 miles from a public motor vehicle road or snowmobile trail. We are not optimistic that either of these tracts will be offered for sale to the state. Therefore failing to protect the intangible qualities of remoteness at Boreas Ponds would be an inexcusable failure on the part of the current generation of wilderness stewards.

AWA questions the assumption that this acquisition should be managed as a paddling destination. Boreas Ponds is an isolated body of water with no connecting paddle routes of merit. LaBier Flow is miniscule and shallow, only a fraction of the Boreas River is navigable, and so in this regard we say that the paddling options here are interesting, but very limited.

Boreas Ponds is essentially a large wetland, with

marshy shores and broad patches of dead timber. If it were not for the views of the High Peaks, public interest in exploring this place by canoe would be much less enthusiastic. The physical reality is that this is a 320-acre flow located at the heart of 20,758 acres of forest. It is not the next Lake Lila; there are no sand beaches, there is no Shingle Shanty Brook or Frederica Mountain, and there are only a handful of camping opportunities.

This is not to say that paddling Boreas is not rewarding, but in this age of wheeled pushcarts and carbon fiber hulls, the difficulties of portaging a canoe along the entire length of Gulf Brook Road have been grossly exaggerated. And if portaging a canoe over this distance is not for everyone, then so what? Is a remote wilderness pond any less enjoyable if all you do is hike to its shoreline and enjoy its tranquility from land?

## Comparative Environmental Impact Analysis

With all of these factors in mind, we have performed our own comparative impact analysis on the various APA classification alternatives. It is not difficult to imagine the types of management issues that would arise at a place like Boreas Ponds. Everything that we have identified as an environmental impact is the type of management issue that can realistically be attributed to a land classification action. Furthermore, all of these impacts deal directly or indirectly with the following criteria identified in the DSEIS:

- A. Changes in existing use or levels of use which exceed the physical, biological or social carrying capacity of State lands could result in significant adverse impacts on the natural resources and open space character of State lands.
- B. Diminishment in quality of recreational opportunities requiring vast acreages of open space, such as hunting, backpacking and wilderness canoeing, could cause significant adverse economic impacts.
- C. Diminishment in area of lands designated Wilderness, Primitive or Canoe would significantly decrease the availability of primitive recreational opportunities which are at present extremely limited in New York State and rare in the Northeastern United States.
- D. The designation of large tracts of State land as Wilderness, Primitive or Canoe provides the unusual opportunity for the reintroduction

of extirpated species of wildlife which require significant acreages of habitat essentially undisturbed by man.

- E. Deterioration of the quality or character of Wilderness, Primitive or Canoe area resources could adversely impact the educational and research values of those areas.
- F. Deterioration in the quality of the natural or scenic resources of State lands could adversely affect the Park economy.

These criteria clearly establish that any APA action that diminishes or impairs the quality of a Wilderness or the opportunities for primitive recreation qualifies as an environmental impact that must be mitigated. Therefore our comparative analysis of the four agency alternatives begins with the classification option with the least amount of Wilderness protections, which logically includes the largest amount of expected environmental impacts. We then consider the extent to which each of the subsequent alternatives mitigate those impacts—including several alternatives not included in the DSEIS.

## Alternative 1

This alternative would be highly destructive to the wilderness quality of the Boreas Ponds basin and adjacent slopes, and it would place the Value 1 wetlands at extreme risk. Motor vehicle use could encircle Boreas Ponds, if such use is approved in a UMP—passing around and through the Value 1 wetland complex. Coupled with the snowmobile usage, the possibility of wilderness recreation on the ponds would be eliminated at all times of the year, regardless of whether or not motorboats are allowed.

A major fault of this alternative is that it unnecessarily fragments the landscape into separate zones for recreational purposes, along lines that have no ecological significance. Upland areas and mountain slopes fall within the expanded Wilderness boundaries, but many of the lowland Value 1 wetlands are excluded by virtue of falling on the wrong side of the proposed recreational trail system. According to the SLMP, steep mountain slopes and low-lying wetlands are regarded as equal

priorities for Wilderness protection.<sup>7</sup> The exclusion of the largest high-elevation wetland complex in New York State from the protected area is Alternative 1's biggest flaw.

The easy motorized access to and around Boreas Ponds makes it inevitable that nonnative fish species will be introduced to the waterways either through carelessness (i.e. the disposal of bait fish) or by deliberate action.<sup>8</sup> Streams will remain fragmented due to the continued presence of culverts, required to keep the roads passable to motor vehicles.<sup>9</sup> Shoreline areas will become degraded as boaters seek places to land. Continued maintenance of the dams will prevent the restoration of natural water flows.<sup>10</sup>

With parking available at either LaBier Flow or Boreas Ponds, we expect this will quickly be discovered as an alternate summer access point for the adjacent High Peaks, in light of the existing trail to Panther Gorge and the attractive proximity to Allen Mountain. High volumes of foot traffic will pass through the Boreas Ponds and Casey Brook tracts to reach the summits of Marcy, Haystack, and Allen. Members of the hiking community will take it upon themselves to create a new trail to the summit of Allen, an illegal act that may be encouraged in online forums. The roadside clearings at Boreas Ponds and LaBier Flow will become base camping areas for climbers, similar to South Meadow Lane, and the former lodge site at Boreas could

develop into a clustered camping area similar to Marcy Dam. This would likely result in habituated black bears, user conflicts, and degraded campsites.

Roads are often a vector for terrestrial invasive species, especially along roadside edges and at cuts in gravel pits.<sup>11</sup> They are also significant causes of habitat fragmentation.<sup>12</sup> In terms of economic costs, the annual price tag for maintaining Gulf Brook Road, in light of its underlying soil conditions, is estimated to be \$46,650.<sup>13</sup>

The only way to mitigate these impacts is to promulgate strict regulations that will require a constant ranger presence to be enforced. That makes the economic cost of this alternative very high, as well as the risk for potential environmental harm. Therefore we are unable to embrace this alternative as a viable solution.

## Alternative 2

This alternative only resolves one of the anticipated impacts foreseen in the first alternative: the potential for motor vehicle use encircling the ponds and passing through the large Value 1 wetland complex. It would allow the removal of culverts from tributaries to Boreas Ponds, for instance, and prevent the possibility of motor vehicle access extending to White Lily Pond at the foot of Allen Mountain.

Otherwise, motor vehicle access could occur all the way to the Boreas Ponds dam, and therefore all of the other expected impacts identified in Alternative 1 remain unmitigated with this alternative. It fails to protect the fishery, for the same reasons cited above. It makes access to the High Peaks too easy. The full cost of annual road maintenance remains. It allows motorized access into or near the Value 1 wetland areas at LaBier Flow, Andrew Brook, Andrew Brook Tributary, and Brant Brook. It sets up the likelihood that Boreas Ponds will become a concentrated camping area requiring

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7 Adirondack Park State Land Master Plan, 2014. II. Classification System and Guidelines, Page 13

8 George E. 2010. Tragedy of the Trout. *Adirondack Explorer*. Findlay CS, Bert DG, & Zheng L. 2000. Effect of introduced piscivores on native minnow communities in Adirondack lakes. *Canadian Journal of Fisheries and Aquatic Sciences*, 57: 570-580.

9 Huldey et al. 2005. Distribution, status, and perturbations to brook trout within the eastern United States. *Eastern Brook Trout Joint Venture*.

Nislow et al. 2011. Variation in local abundance and species richness of stream fishes in relation to dispersal barriers: implications for management and conservation. *Freshwater Biology*, 56: 2135-2144.

Torterotot et al. 2014. Influence of forest road culverts and waterfalls on the fine-scale distribution of brook trout genetic diversity in a boreal watershed. *Transactions of the American Fisheries Society*, 143(6): 1577-1591.

10 Bednarek AT. 2001. Undamming rivers: a review of the ecological impacts of dam removal. *Environmental Management*, 27(6): 803-814.

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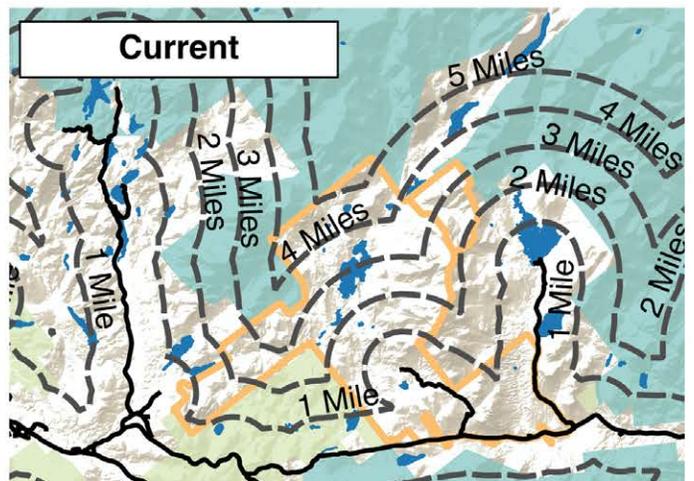
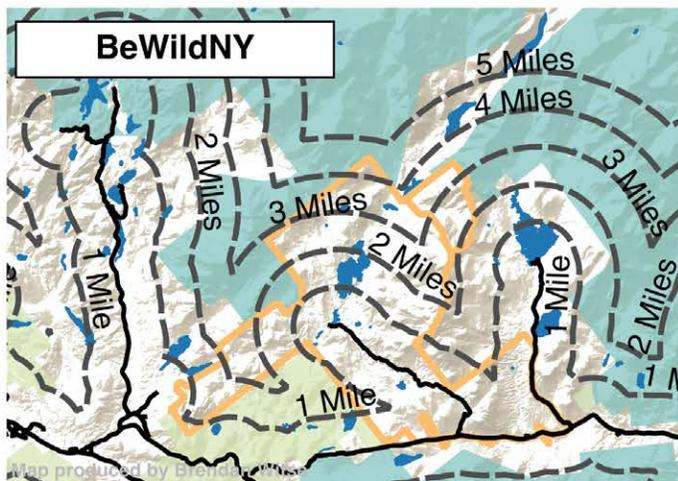
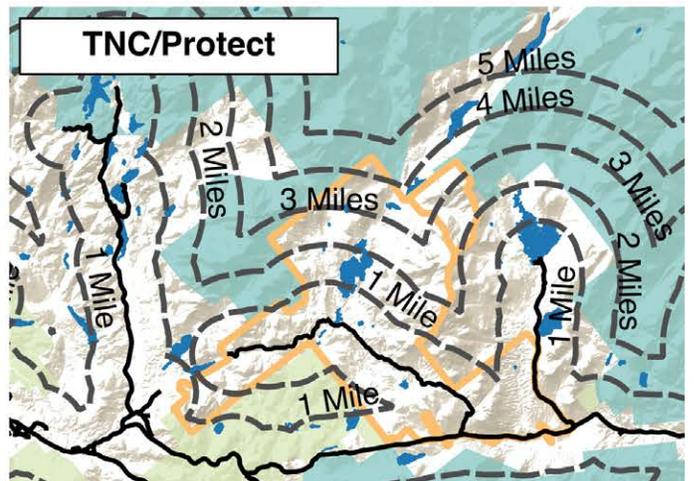
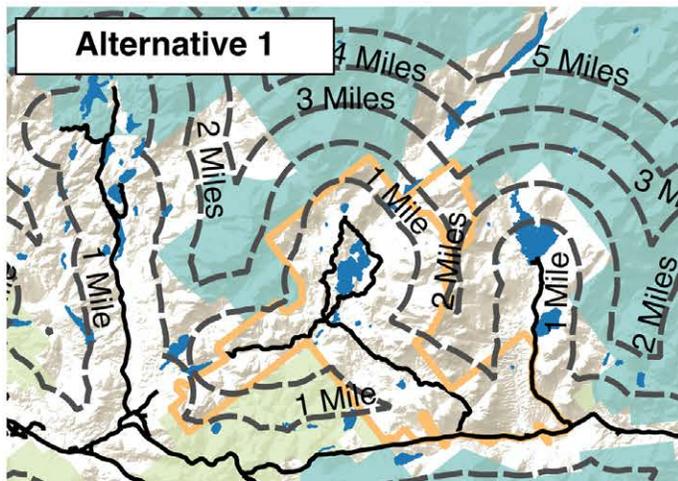
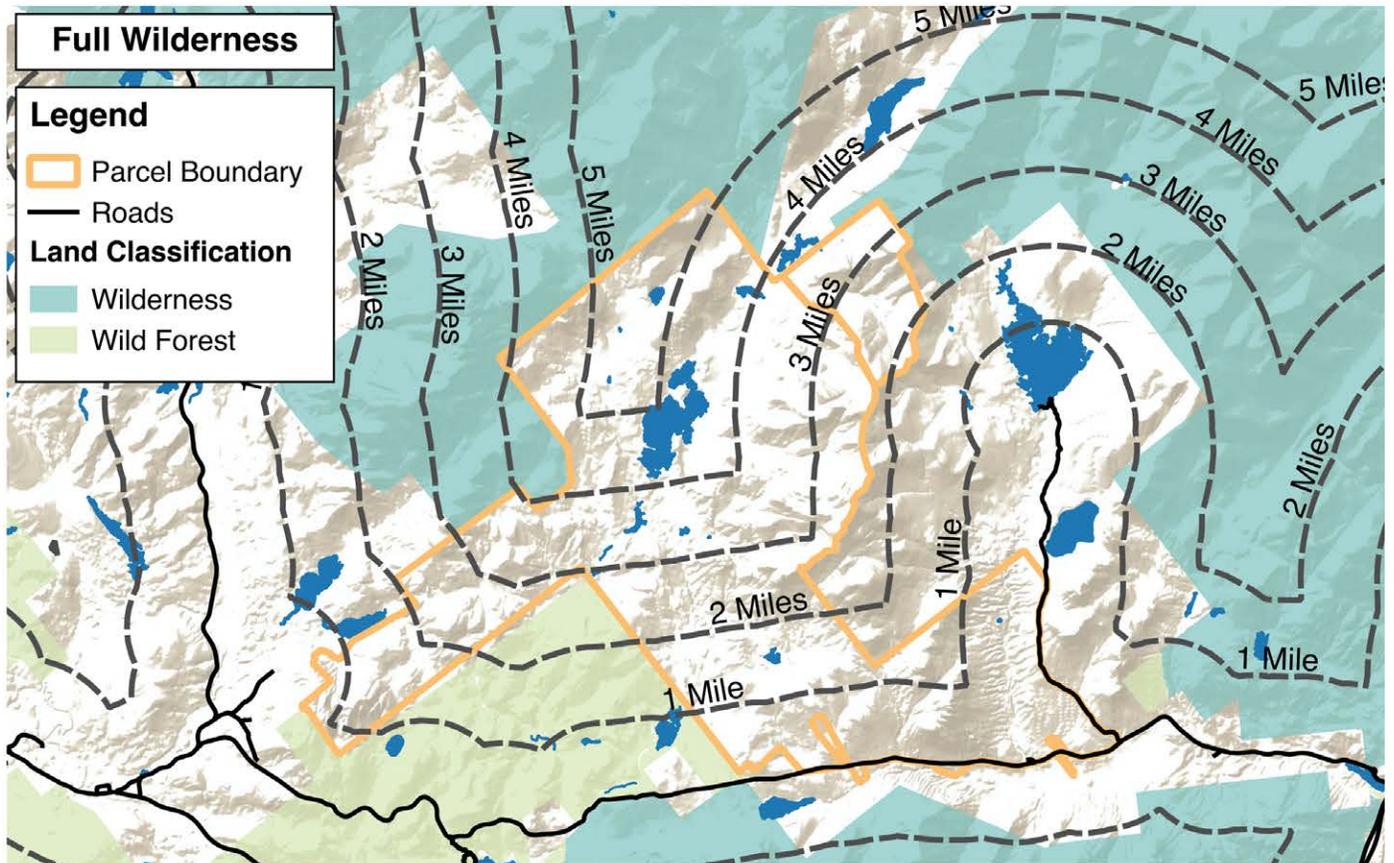
11 Robinson et al. 2010. A conceptual framework for understanding, assessing, and mitigating ecological effects of forest roads. *Environmental Reviews*, 18: 61-68.

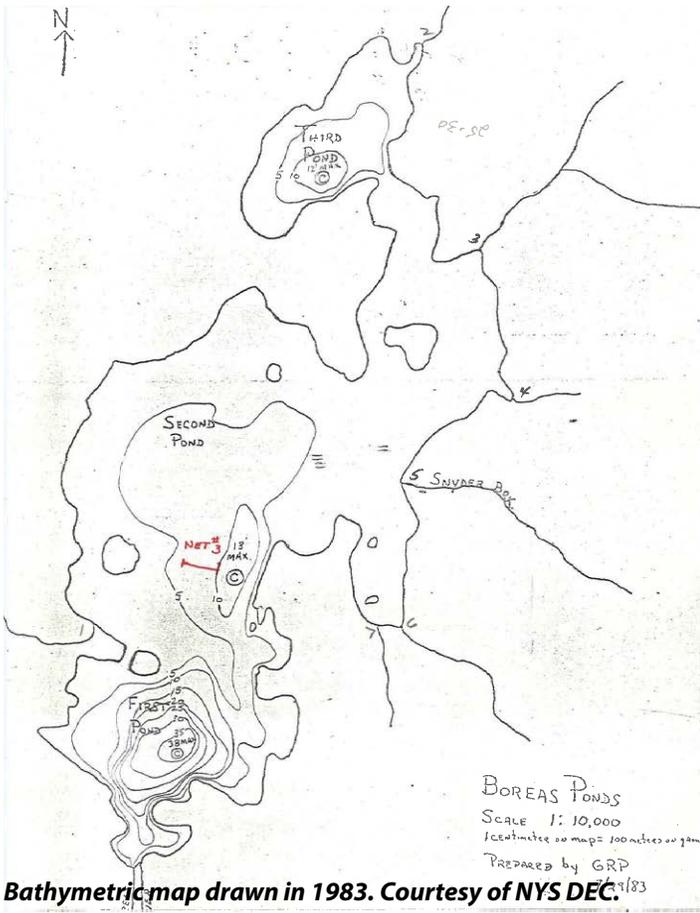
12 Trombulak & Frissell. 2000. Review of ecological effects of roads on terrestrial and aquatic communities. *Conservation Biology*, 14(1): 18-30.

13 Pikus. 2016. Boreas Ponds Roads: How soil properties affect maintenance costs. <http://adkres.org/2016/11/03/boreas-ponds-roads-soil-properties-affect-maintenance-costs/>



# Impact of Classification Alternatives on the Remoteness of the Boreas Ponds Tract





**Bathymetric map drawn in 1983. Courtesy of NYS DEC.**



**Historic map depicting three native Boreas Ponds**



**Aerial imagery of Boreas Ponds and environs**



**Modified image reconstructing what native Boreas Ponds might have looked like before dam construction**

ing a constant ranger presence.

In fact, the few incremental advantages gained by this alternative are very much outweighed by the many impacts that would remain unchecked, making it very detrimental to the wilderness quality of the landscape. Therefore based on these merits, we reject Alternative 2.

## Alternatives 3 & 4

Adirondack Wilderness Advocates sees no material distinction between these alternatives. Clearly, APA's assumption is that the appropriate level of access could be determined at the UMP level. However, UMPs are more susceptible to administrative whim and do not provide the same guarantee of protection as a Wilderness classification. So with no ability to predict the outcome of the UMP process, we are forced to assume that the maximum amount of motor vehicle access will be granted when weighing our responses to the DSEIS.

Therefore, in comparison to the previous alternatives, the only additional impact that will be mitigated by Alternatives 3 and 4 is the proximity of snowmobile access to Boreas Ponds, because the option of using Boreas Ponds Road as part of a community connector trail is eliminated in this alternative. In the winter at least, the interior of the tract might be a quiet place to explore.

Otherwise, both of these alternatives allow motor vehicle access to come too close to the ponds to effectively mitigate any of the other potential impacts identified in Alternative 1. While these proposals do offer full wilderness protection for the Value 1 wetland at Andrew Brook Tributary, they exclude LaBier Flow (which has 18 identified emergent and deep-water marsh species, 2 more than Boreas Ponds), Andrew Brook, Brant Brook, and all but the shorelines of Boreas Ponds.

Furthermore, Adirondack Wilderness Advocates objects to the use of spot-zoning to create a Wild Forest Corridor and other sub-units within the expanded Wilderness. For all of these reasons, we are unable to embrace either of these alternatives.

## The Nature Conservancy / Protect the Adirondacks

This proposal would establish Gulf Brook and Boreas

Ponds roads as the Wilderness / Wild Forest boundary. This configuration is only slightly different than Alternative 2, with two negligible improvements. First, use of the waterways would be somewhat reduced due to the mile-long portage, but given the 2016 visitation rates we should expect that most people would not see that mile as an obstacle. Second, the Boreas Ponds dam would be placed within the Wilderness boundaries. During the course of writing the UMP, the state might be more inclined to study Boreas Ponds to determine the desirability of retaining the dam in a wilderness setting.

Otherwise, all other expected impacts identified in Alternative 2 remain unmitigated. The soundscape of the Boreas Ponds basin would remain impaired, and the access trail to Boreas Ponds would likely prove insufficient to protect the waterways, given the friendliness of the terrain to wheeled canoe carts.

## BeWildNY

This proposal allows motor vehicle access to within “at least 1 mile” of the Boreas Ponds dam—that is, at or near the LaBier Flow dam—and routes the snowmobile trail far to the south. In this respect it is similar to Alternative 4; the main distinction is the extent to which the Boreas River should be protected downstream from LaBier Flow.

Otherwise, we can see no advantage to this proposal over Alternative 4, and at least one disadvantage.

Like the APA, the authors of this proposal suggest that the details of public motorized access should be worked out in the UMP process. However, when weighing the potential impacts of the proposal we are not able to contemplate a hypothetical outcome of a UMP that has not yet been drafted. A proposed permit system intended to restrict motorized access to a small number of individuals cannot be incorporated into the land classification, therefore it cannot be considered in our analysis of the current DSEIS. For the present exercise, we must assume that public motor vehicle access would occur all the way to LaBier Flow—the basic fact on which this analysis hinges.

The mile-long distance from the proposed parking area at LaBier Flow underestimates the extent to which people are willing to carry or wheel a canoe, especially considering the number of people who were willing to transport canoes over much longer distances in 2016.

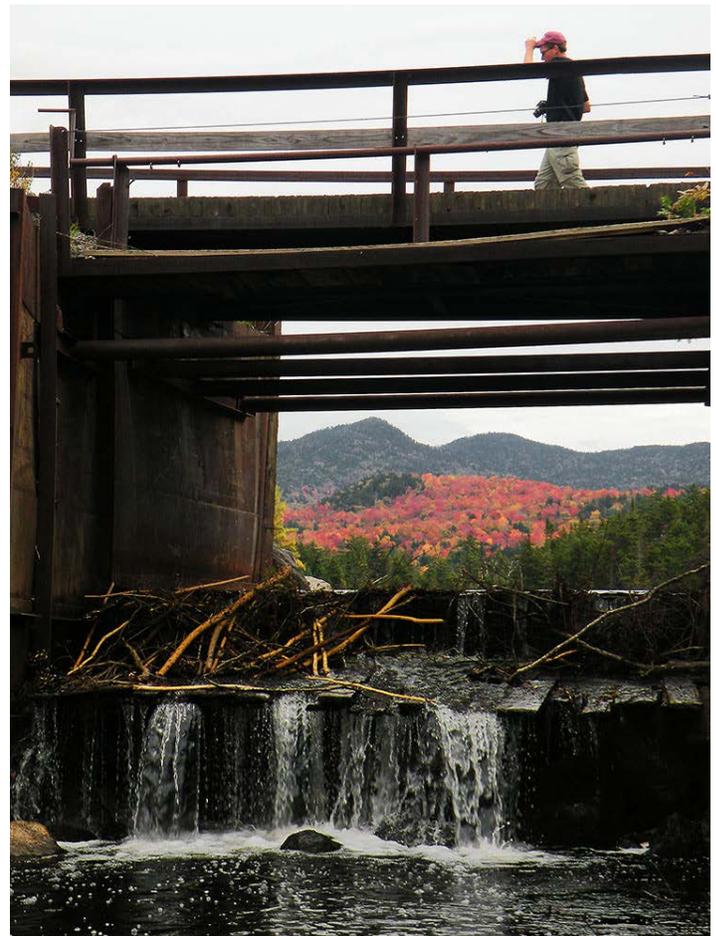
Therefore we have no reason to believe that the waterway impacts identified in Alternative 1 will be better mitigated with this proposal. Because the carry trail is so friendly to wheeled canoe carts, bait fish can still be easily transported to Boreas Ponds, and small body aquatic invasive species such as the spiny water flea can be easily transported on fishing gear. In short, the threat of spreading nonnative species will still exist.

Additionally, this proposal fails to address the likely impacts that Alternative 1 will have on the adjacent High Peaks. From the proposed parking area, the walking distance to Allen Mountain's summit will be about 5.5 miles. To our knowledge there is no existing trail from White Lily Pond to the summit of Allen, but the overall distance is so much shorter than the current route from Upper Works (roughly 9.1 miles) that the creation of a new herd path is a near certainty. We foresee the area near the Boreas Ponds dam and lodge site becoming a popular base camping area, which in turn will require a constant ranger presence to enforce a set of strict regulations, just as in Alternative 1. Therefore AWA finds this proposal to be very inadequate in its ability to resolve the likely impacts associated with easy motor vehicle access.

The added disadvantage of this proposal is that we have not identified any existing clearings in the general vicinity of the proposed parking area. The authors of the proposal have indicated that it should be at least 1 mile from Boreas Ponds and perhaps no more than 1.25 miles. This would place the trailhead at the LaBier Flow dam (1 mile from the Boreas Ponds dam) or a short distance to the east. The dam itself is a narrow causeway, unsuitable for parking. The nearest clearing is actually one of the gravel pits subject to the easement rights acquired by the towns, located a few rods west of the dam. No clearings exist along Gulf Brook Road within a range of 0.25 mile to the east of LaBier. Therefore it is very likely that a significant amount of tree cutting would be required to accommodate this proposal.

### Alternative 4 with No Road Access

This alternative, not proposed by any group, has been favored by some members of the public. It essentially prohibits motor vehicle access beyond a point at or near the current trailhead parking area created by DEC as part of the interim management plan. Presumably, the land beyond the gate would be classified Wilderness,



**Dam at LaBier Flow**

with no Wild Forest Corridor to accommodate motor vehicle use of the road or Primitive Area to accommodate dam maintenance. It is essentially Alternative 4, but with a solid Wilderness zone beyond the trailhead parking area.

This proposal adds 2.5 miles (approximately 45 – 50 minutes) of foot travel to the alternatives and proposals considered above; this is the distance between the gate and the dam at LaBier Flow. The total distance to Boreas Ponds is 3.5 miles, which might be sufficient to reduce some of the waterway impacts contemplated above. Because the carry trail is so friendly to wheeled canoe carts, a higher-than-expected number of people will still be inclined to make weekend camping visits. This will require DEC to establish durable camping sites at Boreas Ponds, which will be difficult due to the extensive wetlands. But it might be more feasible to achieve dispersed camping conditions that are more appropriate to the quality of the resource than in any of the previous alternatives.

In this scenario, both dams will be managed in accordance with Wilderness guidelines. It is important

to note that historic maps of Essex County do indicate that in the nineteenth century there were indeed three native Boreas Ponds; if the dams were removed or breached we do know that the ponds would not simply disappear. Data provided by DEC show that the only pond deep enough to have cold bottom waters is First Pond. These data show that this pond lacks oxygen in these waters, most likely due to large amount of organic material being input from the associated wetland. Therefore it is unlikely that removing the dams would be detrimental to the fishery. Making the dams more remote and difficult to maintain may force DEC to consider alternative actions, much as it has in the case of other wilderness impoundments.

From the current interim parking area, the total walking distance to Allen Mountain is 8 miles, about 1.1 miles shorter than the current route from Upper Works; a new herd path to the summit will still probably develop in this scenario, but it will do so at a slower rate. The route to Panther Gorge via Boreas Ponds is 12.8 miles long, making it more appealing as part of a point-to-point backpacking route than as an alternate

approach to Mount Marcy. Therefore the likelihood of the ponds becoming a congested base-camping area, as expected in the earlier alternatives, seems notably less likely to occur.

Based on 2016 observations, we do expect that summer visitation levels would remain moderately high if this scenario were adopted. While the remoteness of the Boreas Ponds basin would be diminished by retaining motor vehicle access to the first 3.1 miles of Gulf Brook Road, many of the experiential qualities would still be preserved. Therefore, of the seven alternatives considered so far, this is the first that makes significant strides at effectively mitigating the impacts identified in Alternative 1.

## Full Wilderness Classification

This alternative, which has been proposed by Adirondack Wilderness Advocates (as well as Adirondack Wild, Citizens Campaign for the Environment, New

### *View of Allen Mountain from White Lily Pond*





York Ornithological Association, and Northern New York Audubon, none of which are affiliated with AWA), envisions the complete closure of Gulf Brook and Boreas Ponds roads. Public access would be accommodated on foot, ski, horse, and wagon beginning at Blue Ridge Road. The total distance to LaBier Flow is 5.6 miles, and the total distance to Boreas Ponds is 6.6 miles.

Most of the expected impacts identified in Alternative 1 are mitigated in this proposal, because the majority of the tract is classified as Wilderness. The number of overnight campers is more in line with resource capacity. Opportunities for primitive recreation, which are at present extremely limited in New York State and rare in the Northeastern United States, are maximized at Boreas Ponds.

Furthermore, the remote quality of the preexisting state lands adjacent to the new acquisition will be preserved. While some backpackers will pass through the property en route to the High Peaks, Boreas Ponds no longer provides a shortcut to any of the summits. Therefore the visitors who choose to explore the tract will be primarily interested in the ponds as a destination, not as a base camping area. The threat of a new herd path to the summit of Allen is all but eliminated in this scenario.

Access for the differently abled can be accommodated by adaptive methods, such as by outfitters equipped with horses and wagons. People seeking to regain their mobility after an illness or injury will find the relatively gentle trail to be a preferable alternative to a traditional foot trail. Easier hiking opportunities can be afforded at Ragged Mountain, Wolf Pond, and Vanderwhacker Pond.

The added disadvantage of this alternative is that the remoteness of the Boreas Ponds basin might mean that interior facilities are not always maintained on a timely basis. However, the cabin at LaBier Flow, if retained for its historic value, may also serve as a ranger station and base of operation for stewardship crews.

Given the established criteria for evaluating environmental impacts in the DSEIS, the list of likely impacts that would result in the adoption of Alternative 1, and the failure of most of the alternative proposals to ad-

dress those impacts, the full-Wilderness option is clearly the best alternative for the following reasons:

- It would not cause a change in existing uses or levels of use which exceed the physical, biological or social carrying capacity of State lands, avoiding significant adverse impacts on the natural resources and open space character of State lands.
- It would not cause a diminishment in the quality of recreational opportunities requiring vast acreages of open space, such as hunting, backpacking and wilderness canoeing, which in turn could cause significant adverse economic impacts.
- It would not cause a diminishment in the availability (or quality) of primitive recreational opportunities, which are at present extremely limited in New York State and rare in the Northeastern United States.
- It would provide the unusual opportunity for the reintroduction of extirpated species of wildlife that require significant acreages of habitat essentially undisturbed by man.
- It would not cause a deterioration of the quality or character of the Wilderness resource, thereby avoiding an adverse impact to the educational and research values of the area.
- It would not cause a deterioration in the quality of the natural or scenic resources of State lands, thereby avoiding an adverse impact to the Park economy.

Therefore, in light of this analysis, Adirondack Wilderness Advocates concludes that Wilderness is the best option for the Boreas Ponds Tract.



ers. The connection with Newcomb Lake will enable a circumnavigation of the entire Santanoni Range—a gift to trekkers.

- **Establish improved canoe access points for Sanford Lake and the Hudson River.** Part of the MacIntyre East Tract extends outside of the proposed Wilderness boundaries, and should be added to the Vanderwhacker Mountain Wild Forest. This section of the Hudson is navigable by canoe, although it currently suffers from a lack of good launching and takeout points. There are intriguing views of the surrounding mountains at various points along the river, and if access can be improved (especially at the downstream end) this has the potential to become a favorite paddling destination.
- **Designate Gulf Brook Road as a multi-use trail for horses, skiing, and hiking.** Once the hunting club leases expire in 2018 and all non-conforming structures have been removed, there will be no further obligations to maintain the road. Adirondack Wilderness Advocates strongly urges the state to keep the road closed to public motorized uses, designating it as a trail instead. Its surface would be ideal for canoe carts and wagons, which are permissible uses within Wilderness Areas, and in the winter it would be an

excellent cross-country ski trail. The latter opportunity would be lost, however, if the road were opened to motorized uses, including snowmobiles.

- **Build two lean-tos near the shoreline of Boreas Ponds and manage the area as a remote backpacking destination.** This body of water, with its stunning views of the neighboring peaks, features extensive marshes along its shoreline. Although there has been much discussion about managing Boreas Ponds as a canoeing destination with easy road access, the absence of connecting waterways—combined with the dearth of potential campsites—make this an unrealistic setting for car-enabled paddling access. It appears that past recreational use of the pond has been low, and therefore an increased human presence enabled by easy road access could have an adverse impact on the wildlife that inhabits the area, including a robust moose population. Instead, Adirondack Wilderness Advocates proposes that Boreas Ponds is better suited for dispersed, low-impact recreation, and that its remote characteristics should be strongly protected. Lean-tos at carefully selected sites would concentrate use at durable locations, leaving much of the shoreline untouched for the benefit of nesting loons and browsing moose. Connecting trails to Panther Gorge and the Opalescent River would “plug” this tract into



*Cabin at LaBier Flow might make a suitable ranger outpost*



***The ledges on Ragged Mountain would make an excellent family-friendly short hiking destination***

the existing High Peaks trail network, and extending the new Wolf Pond Trail north to LaBier Flow would provide alternate foot access from the south.

- **Assess the historic value of the LaBier Flow hunting camp and retain this log structure as a ranger station, if warranted.** This particular cabin, located on the main route to Boreas Ponds, is believed to have been constructed in the nineteenth century. If an assessment of its historic value determines that it is worth preserving, then Adirondack Wilderness Advocates supports the possibility of its retention as a ranger station, subject to Wilderness guidelines. However, this would require an amendment to the State Land Master Plan, so it is critical that a thorough assessment be completed before any final decisions are made. Under no circumstances would we condone the cabin's use as a public camping or lodging facility.

- **Cut a foot trail to the southern summit of Ragged Mountain, where outstanding views of the Hoffman Notch Wilderness can be found.** This has the potential to become a favorite short hike within easy reach of the Gulf Brook trailhead. Currently, a short bushwhack is required to find the rock ledges, but a quality hiking trail could be established with minimum effort.
- **Designate an area for camping and motor vehicle access in the vicinity of The Branch, east of Ragged Mountain.** This existing Finch, Pruyn road does not penetrate a remote area and would not infringe on the wilderness values of the interior of the Boreas Ponds Tract, making it a more suitable location for motorized recreation.
- **Establish a “wilderness gateway” facility at North Hudson.**



*Dear APA:*  
**FOCUS ON TRAILS  
NOT TAILPIPES!**

**Comments on Other Tracts**

**ES-09**

**2016 Classification Package**



Adirondack  
Park Agency

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**East Branch Ausable**

Town of Keene

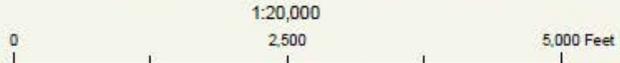
Adjacent to Hurricane Mtn Wilderness

Proposed Class: Wilderness, Primitive, Wild Forest

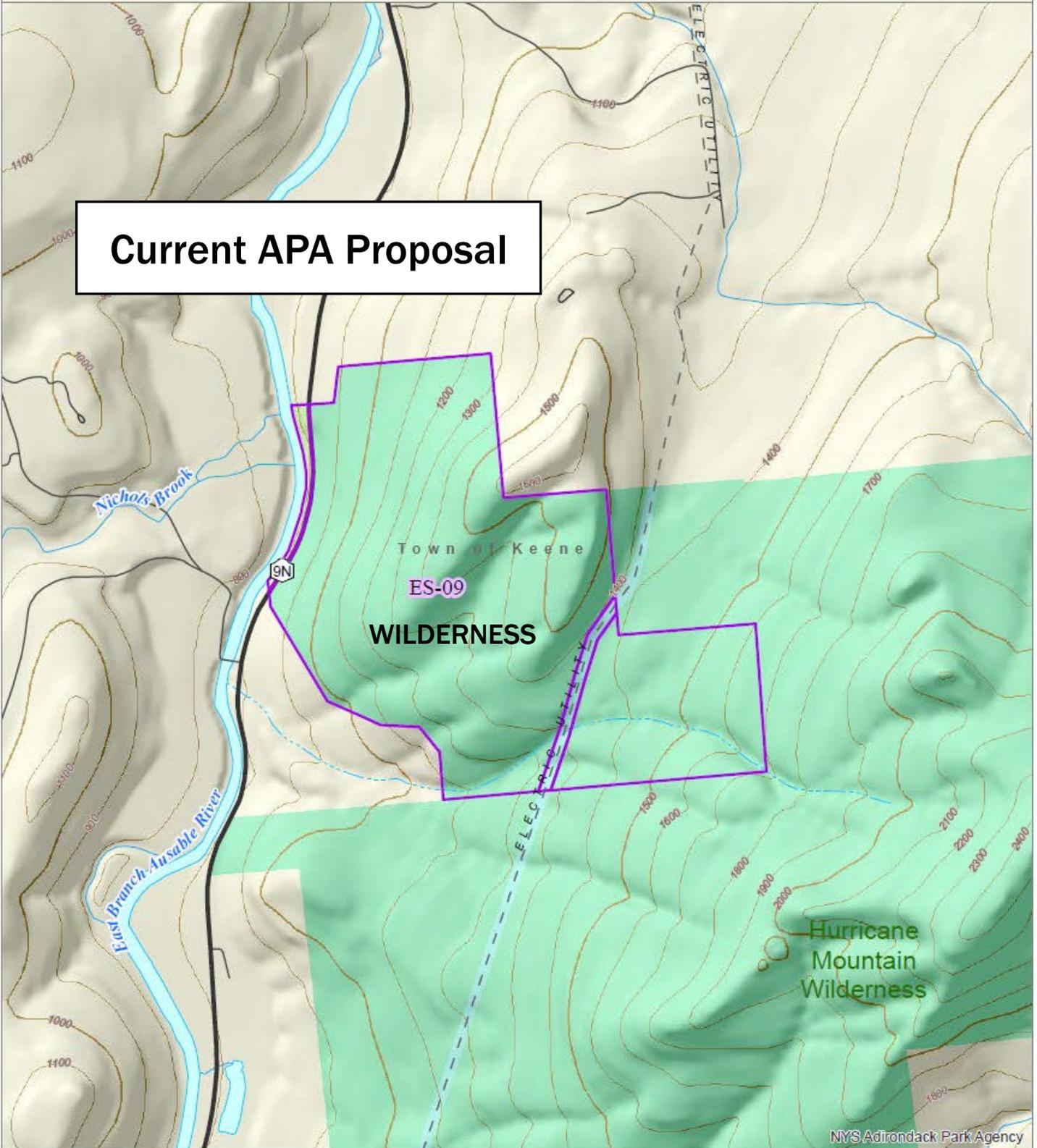
Proposed Unit: Hurricane Mtn & Hammond Pond

Source: AFP 16-469

- 2016 Classification
- Private
- Wilderness
- Canoe Area
- Primitive Area
- Wild Forest
- Intensive Use
- Historic
- State Administrative
- Pending Classification



**Current APA Proposal**



NYS Adirondack Park Agency

**ES-09**

**2016 Classification Package**



Adirondack Park Agency

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Print Date: 10/3/2016

**East Branch Ausable**

Town of Keene

Adjacent to Hurricane Mtn Wilderness

Proposed Class: Wilderness, Primitive, Wild Forest

Proposed Unit: Hurricane Mtn & Hammond Pond

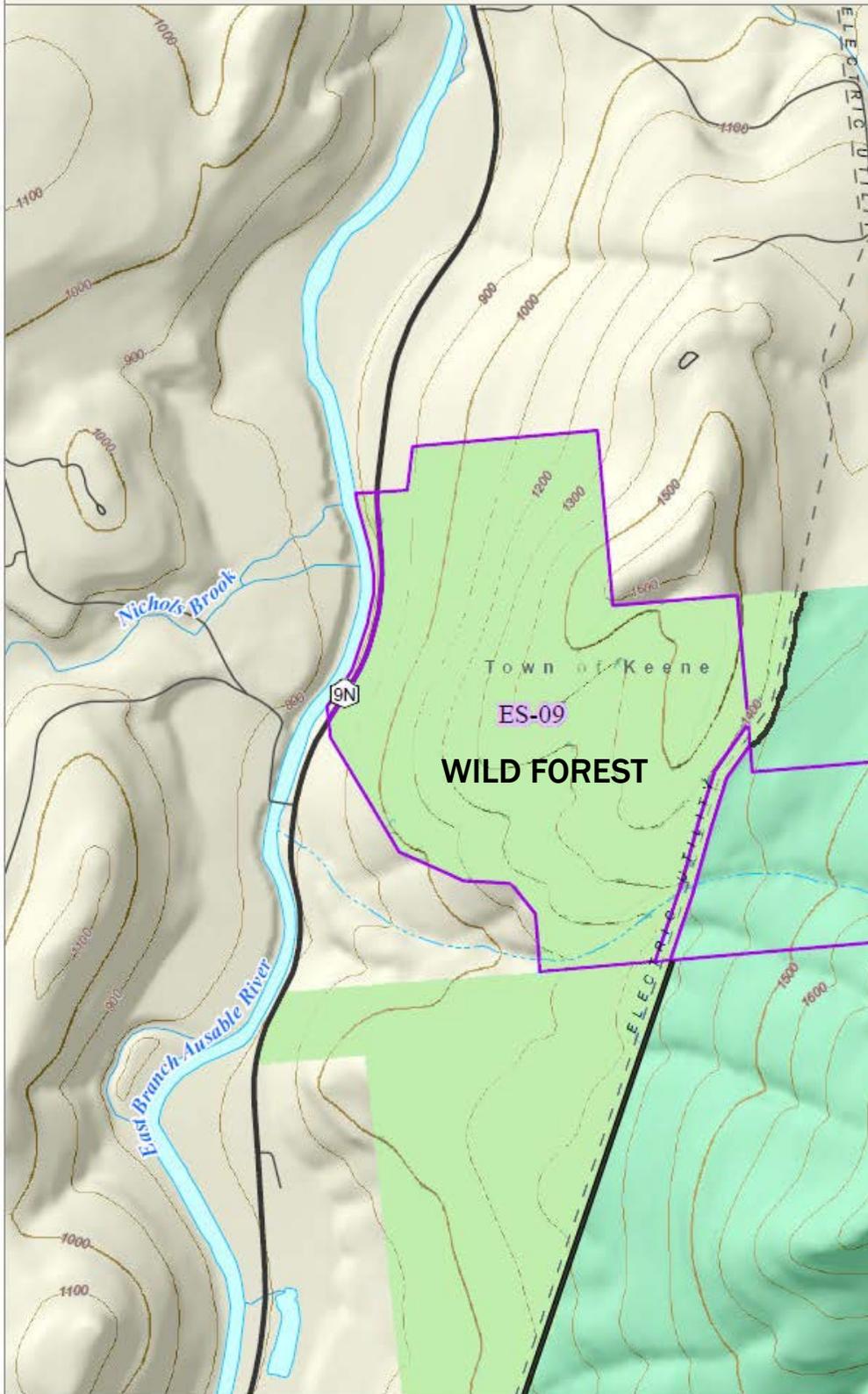
Source: AFP 16-469

- 2016 Classification
- Private
- Wilderness
- Canoe Area
- Primitive Area
- Wild Forest
- Intensive Use
- Historic
- State Administrative
- Pending Classification



1:20,000

0 2,500 5,000 Feet



**AWA Proposal**  
 Because of the permanent nature of the utility corridor, the low elevation, the proximity to a major highway, and the absence of identified sensitive resources, the powerline and all lands to the west are low priorities for a wilderness classification. The proposed primitive corridor would sever these lands from the main body of the wilderness, making the area non-contiguous (in violation of the SLMP) and resulting in an inappropriate use of spot-zoning, which AWA opposes. This map suggests a wild forest classification for the non-contiguous lands, but a primitive designation may also be appropriate.

NYS Adirondack Park Agency

# ES-16

## MacIntyre West

Town of Newcomb

Former Finch land adjacent to High Peaks

Proposed Class: Wilderness & Primitive

Proposed Unit: High Peaks & MacIntyre Primitive

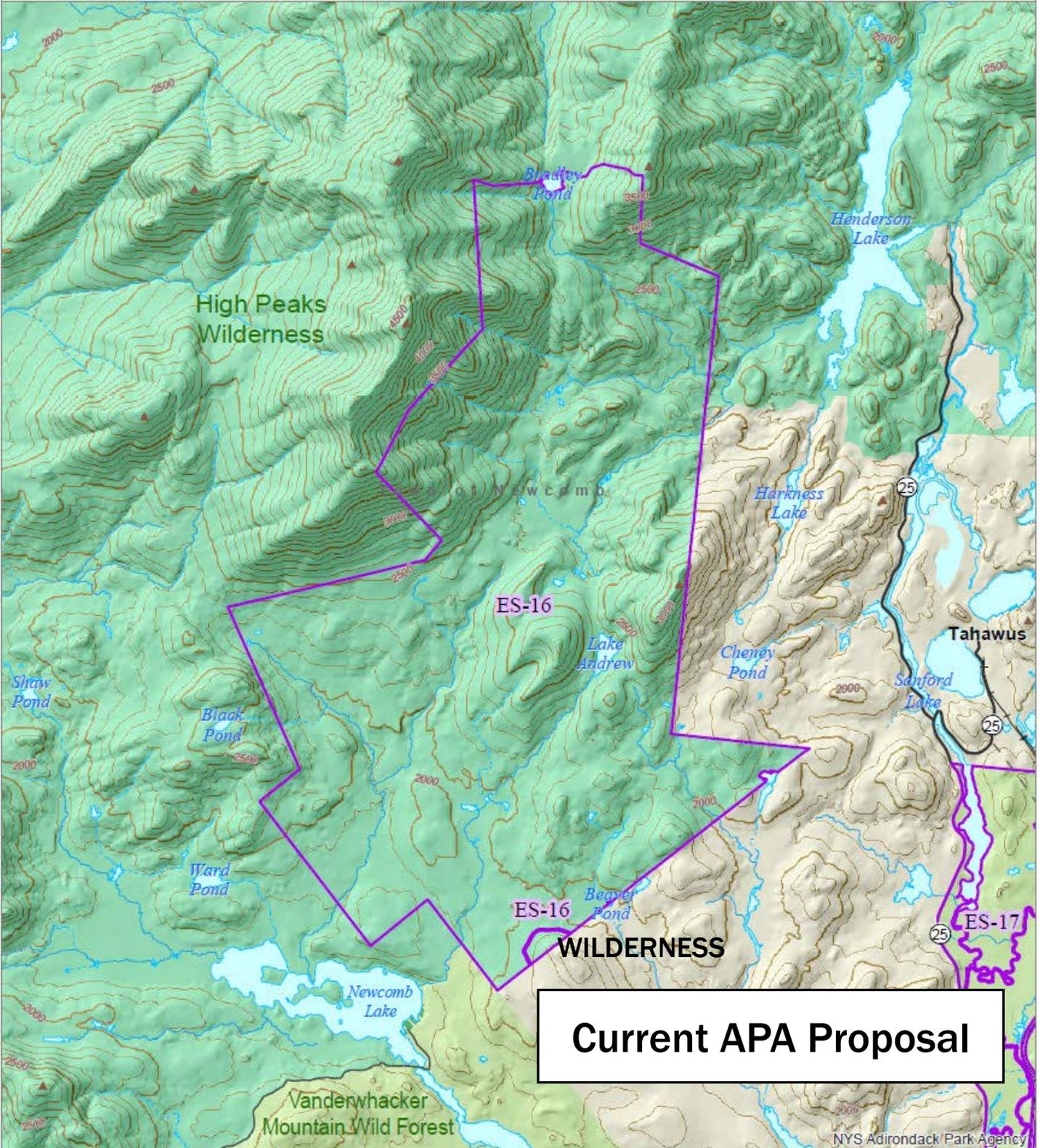
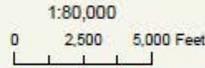
Source: AFP 16-457.01, AFP 16-458A

### 2016 Classification Package



Adirondack Park Agency

- 2016 Classification
- Private
- Wilderness
- Canoe Area
- Primitive Area
- Wild Forest
- Intensive Use
- Historic
- State Administrative
- Pending Classification



**ES-16**

**2016 Classification Package**



Adirondack Park Agency

**MacIntyre West**

Town of Newcomb

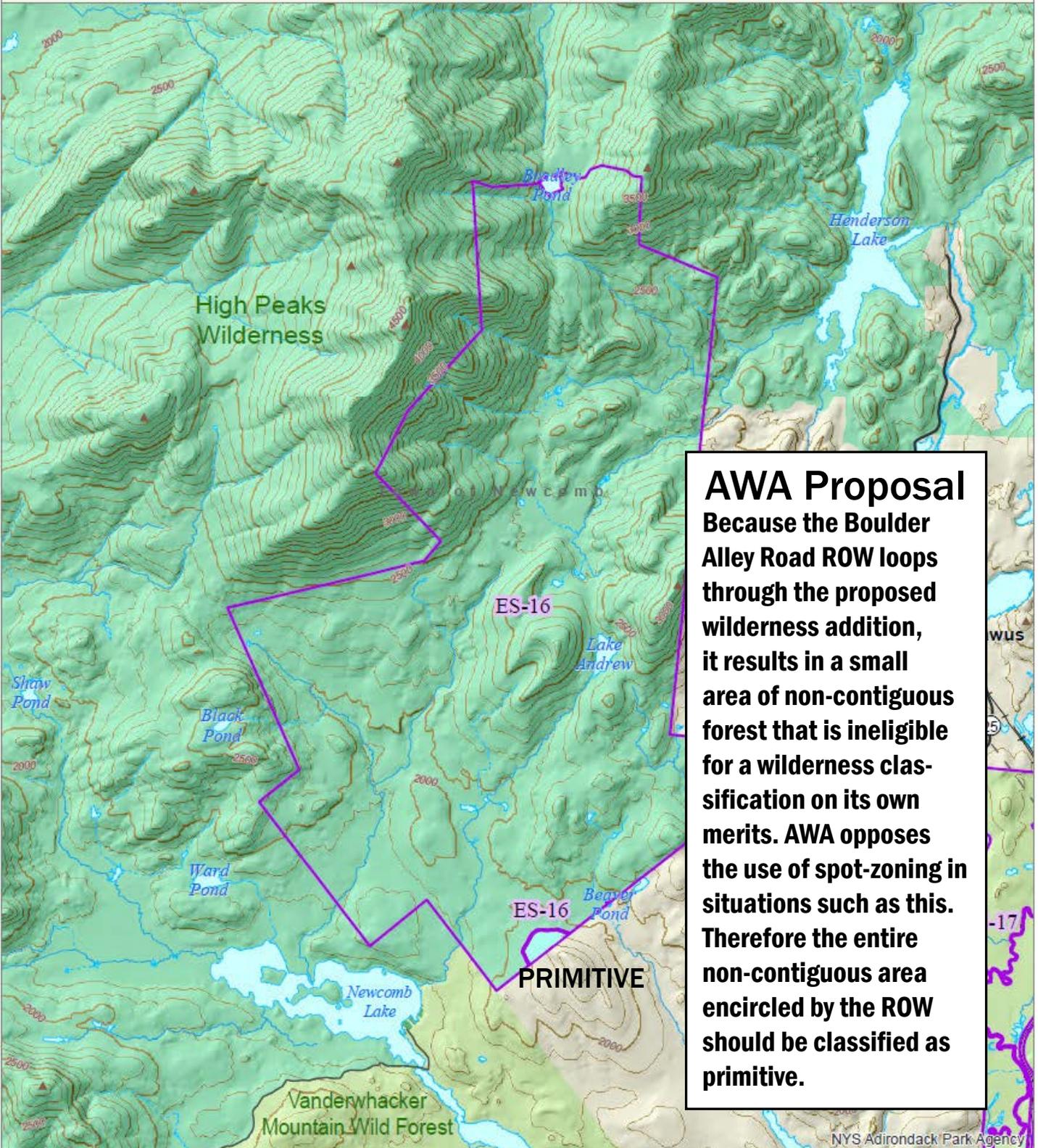
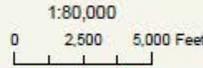
Former Finch land adjacent to High Peaks

Proposed Class: Wilderness & Primitive

Proposed Unit: High Peaks & MacIntyre Primitive

Source: AFP 16-457.01, AFP 16-458A

- 2016 Classification
- Private
- Wilderness
- Canoe Area
- Primitive Area
- Wild Forest
- Intensive Use
- Historic
- State Administrative
- Pending Classification



**AWA Proposal**  
 Because the Boulder Alley Road ROW loops through the proposed wilderness addition, it results in a small area of non-contiguous forest that is ineligible for a wilderness classification on its own merits. AWA opposes the use of spot-zoning in situations such as this. Therefore the entire non-contiguous area encircled by the ROW should be classified as primitive.

**ES-17**

**MacIntyre East**

Town of Newcomb, Town of North Hudson

Former Finch land adjacent to High Peaks

Proposed Class: Wilderness, Primitive, Wild Forest

Proposed Unit: HP, MacIntyre, Vanderwhacker Mtn

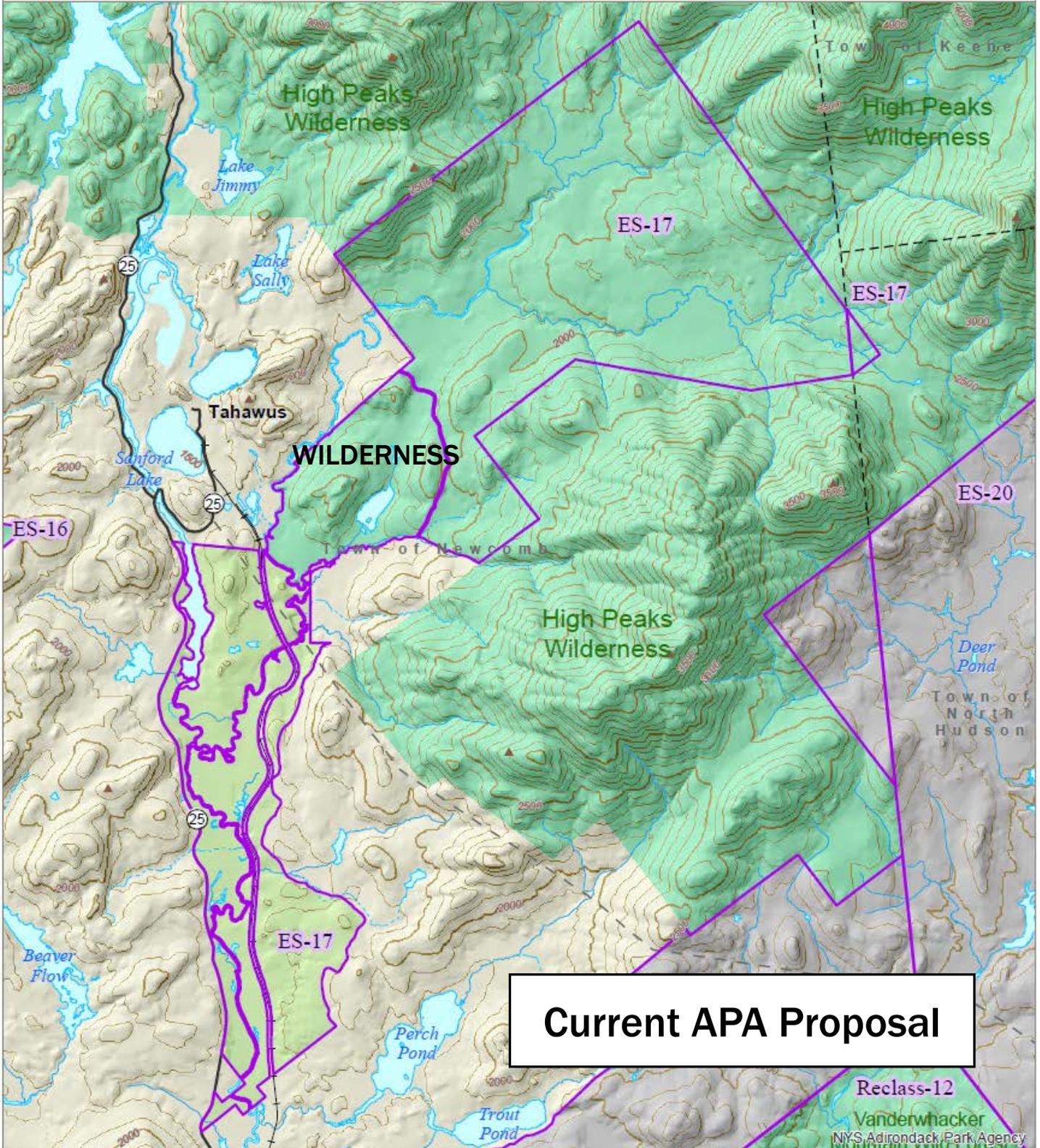
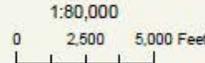
Source: AFP 16-458A

**2016 Classification Package**



Adirondack Park Agency

- 2016 Classification
- Private
- Wilderness
- Canoe Area
- Primitive Area
- Wild Forest
- Intensive Use
- Historic
- State Administrative
- Pending Classification



**Current APA Proposal**

**ES-17**

**2016 Classification Package**



Adirondack  
Park Agency

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**MacIntyre East**

Town of Newcomb, Town of North Hudson

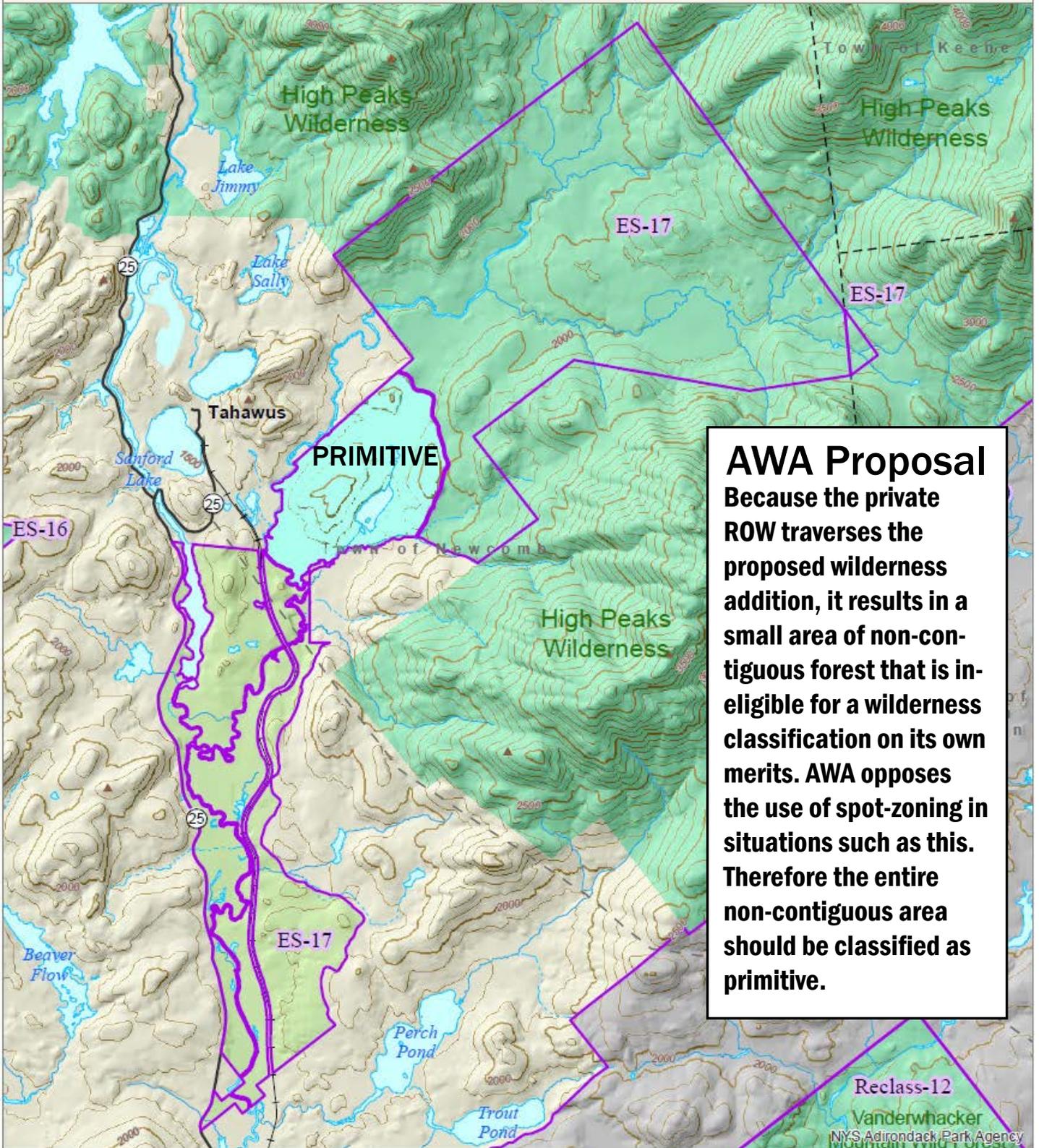
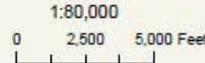
Former Finch land adjacent to High Peaks

Proposed Class: Wilderness, Primitive, Wild Forest

Proposed Unit: HP, MacIntyre, Vanderwhacker Mtn

Source: AFP 16-458A

- 2016 Classification
- Private
- Wilderness
- Canoe Area
- Primitive Area
- Wild Forest
- Intensive Use
- Historic
- State Administrative
- Pending Classification



**AWA Proposal**  
 Because the private ROW traverses the proposed wilderness addition, it results in a small area of non-contiguous forest that is ineligible for a wilderness classification on its own merits. AWA opposes the use of spot-zoning in situations such as this. Therefore the entire non-contiguous area should be classified as primitive.

**FR-02**

**2016 Classification Package**



**Adirondack Park Agency**

**Long Pond Mountain**

Town of Duane, Town of Santa Clara

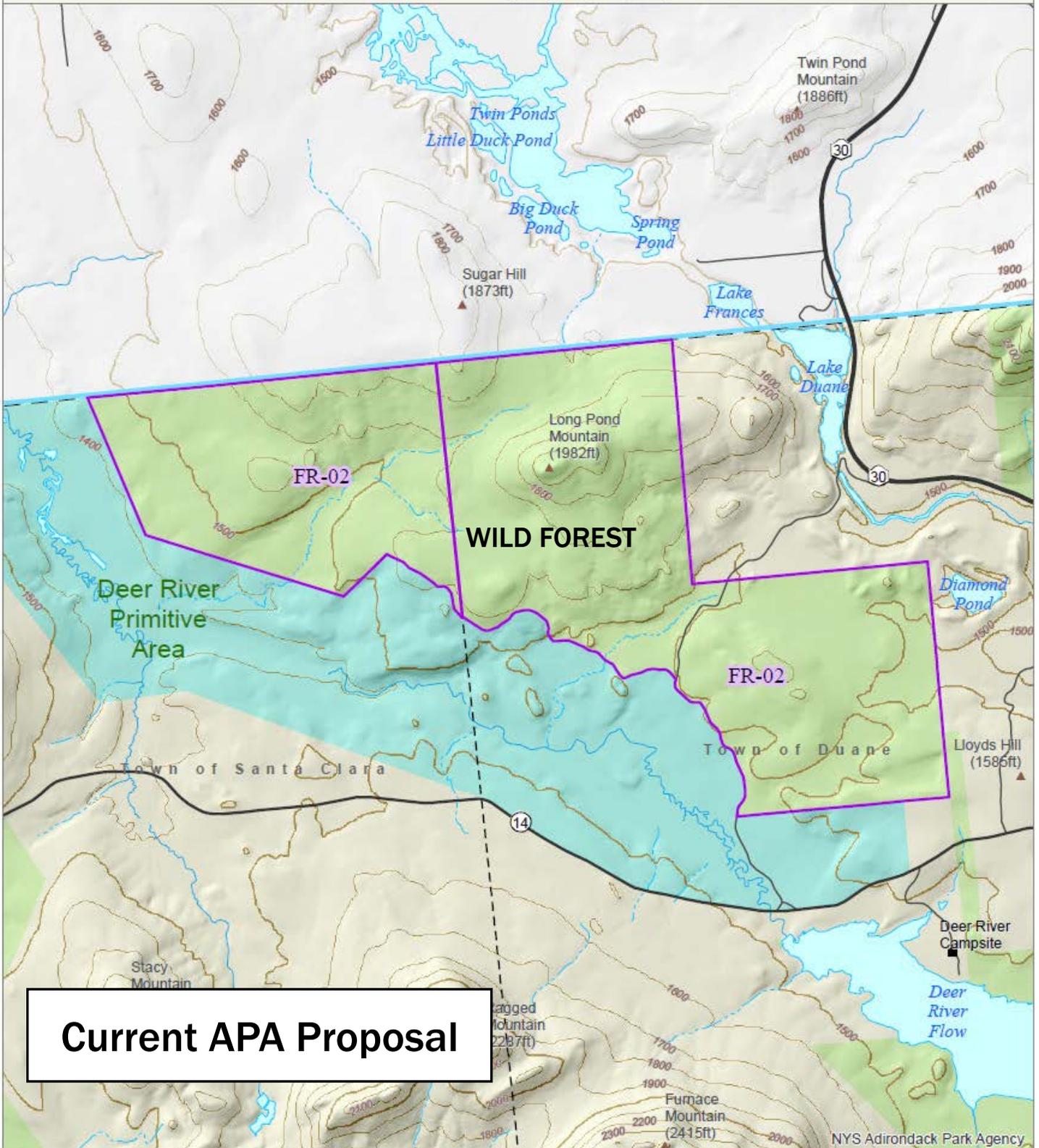
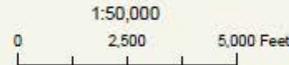
Long Pond Mtn, Deer River

Proposed Class: Wild Forest

Proposed Unit: Debar Mountain

Source: AFP 17-231B

- 2016 Classification
- Private
- Wilderness
- Canoe Area
- Primitive Area
- Wild Forest
- Intensive Use
- Historic
- State Administrative
- Pending Classification



Long Pond Mountain

Town of Duane, Town of Santa Clara

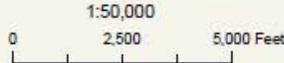
Long Pond Mtn, Deer River

Proposed Class: Wild Forest

Proposed Unit: Debar Mountain

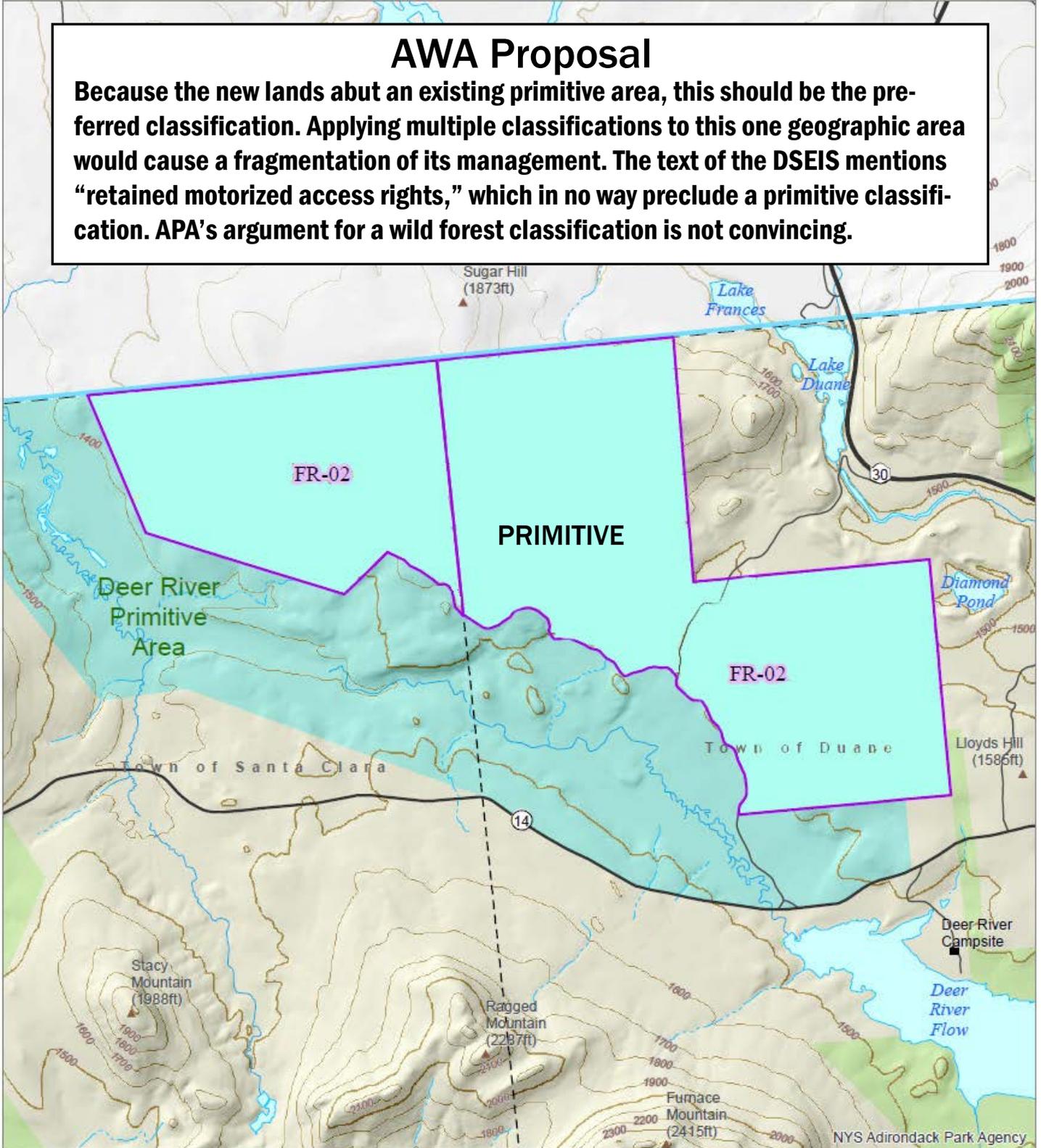
Source: AFP 17-231B

- 2016 Classification
- Private
- Wilderness
- Canoe Area
- Primitive Area
- Wild Forest
- Intensive Use
- Historic
- State Administrative
- Pending Classification



**AWA Proposal**

**Because the new lands abut an existing primitive area, this should be the preferred classification. Applying multiple classifications to this one geographic area would cause a fragmentation of its management. The text of the DSEIS mentions “retained motorized access rights,” which in no way preclude a primitive classification. APA’s argument for a wild forest classification is not convincing.**



# HM-02, HM-03

# 2016 Classification Package



Adirondack Park Agency

Cedar Ridge, Township 33

Town of Indian Lake

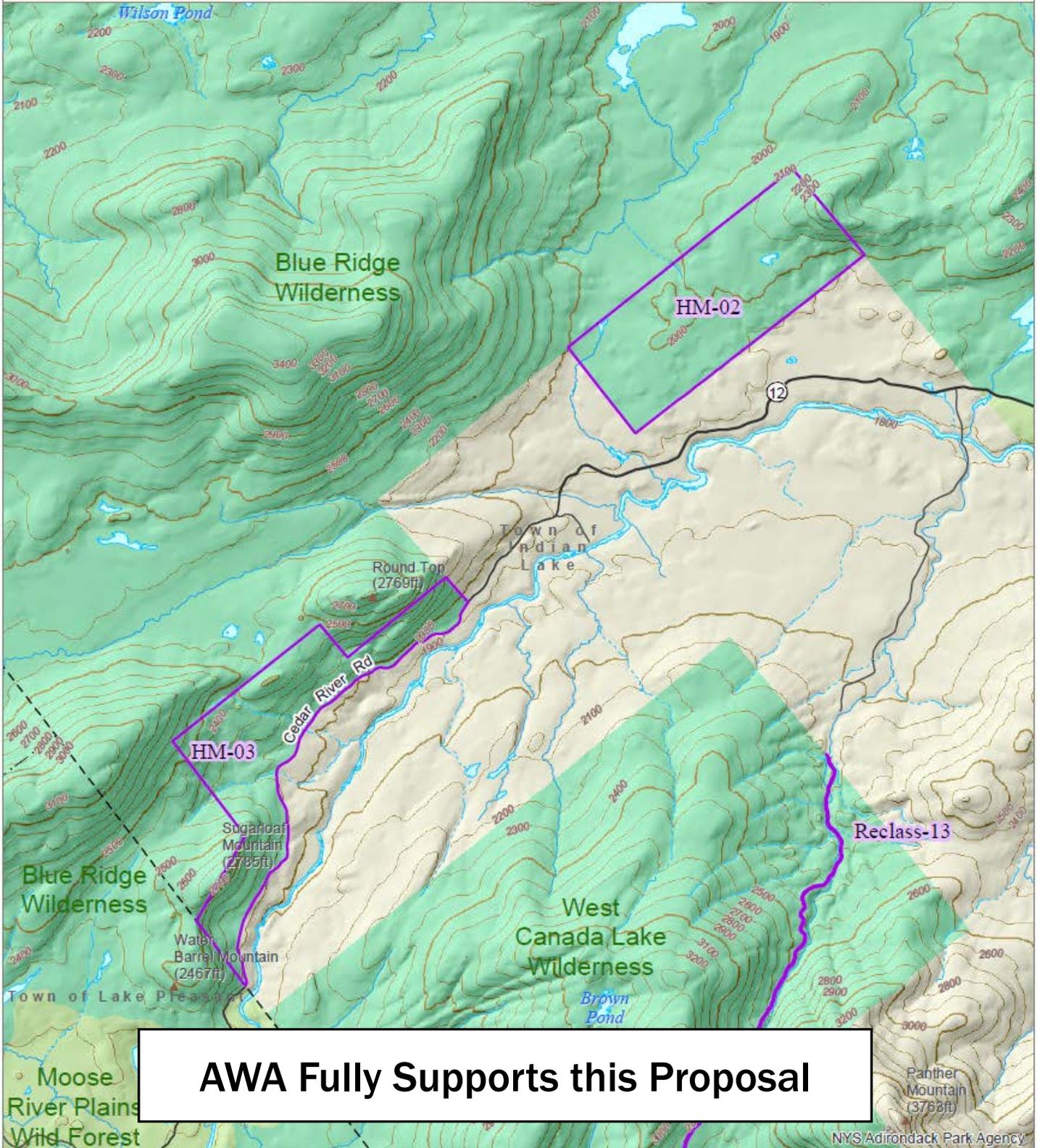
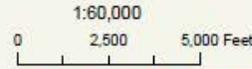
Adjacent to Blue Ridge Wilderness

Proposed Class: Wilderness

Proposed Unit: Blue Ridge

Source: AFP 21-317, AFP 21-318A

- 2016 Classification
- Private
- Wilderness
- Canoe Area
- Primitive Area
- Wild Forest
- Intensive Use
- Historic
- State Administrative
- Pending Classification



# HM-04

# 2016 Classification Package



Adirondack Park Agency

## Buell Valley

Town of Indian Lake

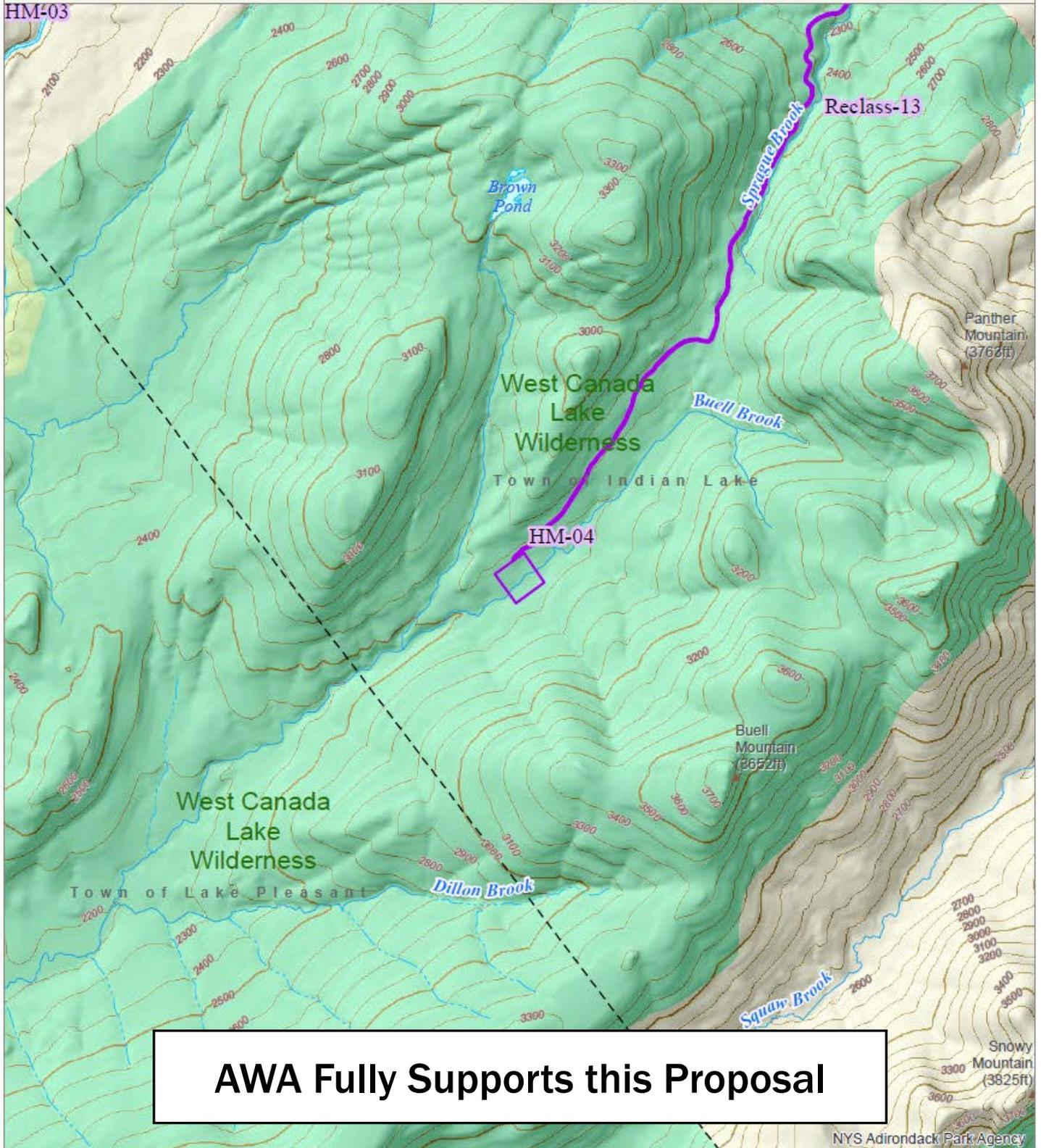
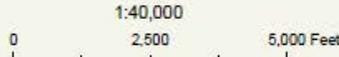
Adjacent to West Canada Lake Wilderness

Proposed Class: Wilderness

Proposed Unit: West Canada Lake

Source: AFP 21-319

- 2016 Classification
- Private
- Wilderness
- Canoe Area
- Primitive Area
- Wild Forest
- Intensive Use
- Historic
- State Administrative
- Pending Classification



NYS Adirondack Park Agency

# HM-05

## Good Luck Tract

Town of Indian Lake

Adjacent to Wilderness & WF, St Rt 28

Proposed Class: Wilderness & Wild Forest

Proposed Unit: Hudson Gorge & Blue Mtn

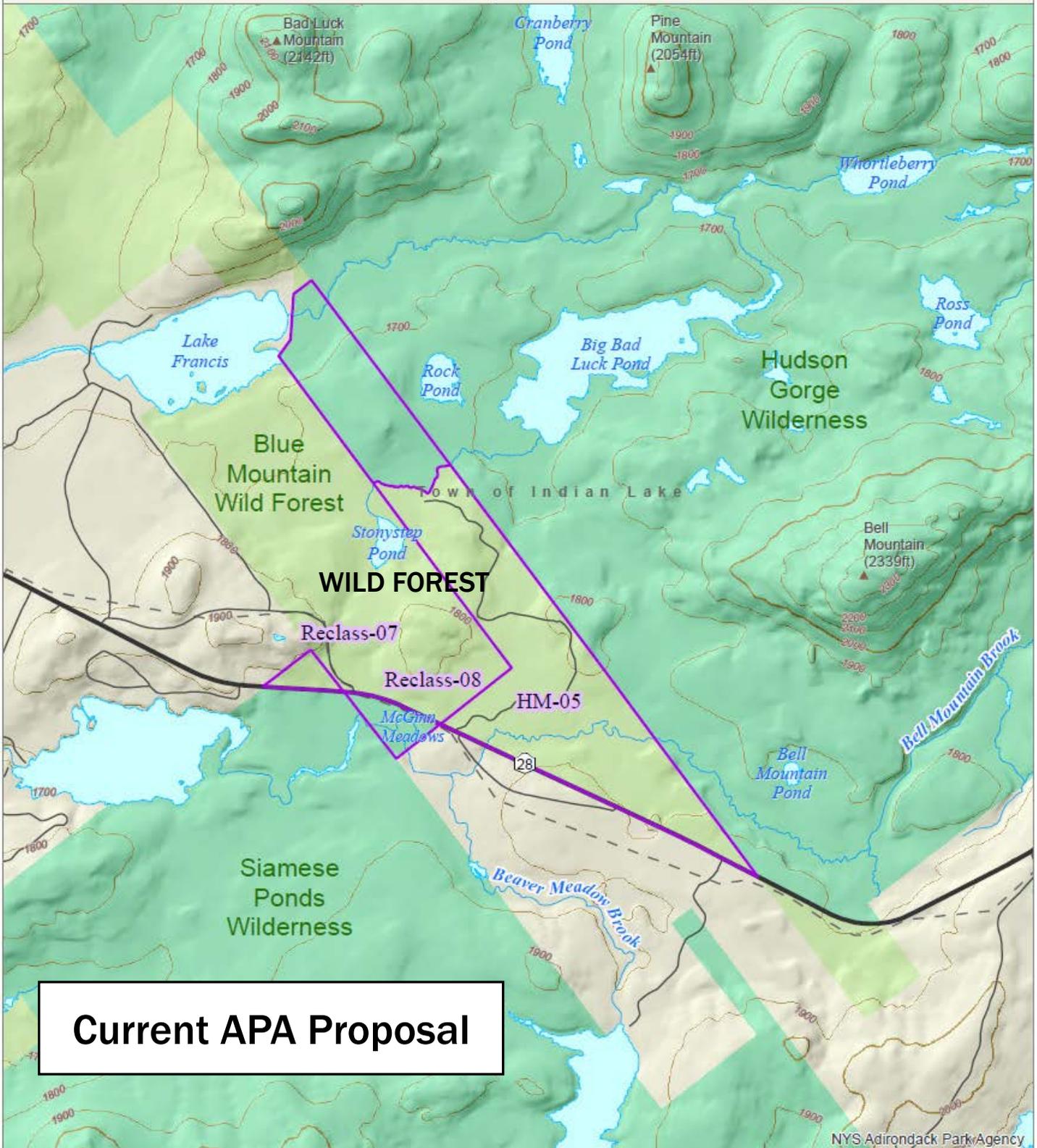
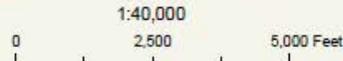
Source: AFP 21-323A

# 2016 Classification Package



Adirondack Park Agency

- 2016 Classification
- Private
- Wilderness
- Canoe Area
- Primitive Area
- Wild Forest
- Intensive Use
- Historic
- State Administrative
- Pending Classification



# HM-05

## 2016 Classification Package



Adirondack Park Agency

### Good Luck Tract

Town of Indian Lake

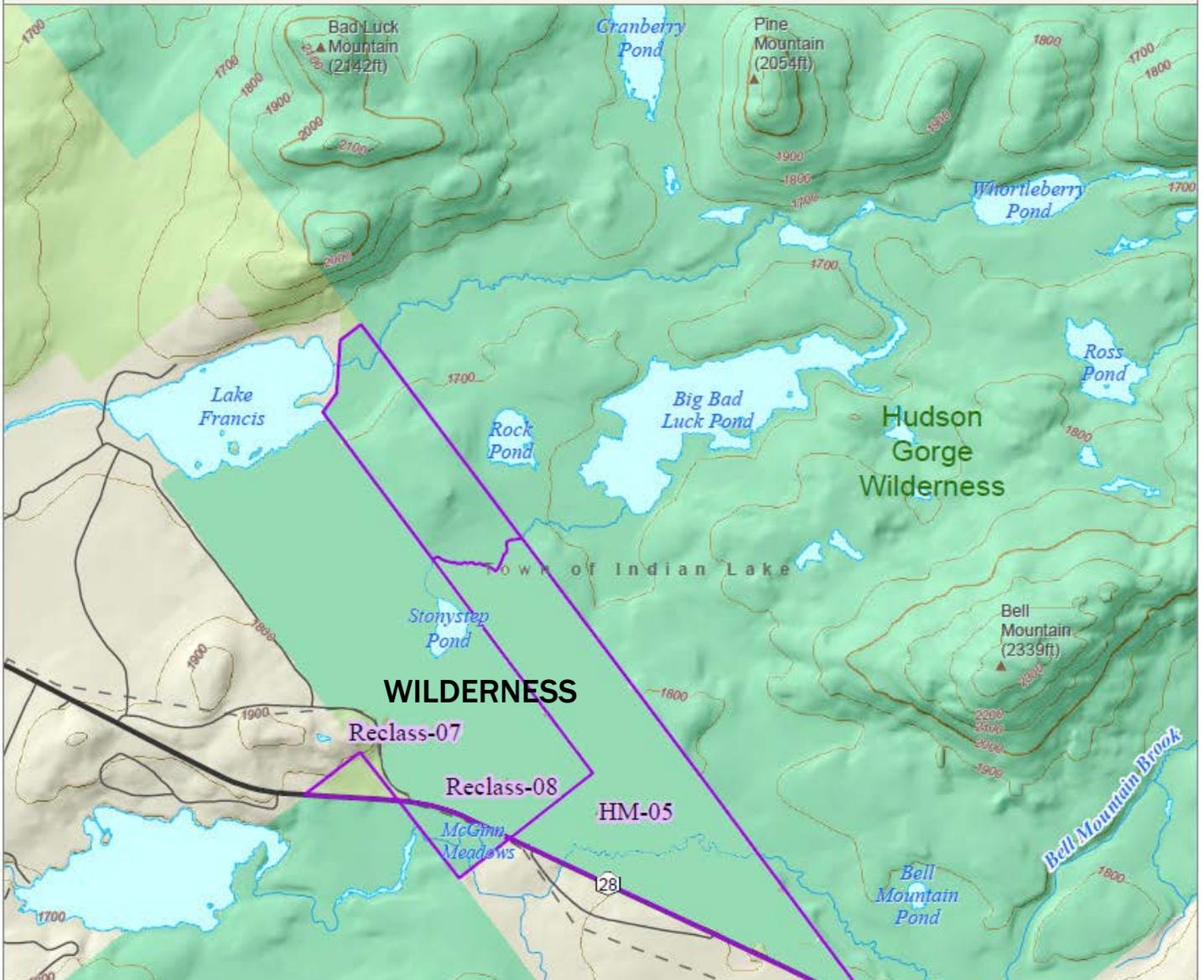
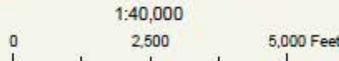
Adjacent to Wilderness & WF, St Rt 28

Proposed Class: Wilderness & Wild Forest

Proposed Unit: Hudson Gorge & Blue Mtn

Source: AFP 21-323A

- 2016 Classification
- Private
- Wilderness
- Canoe Area
- Primitive Area
- Wild Forest
- Intensive Use
- Historic
- State Administrative
- Pending Classification



## AWA Proposal

Previously, public access to Big Bad Luck Pond from the west was blocked by the private Stonystep parcel, offering some amount of protection. However, the classification of this parcel as wild forest (and the potential opening of the road) would reduce the protections of the existing wilderness lands. The Stonystep area is characterized by extensive wetlands that demand wilderness management.

# HM-06, HM-07

## 2016 Classification Package



Adirondack  
Park Agency

### Hudson Gorge, Raquette Brook

Town of Indian Lake

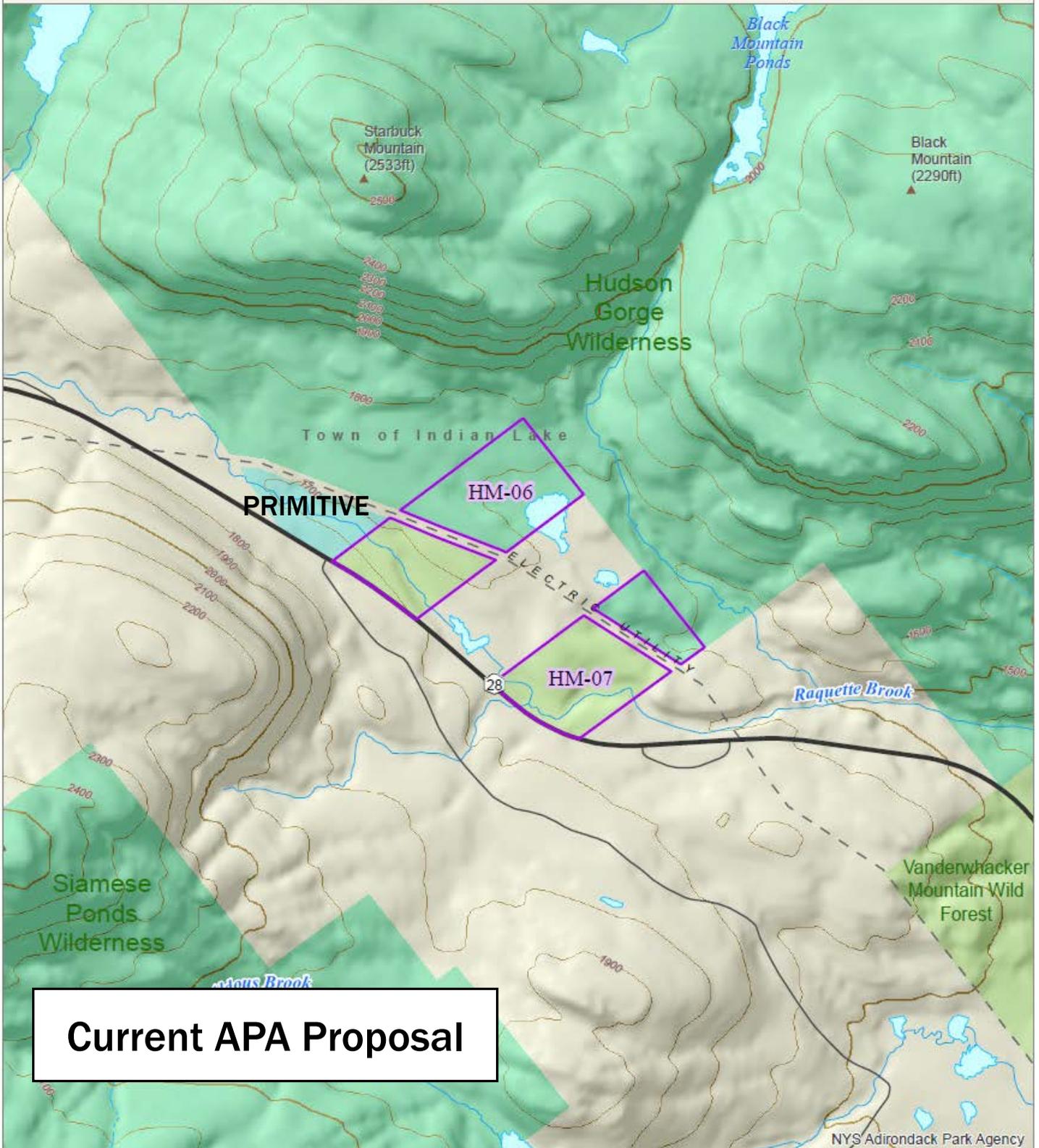
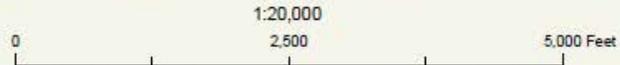
Two parcels with utility fee ownership

Proposed Class: Wilderness & Wild Forest

Proposed Unit: Hudson Gorge & Vanderwhacker Mtn

Source: AFP 21-303

- 2016 Classification
- Private
- Wilderness
- Canoe Area
- Primitive Area
- Wild Forest
- Intensive Use
- Historic
- State Administrative
- Pending Classification



# HM-06, HM-07

## 2016 Classification Package



Adirondack Park Agency

### Hudson Gorge, Raquette Brook

Town of Indian Lake

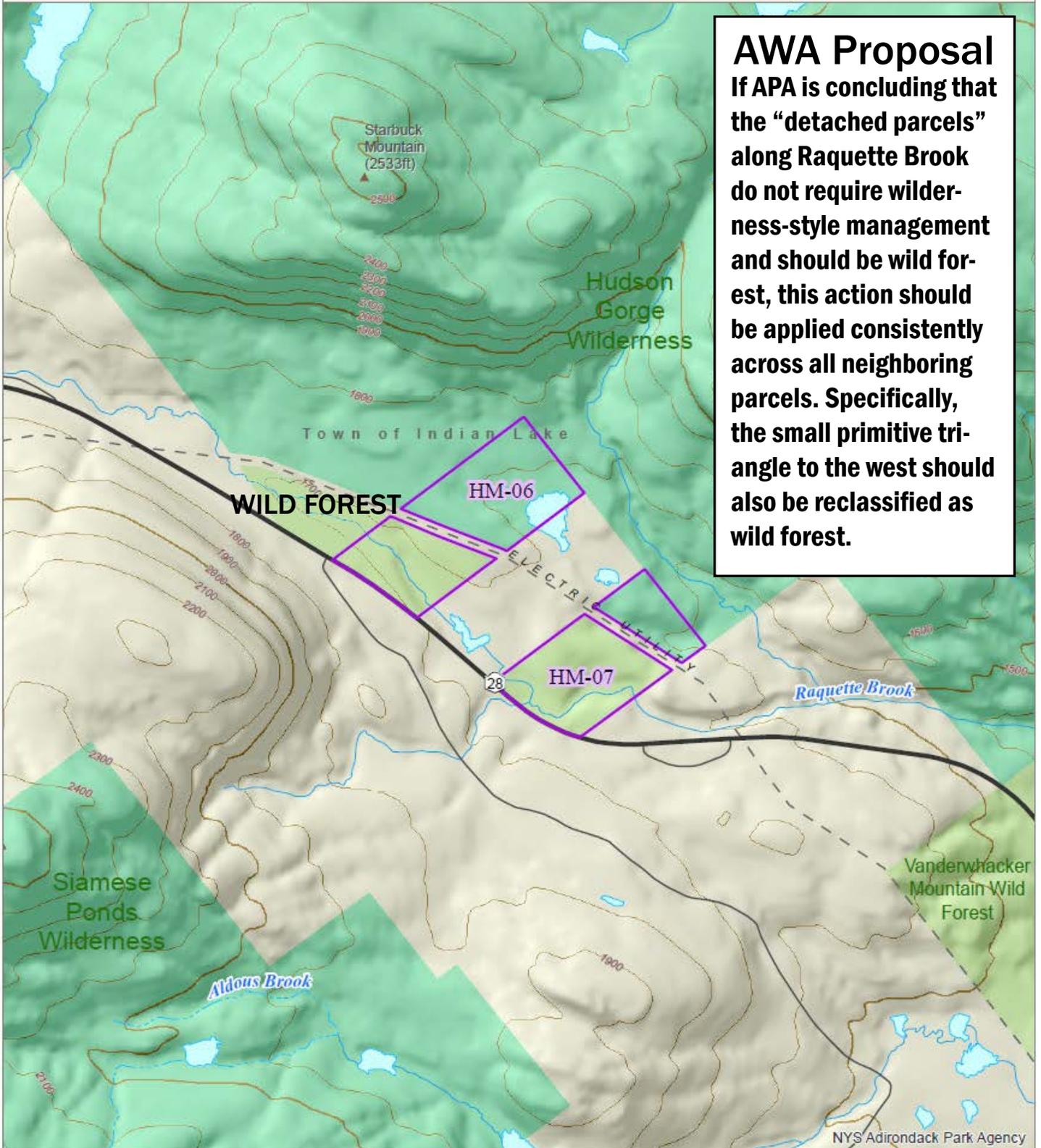
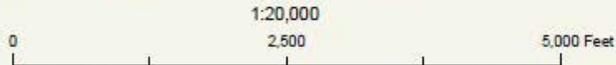
Two parcels with utility fee ownership

Proposed Class: Wilderness & Wild Forest

Proposed Unit: Hudson Gorge & Vanderwhacker Mtn

Source: AFP 21-303

- 2016 Classification
- Private
- Wilderness
- Canoe Area
- Primitive Area
- Wild Forest
- Intensive Use
- Historic
- State Administrative
- Pending Classification



**AWA Proposal**  
 If APA is concluding that the “detached parcels” along Raquette Brook do not require wilderness-style management and should be wild forest, this action should be applied consistently across all neighboring parcels. Specifically, the small primitive triangle to the west should also be reclassified as wild forest.

# HR-08

Anne LaBastille

Town of Webb

Anne LaBastille Estate, power line ROW

Proposed Class: Wilderness & Primitive

Proposed Unit: Pigeon Lake & Twitchell Lake

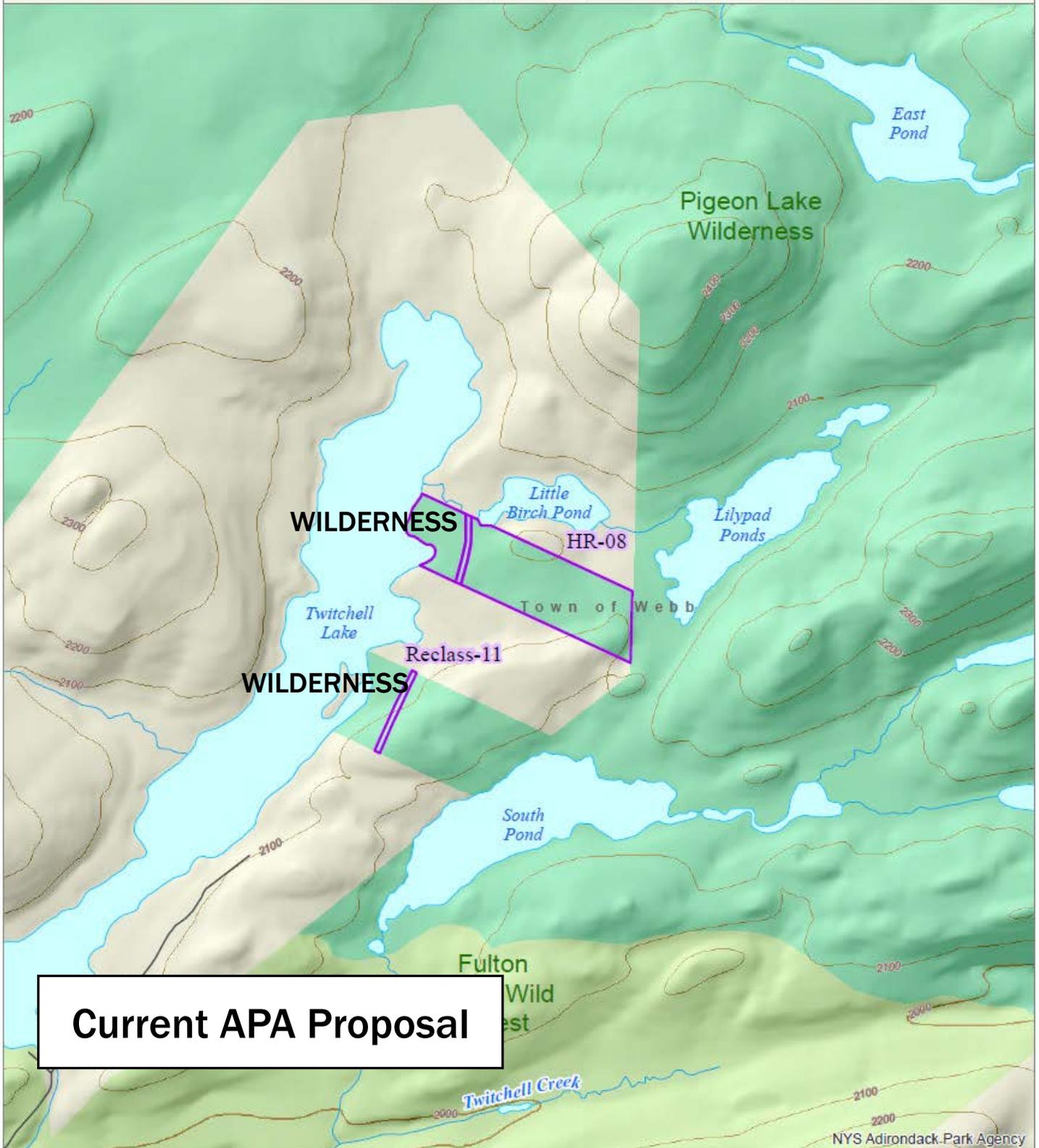
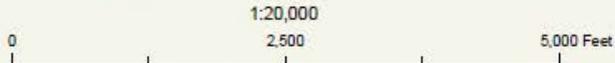
Source: AFP 22-183

## 2016 Classification Package



Adirondack Park Agency

- 2016 Classification
- Private
- Wilderness
- Canoe Area
- Primitive Area
- Wild Forest
- Intensive Use
- Historic
- State Administrative
- Pending Classification



Anne LaBastille

Town of Webb

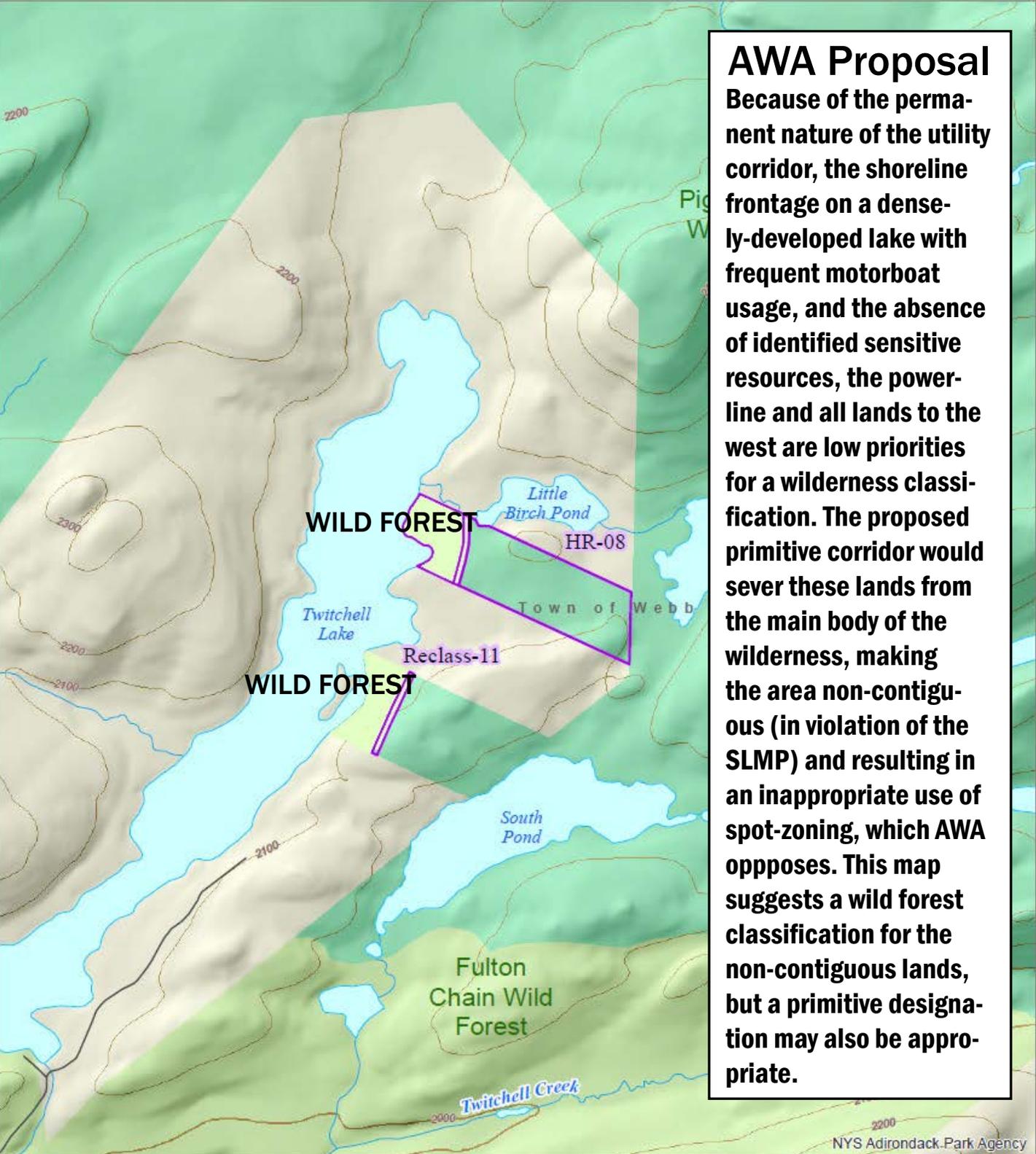
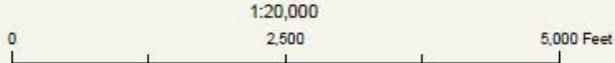
Anne LaBastille Estate, power line ROW

Proposed Class: Wilderness & Primitive

Proposed Unit: Pigeon Lake & Twitchell Lake

Source: AFP 22-183

- 2016 Classification
- Private
- Wilderness
- Canoe Area
- Primitive Area
- Wild Forest
- Intensive Use
- Historic
- State Administrative
- Pending Classification



**AWA Proposal**  
 Because of the permanent nature of the utility corridor, the shoreline frontage on a densely-developed lake with frequent motorboat usage, and the absence of identified sensitive resources, the power-line and all lands to the west are low priorities for a wilderness classification. The proposed primitive corridor would sever these lands from the main body of the wilderness, making the area non-contiguous (in violation of the SLMP) and resulting in an inappropriate use of spot-zoning, which AWA opposes. This map suggests a wild forest classification for the non-contiguous lands, but a primitive designation may also be appropriate.

# FL-01, HM-10

## 2016 Classification Package



Adirondack  
Park Agency

### Benson Road

Town of Benson, Town of Mayfield

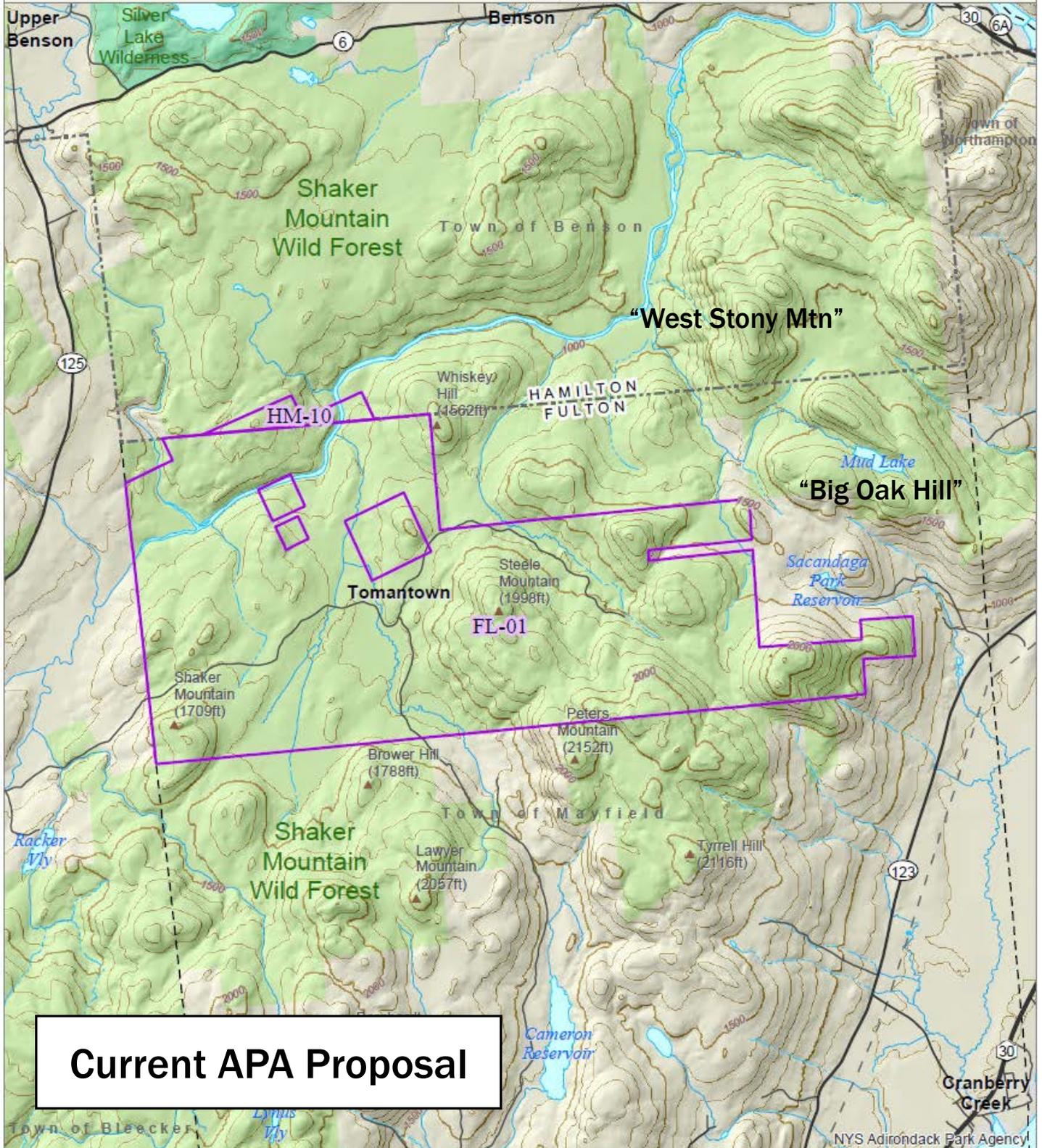
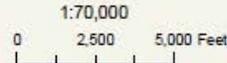
Former Finch land

Proposed Class: Wild Forest

Proposed Unit: Shaker Mountain

Source: AFP 18-210A

- 2016 Classification
- Private
- Wilderness
- Canoe Area
- Primitive Area
- Wild Forest
- Intensive Use
- Historic
- State Administrative
- Pending Classification



**Current APA Proposal**

# West Stony Creek & Tomantown

The APA has concluded that the West Stony Creek area does not warrant a wilderness classification because the area “does not have shallow, sensitive soils, steep slopes, high elevations, or extensive wetlands or other unique natural communities.”

However, the Shaker Mountain Wild Forest Unit Management Plan (January 2006) provided few useful biological inventories for this area, and so it is difficult for the public to reach APA’s dismissive conclusions. In truth, only generalities can be honestly made at this time, and these are insufficient to determine whether the West Stony Creek unit does or does not meet the physical and biological characteristics of a wilderness area.

Based on field exploration, West Stony Creek does indeed possess some interesting attributes. Several of the unnamed mountains in the northeastern section, surrounding Mud Lake, feature open rock areas with good views. Those on the so-called “West Stony Mountain” (elevation 1980 feet) are particularly good, and

might be an attractive substitute for the loss of public access to nearby Cathead Mountain. This particular summit is located very close to the Northville-Placid Trail.

Several of these small summits are covered with an ivy-like plant related to morning glories. An informal late-season inspection suggested they may be a form of bindweed that is invasive to this area. Bindweed is not commonly identified as an Adirondack invasive, therefore it would be worth a more detailed look when the flowers are in blossom during the summer months. “Big Oak Hill” to the south of Mud Lake seemed to have the highest concentration.

The defining feature of this “pocket wilderness” is West Stony Creek, which is wide and shallow with ice meadows all along its edges. Every winter and spring the mighty creek heaves great blocks of ice onto its banks, scouring the ground and preventing trees from growing too close to the water’s edge. In April these bergs can be stranded on dry land as the waters recede. A variety of wildflowers call these ice meadows home, including Canadian burnet, gentian, cardinal flowers, and several varieties of asters.

(Source: Discover the Southern Adirondacks, 2014)



*View from West Stony Mountain*

# Reclass-06

# 2016 Classification Package



Adirondack Park Agency

## Cathead Mtn

Town of Benson

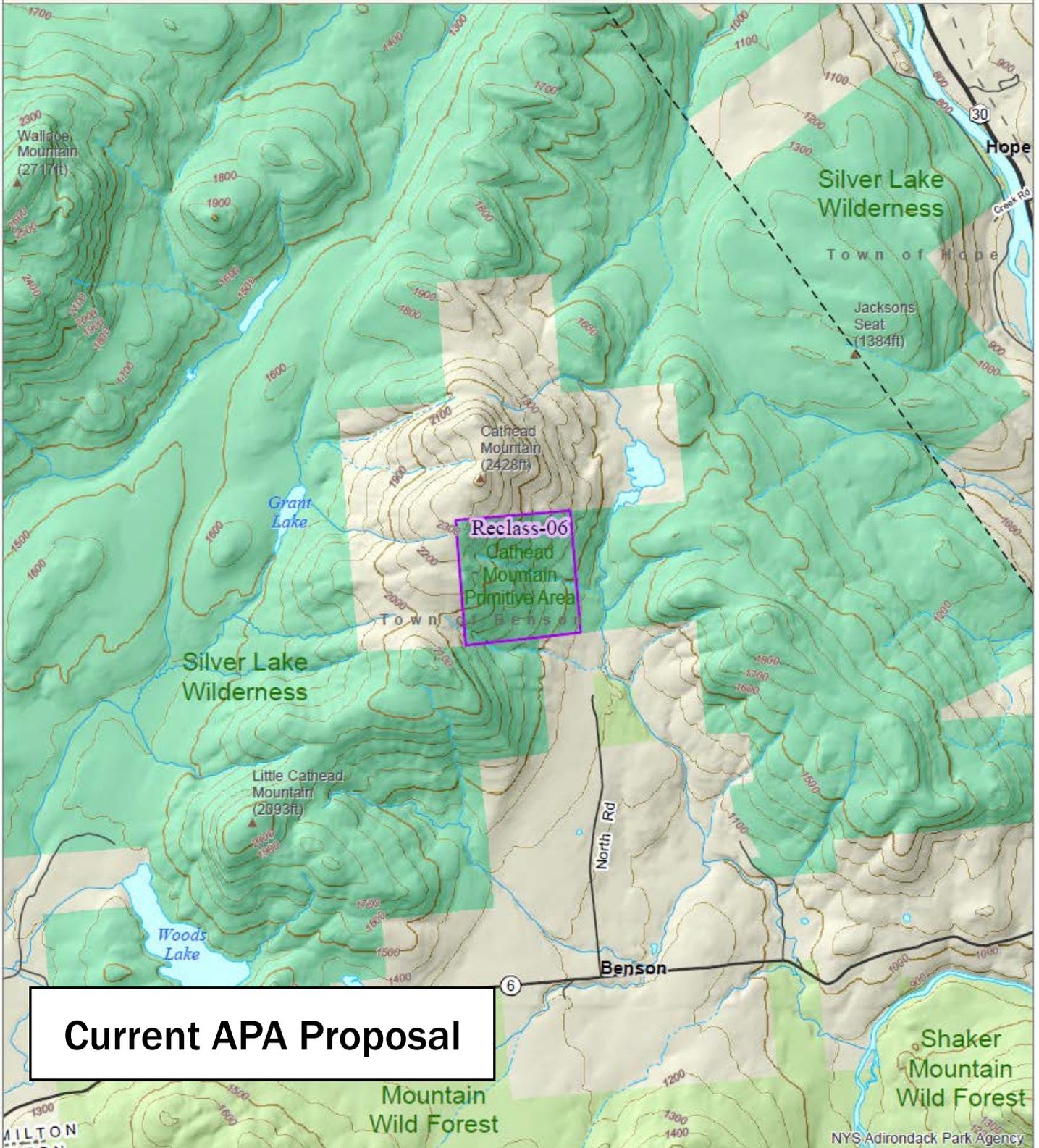
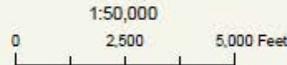
Currently Cathead Mountain Primitive Area

Proposed Class: Wilderness

Proposed Unit: Silver Lake

Source: Reclass

- 2016 Classification
- Private
- Wilderness
- Canoe Area
- Primitive Area
- Wild Forest
- Intensive Use
- Historic
- State Administrative
- Pending Classification



# Cathead Mountain

Adirondack Wilderness Advocates disagrees with the proposal to reclassify the Cathead Mountain Primitive Area as wilderness, and recommends that this project be postponed pending further study.

While AWA agrees that if the non-conforming facilities associated with the former fire tower have been closed or removed from this lot then the area might warrant wilderness classification, it is our contention that this action fails to consider the larger context of the mountain.

As APA is no doubt aware, Cathead Mountain is the site of law enforcement communication equipment mounted inside the former fire tower. This is a feature that should be regarded as an essentially permanent utility. The summit is privately owned, but it is surrounded by Forest Preserve land across which there is no deeded right of way. A constitutional amendment that would have resolved this access issue failed to gain support in 2008. A wind turbine provides power to the radio equipment, and a helicopter landing pad serves in the absence of a road.

It would be inappropriate to surround this site by wilderness-classified lands, and not just for public safety reasons. "Planning" infers the act of looking ahead to future contingencies, not simply an assessment of current field conditions. It is reasonable to assume that the state may acquire all or most of Cathead Mountain someday, and if that were to occur there would be no expectation that the mountain, with its critical infrastructure, should be managed as wilderness. Likewise, there is no expectation that the portion of the mountain between the tower and the nearest public road should be managed as wilderness.

AWA does not propose a specific alternate classification for this lot. Instead, we think the agency should include a thoughtful deliberation on the status of Cathead Mountain with a broader analysis of the Silver Lake Wilderness boundary.

For example, the proposed closure of the final 0.7 mile of West River Road in the town of Wells has proven highly unpopular, and no action has been taken since the adoption of the Silver Lake Wilderness UMP in April 2006. While the enhanced remoteness that would be achieved by closing the road is enticing for a wilderness advocate to contemplate, it is also indis-

putable that the existing Whitehouse trailhead parking area is an adequate facility. The proposed new trailhead is impractical and would require a substantial amount of tree cutting-all for the gain of a fraction of a mile.

Therefore we recommend that the Sacandaga Primitive Area and minimal sections of the Silver Lake Wilderness (generally located between West River Road and the West Branch Sacandaga River) be reclassified as wild forest, eliminating the need to close any portion of the road.

To offset the subtraction of Cathead Mountain and Whitehouse from the Silver Lake Wilderness, a substantial addition to the wilderness should occur. The best candidate is a section of the Shaker Mountain Wild Forest in the vicinity of Eastman Lake and Chase Lake. Although snowmobile trails cross the southern portion of this area, the northern reaches abut the wilderness and feature extensive trailless areas. It includes several remote lakes that are of comparatively high elevation for the southern Adirondacks, and shares many of the attributes of the neighboring Silver Lake Wilderness. Therefore the Silver Lake Wilderness boundary



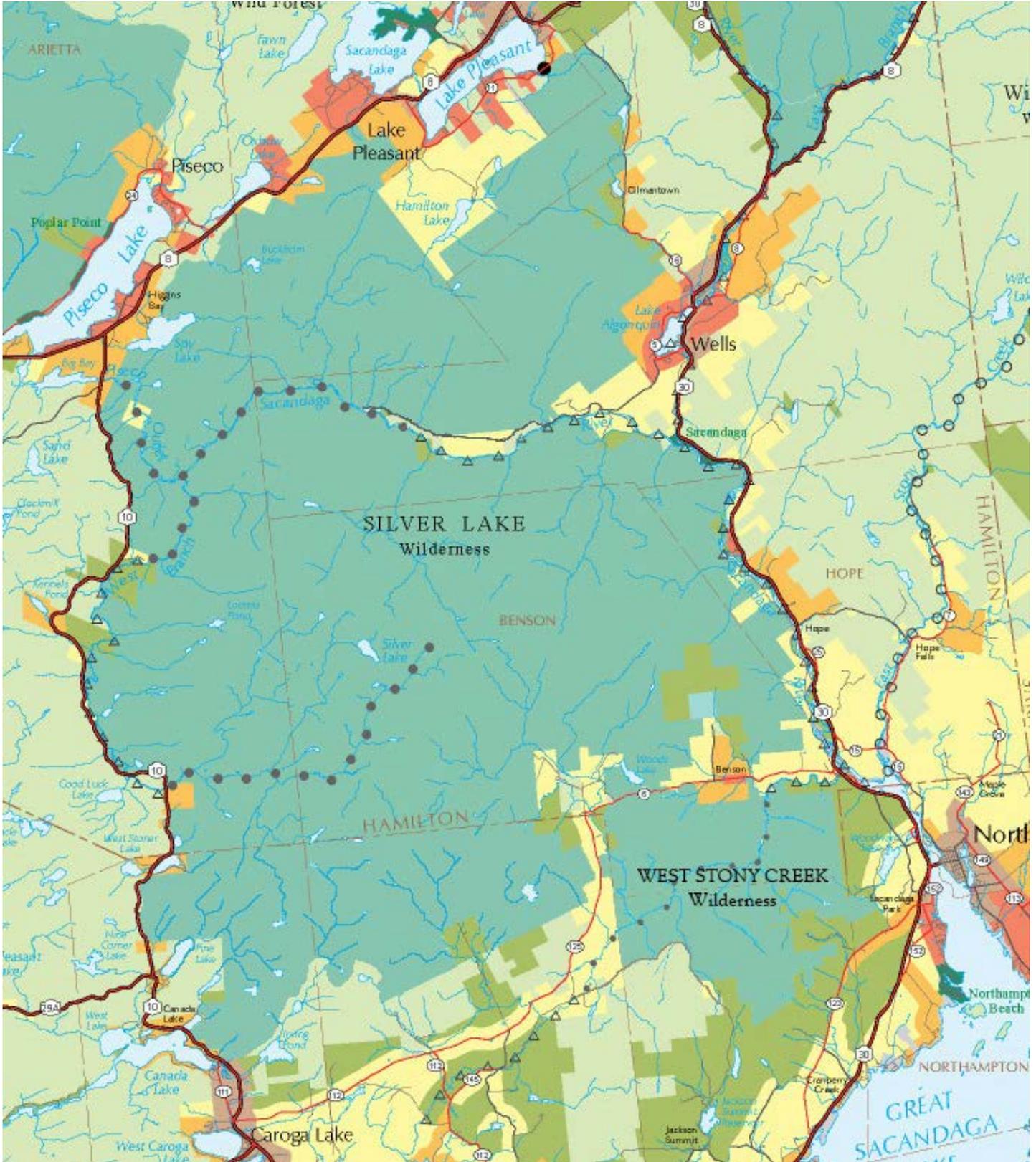
*Towers on Cathead Mountain*

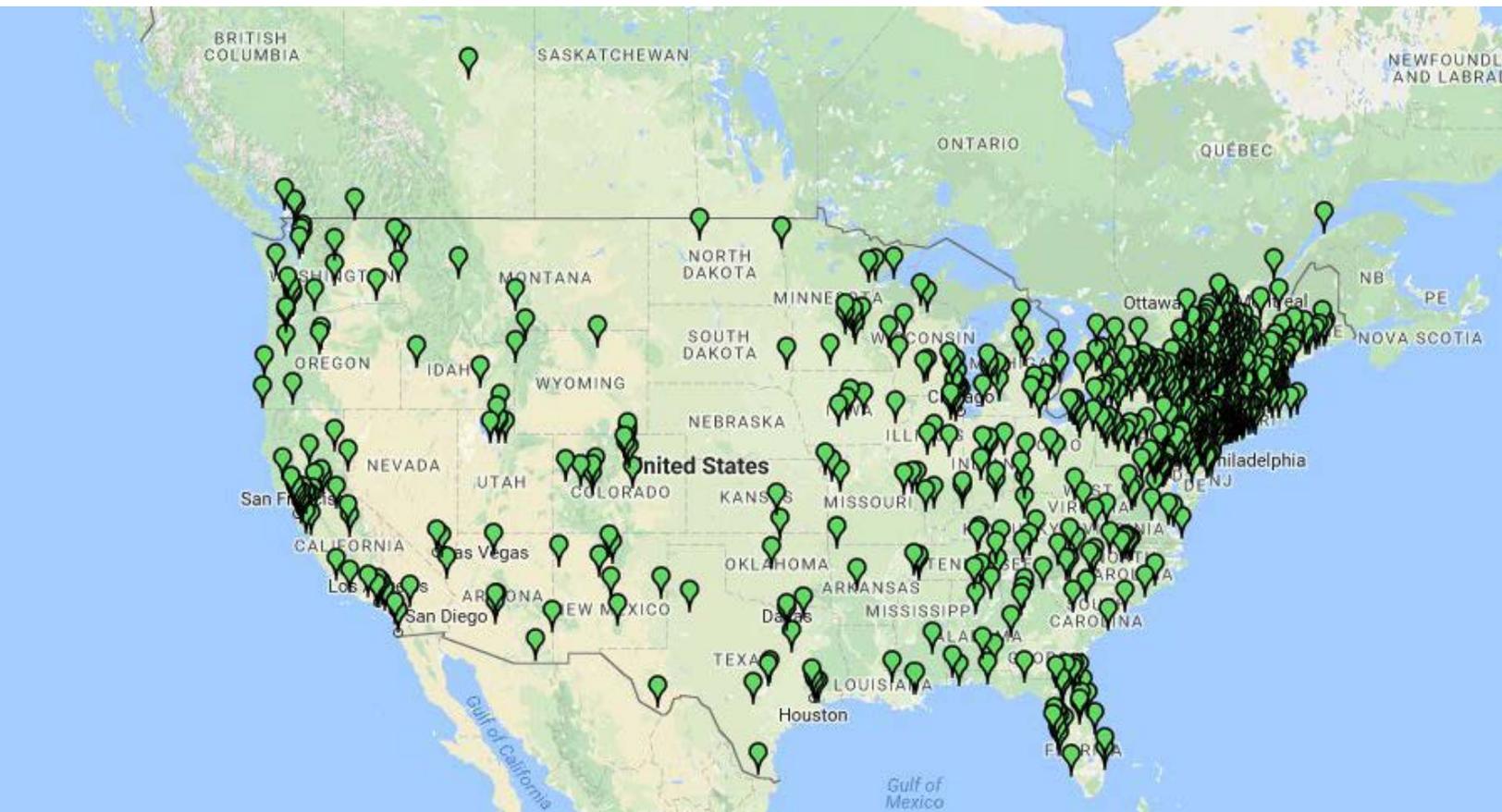
should be extended south into Fulton County, with care not to include any snowmobile trails in the towns of Bleecker and Caroga.

The map below shows one potential configuration that utilizes lot lines and natural topography to define the new wilderness boundary. The addition would

ensure the protection of a larger wilderness core area, adequately offsetting the loss of Cathead Mountain and the retention of the last 0.7 mile of West River Road.

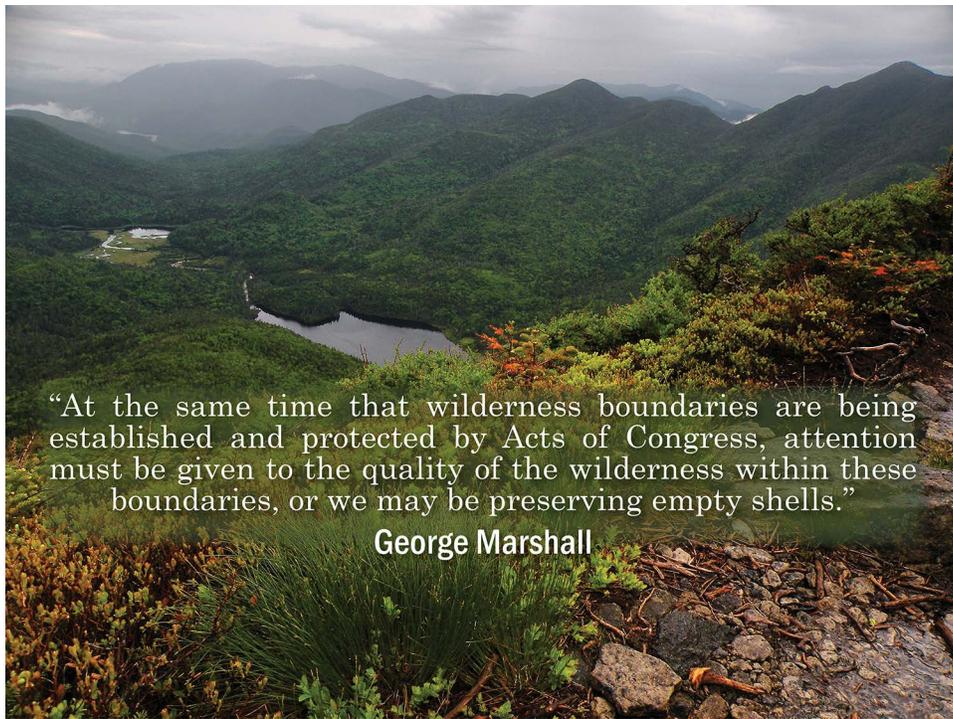
These corrective adjustments to the Silver Lake Wilderness boundary should be withheld from the 2016 classification package and given further consideration.





# People Want Wilderness!

The map above depicts the locations across the continental U.S. from which people have sent in letters in support of an all-Wilderness classification for the Boreas Ponds through our website, [AdirondackWilderness.org](http://AdirondackWilderness.org). It turns out that support for Adirondack Wilderness abounds!



“At the same time that wilderness boundaries are being established and protected by Acts of Congress, attention must be given to the quality of the wilderness within these boundaries, or we may be preserving empty shells.”

**George Marshall**