



April 19, 2018

Robert Ripp, Forester  
NYS Department of Environmental Conservation  
232 Golf Course Road  
Warrensburg, NY 12885

**Re. Boreas Ponds Management**

Dear Rob,

Now that the classifications of the Boreas Ponds tract have been approved by the Governor, it falls to the Department of Environmental Conservation (DEC) to consider management of this magnificent landscape in the form of amendments to the Vanderwhacker Wild Forest and High Peaks Wilderness unit management plans (UMPs). At the DEC public meeting in Newcomb on April 3, DEC asked for initial public comments about future management actions at Boreas Ponds and other newly classified lands and waters by April 20. Adirondack Wild is pleased to offer these initial recommendations focused on Boreas Ponds tract.

The failure by DEC and the Adirondack Park Agency (APA) to consider an all-Wilderness alternative for a tract as resource-rich and remote as Boreas Ponds presents the Department with a unique challenge. DEC now has the obligation to utilize all available tools to manage the tract in ways that avoid damage to natural resources and enhance opportunities to experience solitude and an unconfined, primitive recreational experience in this

magnificent new addition to the High Peaks Wilderness. The Adirondack Park State Land Master Plan states on pages 17-18 that DEC may provide for more restrictive management than allowed under a particular land classification, where necessary to protect natural resources. The natural resources, fragility and wild character of Boreas Ponds demand that DEC employs more restrictive management there than the Wild Forest classifications of the road corridors would otherwise allow, particularly in terms of limiting public motorized access for the reasons set forth below.

**Summary:** Based on public statements that NYS DEC and APA have made about the unusual combination of resources and the remote character of Boreas Ponds, as well as on the pattern of recreational use that DEC established by its interim management plan, in future unit management plan amendments DEC ought to:

1. Limit general public motorized use to the first two miles of Gulf Brook Road, and designate the current interim parking lot as the permanent public parking lot;
2. Gate the Gulf Brook Road at this parking lot, and only permit those with CP-3 permits to drive further into the tract;
3. Limit interior parking to a small lot at Four Corners dedicated strictly for CP-3 permittees;
4. Gate the Boreas Road at Four Corners and turn the road to Boreas Ponds into an accessible trail useable by hikers, paddlers, equestrians and wheelchair users;
5. Use of Gulf Brook Road for snowmobiling presents potentially significant noise and air pollution issues for the Ponds and High Peaks Wilderness all around the Ponds. Given the Wilderness classification, DEC should study the impacts of snowmobiling on the air quality and soundscape around Boreas Ponds and in the High Peaks beyond the Ponds before allowing any snowmobiling in the area;
6. DEC should prohibit snowmobiling on the Gulf Brook Road pending completion of this study, finalization and execution of all necessary private landowner agreements, and adoption of an approved UMP

amendment for a snowmobile community connector trail between North Hudson and Newcomb.

**Characteristics:** As you know, the APA and DEC staffs have devoted two years of study to the biological, ecological, recreational and intangible characteristics of the Boreas Ponds tract. In February of this year, APA staff distilled that knowledge into an extensive presentation to the full agency, explaining and extolling the tract's remarkable unbroken block of matrix forest, its northern hardwood, spruce, fir and northern cedar forests, its highly significant high altitude peatland (highest in the state), its large acreage of emergent and deep water marsh, its large littoral zone, and the rare and endangered plants growing there.

In addition, APA and DEC staff have also frequently and publicly remarked upon the tract's intangible qualities of ruggedness and remoteness, as well as its ecological connectedness to the High Peaks Wilderness ecosystem, concluding in public remarks delivered on Feb. 1 that "the ecological value of the tract cannot be overstated."

Assisting the APA in its conclusions were two detailed independent scientific assessments: *Boreas Ponds: Scientific Assessment of its Physical, Biological and Intangible Characteristics* (Dr. Ezra Schwarzberg, Adirondack Research LLC) and *Ecological Composition and Condition of the Boreas Tract* (Dr. Michale Glennon, Wildlife Conservation Society).

Dr. Glennon's assessment concluded that "in terms of terrestrial habitats, its resilience, connectedness and ecological integrity, the profile of the Boreas tract is most similar to existing wilderness tracts." Her assessment noted that "the tract is exceptional when it comes to resilience and local connectivity – among the top 15% and 10 % respectively when compared with other state land units throughout the Adirondack Park."

Dr. Schwarzberg concluded that "Overall, the Boreas Ponds tract is an excellent candidate for classification as a Wilderness tract. It scores high for ecological integrity, wild character and recreational constraints. It is situated adjacent to two Wilderness areas, and is quite remote."

**Impacts of Roads:** In terms of the ecological implications for management of the tract, Dr. Glennon devoted part of her assessment to the impacts of the roads, writing that: “It is almost impossible to overstate the degree to which roads influence wildlife populations, even small forest roads like the ones on the Boreas. Impacts of forest roads on species and ecosystems begin during the construction phase, but persist and accumulate well after a road is no longer in use, with effects including mortality from construction, mortality from vehicle collision, modification of animal behavior, alteration of the physical environment, alteration of the chemical environment, spread of exotics, and increased use of areas by humans.”

APA staff noted in their February 1, 2018 presentation to the full agency that: “impacts of roads here are high. In terms of environmental impact zone, it exists up to 1 kilometer on either side of the road. The road impacts are related to type, timing, and intensity of road use.”

The Wild Forest classification of the seven-mile long Gulf Brook Road makes possible daily, two-way public automobile and truck traffic to LaBier Flow and Four Corners. In addition, maintaining the road for such frequent public use will require additional, perhaps weekly, truck traffic and machinery.

The adverse ecological implications of such a sudden increase in the intensity of motorized traffic are, as Dr. Glennon explained, impossible to overstate. The ecological impact zones of adverse impacts extend out 1 km. on either side of the road according to APA. In addition, there will be a terrible loss of the intangible values noted by the APA and the scientists, meaning the loss any sense of solitude and natural-ness from hiking into Boreas Ponds due to the noise, dust and intensity of two-way motorized traffic.

In addition, the public safety risks are also likely to be high given daily competition for this narrow road and road shoulder from two-way passage of cars and trucks competing for space with hikers and paddlers wheeling boats. With such conflicting uses on such a narrow road, accidents and injuries may occur. Given the erosion and wear and tear on the road and any road shoulders, costs associated with the road’s maintenance for all seven miles are

conservatively estimated at around \$50,000 annually (Adirondack Research LLC).

**Use Existing Parking Lot:** Given these high risks to ecology and naturalness of the road corridor and its 1 km. impact zone, and given the public safety hazards and high costs of opening Gulf Brook Road to daily, two-way public motorized uses, we urge DEC to maintain and improve the current parking lot 2 miles into Gulf Brook Road as the parking lot for the general public. By gating the road here, and by limiting further motorized access only to certified persons with disabilities who otherwise cannot get to the Ponds, all of the above impacts are significantly reduced.

For two years, persons of all abilities have proven that they are willing to walk from this exterior lot, assisted or not, and wheel their boats to LaBier Flow and Boreas Ponds beyond. This two-year pattern of muscle-powered public access to the Flow and Ponds should be continued in an amendment to the Vanderwhacker Wild Forest UMP.

**Small Handicapped-Only Lot at Four Corners:** The gate at this exterior parking lot should be opened only by administrative personnel and by certified persons with disabilities to allow them to drive to a new, small parking lot near Four Corners that is strictly dedicated to certified persons with disabilities (not universal access). A means to convey or relay information when this interior, dedicated lot is full should be established to prevent fruitless driving beyond the exterior lot only to find the small interior lot at capacity.

**Boreas Road to the Ponds:** The closer one gets to the wetlands and the Ponds themselves, the greater the ecological risks of intense motorized traffic bringing invasive species, trash, noise, pets and other intrusions into this classified Wilderness. The one mile of Boreas Ponds Road leading to the Ponds should be gated to any public motorized traffic, including snowmobiles, and improved as necessary to allow wheelchair access for those persons with disabilities requiring such access. The Boreas Road should be viewed, treated and managed as an accessible trail which invites tranquil, quiet walking/hiking, wheeling of boats or wheelchair use to reach the

magnificence and scenic beauty of the Ponds and Wilderness that surrounds the visitor.

Any motorized traffic from Four Corners to the Ponds, or anywhere proximate to the Ponds would constitute a violation of not only the Wilderness environment and heightened sense of enjoyment that it brings, but also a violation of the State Land Master Plan guidelines for Wilderness areas. The SLMP permits, where necessary, certain uses within 500 feet of where a Wilderness boundary intercepts a highway like Gulf Brook Road at Four Corners. Public motorized uses penetrating one mile into a Wilderness area is clearly not among those possible uses, and is therefore prohibited by the Master Plan.

**Snowmobiling:** In 2015 DEC deferred its choice of a preferred community connector snowmobile trail for reasons of State Land classification, natural resource and topographic constraints and lack of agreements with private landowners on the Blue Ridge highway. Despite the Wilderness classification of over 11,000 acres of the tract, DEC has made no commitments to evaluate the potential noise and air pollution impacts of snowmobiling up and down the Gulf Brook Road from various vantage points around Boreas Ponds and beyond in the High Peaks Wilderness.

DEC should not allow snowmobiling until all private landowner agreements are signed and other management steps are taken that would allow creation of a community connector snowmobile trail between North Hudson and Newcomb. In the interim, DEC should analyze the impacts snowmobile air pollution and noise would have on the Wilderness portions of the tract and in the High Peaks to the north. Until such time, during snow cover Gulf Brook Road should be managed as a cross-country skiing and snowshoeing trail.

**Other Management Actions:** In addition, Adirondack Wild recommends the following management actions at Boreas Ponds:

- Intensively study primitive campsite opportunities near Boreas Ponds. Allow natural resource characteristics to guide the location of any and all primitive camping;
- Do not permit campsites or trails near the littoral zone to degrade natural resources or wilderness character of the 10 water bodies on the tract. Use Limits of Acceptable Change indicators. DEC should consider extending the required 100-ft minimum distance between primitive tent sites and Boreas Ponds and its streams and littoral zone;
- Narrow the Wilderness ring roads around the Ponds to White Lily, etc. by revegetating to trail conditions, removing culverts, and by building foot bridges as needed;
- Over time, change out the old round culverts under Gulf Brook Road and replace them with ecologically connective box culverts or similar;
- Improve the Boreas Ponds inventory by actually undertaking an assessment of the extent and nature of projected public use, and then assess the anticipated impact of that projected public use with special attention to resource protection;
- Develop Limits of Acceptable Change studies at Boreas Ponds where popular visitation areas and especially sensitive natural resources intersect at the Ponds, at White Lily Pond and other places to be identified. Monitor visitor access to and from the Ponds from the beginning of the UMP implementation;
- Establish with scientific partners a long-term study and monitoring of change to the 1800 acres of wetlands on the tract, especially the boreal wetlands including the dwarf shrub bogs,

black spruce tamarack bogs, medium fens, northern white cedar swamps, inland poor fens;

- Monitoring ought to include the three identified rare and endangered plant species and their habitats, and Common Loon nesting sites;
- Establish Special Management areas with use restrictions should they be needed to protect and sustain the above vital habitats, rare species, wetlands and water bodies.

Thank you for considering these initial comments on future management of Boreas Ponds. We will expand upon these recommendations with additional comments after the DEC prepares draft amendments to the Vanderwhacker Wild Forest and High Peaks Wilderness UMPs.

Sincerely,



David Gibson



Dan Plumley

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