At the Northville Central School public hearing this past week, about 60 citizens lined up to speak their minds regarding the Adirondack Park Agency’s 2016 – 2017 Amendments to the Adirondack Park State Land Master Plan. These amendments involve the Classification and Reclassification of 54,418 acres of State Lands (Forest Preserve) in the Adirondack Park which include the Boreas Ponds Tract, 32 Additional Classification Proposals, 13 Reclassification Proposals, and 56 Classifications involving map corrections.

As I waited my turn at the microphone, I was very impressed with the respectful sincerity and preparedness of the speakers who came before me. These included folks much younger than me who spoke about wilderness values, the potential of wild restoration, and how such restoration comports with their own personal values.
Most comments pertained to the largest tract, 20,000-acre Boreas Ponds in Essex County. But local Park hearings are important because they may touch on Forest Preserve within a matter of a few miles away. That was the case in Northville. I was particularly impressed with what Hamilton County officials had to say about the summit of Cathead Mountain just a few miles from Northville Central School. For such a relatively small area, this is very complicated subject.

Cathead Mountain summit in Benson is privately owned. Its fire tower whose original purpose dates back a century now contains modern communication equipment useful to public law enforcement and safety. The old jeep trail leading to the mountain summit at just under 2500 feet in elevation is public Forest Preserve. Due to this jeep trail and the telephone line to the fire tower, these 173 acres of Forest Preserve have long been classified Primitive. With the jeep trail and telephone line no longer in use, at least officially, APA proposes to reclassify the 173 acres from Primitive to Wilderness to conform with the Silver Lake Wilderness which wraps around Cathead’s summit to the west and north. However, the Hamilton County Emergency Preparedness director, Hamilton County Sheriff and Hamilton County Board of Supervisors Chair all asked that the tract continue to be classified as it is to ensure access to the communication equipment which “protects backcountry lives,” to quote County Sheriff Carl Abrams. The status of the emergency communications equipment, its role in public health and safety and methods of accessing that equipment certainly adds important, fact-based elements to this reclassification decision.

Returning to Boreas Ponds, North Hudson’s Town Supervisor Ron Moore has consistently sought all forms of public access, motorized and muscle-powered, on this large new tract of Forest Preserve in his town. He, like other town leaders, favor APA Alternative 1, a Wild Forest classification with some Wilderness beyond the Ponds in order to maximize what they see as the recreational and economic benefits of the public’s reaching Boreas Ponds by motor and bicycle. What I appreciate about Mr. Moore’s comments are their acknowledgement of the sensitive environmental considerations at Boreas Ponds and his refusal to demonize those who favor a large, Wilderness alternative. He effectively makes his case without bombast and without putting down anyone else.

I spoke for Adirondack Wild’s position that all or most of the Boreas Ponds tract ought to be classified Wilderness because of the scale and importance of the natural resources on the tract, and how those wilderness resources naturally grade and connect to the High Peaks and Dix Mountain Wilderness to the north of the Ponds. There is an awesome stillness here and critical ecological connection to be made which altogether presents a very rare opportunity. We should seize the chance to create a block of 280,000 acres of Wilderness. To our minds, to realize that potential means that all or most of the Gulf Brook
Road be closed to public motorized uses.

I also wanted to use part of my 3-minutes in Northville to remind APA of the views of its former State Land Chair Richard Booth. Until his retirement from the APA as of July 1, Mr. Booth had served the agency for eight years as a citizen member. He was also a member of APA’s staff many years before that. He is a North County man who taught school, worked summer camps, practiced law and deeply respects the Park’s people and their needs to make a living. At the same time, he is that rare someone who also deeply respects the laws protective of the Park’s environments and who has spent countless hours thinking critically about applying those laws and the standards the State Legislature intended APA to hold. On his last day of service to the APA this summer, Mr. Booth wrote a memorandum intended for public distribution about the Adirondack Park State Land Master Plan. That memo has appeared in the Almanack before, but it bears mentioning again now that the Classification hearings are well underway (five more are scheduled).

Here are the final few pages of Mr. Booth’s memo pertaining to the eventual classification of the Boreas Ponds. He writes on June 29, 2016 with one day remaining to his term as the Chair of APA’s State Land Committee.

III. THE AGENCY’S EVENTUAL CLASSIFICATION OF THE BOREAS PONDS TRACT

1. Preliminary Points

   • A) As of this date Agency members have not received from the Agency’s staff any summary re the resource values inherent in the Boreas Ponds Tract (hereafter TRACT). However, I have received and reviewed various pieces of information regarding the TRACT. This section of this memo reflects what I have derived from that information.

   • B) My comments here focus on the broad question of what should be the appropriate classification for the largest portion(s) of the TRACT pursuant to the SLMP. Nothing in this memo addresses where any classification line should be drawn on the TRACT between different state land classifications.

   • C) Because my term on the Agency expires on June 30, as previously noted, I will not still be on the Agency when it eventually acts to classify the TRACT pursuant to the SLMP.

2. Primary Conclusions

As the previous discussion explains, the SLMP’s various mandates create a very strong presumption in favor of a Wilderness classification that covers the great majority of the Boreas Ponds Tract. This conclusion pertains most critically to the TRACT’s ponds and considerable amounts of lands around those water bodies. Furthermore, this presumption should be set aside only if there
is a very clear showing that a Wilderness designation for most of the TRACT would be inconsistent with the purposes of the Master Plan.

3. A Large Forest Preserve Acquisition That Contains Exceptional Resource Values

A) By any reasonable definition the TRACT constitutes a major addition to the Forest Preserve. Containing more than 20,000 acres, it is larger than several of the Park’s existing Wilderness Areas: Hurricane Mountain (13,948 acres), Jay Mountain (7,896 acres), Little Moose (12,258 acres), Round Lake (10,356 acres), and William C. Whitney (13,678 acres). In addition, it is nearly as large as several other Wilderness Areas in the Park: Ha-De-Ron-Dah (25,272 acres), Hudson Gorge (23,494 acres), Pepperbox (23,816 acres), and Sentinel Range (24,017 acres).

B) While my assessment of the TRACT’s resources is admittedly preliminary, it is abundantly clear that any detailed and balanced analysis of those resources must conclude that in the context of the Park’s Forest Preserve (and the Park more generally) the natural resources values and social resource values present on the TRACT are of exceptionally high order. The materials I have reviewed to date make clear that these special resource values include (but are by no means limited to):

- fragile soils over considerable areas, including extensive areas with soils with severe potential for erosion;
- significant areas over 2500 feet elevation;
- an extensive network of streams, including a significant river segment;
- extensive areas covered by ponds;
- extensive wetland habitat, including more than 1,000 acres of peatlands;
- an abundance of plant and animal species, including a number of boreal species, and a number of rare, threatened or endangered species;
- stunning vistas from the TRACT into lands already classified as Wilderness;
- superior location re the protection of wilderness values (the TRACT adjoins the High Peaks Wilderness Area; if the TRACT is eventually classified as Wilderness and added to the High Peaks Wilderness Area, it will constitute a remarkable addition to the Park’s largest and most famous Wilderness Area);
- its remoteness and its capacity to provide extensive opportunities for solitude (These characteristics of the TRACT merit special emphasis. By any reasonable definition, large portions of the TRACT are remote, and the TRACT provides multiple opportunities for people to find solitude, to experience nature’s wildness over a large landscape containing widely varying resources, and to traverse this landscape in as non-intrusive ways as possible. The importance of these qualities will be greatly enhanced if the TRACT is added to the High Peaks Wilderness Area.)

4. The TRACT’s Prior Use By The Forest Products Industry

The forested lands in the TRACT have been the subject of intensive timber management practices over an extended period (involving among other things the development of an extensive road network to permit truck transportation of logs). Due to that fact, some are arguing that the TRACT’s resource values do not justify a Wilderness classification under the SLMP. That argument should be rejected.

If permitted to do so, nature can and will over time renew lands very heavily impacted by human activities. The previous existence of significant logging operations and the road networks built as part of those operations do not prevent regeneration of forested lands and reestablishment of those lands as truly wild lands. This reality is clearly demonstrated in a number of the Park’s Wilderness Areas where substantial timber harvesting once occurred (e.g., Blue Ridge, Ha-De-Ron-Dah, McKenzie Mountain, Round Lake, Siamese Ponds, and William C. Whitney). The Park’s existing inventory of wilderness would be far less substantial than it now is had the Agency in previous years allowed evidence of past logging activities to prevent designation of qualifying lands as Wilderness Areas. Similarly, pursuant to the federal Wilderness Act, Congress has designated numerous Wilderness Areas since 1964 that had previously been substantially affected by human activity; this has been particularly true regarding federal Wilderness Area designations in the eastern United States. Nothing relating to past forest management activities on the TRACT in any way prevents its being classified as Wilderness under the SLMP.

5. Application Of The SLMP’s Fourth Classification Determinant To The TRACT

As discussed previously, the SLMP’s fourth classification determinant requires consideration of “… established facilities on the land, the uses now being made by the public and the policies followed by the various administering agencies. …” (SLMP, Section II, p. 14) This determinant lends no weight to any potential suggestion that the great majority of the TRACT should be classified as something other than Wilderness. Because the TRACT has been in private hands until very recently, there are no established facilities used by the public that could arguably prevent the great bulk of these lands from being classified as Wilderness. In determining how the TRACT should be treated under the
SLMP, the Agency will be “writing on an essentially clean slate” with respect to this fourth determinant.

6. **Other Potential Classifications For Large Portions Of The TRACT**

**A)** I know of no circumstances that indicate any large portion of the TRACT should be classified as Primitive. However, it is possible that a small portion(s) of the TRACT could properly be classified as Primitive.

**B)** While the TRACT contains an abundance of stream and pond resources, I do not think the degree of the water-based recreation opportunities it offers would merit its being classified as a Canoe Area.

**C)** I know of no circumstances that suggest that anything approaching a majority of the TRACT acreage should be classified as Wild Forest. Reasonable assessment and application of the SLMP’s land classification determinants would prevent such a classification in this case. The TRACT’s resources place this acquisition in the high echelons of any reasonable listing of valuable resource areas existing anywhere within the Forest Preserve. While careful review may result in an appropriate determination that some portion of the TRACT should be classified as Wild Forest, that classification cannot be reasonably assigned to the great majority of the TRACT’s lands.

**D)** The SLMP cannot be accurately or logically read to permit a Wild Forest classification of the TRACT with an overlay treating it (or large portions of it) as a Special Management Area. The essential purpose of the Special Management Area concept in the SLMP is to allow special treatment (i.e., more restrictive management) of relatively small areas inside of a larger land area. Nothing in the Master Plan contemplates the notion that the Agency may properly reduce the level of classification for a large area to a lesser level of protection than should be assigned given the resource values of that area and then use the Special Management Area mechanism to modify the impacts that would be generated by utilizing that lesser level of protection. In other words, the SLMP does not permit designating as Wild Forest an area whose resources merit a Wilderness Area classification (or a Primitive Area or Canoe Area classification) and then using Special Management Area guidelines to offset the negative impacts that will be caused by classifying the area as Wild Forest. (SLMP, Section II, pp. 49-50)

(Note: the potential Special Management Area treatment of all (or most) of what are now the Essex Chain Lakes Primitive Area and the Pine Lakes Primitive Area was suggested by DEC in 2013. Fortunately the Agency rejected that approach then, and it should similarly reject any suggestion favoring this approach with regard to the TRACT.)