

Appendix A

Summary of Public Comments

**Adirondack Park Agency
Summary of Public Comments
Adirondack Park State Land Master Plan (APSLMP)
Amendments**

In December 2015, the Adirondack Park Agency (APA or Agency) accepted a Draft Supplemental Environmental Impact Statement (DSEIS) for proposed amendments to the Adirondack Park State Land Master Plan (APSLMP). The Agency solicited public comments on the DSEIS and proposed amendments, including four public hearings held in the month of January. The public comment period concluded on January 29, 2016. Set out below is a summary of the comments and responses to the issues raised during the comment period. Public comments are in black print. The Agency staff response is in blue, italic print.

Bicycle Use in Essex Chain Lakes and Pine Lakes Primitive Areas

In favor of the use of bikes in the Essex Chain Lakes and Pine Lake Primitive Areas.

- Regarding the use of bicycles in the Essex Chain Lakes Tract, I support proposed Alternative 2A (in Appendix 2A of the DSEIS) which states, "Amend Primitive Guidelines to Allow Bicycle Trails on Former All-Season Roads in Essex Chain Lakes and Pine Lake Primitive Areas without Using Motor Vehicles for Maintenance."
- Support Alternative 2A, which allows mountain biking in the Essex Chain Lakes and Pine Lake Primitive Areas and in Wild Forest areas, but NOT in Wilderness or other Primitive Areas. In addition, I oppose motor vehicles being used for maintenance on non-motorized recreation trails in ANY Primitive Area.

Response: *Alternative 2A would permit the continued use of approximately nine miles of former all-season roads for cycling. However, these roads were designed and built with drainage features such as ditches and culverts which required significantly more maintenance than typical trails in the Forest Preserve. These roads will be converted to trails which will include removing culverts and significant changes to other drainage features. Through the review process staff recognized the opportunity to be proactive on this road-to-trail conversion. In order to responsibly open these former roads as recreation trails for bicycles, horses and other non-motorized recreation, the Department needs to use motor vehicles, motorized equipment, and aircraft on a periodic basis.*

Opposed to bikes in Essex Chain and other Primitive Areas.

- The No Action Alternative is the best option. The APA should not amend the APSLMP to allow bikes or state use of motor vehicles in Essex Chain and Pine Lakes Primitive Areas. It's important that the Essex Chain Lakes-Pine Lake Primitive Areas remain as lands managed as Wilderness areas and not places with bicycles and motor vehicles. There is 1.3 million acres of Forest Preserve lands classified as Wild Forest to undertake these activities.

Response: *The Agency made a commitment in its classification resolution to consider bicycle use in the Essex Chain Lakes and Pine Lake Primitive Areas. The Essex Chain Lakes and Pine Lake Primitive Areas were classified as Primitive due to their sensitive aquatic habitats and due to the reserved rights permitting float plane landings on First and Pine Lakes. Evaluation of the character of the former all-season roads shows that they can be used as bicycle trails.*

- The bicycle alternatives also violate the 1979 FPEIS guidelines which call for restoration and rehabilitation of Primitive areas, disallows the expansion of facilities in heavily used portions of Primitive, and requires APA to protect the character of Primitive areas.
- The terrain around the Essex Chain of Lakes dictates against motorized and mechanized uses. In places, these former roads are steep, unstable and eroding into the wetlands. Gullying of the former roads will continue.
- Motorized maintenance will not alleviate the condition but could make it worse. These unstable former roads should be stabilized once to stop the erosion, and then be allowed to revegetate into standard 4-8 foot trails for primitive foot, ski and snowshoe travel. Primitive forms of recreation – travel by foot, snowshoe and ski – are appropriate around the sensitive Essex Chain of Lakes, not gear-leveraged mechanical uses which not only cancel out primitive and wilderness values but can also all too easily introduce human refuse and invasive species into the lakes.

Response: *The preferred alternative allows the Department to use motor vehicles and motorized equipment until October 1, 2019 to convert and rehabilitate these former all-season roads to trails. Motor vehicle and motorized equipment use by the Department would be possible for an additional three years following the extinguishment of the lessees' retained rights for usage of roads, for the removal of non-conforming structures such as culverts. The Department will be able to maintain the Primitive Recreational Trails (up to 10 feet wide for horse and wagon use) using motor vehicles and motorized equipment on a limited basis after October 1, 2022. Motorized maintenance may be necessary to maintain these trails.*

- Review and analysis of nearby Wild Forest and easement lands should be conducted to determine more appropriate places for cycling.
- One reasonable alternative to bicycle use in Primitive that is not considered in the DSEIS is the opening to bicycling of more roads or trails in nearby Wild Forest as well as the former Finch lands under conservation easement. Another reasonable alternative ignored by the DSEIS is to place more limitations on the use of bicycles in the Essex Chain Lakes and Pine Lake Primitive areas. Analysis of this alternative is important in light of the APA's acknowledgement that intensity of use "significantly higher than other comparable areas" could create "an unacceptable level of conflict between users."

Response: The creation of bicycle trails was considered in the Essex Chain Complex UMP. Bicycle use was identified for approximately 7 miles of Wild Forest lands within the complex area, including Chain Lakes Roads (North and South), Deer Pond Road, and Drake's Mill Road. Approximately 9 miles of former all-season roads would be designated as trails in conformance with the APSLMP. The UMP identified an action step to evaluate any potential additional bike trails in Wild Forest areas of the Complex. Such trails identified would require a UMP amendment. Bicycling is permitted, where designated, on roads open to the public, including the Cornell Road; a road located on conservation easement lands, used to access the Essex Chain Lakes Primitive Area. There are no additional bicycle trails identified in the neighboring easement lands.

- There is no precedent for authorizing bicycling in areas managed as Wilderness. When the U.S. Congress passed the Wilderness Act, it prohibited both motor vehicles and mechanical transport in Wilderness. Park historians recognize that the Adirondack Park's Wilderness, Primitive and Canoe area definitions and guidelines were inspired by the Wilderness Act.

Response: Although there is no precedent for authorizing bicycling by the public in areas classified as Wilderness, the APSLMP does allow limited use of bikes by administrative personnel. Additional limited use is permitted, by the public, on administrative roads in areas classified as Primitive and Canoe.

- Although the Catskill Park State Land Master Plan was amended to authorize primitive bicycle corridors at the boundary or even between some Wilderness areas in the Catskill Forest Preserve, the background circumstances and analysis of need and impacts underlying that action, deficient as it was, are utterly distinct from the Adirondack experience and should not be viewed as a precedent. Only 150 acres are involved in these corridors.

Response: The Agency agrees that the creation of a new classification category, Primitive Bicycle Corridor, in the Catskill Park State Land Master Plan in 2008 was under different circumstances.

Bicycle Use in additional Primitive Areas

- Wants to know how many miles of all-season roads are in the Primitive classification?

Response: *The Agency area descriptions for all Primitive Areas states that there are 7.85 miles of Public Roads, 63.43 miles of Private Roads and an undetermined number of miles of State owned roads with private access. This analysis has not been verified in the field. This analysis does not include mileage of former all-season roads which are no longer being used as roads. An inventory of roads would have to be done on a unit-by-unit basis.*

- Support bicycle use in all Primitive Areas.

Response: *Noted.*

- If bicycles ultimately are allowed in the Essex Chain Primitive area because of the present road system and the promise to the town governments, they should not be allowed anywhere else. Dirt roads will heal themselves very quickly if they are left to nature. Bicycle trail needs to be defined as having the character of a foot trail.

Response: *The Agency has determined that the use of bicycles on former all-season roads converted to trails should be limited to the Essex Chain Lakes and Pine Lake Primitive Areas.*

- Support 3B. Logging roads in Essex Chain Lakes Primitive Area and Pine Lake Primitive Area are well suited to biking as are most primitive areas which were commercial forests prior to acquisition.
- This amendment does not address the true wants or needs of mountain bikers in New York. The majority of mountain bikers enjoy the experience of traveling on a singletrack trail. This is evidenced by the fact that while many remote roads in the Adirondack Park are already open to cycling, most see very little use for that purpose. We respectfully encourage the Adirondack Park Agency to explore the development of more multi-use singletrack trail systems in Wild Forests (where off-road cycling is already allowed) as well as the potential designation of Primitive Bicycle Corridors in limited but specific wilderness areas in the Adirondack Park. The development of these trails and corridors would provide a much more valuable riding opportunity and help grow the Adirondack Park as a mountain bike destination. The DSEIS fails to demonstrate that there is a need for opening Primitive areas to bicycle use as contemplated by alternatives 2A and 3A. The DSEIS offers no evidence that existing bicycling opportunities are insufficient. Experienced bicyclists testified at the APA hearings that there is a great deal of diverse bicycling experience and opportunity in the Park today and no need to degrade or destroy wilderness character and conditions in the Primitive classification in order to create more.

Response: *During the Public Comment period there were comments suggesting that riding bicycles on the former all-season roads is not what all cyclists desire. The experienced mountain bike riders suggested that they are looking for an alternative biking experience, one known as single-track cycling. Single-track trails are conforming in areas classified as Wild Forest. The cycling experience sought for the Essex Chain Lakes and Pine Lake Primitive Areas is one on gentle trails with minimal obstacles.*

Motorized Maintenance

- Although the DSEIS acknowledges the potential for negative impacts of motorized maintenance of trails on users expecting a non-mechanized wilderness setting in the roads in the Essex Chain Lakes and Pine Lake Primitive areas, the DSEIS fails to include any analysis or discussion of this identified adverse impact as required by SEQRA. Moreover, the DSEIS claims that these negative impacts “may be offset by the benefits to land through drainage and erosion control.” There is no provision in SEQRA or the SEQRA regulations allowing an agency to fail to analyze an identified adverse impact by claiming that the impact will be “offset” by some other, purportedly positive impact.

Response: *The FSEIS contains the preferred Alternative 2B which has been modified to allow for maintenance with motor vehicles and motorized equipment on a periodic but not usual or routine basis. This work would be identified through a work planning process by DEC in consultation with the Agency. These limitations and the benefits to the land are appropriate mitigation measures for consideration in this FSEIS.*

- Motorized maintenance of the Catskill Park Primitive Bicycle Corridors is not permitted.

Response: *Noted.*

- Bicycles should not be allowed in Primitive Areas, they are to be managed as Wilderness. Nor should motor vehicles be allowed for management.

Response: *The preferred alternative allows bicycle use on trails following former all-season roads able to withstand such use and identified in the Essex Chain Lakes Management Complex UMP, a limited expansion (nine miles) of bicycle use within two Primitive Areas. The preferred alternative allows maintenance using motor vehicles and motorized equipment for periodic, but not usual or routine maintenance.*

- Support 2B and 3B, while being more disruptive, would help assure the roads are maintained.

Response: The goal of these alternatives is the proper maintenance of trails, not roads. The use of motor vehicles and motorized equipment for maintenance of trails does not necessarily assure proper trail maintenance. Proper trail maintenance can be achieved and has occurred regularly in Wilderness, Primitive and Canoe Areas without the use of motor vehicles and motorized equipment. Motor vehicles are not used for management in the Catskill Park or Federal Wilderness Areas.

The Department can use motor vehicles to convert and rehabilitate these former all-season roads to trails for three field seasons after the retained rights to the use of roads is extinguished. Following that period, which ends on October 1, 2022, the Department can use motor vehicles for periodic, not usual or routine maintenance.

The Department has stated that the roads within the Essex Chain Lakes Management Complex were designed and built with drainage features such as ditches and culverts which required significantly more maintenance than typical trails in the Forest Preserve. These roads will be converted to trails which will include removing culverts and significant changes to other drainage features. The Department intends to be proactive in the conversion of these roads to trails, however, staff recognize the opportunity to be proactive on this road-to-trail conversion. In order to responsibly open these former roads as recreation trails for bicycles, horses and other non-motorized recreation the Department needs to use motor vehicles, motorized equipment, and aircraft on a periodic basis.

Other Bicycle Comments

- The Supplemental Environmental Impact Statement is inadequate for examining the proposed alternatives. It fails to assess the reality of bicycle use on the Forest Preserve.

Response: The alternatives that included the use of bicycles in all areas classified as Primitive were not the preferred alternatives. The FSEIS did not conduct an analysis of bicycle use of Forest Preserve because the preferred alternative is limited to the Essex Chain Lakes and Pine Lake Primitive Areas.

- Bicycles should not be allowed in any natural area.

Response: The APSLMP land classification system provides a range of recreational opportunities. Areas classified as Primitive have limited cycling opportunities, while areas classified as Wild Forest, Historic, and Intensive Use have greater cycling opportunities.

- As an avid mountain biker and ATV enthusiast, I have plenty of places to ride and the Primitive Areas should be protected. Once you allow bikes, ATVs and snowmobiles will follow on a slippery slope.

Response: *The addition of bicycle use on the former all-season roads in the Essex Chain Lakes and Pine Lake Primitive Areas is limited to approximately nine miles. Motorized use, including ATVs and snowmobiles, will not be allowed by the public.*

- Don't want bikes and the erosion that comes with their use. Quiet helps add to the beauty to our area.
- The US Forest Service prohibits biking in Federal Wilderness Areas because of the potential damage bikes can cause to trails.
- Horses cause more damage to trails than bikes.

Response: *Cycling, horse and wagon, and horseback riding will be limited to former all-season roads that can withstand such use. Erosion can be avoided with properly designed trails. Different recreational activities may require different trail designs.*

- Consider opening Wilderness to mountain bikes.

Response: *The proposed alternatives being considered in this amendment did not include the addition of cycling in Wilderness Areas.*

- Allowing bicycling and motor vehicle maintenance in Essex downgrades those areas and the definition of Wilderness. There has to be a fight to save Wilderness.

Response: *The addition of approximately nine miles of bicycling on the former all-season roads identified in the Essex Chain Complex UMP as a conforming use is not intended as a precedent for other Primitive or Wilderness Areas.*

- Expanding bicycle use to Wilderness or Primitive is potentially illegal.

Response: *Expanding bicycle use in these areas is being done following the guidance outlined in the Final Programmatic Environmental Impact Statement (FPEIS) for amending the APSLMP. The FPEIS foresaw a possible need to amend the APSLMP.*

- The DSEIS does not rationally connect its reference to a “rapidly growing market” for mountain biking and “the potential to capture users from a large and expanding sport” to the action alternatives at issue. The document fails to offer a basis for reasoning that mountain bikers would have any interest in cycling on groomed and “relatively easy loop trails.”

Response: *The popularity of bicycling in other areas of the park on trails of all types is well-known. The FSEIS must address the environmental impacts of the proposed action. The Essex Chain Lakes Complex UMP proposes the use of bicycles and requires an analysis of use and impacts from this use.*

Cedar River Bridge

- Very opposed to the use of non-natural materials to build bridge over Cedar River. Both law and regulation prohibit a motorized bridge crossing at this location.
- The Wild, Scenic and Recreational Rivers act MUST take precedence in this SLMP proposal.
- A new motor vehicle bridge over the Cedar River is illegal. The APSLMP should not be changed to support construction of an illegal motor vehicle bridge over the Cedar River in violation of the NYS Wild, Scenic and Recreational Rivers Act. The Chain Lakes Road South that accesses the Cedar River Bridge is also illegal because it passes through a Wild River corridor.
- The Wild and Scenic Recreational Rivers Act MUST take precedence in this SLMP proposal.

Response: The Department interprets and enforces the Wild, Scenic, Recreational Rivers Act and its regulations on State lands. The Department has determined that the proposed bridge over the Cedar River is legal. The proposed bridge will be located on lands classified Wild Forest, which permits bridges and motorized uses.

Natural Materials

- Support the use of non-natural materials to build the Cedar River Bridge. However, non-natural materials should not be used for any bridge construction in any Wild Forest Area without a more specific analysis and review of limitations than is currently proposed. Alternate 3 should be modified to be more protective of the natural resources at individual locations.

Response: In consideration of public comment and further consultation between the Agency and the Department, the two agencies are committed to a public process for the development of appropriate guidelines for the use of non-natural materials on bridges other than the one proposed for the Cedar River following a minimum requirement approach.

The Unit Management planning process is the appropriate place to analyze the need for any structure including bridges. Careful analysis at the time and the application of minimum requirements principles will insure that non-natural materials will be used only when no other reasonable alternative exists.

- In favor of non-natural materials being used for bridge construction.

- Support use of non-native materials for bridges in all land classifications. Non-native materials allow for construction of lower profile bridges over longer spans and can be covered with wood veneer.

Response: *The Preferred Alternative enables the possible use of non-natural materials for bridge construction in areas classified as Wild Forest, following a minimum requirement approach.*

- There is no analysis of the bridge construction process and no proof that natural material bridges would be larger than those constructed with non-natural materials.

Response: *The Preferred Alternative includes that analysis occurring on a case-by-case basis for each bridge proposed.*

- There are already many cable suspension bridges and steel deck bridges in Wilderness

Response: *These bridges are non-conforming structures which when replaced would need to be replaced with structures made of natural material.*

- Oppose all of the proposed actions that allow the use of non-natural materials in bridge construction, at the Cedar River or anywhere else in designated Wild Forest areas. The existence of such bridges would prevent future land reclassifications, because the structures would be non-conforming in any other land category.

Response: *There are no present plans for reclassification. When State land is reclassified, any existing structures which are no longer conforming would be identified and removed, or at a minimum, not replaced. Having these structures on the land does not prevent reclassification.*

Minimum Requirement Approach

- In favor of 3: logical and cost effective.

Response: *Agreed; Alternative 3 is the preferred alternative.*

- Regarding the use of non-natural materials I encourage the APA to develop a new amendment alternative which would utilize a Minimum Requirement Approach and analysis for non-natural materials for bridges in all Classification Areas, including Wild Forest and Wilderness. I also encourage the APA to consider the use of non-natural materials and a Minimum Requirement Approach and analysis for privies in all Classification Areas.

Response: *These alternatives address bridge construction in Wild Forest. Future amendments might consider expanding this approach to other classifications or structures.*

- The APSLMP should not be revised to adopt federal “Minimum Requirement Approach” standards for bridge construction. If the APA wishes to change Forest Preserve bridge construction to a more versatile and discretionary program that could include non-natural materials, it should develop its own standards appropriate for the realities of the Adirondack Forest Preserve and not simply try and download the federal program. The APA should also undertake a study of all types of bridges used on the Forest Preserve before it makes these changes.

Response: *The FSEIS proposes creating a version of the minimum requirement approach specifically tailored to the construction of bridges in areas classified as Wild Forest. This analysis would be created in a separate public process and would include developing criteria for reviewing bridge projects. These criteria could include such items as the necessity of a particular bridge, alternate design and locations, impacts in surrounding natural resources and aesthetics. The Agency emphasized at the Public Hearings that the document would be developed in consultation with the Department, that there would be a public comment period and that the Agency and Department would add adopted guidance to the Interagency Memorandum of Understanding.*

Ministerial Changes, Minor Changes and Additional Content

- Many of the proposed “ministerial” or “minor” changes to the APSLMP are substantial and require full analysis in the SEIS as well as public hearings that provide serious alternatives.

Response: *Ministerial changes, minor changes, and additional content were all included in Appendix 1 without each item being identified as such. The Agency notes that some changes were more substantial than first realized and have removed some of those proposed changes. Appendix 1 of the DSEIS is renamed Appendix A in the FSEIS.*

- Changes to the “Conservation Easements” section are major changes, not minor changes. APA is making a legal determination without proper review. APA states that conservation easements “remain in private ownership” due to less-than-fee ownerships. This is a major decision that merits a fuller analysis in the SEIS. On vast swaths of the more than 750,000 acres of conservation easement lands, the State of New York pays 65% or more in local taxes. Conservation easements are not simply private fee title land; they include an enormous public ownership.

Response: *Private lands with State owned conservation easements have Recreational Management Plans (RMPs) which are reviewed by the Agency. An interagency MOU was developed in 2010 which clarifies new land use and development guidelines for these lands and integrates recreational opportunities with nearby Forest preserve and private lands.*

- Do not believe the change in Appendix 1 of Fishing and Waterway Access site is minor and believe it requires more discussion. Not allowing trailers to enter the water limits the launching of boats to stronger people and/or lighter boats.
- The suggested change to the Fishing and Waterway Access site definition would eliminate the ability for boat trailers to enter water in certain areas. We are opposed to any modification of definitions that would prohibit or restrict existing or future boat launching facilities.

Response: *The suggested changes to the Fishing and Waterway Access site definition have been withdrawn.*

- Changing the word “railroad” to “right-of-way” in the Travel Corridor section of the SLMP changes the meaning of the sentence.
- The APA proposes to change the “Designation of Travel Corridors” section to change “Remsen to Lake Placid railroad” to “Remsen to Lake Placid” right-of-way. This is a subtle yet major change and merits further analysis in the SEIS and alternatives.

Response: *The Agency suggested this change to have the text in the “Designation of Travel Corridors” match the text in the “Definition of Travel Corridors.” The Agency has modified this change to improve this objective. The text was not modified to change the meaning of the sentence.*

- Increasing the meaning of “administrative personnel” could make for an uncontrollable problem, as even trained DEC workers do not always follow BMPs or even Article XIV when it comes to cutting trees. In the present SLMP administrative personnel were assumed to be trained, paid employees of DEC, with accountability presumed.
- Change to “Administrative Personnel” is a major change, not a minor change. This change constitutes a major expansion in the number of people included to hundreds, if not thousands of people.

Response: *After consultation and reconsideration, the proposal regarding the definition of Administrative Personnel has been withdrawn.*

- Creation of a new “Bike Trail.” This is a major change as it’s a new type of trail on the Forest Preserve. The APSLMP lists “roads,” “foot trail,” “horse trail,” “snowmobile trail” and two kinds of “cross country ski trails.” Adding a “bike trail” is important. Moreover, this definition needs to include language, similar to other trails, that a bike trail should have the character of a foot trail.

Response: *The DSEIS proposed the addition of Bicycle Trail definition. The proposed definition now reads “a marked trail, designated for travel by bicycles, located and designed to provide access in a manner causing the least effect on the local environment.” The definition would apply in the Essex Chain Lakes and Pine Lakes Primitive Areas only if Alternative 2A is adopted. Alternative 2A is not the preferred alternative.*

- Adding the invasive species section is a great start.

Response: *Thank you.*

- The APA proposes to delete all deadlines for the removal of all nonconforming uses on the Forest Preserve by certain dates. Though the APA and DEC have failed to meet the various deadlines in the APSLMP, these deadlines should not be deleted. These deadlines should be updated and the APA should recommit itself to ensuring that these nonconforming uses are removed and the natural resources of the Forest Preserve protected.

Response: *The deletion of all deadlines for the removal of all nonconforming uses on the Forest Preserve by certain dates has been removed. However, the obligation to use best efforts to remove such uses remains.*

- Incompatible uses in 1972 are still incompatible, in fact more dangerous because of the increased ease of speed possible with 100 mph snowmobiles and high tech geared bicycles.
- The APA proposes to change Wild Forest Basic Guideline 5 to remove the preference that “care” should be taken to “separate” various recreation uses and to remove a list of these potentially conflicting uses. This is a big change and should not be made without proper analysis.

Response: *The change was made to acknowledge that there are multiple types of use in the Forest Preserve and that what is seen as a conflict to one person may not be interpreted the same way by another. This change was not intended to suggest that multi-use trails can or should always be recommended as a management objective.*

- The APA needs to update the “Wilderness Statistical Parkwide Totals” section. Whereas the acreage of Wilderness Areas has been updated with new classification hearings, there has been no thorough list of nonconforming uses. This should be

done; for instance, we find almost 7 miles of nonconforming and illegal roads in Wilderness Areas, yet the revised APSLMP lists just 2.73 miles.

Response: *The Area Descriptions section of the APSLMP was updated in 2012. The Agency is not updating this section during this amendment cycle.*

Natural Resources

- Do not make any changes to the SLMP Primitive Area management guidance. There is very little true Wilderness, it is no longer valued. Politics have taken over and few realize the Park's long term value and our moral obligation to preserve it.
- Natural and ecological processes should be emphasized in wilderness AND primitive areas while suitable recreation should be emphasized in Wild Forest and Intensive Use areas.
- Amendments should not weaken any mandates that protect and preserve the natural resources.

Response: *The APSLMP states that the protection and preservation of the natural resources of the state lands within the Park must be paramount. Human use and enjoyment of those lands should be permitted and encouraged, so long as the resources in their physical and biological context, as well as their social or psychological aspects, are not degraded.*

New Land Classification Category

- The proposed APSLMP changes do not represent the full range of alternatives. One option, which was mentioned at APA meetings, but not included, is the creation of a new state land management category. There could be an intermediary classification between Wild Forest and Wilderness/Primitive.

Response: *The Agency believes that a new land classification could be examined, but is not among the reasonable alternatives to be considered for the limited purpose of this environmental impact statement and the proposed action.*

Lean-tos

- Opposed to change proposed for lean-to language.
- Want lean-to to be exempt from the definition of non-conforming structures with reference to setbacks and clustering.
- Opposed to making lean-tos less conspicuous.

- Lean-tos should be allowed to stay in their current locations.

Response: *Appendix 1 has been modified and the lean-to definition remains as it was. Appendix 1 of the DSEIS is renamed Appendix A in the FSEIS.*

Economics

- The towns in the area have lost jobs in the logging industry and visitor activity in the Essex Chain Lakes and Pine Lakes areas has not replaced those jobs to date. Biking has the potential to provide economic benefits to the five towns and all towns in the Adirondacks, if the SLMP is amended to allow it. (Adk Wild)

- We have lost these lands as productive forests and now we need to have another way to improve our economy.

Response: *The Forest Preserve is an important economic asset for the Adirondack Park. The scenic, recreational, and aesthetic resources the Forest Preserve provides serve as powerful attractors to tourists and provide a positive influence on private land values. Additionally, the Forest Preserve provides unabated economic stimulus in the form of property tax payments to local governments.*

Additionally, the NYS Forest Preserve provides for a range of recreation opportunities that can spur visitation to the region. A variety of factors influence the visitation to the Forest Preserve including the appeal of the natural resource itself, available recreation infrastructure (including trails, camping sites, etc.), proximity to population centers and accommodations, access points, local event programming, and the marketing of the resource.

- Adirondack communities need to realize that what outside tourism they do get is due to the unique assets of the area, not that they lack development of the areas outside. Any shift of wilderness – inappropriate activity to the Park simply takes it away from areas outside of the park in need of such tourism and that are better able to accommodate that use.

Response: *The unique scenic and recreational assets provided by the Forest Preserve serve as a tourism attractor that differentiates the Park from other tourism-dependent areas. The Forest Preserve attracts people seeking outdoor recreation opportunities in a variety of activities ranging from hiking, canoeing/kayaking, and fishing in the warmer months to cross-country skiing, snowshoeing and snowmobiling in the winter.*

It is acknowledged that increased visitation to the Adirondack Park may redirect visitation from other places.

- Recreational and economic uses should NOT be given priority over environmental protection and preservation.

Response: The APSLMP states that the protection and preservation of the natural resources of the state lands within the Park must be paramount. Human use and enjoyment of those lands should be permitted and encouraged, so long as the resources in their physical and biological context, as well as their social or psychological aspects, are not degraded. It is not anticipated that the proposed amendments will adversely affect the Forest Preserve's ecology.

Snowmobiles

- The SLMP should not be amended to allow grandfathering of non-conforming uses, such as has been done to justify snowmobile trails in the Essex Chain Lakes Complex.

Response: The APSLMP proposed amendments do not include grandfathering of snowmobile trails as a conforming use. The proposed snowmobile trail is located on land classified as Wild Forest.

- Snowmobiles have NO place anywhere on state land.

Response: Snowmobiles are conforming on lands classified as Wild Forest, subject to an approved UMP.

UMP

- In favor of narrow corridor for bikes and snowmobiles.
- Don't remove the Polaris Bridge.
- Keep the Gooley Club main lodge as an interior ranger station and visitor center.
- Advocate for a revision of the Essex Chain unit management plan to allow for a snowmobile and mountain bike corridor.

Response: The APSLMP proposed amendments do not address management objectives of the Essex Chain Lakes Complex UMP. The UMP addressed these issues in a separate public process.

Constitutional

- Let's not start changing the constitution to become a better recreation area.

Response: *The changes proposed to the APSLMP do not involve changing the constitution.*

Miscellaneous

- Why isn't the Remsen-LP Corridor listed as a Historic Area? (Omitted from pages 47, 119, and 120).

Response: *The Remsen-Lake Placid Travel Corridor was classified as a Travel Corridor and has not been considered for reclassification as a Historic Area.*

- The APA is proposing, in effect, to create a new third type of Primitive Area. In order to do this the APA needs to amend the 1979 Programmatic Environmental Impact Statement.

Response: *The Agency is not proposing a third type of Primitive Area.*

- Maintain the roads like you do at Santanoni.

Response: *The Newcomb Lake Road to Camp Santanoni Road is part of the designated Historic Area and may be maintained as a road. The former all-season roads in these Primitive Areas would become trails and would no longer be roads. The Department cannot maintain these as roads because they do not fit the definition of State Truck Trail or Administrative Road. In order for the all-season roads to remain roads in the Primitive classification category, the Department would need an administrative purpose for the roads.*

- Generally in favor of amendments being proposed. They will save money.

Response: *Finances may be a consideration in management decisions.*

- In favor of proposed changes, will provide highest quality of recreation.

Response: *Noted.*

- ATVs should be allowed for emergency purposes.

Response: *The current Master Plan allows the use of motor vehicles, motorized equipment, and aircraft in cases of emergency in all classification categories.*

- Closed unmaintained deteriorated roads provide no significant economic benefit.

Response: *Users of the Forest Preserve seek differing experiences. Some users and visitors value a sense of remoteness while others seek more intensive uses. Additional information is necessary to determine the exact economic impact of closing a road.*

- No more access to wild areas.

Response: *Access is available to all public lands of the Forest Preserve. The ease of access differs based upon classification and management objectives. Access to Wilderness tends to be more self-sufficient than access to Intensive Use Areas. There is a spectrum of opportunities ranging between these classification categories.*

- Support multi-use trails.

Response: *The proposed amendments neither support nor oppose multi-use trails.*

- These lands are not Wilderness by the SLMP definition.

Response: *Areas classified as Wilderness have the potential to become Wilderness and may not be at the time of classification. Many of the park's Wilderness Areas were logged or burned prior to becoming Wilderness.*

- Allow all-terrain vehicle use in Intensive Use areas. Jeep trails are a written legacy of the Park.

Response: *All-terrain vehicles are regulated by the Vehicle Traffic Law and are not prohibited in Intensive Use areas. The roads in Intensive Use Areas are considered public highways and, as such, ATVs are generally prohibited.*

Reduce limits on loop trails that effectively eliminate most opportunities for families with younger children to learn about the Park with more local oriented trips. There are not sufficient conservation easements to make up for these limits in the APSLMP.

Response: *The creation and location of loop trails are a management decision.*