



**Adirondack
Park Agency**

No Material Increase of Road Mileage on Wild Forest – Public Comments

September 14, 2022

Objectives for Today

- Quick recap of the interpretations needed by the Board
- Share summary of public comments received and APA/DEC response
- Provide limited supplemental information to enhance understanding of the issue
- Offer time for board deliberation (no decisional action needed at this meeting)
- Determine next steps

Revisiting Decision Points

1. 1972 Road Mileage Determination
 - What road mileage existed on Wild Forest lands in 1972? What road mileage exists on Wild Forest lands today?
2. No Material Increase Interpretation
 - What mileage increase is allowed without constituting a material increase?
3. Definition of Road Interpretation
 - Does CP-3 mileage meet the definition of road in the APSLMP and therefore require inclusion in the total Wild Forest road mileage calculation?

No Material Increase Alternatives

- NMI Alternative 1: 15% increase in road mileage
 - Consistent with snowmobile trail NMI interpretation
 - Snowmobile trails and roads treated similarly in APSLMP
- NMI Alternative 2: Increase more than 15%
 - Account for no replacement of mileage closed due to reclassification of wild forest to wilderness, primitive, or canoe
 - Board would have to set percentage or mileage
- NMI Alternative 3: Increase less than 15%
 - Recognize difference in treatment of roads and snowmobile trails in the SLMP
 - Board would have to set percentage or mileage

Definition of “Road” Alternatives

- Road Definition Alternative 1 - CP-3 included
- Road Definition Alternative 2 - CP-3 not included
- Road Definition Alternative 3 - Non-Galusha CP-3 included

Public Engagement

- 60-day public comment period (May 12 - July 12)
 - 215 comments received; 6 of which came in after the deadline
 - ~150 comments were form letters
- Two public information sessions (per the Board's request)
 - June 2 (virtual)
 - June 7 (in-person)
 - 7 verbal comments total
- DEC/APA Accessibility Advisory Committee – remote presentation (by invitation) on June 1
- Adirondack Assoc. of Towns and Villages – in-person presentation (by invitation) on June 6

Summary of Public Comments & the APA and DEC Response



Theme: NMI Alternatives

- General support was expressed for each of the three NMI alternatives
- NMI Alt #1 – 15% increase
 - Simplest choice, keeps with 15% threshold established in snowmobile trail interpretation from 2008
- NMI Alt #2 – >15% increase
 - Opposition to limits on roads, environmental impacts not a concern
 - Increase should be linked to lands acquired since 1972
 - *1973-2018 increase in acreage is 11.6%*
- NMI Alt #3 – <15% increase
 - Snowmobile trail interpretation that 15% increase is not material is not statistically valid

Theme: NMI Alternatives

- NMI Alt #3 – <15% increase (continued)
 - Design characteristics of roads differ from snowmobile trails
 - They are larger, can be used by bigger/heavier machinery, require more maintenance, more environmental impact
 - A more appropriate threshold would be 1-5%
 - WFBG4 should be interpreted to serve as a cap on roads

Theme: Road Definition Alternatives

- General support was expressed for each of the three road definition alternatives
- Road Definition Alt #1 – CP-3 Mileage Included
 - If it looks like a road, is used by motor vehicles like a road, and is maintained as a road – it's a road
 - CP-3 routes are open to the public, though a permit is required on a "discretionary basis"
 - Master Plan does not permit motorized access on any facilities other than roads; CP-3 routes must be defined and counted as roads because motor vehicle use is not permitted on trails – all other interpretations prohibited by the Master Plan

Theme: Road Definition Alternatives

- Road Definition Alt # 2 – CP-3 Mileage Not Included
 - There are ~1,000 CP-3 permit holders, a minute fraction of NY's population
 - DEC does not have discretion to close CP-3 routes per the ADA and Galusha settlement
 - Mileage should increase in proportion to expansion of state land ownership to equitably provide necessary and appropriate access for people with disabilities
 - State should increase recreational opportunities for people with disabilities

Theme: Road Definition Alternatives

- Road Definition Alt #3 – Non-Galusha CP-3 Mileage Included
 - State should use VUM rather than setting hard and fast limits on road mileage
 - Acknowledging that this framework would take time to develop, Alt #3 is more protective than allowing unlimited increase in CP-3 mileage under Alt #2

Theme: WFBG #4 in the Context of the Master Plan (SLMP)

Wild Forest Basic Guideline #4 must be examined in relationship to the other relevant provisions of the Master Plan that pertain to roads and motorized uses.

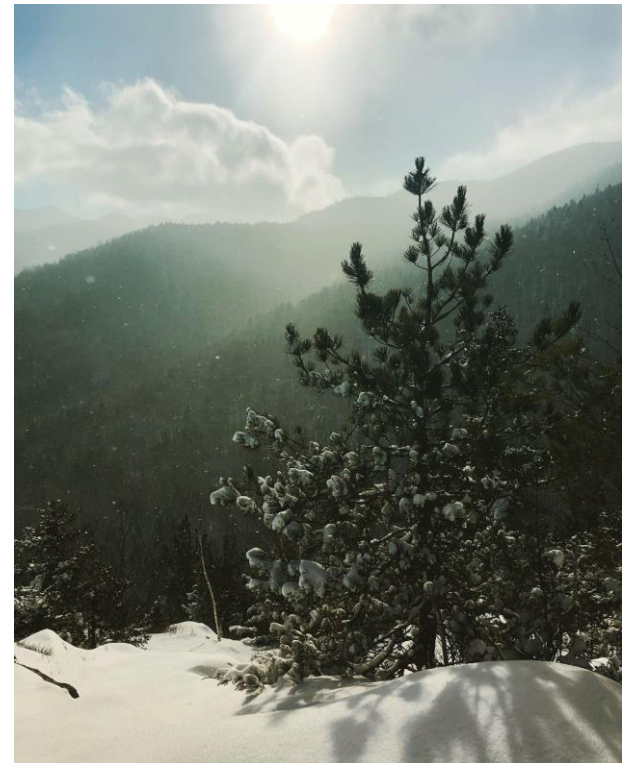
Wild Forest roads and administrative roads guideline #3 (pg. 38):

“Established roads or snowmobile trails in newly-acquired state lands classified as Wild Forest may be kept open to the public, subject to Basic Guideline #4 set forth above and in the case of snowmobile trails to the special guidelines for such trails set forth below, at the discretion of the Department of Environmental Conservation, provided such use is compatible with the wild forest character of the area.”

Theme: WFBG #4 in the Context of the Master Plan (SLMP) Cont'd

Wild Forest Basic Guideline #1 (pg. 35):

“The primary Wild Forest management guideline will be to protect the natural wild forest setting and to provide those types of outdoor recreation that will afford public enjoyment without impairing the wild forest atmosphere.”



Theme: WFBG #4 in the Context of the Master Plan (SLMP) Cont'd

Wild Forest structures & improvements guideline (pg. 36-37):

“The maintenance and rehabilitation of the following structures and improvements will be allowed to the extent essential to the administration and/or protection of state lands or to reasonable public use thereof but new construction will not be encouraged...roads, and administrative roads as set forth below; snowmobile trails as set forth below...”

Theme: WFBG #4 in the Context of the Master Plan (SLMP) Cont'd

The Wild Forest definition on page 34 describes this land classification as follows:

“An area that frequently lacks the sense of remoteness of wilderness, primitive or canoe areas and that permits a wide variety of outdoor recreation.”

Comment: By this definition, the social and psychological aspects of these lands would not be degraded by motor vehicle use on already established roads. Wild Forest lands are categorically less fragile than more restrictive land classifications and therefore able to withstand a higher degree of use.

Theme: WFBG #4 in the Context of the Master Plan (SLMP) Cont'd

Wild Forest recreational use and overuse guideline #1 (pg. 40):

“All types of recreational uses considered appropriate for wilderness areas are compatible with Wild Forest and, in addition, snowmobiling, motorboating and travel by jeep or other motor vehicles on a limited and regulated basis that will not materially increase motorized uses that conformed to the Master Plan at the time of its adoption in 1972 and will not adversely affect the essentially wild character of the land are permitted.”

Theme: WFBG #4 in the Context of the Master Plan (SLMP) Cont'd

Wild Forest motor vehicles, motorized equipment and aircraft guideline #3 (pg. 38):

“The Department of Environmental Conservation may restrict, under existing law and pursuant to authority provided in this Master Plan, the use of motor vehicles, motorized equipment and aircraft by the public or administrative personnel where in its judgment the character of the natural resources in a particular area or other factors make such restrictions desirable.”

Theme: WFBG #4 in the Context of the Master Plan (SLMP) Cont'd

APA should consult the 1979 Programmatic Environmental Impact Statement (EIS) when making an interpretation of the Master Plan.

NOTICE OF COMPLETION

FINAL PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

GUIDELINES FOR AMENDING THE ADIRONDACK PARK STATE LAND MASTER PLAN

Date: February 28, 1979

Title of Action: Guidelines for Amending the Adirondack Park State Land Master Plan

Project Location: Adirondack Park: State of New York

Preparing Agency: Adirondack Park Agency
Box 99
Ray Brook, NY 12977

Author and Contact: John P. Wargo
Chief, State Land Master Plan
Adirondack Park Agency
518-891-4050



Theme: Additional Alternatives and Interpretations of WFBG #4

- Revise the Master Plan to address large scale shifts in land ownership and policy over the past 50 years
 - Amend the Plan to add a definition of CP-3 roads
 - Increase road mileage as the State buys more land
- Metrics to assess use
 - Mileage is a poor proxy for use
 - Remoteness, more so than mileage, is a fundamental component of wild forest character and should be assessed

Theme: Additional Alternatives and Interpretations of WFBG #4 Cont'd

- Other considerations
 - Define material increase in a way that more accurately reflects the non-linear relationship between road mileage and acreage, can be considered on a unit-by-unit basis
 - Use VUM to establish social, biological, and physical thresholds for CP-3 routes, monitor usage, manage adaptively
 - Consider opportunities for motorized recreation on conservation easement lands
- NMI has already been exceeded and the State must close some roads

Theme: Related Topics & Issues

Various topics not pertinent to the interpretations at hand were described by commenters, including (but not limited to):

- Climate considerations
- Concerns about loss of access
- Further restrictions on motorized uses
- Ecological impacts of roads
- Economic considerations
- Snowmobile trail mileage considerations

Please refer to Theme V and VI in the "Response to Comments" document for more details.

Theme: Accessibility to State Lands for People with Disabilities

A cap on what can be made more accessible via a road is counter to the purpose of the ADA; a ceiling on access is not acceptable.

Theme: Accessibility to State Lands for People with Disabilities Cont'd

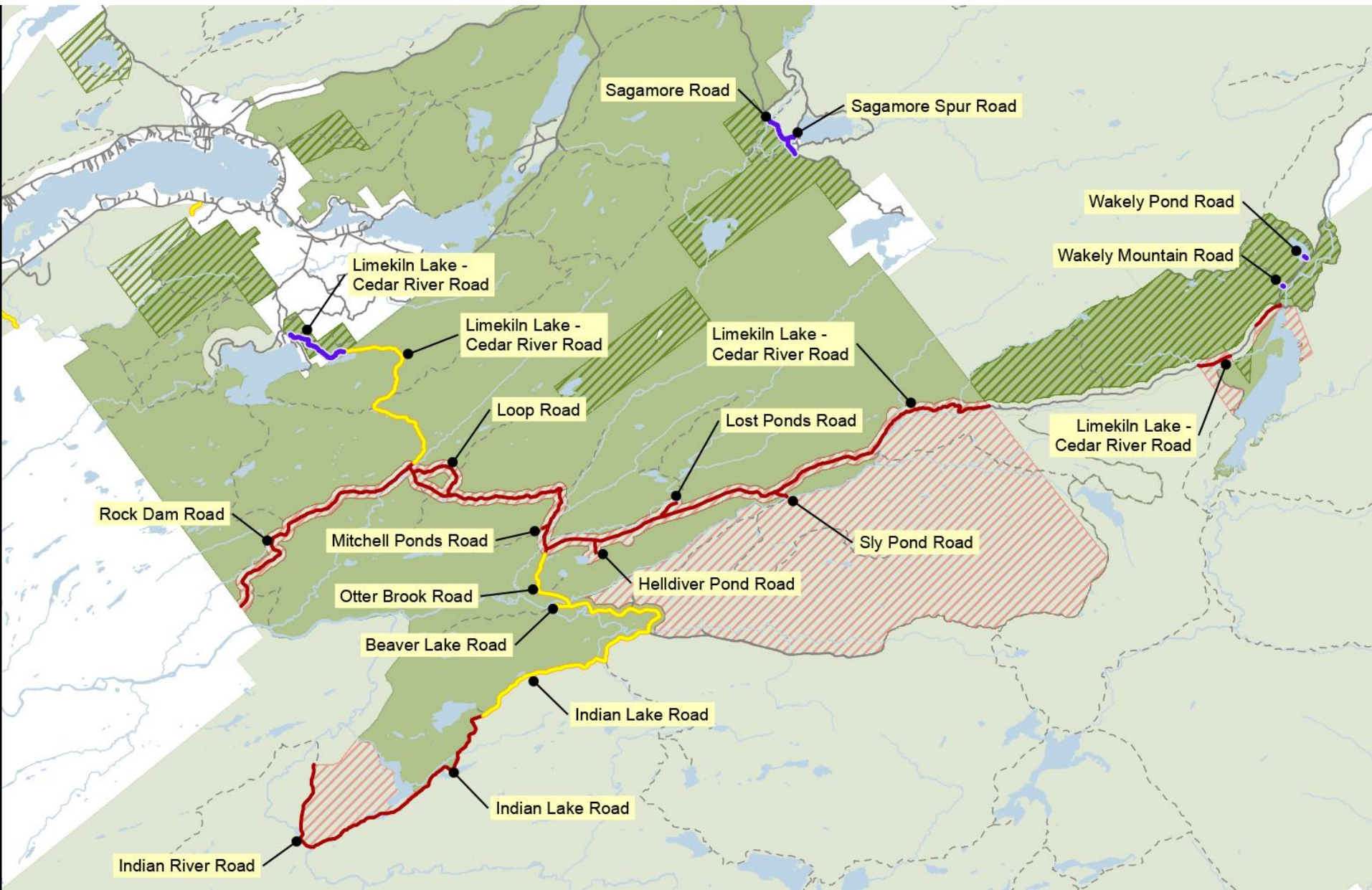
- The State should re-think the CP-3 program
- Expanded options for power-driven mobility devices are not adequately reflected in the State's current accessibility programs
- DEC and APA should discuss alternatives to CP-3 routes such as accessible trails and routes for other power-driven mobility devices
- Ongoing service interruptions in providing wagon access to Great Camp Santanoni, which was a requirement of the Galusha settlement

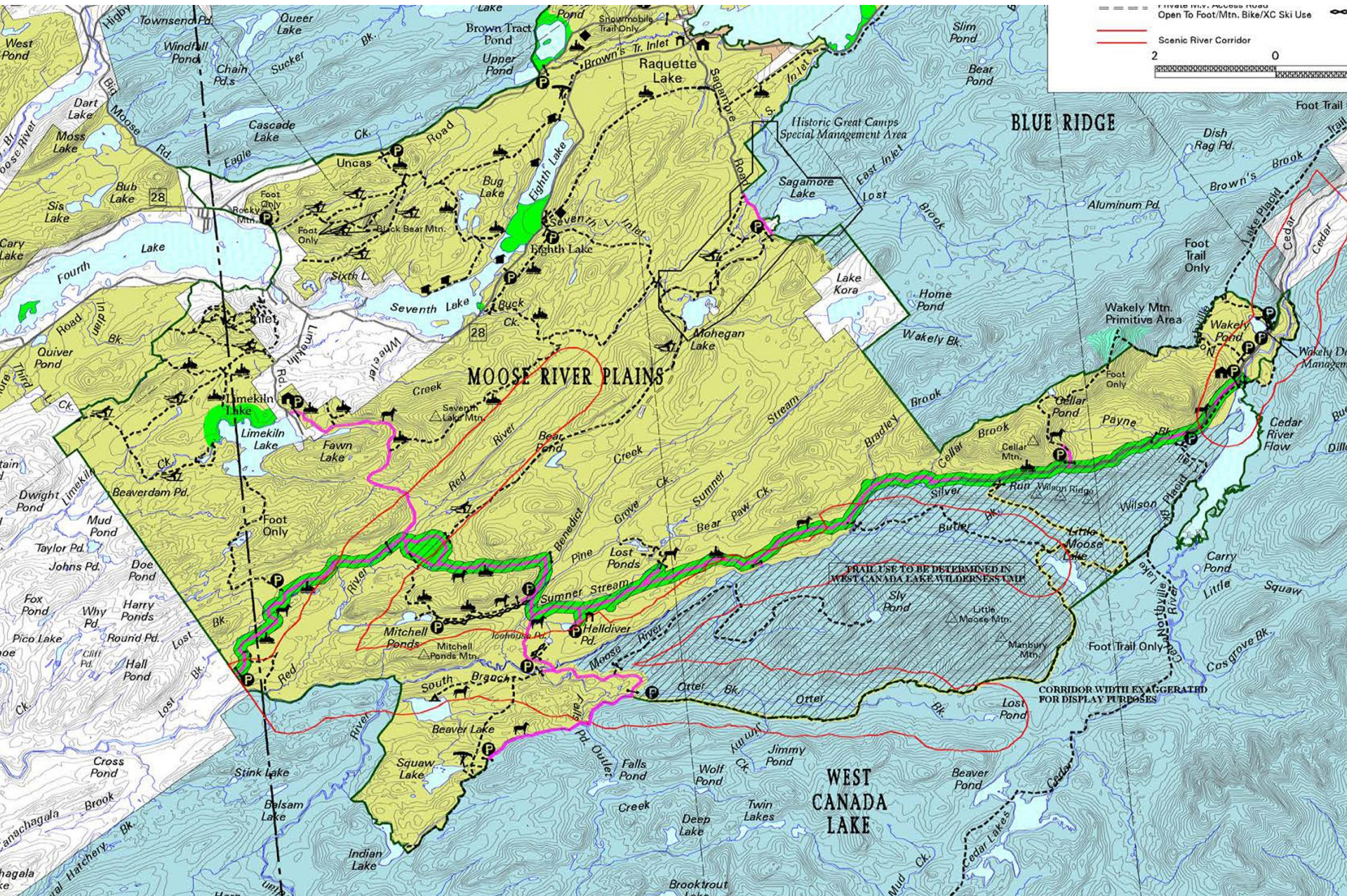
Theme: Accessibility to State Lands for People with Disabilities Cont'd

APA and DEC should solicit input directly from the APA/DEC Accessibility Advisory Committee on the Wild Forest Basic Guideline #4 interpretations that are pending before the APA board.

Theme: Technical and/or Site-Specific Corrections and Feedback on Methodology for Mileage Tallies

The primary road through the Moose River Plains intensive use area was counted in the 1972 tally but not current day tally, and the accounting of road mileage in this area should be consistent.





Theme: Technical and/or Site-Specific Corrections and Feedback on Methodology for Mileage Tallies Cont'd

Re-Classification Outcomes:

New Intensive Use: 2,925 acres

New Wilderness: 14,667 acres

Total Reduction in Wild Forest: 17,592 acres

Total Reduction in Wild Forest Road Mileage: 19.1 miles

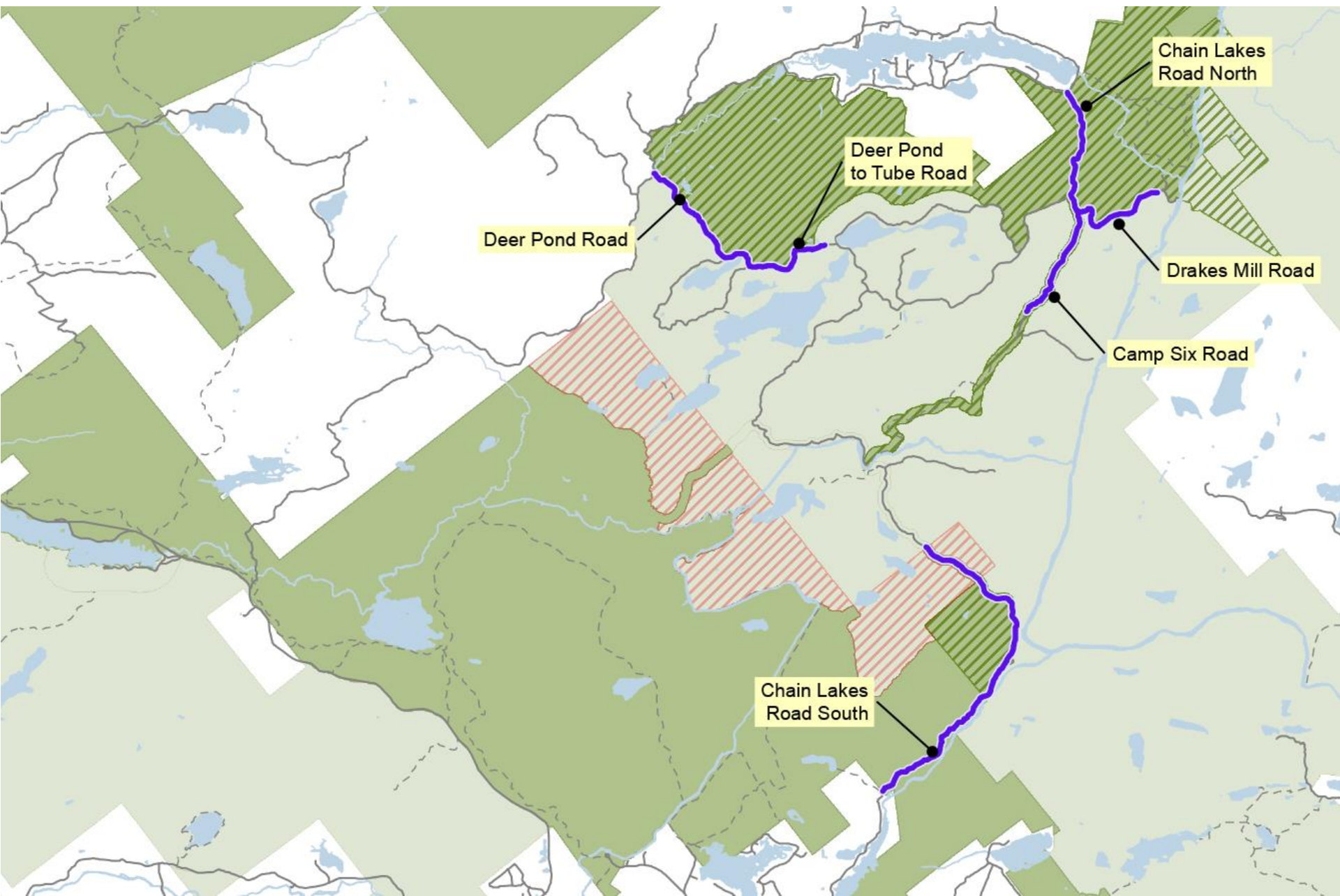
Theme: Technical and/or Site-Specific Corrections and Feedback on Methodology for Mileage Tallies Cont'd

Final Generic Environmental Impact Statement for Integrated Series of Proposed State Land Management Actions in the Vicinity of the Moose River Plains Wild Forest (pg. 21):

"Combined, each individual reclassification action would positively reinforce the other and would provide a balanced approach to the management of the area."

Theme: Technical and/or Site-Specific Corrections and Feedback on Methodology for Mileage Tallies Cont'd

The Essex Chain Lakes primitive recreational trail was not counted toward the road mileage total and should be.



Theme: Technical and/or Site-Specific Corrections and Feedback on Methodology for Mileage Tallies Cont'd

SLMP Primitive Area Guideline on Primitive Recreational Trails (pg. 30):

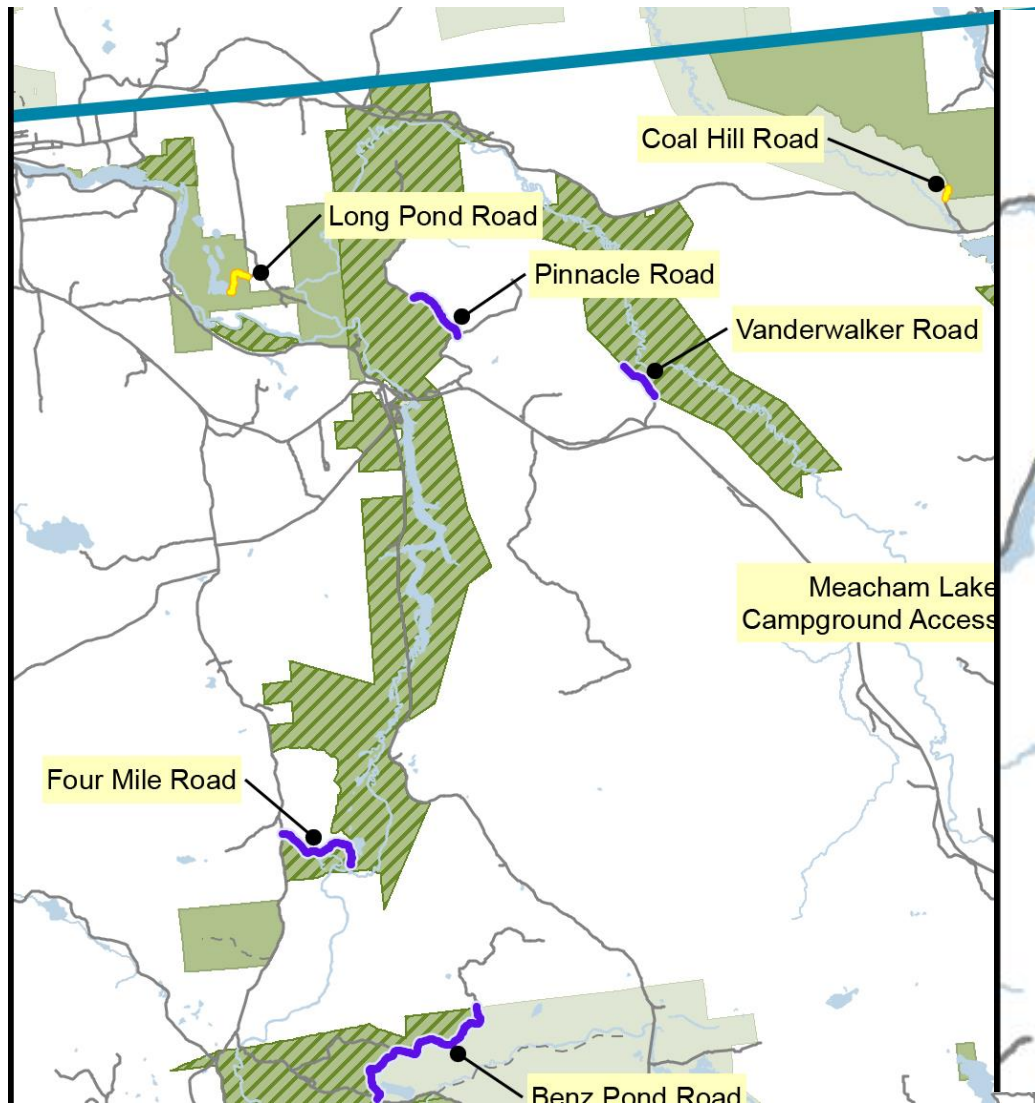
“...The Department may maintain a Primitive Recreational Trail by periodic, but not usual or routine, use of motor vehicles and motorized equipment for specific major maintenance, rehabilitation or construction purposes during off-peak seasons, unless extraordinary conditions, such as a fire, major blowdown, or flood mandate more frequent work or work during peak periods.”

Theme: Technical and/or Site-Specific Corrections and Feedback on Methodology for Mileage Tallies Cont'd

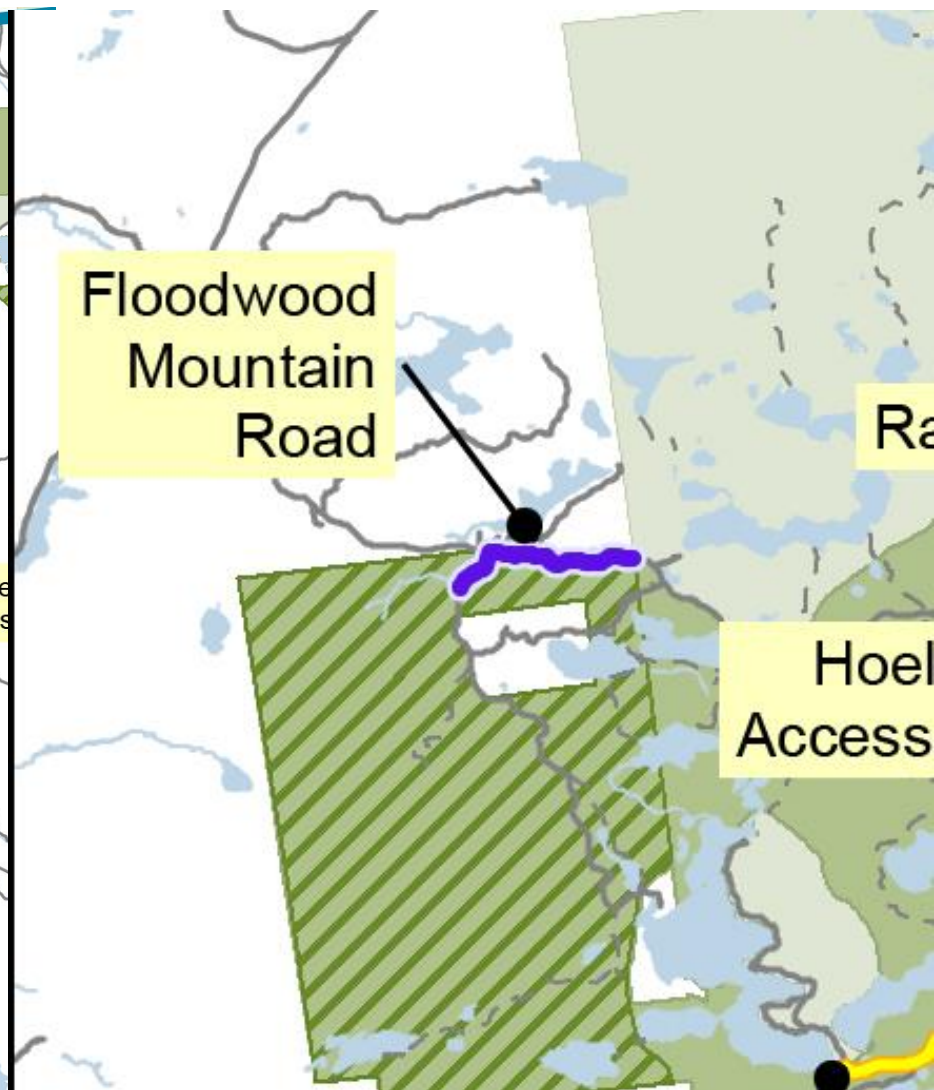
Debar Mountain Wild Forest – a section of the Four Mile Road and all of Pinnacle and Vanderwalker Roads, which form a boundary between private lands and Wild Forest lands.

Saranac Lakes Wild Forest – Floodwood Mountain Road is a boundary between state and private lands.

Debar Mtn. WF



Saranac Lakes WF



Theme: Technical and/or Site-Specific Corrections and Feedback on Methodology for Mileage Tallies Cont'd

Wild Forest Road Mileage Tally Criteria

- *Does not include roads that form the boundary between wild forest and private land, except where DEC has sole jurisdiction of the roads.*

Theme: Technical and/or Site-Specific Corrections and Feedback on Methodology for Mileage Tallies Cont'd

Francis Road in the Independence River Wild Forest is shown on private land, listed as open in 1972 and not in 2022.



0.3-mile reduction
from 1972 mileage

Theme: Technical and/or Site-Specific Corrections and Feedback on Methodology for Mileage Tallies Cont'd

Omission of other types of roads or roads in other state land classifications (administrative roads, CP-3 routes, private rights-of-way, etc.)

To read the comments in detail, review Theme V in the "Response to Comments" document.

Supplemental Information



**Adirondack
Park Agency**

Administrative Road Total

A **rough** estimate of DEC administrative roads in the Adirondack Park is 120 miles.

Recent Wild Forest Acquisitions

The State added 9.7 miles of roads to the Vanderwhacker Mountain Wild Forest following the Boreas Ponds acquisition, classification, and UMP adoption.

The State added 10.6 miles of roads to the Blue Mountain Wild Forest following the Essex Chain Lakes Complex acquisition, classification, and UMP adoption.

Each of these tracts had over 50 miles of pre-existing roads when the State acquired them.

Questions?

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