



SHERMAN CRAIG
Chairman

TERRY MARTINO
Executive Director

MEMORANDUM

TO: Terry Martino, Executive Director

FROM: Kathy Regan, Deputy Director, Planning

DATE: July 6, 2017

RE: Siamese Ponds Wilderness and Jessup River Wild Forest Unit Management Plan (UMP) Amendments

The Department has written a UMP amendment for Siamese Ponds Wilderness and Jessup River Wild Forest that adds protection to wildlife and improves hiking and camping experiences. Agency staff have reviewed the Proposed Final Siamese Ponds Wilderness and Jessup River Wild Forest UMP amendments, dated July 2017, and recommend that they conform to the general guidelines and criteria of the Adirondack Park State Land Master Plan.

The management actions include: installing a gate at a cave entrance to protect a bat hibernaculum, designating several unmarked trails as marked, formal trails, retaining a lean-to that was proposed to be removed, re-routing trails and developing new trails.

The Department's public comment period ran from May 7 through June 16, 2017; they received 14 comment letters. The Agency also had a public comment period and received three comment letters, all from environmental groups of the Park, which voiced strong objections to one or more of the hiking trail proposals. These objections are less about the actual proposed management actions and more about associated UMP language indicating these actions are the first steps in the implementation of two larger, recently completed plans – the “Great South Woods Complex Strategy and Recommendations” (drafted by SUNY College of ESF staff) and the “Conceptual Plan for a Hut-to-Hut Destination-based Trail System for the Five Towns of Long Lake, Newcomb, Indian Lake, Minerva and North Hudson” (drafted by Jack Drury and Joe Dadey).

The Department did not draft or formally adopt either of these documents as plans of action. The Department recognizes that any recommendations made in those plans would need to be incorporated into an approved UMP. DEC staff have addressed these concerns in their response to public comments.

Staff are not concerned about the minimal mileage of new foot trail construction proposed or about the other proposed trail network improvements recommended in this amendment. They are sensible proposals: improvements with significant potential recreational benefits and of a sort we have readily approved in the past as compliant with the APSLMP. Staff recognize the need for a park-wide plan for large-scale trail networks, as recommended by Designee Dawson, and will initiate an inter-agency team to initiate this process.



SHERMAN CRAIG
Chairman

TERRY MARTINO
Executive Director

**DRAFT
RESOLUTION ADOPTED BY
THE ADIRONDACK PARK AGENCY
WITH RESPECT TO AN AMENDMENT TO
THE 2005 SIAMESE PONDS WILDERNESS AND
THE 2006 JESSUP RIVER WILD FOREST
UNIT MANAGEMENT PLANS**

July 13, 2017

WHEREAS, Section 816 of the Adirondack Park Agency Act directs the Department of Environmental Conservation to develop, in consultation with the Adirondack Park Agency, individual management plans for units of land classified in the Master Plan for Management of State Lands and requires such management plans to conform to the general guidelines and criteria of the Adirondack Park State Land Master Plan; and

WHEREAS, in addition to the guidelines and criteria, the Master Plan prescribes the contents of unit management plans and provides that the Adirondack Park Agency will determine whether a proposed individual unit management plan complies with the general guidelines and criteria; and

WHEREAS, in 2005 the Department of Environmental Conservation (the Department) adopted the unit management plan for the Siamese Ponds Wilderness Area, located in the Town of Johnsburg, Warren, County and the Towns of Wells and Indian Lake, Hamilton County; and

WHEREAS, in 2006 the Department adopted the unit management plan for the Jessup River Wild Forest; and

WHEREAS, the Department has now prepared an amendment to the 2005 UMP and the 2006 UMP dated July 2017 (2017 Amendment); and

WHEREAS, the 2017 Amendment includes proposed management actions to construct a gate at the entrance to Eagle Cave to protect an important bat hibernaculum, construct new trails to connect to existing trails, retain a lean-to that had been scheduled for removal and potentially relocate the Botheration Pond Trail; and

WHEREAS, the Department has filed a Negative Declaration on May 10, 2017 in the Environmental Notice Bulletin and sought public comments until June 16, 2017; and

WHEREAS, the Department is the lead agency, and the Adirondack Park Agency is an involved agency whose staff have been consulted in the preparation of the proposed plan amendment; and

WHEREAS, the Agency is requested to determine whether the 2017 Amendment to the 2005 Siamese Wilderness Area and the 2006 Jessup River Wild Forest Area Unit Management Plan dated July 2017 is consistent with the guidelines and criteria of the Adirondack Park State Land Master Plan; and

WHEREAS, the Adirondack Park Agency has reviewed the proposed Amendment; and

WHEREAS, the Amendment recognizes the need to protect the natural areas' resources, improve public use and enjoyment of the areas, avoid user conflicts, and prevent overuse according to the guidelines and criteria of the Adirondack Park State Land Master Plan; and

WHEREAS, the 2017 Amendment's objectives include providing protection of a sensitive bat hibernaculum, connecting existing trails and officially designating a popular trail near Round Pond and Kings Flow, locating new trails and rerouting trails to reasonable public access, where appropriate, in order to provide visitors with recreational opportunities while minimizing resource impacts.

NOW, THEREFORE, BE IT RESOLVED, that pursuant to Section 816 of the Adirondack Park Agency Act, the Adirondack Park Agency finds the 2017 Amendment to the 2005 Siamese Ponds Wilderness Area Unit Management Plan and the 2006 Jessup River Wild Forest Area Unit Management Plan dated July 2017, conforms with the general guidelines and criteria of the Adirondack Park State Land Master Plan; and

BE IT FINALLY RESOLVED, that the Adirondack Park Agency authorizes its Executive Director to advise the Commissioner of Environmental Conservation of the Agency's determination in this matter.

Resolution adopted on this date, July 13, 2017.

AYES:

NAYS:

ABSTENTIONS:

ABSENT:



Department of
Environmental
Conservation

SIAMESE PONDS WILDERNESS AND JESSUP RIVER WILD FOREST

Proposed Final Amendments

to the

2005 Siamese Ponds Wilderness Unit Management Plan

and the

2006 Jessup River Wild Forest Unit Management Plan



NYS DEC, REGION 5, DIVISION OF LANDS AND FORESTS

232 Golf Course Road, Warrensburg, NY 12885
r5.ump@dec.ny.gov

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Introduction

The Siamese Ponds Wilderness is located in the towns of Johnsburg and Thurman in Warren County and the towns of Wells, Lake Pleasant and Indian Lake in Hamilton County. The unit is approximately 114,000 acres in size. A Unit Management Plan (UMP) for this area was completed in 2005.

The Jessup River Wild Forest is located in the towns of Arietta, Wells, Indian Lake, and Lake Pleasant in Hamilton County. The unit is 47,300 acres in size. A UMP for the area was completed in 2006. The UMP was amended in 2010 to configure the snowmobile trail system, and again in 2015 to allow public motor vehicle access across the unit to a public parking area on adjacent private lands.

In the last two years, the Department and its partners have completed three major regional trail planning efforts:

- *North Country National Scenic Trail – Adirondack Park Trail Plan* (NCNST), 2015;
- *Conceptual Plan for a Hut-to-Hut Destination-based Trail System for the Five Towns of Long Lake, Newcomb, Indian Lake, Minerva, and North Hudson* (Hut-to-Hut), 2015; and
- *Great South Woods Complex Planning Strategy and Recommendations* (Great South Woods), 2016.

These UMP Amendments contain seven proposals, including efforts to implement the NCNST, Great South Woods and Hut-to-Hut plans, other proposals intended to improve the hiking and camping experience, and an important wildlife protection measure:

- 1) Installation of a gate at the entrance of Eagle Cave to protect an important bat hibernaculum;
- 2) Construction of the new Wakely Brook Trail to connect the Kunjamuk Trail with the Round Pond Trail;
- 3) Official designation and marking of the Round Pond Trail, the Kings Flow East Trail, and the Puffer Pond Brook Trail;
- 4) Retention of the Puffer Pond lean-to, which was identified for removal in the 2005 UMP;
- 5) Construction of a new trail segment connecting the John Pond - Clear Pond Loop Trail to Parkerville Road;
- 6) Ford across the East Branch of the Sacandaga River; and
- 7) Re-routing of a portion of the Clear Pond Trail.

Management Proposals

1. Eagle Cave Bat Hibernaculum Protection

Background:

Chimney Mountain and the associated caves (see location map, Figure 1) located in the Town of Indian Lake have become a popular destination for recreationists over the years. A short hike from the edge of the unit provides access to Chimney Mountain, interesting geologic formations and wonderful views.

One of the geologic features that has caught the interest of the recreational caving community is Eagle Cave. Eagle Cave, located near the top of Chimney Mountain, appears to be accessed by multiple points and the cave itself consists of a number of “rooms” or “openings”, some large in size which work their way down into the earth. The cave is vast and it is not uncommon for groups of recreational cavers to spend hours below the surface exploring. As with many caves, Eagle Cave is not for the novice and several rescues have taken place here over the years. The recreational caving community has traditionally accessed this cave during all times of the year.

White-nose syndrome (WNS) was first identified in a cave in Schoharie County, New York in February 2006, shortly after the Siamese Ponds Wilderness Unit Management Plan was completed. WNS has been afflicting hibernating bats in New York and across the northeast and beyond. The cold-loving fungus which causes this disease, *Pseudogymnoascus destructans*, grows best between 0-10 degrees Celsius, the same temperature found in bat hibernacula. Since its discovery in 2006, roughly 6 million bats have died within the affected regions and the disease has spread to caves and mines as far away as Alabama, Oklahoma and Canada. In 2016, the disease was documented in Washington State, representing a large jump to the west. In New York, all six hibernating bat species and all hibernacula are now infected. The little brown bat, the northern long-eared bat, and the tri-colored bat have been particularly hard hit. In some hibernacula, 90 to 100 percent of bats have died (primarily little brown bats).

WNS infection causes bats to rouse frequently from hibernation and starve to death because it induces abnormal activity at a time when there are no food resources available. The symptoms associated with WNS include loss of body fat, unusual winter behavior (including flying and congregating at hibernacula entrances), scarring, erosion and holing of the wing membranes, and usually death. Human disturbance of hibernating bats can exacerbate these effects by causing the bats to rouse unnecessarily, increasing the calories they use and accelerating their subsequent metabolic decline.

Current Conditions:

Eagle Cave is now the second largest hibernation site for little brown bats known in the Adirondacks, the third largest in the state, and one of the largest remaining in the Northeast United States. The peak in little brown bat numbers came in 2013 at just over 4500 individuals. The Department annually surveys known bat hibernacula. Recent counts have shown a slightly different picture indicating variability in the trend, though the count is still relatively stable when compared to many other sites in NY. In 2015, only 2788 bats were counted, which was a considerable decline from previous years. However, in 2016 counts were back up to over 3300. This is still a 26% decline from the 2013 high, but an increase from the pre-WNS count in 1985 of approx. 2650 bats.

The Department has also documented northern long-eared bats (federally- and state-listed as threatened) and tri-colored bats (which are being petitioned to be added to the Endangered Species Act and will likely be listed on the state level in the near future) at Eagle Cave.

The Siamese Ponds Wilderness Unit Management Plan was written before the discovery of WNS, and well before the tremendous devastation the disease would wreak on native bats. Thus, public use of the caves within the unit was not deemed to be a threat to bat populations at the time. However, public use of the caves when hibernating bats are present is now recognized as a significant threat to those species. Laboratory and field studies have shown quite clearly that human visitation causes significant disturbance of hibernating bats, exacerbating the effects of WNS. It is virtually impossible to visit the cave when bats are there without disturbing them, no matter how careful visitors are. The only effective approach is to stay out of the cave during the hibernation period. Beyond just the unintentional disturbance that human presence causes, the bats are very vulnerable to intentional vandalism. While this prospect seems unlikely given the relative remoteness of the site, it cannot be ignored, and vandals have been known to deliberately kill hundreds of bats in other caves. Such an act at Eagle Cave could have severe population-level impacts to New York's little brown bat resource.

In order to minimize human disturbance to hibernating bats, the Department began administratively closing Eagle Cave in 2009. The cave is currently closed between October 15 and April 30. Public notification efforts have consisted of posting signs at the cave entrance, parking lot kiosk and trail register, posting the information on the DEC website, and reaching out to the caving and geo-caching communities.

However, data following implementation of the closure indicate the cave still receives public use during the bat's hibernation period. To help quantify the level of public use, the Department installed a light sensor in the cave in the summer of 2012 and retrieved it the following summer. While the sensor malfunctioned prior to its removal, it did document at least 10 trips into the cave between the months of October and January.

It is evident that efforts to keep people out of Eagle Cave during the winter months have not been completely effective. While the signage, outreach and website postings have educated a majority of people, who have subsequently not entered the cave during winter, there are still some who are entering Eagle Cave during periods they should not. Thus, the Department has not adequately adhered to the Adirondack Park State Land Master Plan (APSLMP) mandate that its Unit Management Plans address “the preservation and management of the fish and wildlife resources (including game and non-game species) of the area”.

Management Action:

This amendment proposes to bring the Siamese Ponds Wilderness Unit Management Plan into compliance with the APSLMP by constructing gates on the entrances to, or perhaps within, Eagle Cave to prevent human disturbance to bats during their hibernation period. This proposal is consistent with the unifying theme of the APSLMP, which states “the protection and preservation of the natural resources of the state lands within the Park must be paramount”. Furthermore, the APSLMP indicates temporary closure of all or portions of wilderness areas to permit rehabilitative measures may be appropriate if recreational use threatens a wilderness resource. Similarly, the APSLMP allows for wildlife management structures on a temporary basis when essential for the preservation of wilderness wildlife values and resources.

Iron gating, similar to what has been installed on other caves across the country and in the Adirondacks (Figure 2), will allow the department to exclude human activity while allowing bats and other small animals to enter and exit the cave, and permit the continued natural flow of air. The gates will be designed in accordance with Bat Conservation International guidelines, and will incorporate a door that can be closed and locked at the end of the bat’s active season and opened again when the bats have finished hibernation. This will allow for continued public use of the cave when hibernating bats are not present. Gates will be installed at all entrances to Eagle Cave as they are identified, or placed within the cave itself at a spot(s) beyond where multiple entrances empty into the cave system. The gate(s) will be placed in such a way to be visually unobtrusive to the greatest extent possible and designed and constructed to be tamper resistant. The cave will be surveyed periodically to assess that status of its bat population. If and when little brown bats and other hibernating bat species recover in the Adirondack Park and New York to the point that potential human disturbance is no longer a significant population threat, the gate(s) will be removed.

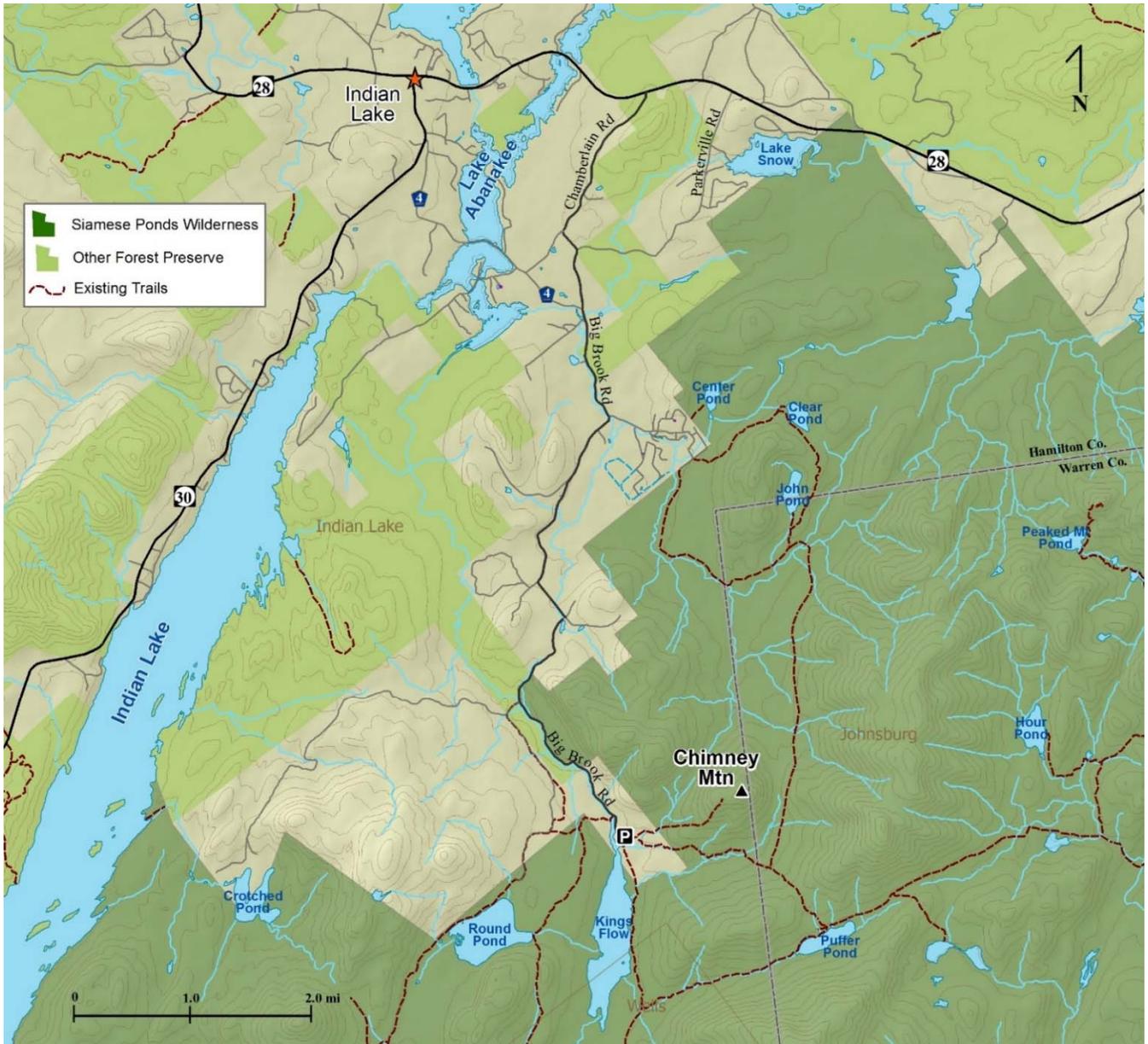


Figure 1. Chimney Mountain location map.



Figure 2. Example gated bat hibernaculum – a graphite mine entrance in Hague, Warren County.

2. Wakely Brook Trail / North Country National Scenic Trail Development

The Department proposes to construct a trail between 1 ½ and two miles in length connecting the Kunjamuk Trail with the Round Pond Trail along Wakely Brook. This trail connection would complete a 24 mile east to west stretch of existing trails that would allow the public to traverse the entire unit from the Ski Bowl in North Creek to the shores of Indian Lake. This segment is proposed to be a section of the NCNST through the Siamese Ponds Wilderness (see Figure 3.) The majority of the NCNST route through the Wilderness Area would rely on existing trails. The only gap is between the Kunjamuk Trail and the Round Pond Trail, where the NCNST Plan proposes this new connecting trail segment. This proposal also meets an objective of the Great South Woods plan. After conducting preliminary field work, Department staff have confirmed that a suitable trail could be located in this area.

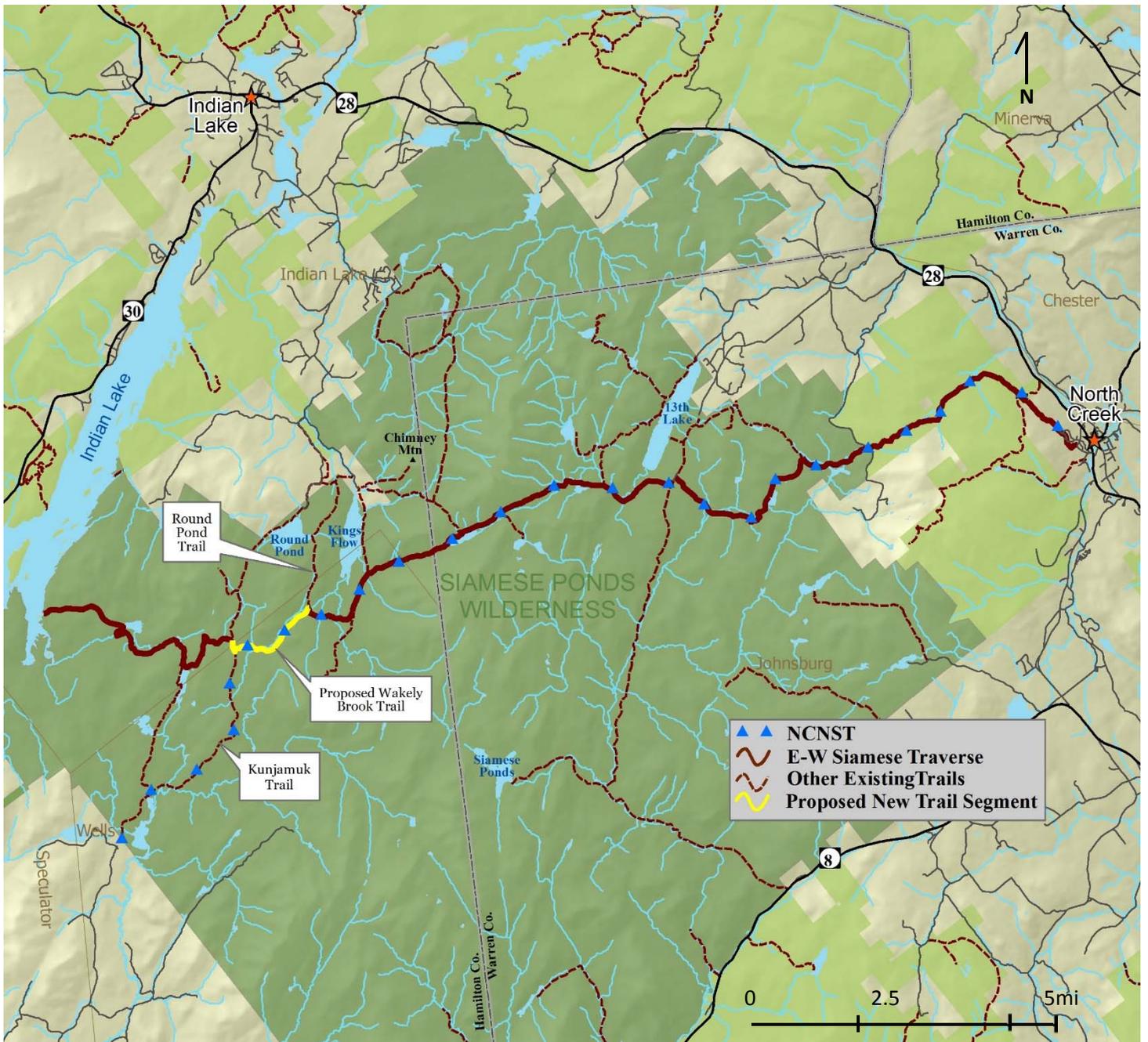


Figure 3. Proposed Wakely Brook Trail in Siamese Ponds Wilderness

3. *Un-marked to Marked Trails*

The Department proposes to officially designate and mark the Round Pond Trail, the Kings Flow East Trail, and the Puffer Pond Brook Trail (see figure 4). These trails are currently listed as unmarked in the Unit Management Plan, however they are well established on the ground and there is significant use by the public from the Chimney Mountain Trailhead. In order to make the trail system more clear in this area and in turn more safe, the Department is proposing to change the status of these trails to “marked” and maintain, sign and mark them in accordance with Department foot trail marking and maintenance guidance. Marking of the Round Pond Trail beyond Round Pond Brook is contingent on securing the rights to cross the Crotched Pond Conservation Easement to connect with the Kunjamuk Trail. Therefore, that section of the Round Pond Trail north of the brook will not be marked until that agreement is made.

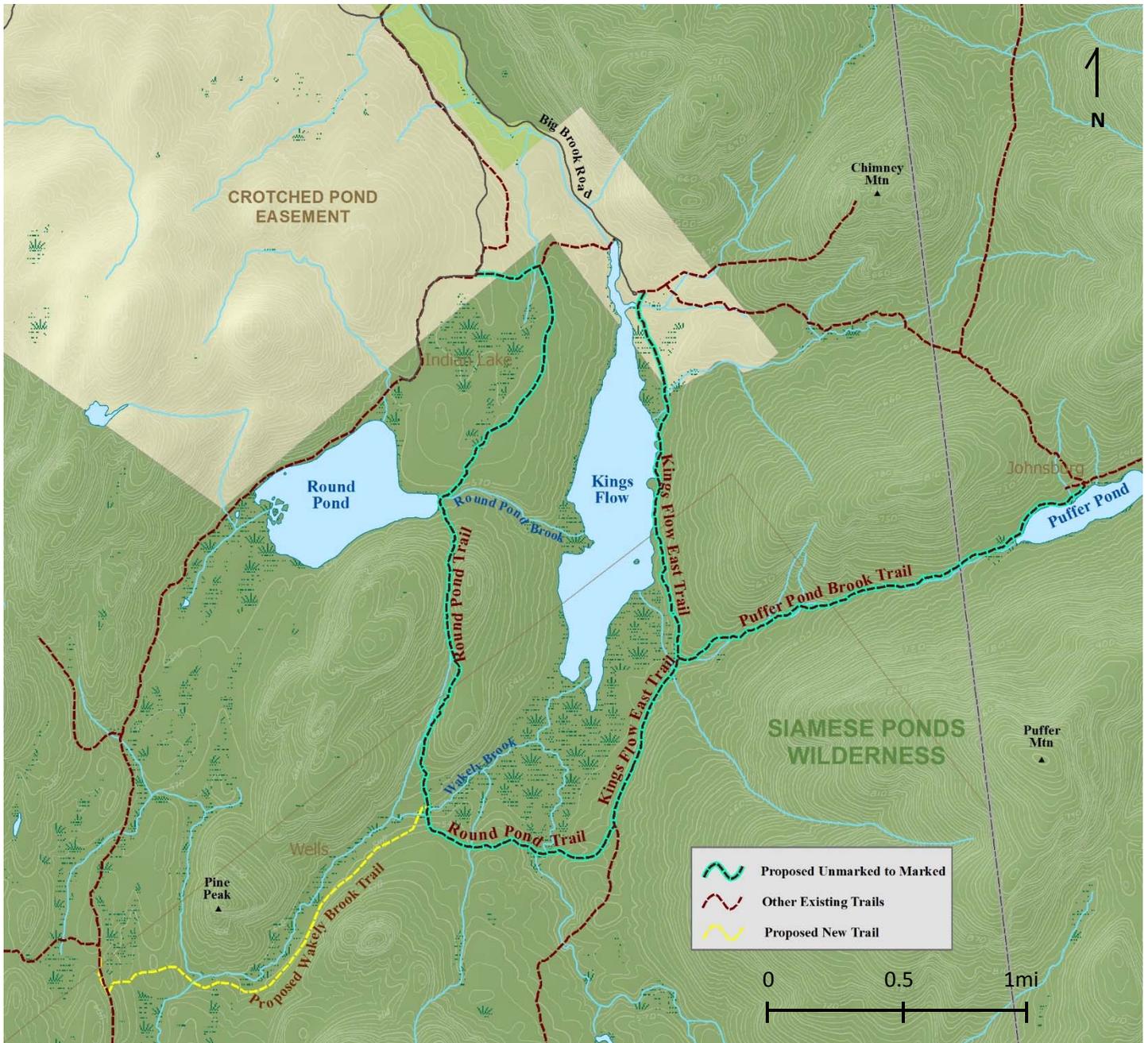


Figure 4. Unmarked trails proposed to be marked

4. Retain Eastern Puffer Pond Lean-to

The Siamese Ponds Wilderness Unit Management Plan called for the eventual removal of the Puffer Pond lean-to on the eastern end of the pond. This location is a popular destination and while the UMP indicates siting and use issues, it has since been determined that if there were issues years ago, they are not apparent now. The location is desirable by many according to lean-to logs and user feedback and with the NCNST designation along the Puffer Pond Trails, maintaining both shelters would be beneficial for managing the additional use at the pond. Therefore the Department proposes to keep both lean-tos on Puffer Pond (see Figure 5). Repairs are needed and at the time those repairs are made, the eastern lean-to would be moved back and sited a minimum of 100 feet from mean high water mark.

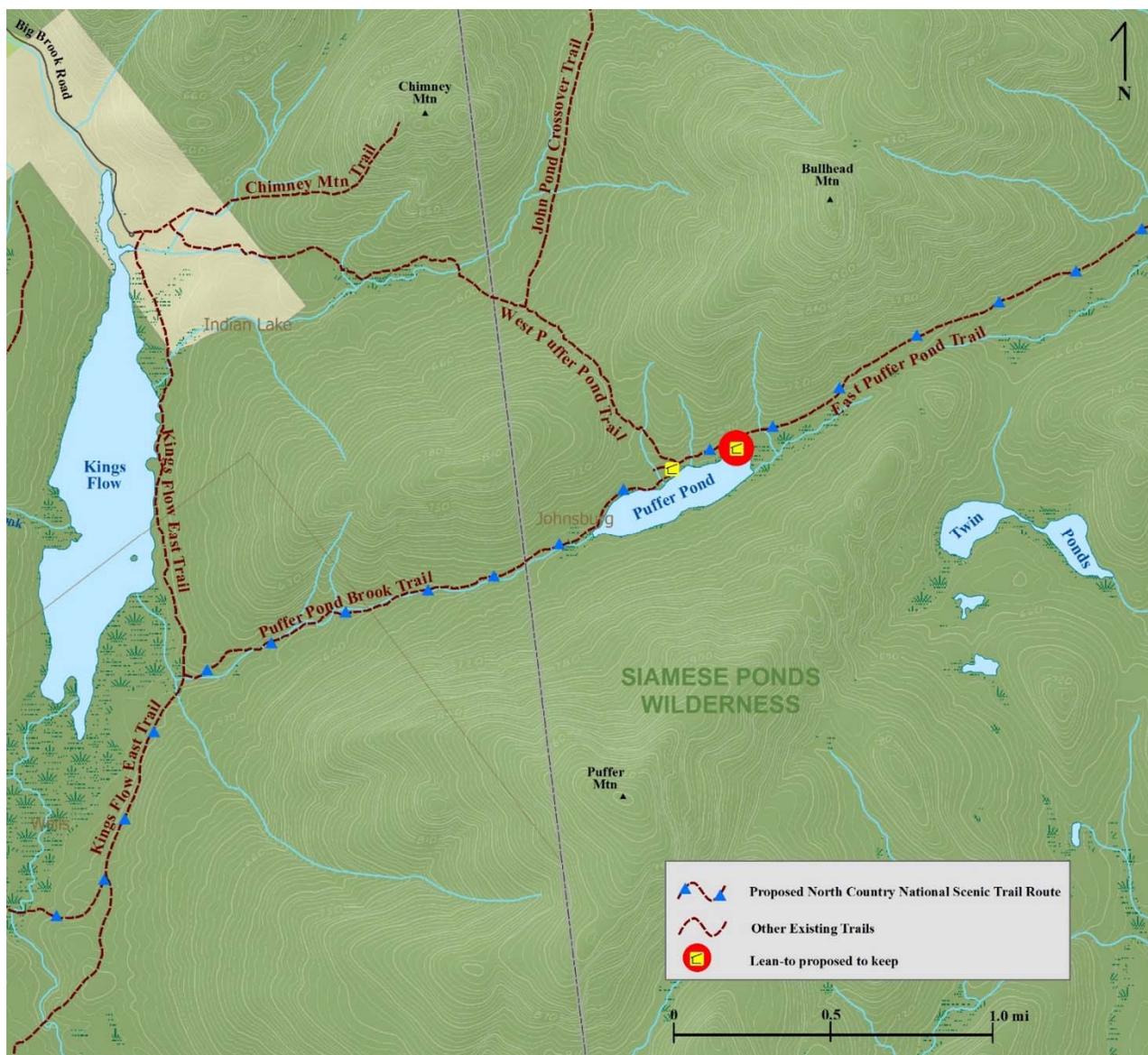


Figure 5. Lean-to proposed to be retained

5. Hut to Hut Trail Connection to Indian Lake

The Department proposes a new section of trail connecting with town roads leading to Indian Lake as proposed in the Hut-to-Hut plan. This section of trail would go from the John Pond - Clear Pond Loop Trail running northerly through Siamese Wilderness Area (approx. 1.6 miles) and an adjacent Jessup River Wild Forest parcel (approx. 1.0 mile) out to Parkerville Road in the Town of Indian Lake. Figure 6 shows a corridor of opportunity. Figure 7 shows the overview of connections to the communities of Indian Lake, North Creek and Speculator through Siamese Ponds Wilderness Area.

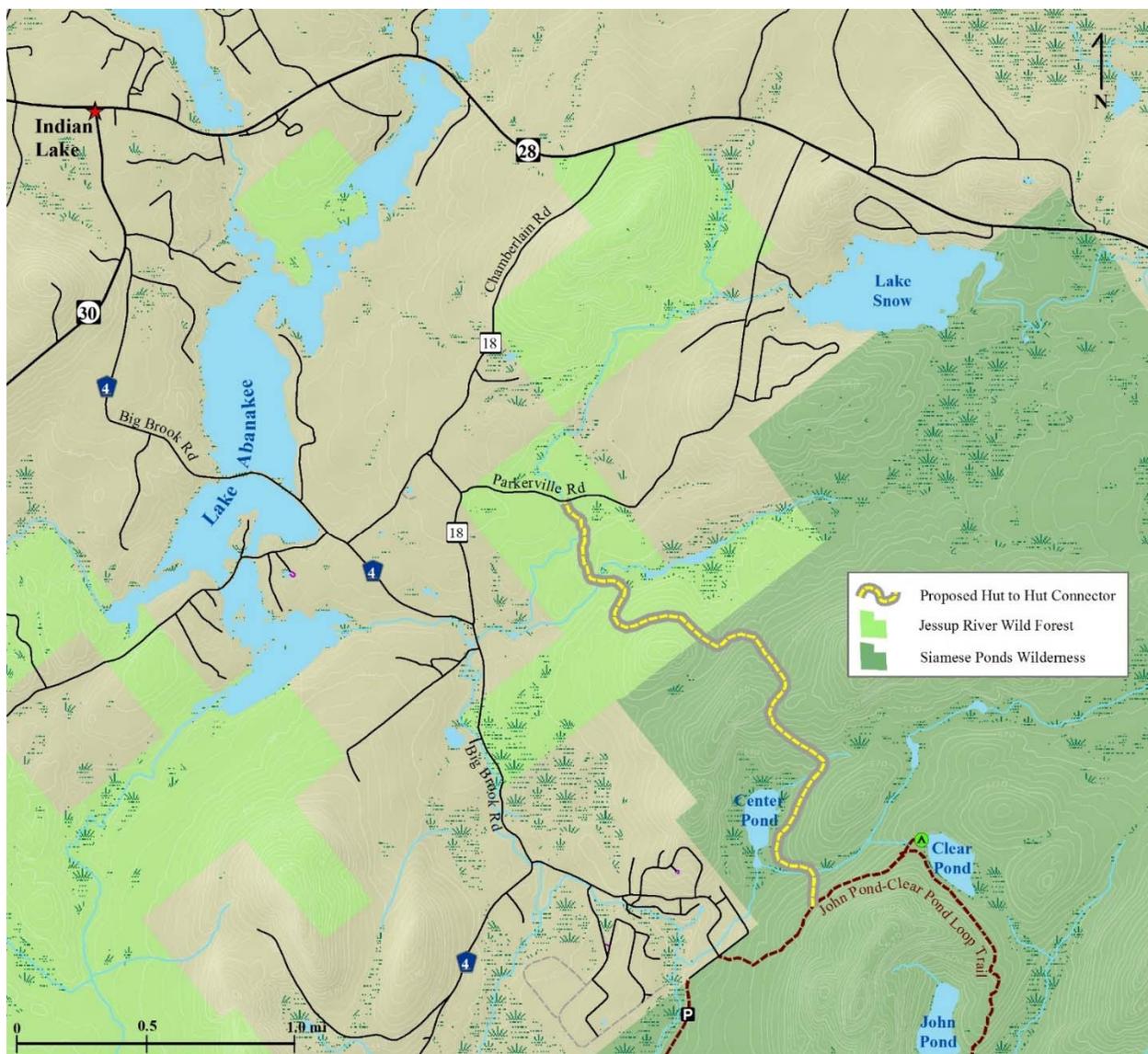


Figure 6. Hut to hut connector trail

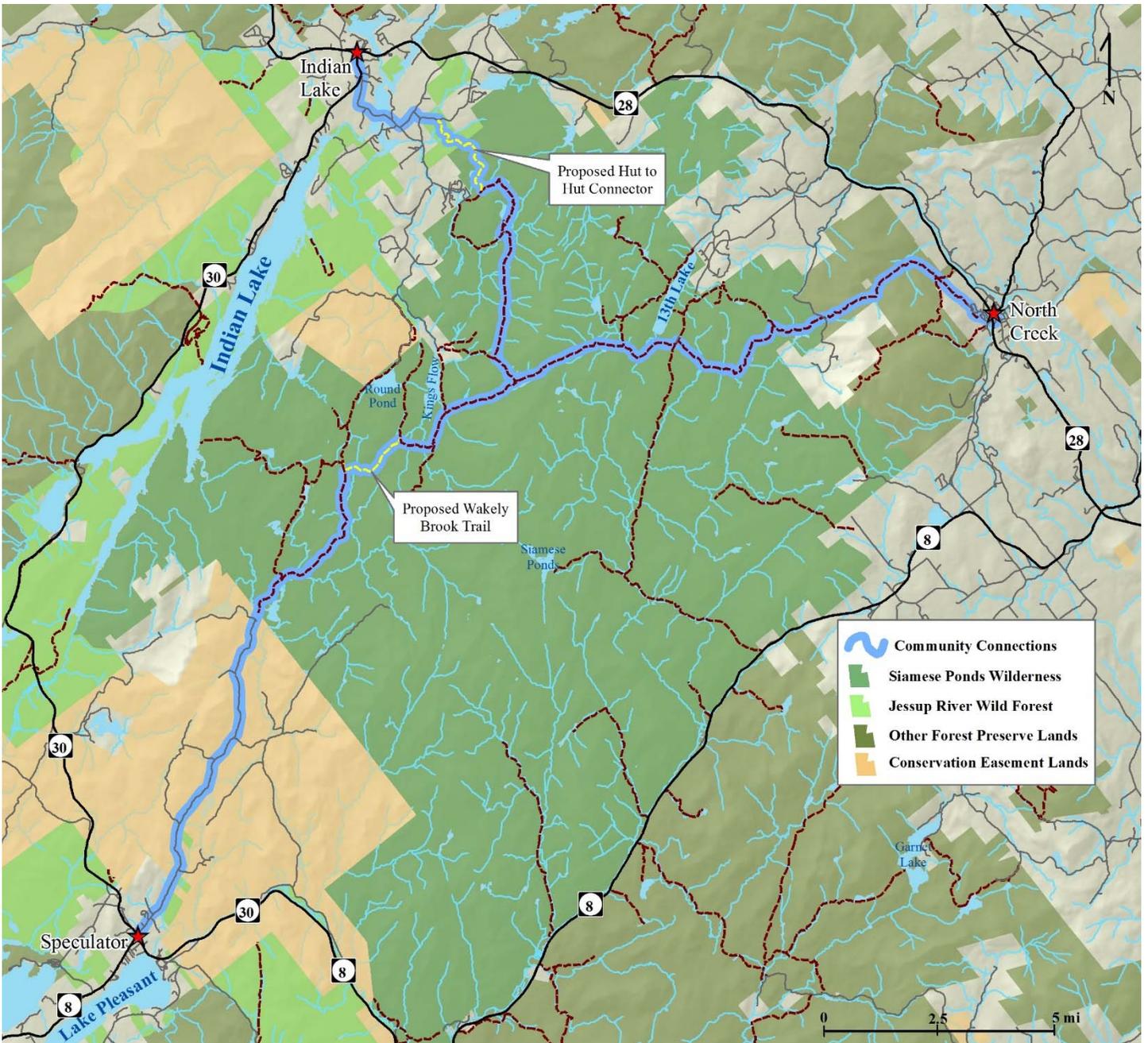


Figure 7. Siamese Wilderness Area community connections

6. East Branch Sacandaga River Ford

In the Siamese Ponds Wilderness, on the Botheration Pond Trail, the 55 foot bridge over the Sacandaga River has failed. This is a very popular trail with skiers and in most cases in the winter the river, which is shallow to bedrock in this section, is frozen solid, creating an ice bridge, even in the recent milder winters. In the summer/fall the river can usually be crossed using rocks and bedrock ledges. The Department proposes to maintain the trail in its current location without replacing the bridge. The Department will monitor the river banks at this location for erosion and evaluate safety conditions of this crossing on a regular basis. If at any point in the future it is determined that the lack of a bridge at this location is not acceptable – for natural resource protection or safety concerns – either a bridge will be constructed or the trail will be re-routed to avoid this river crossing entirely (see Figure 8).

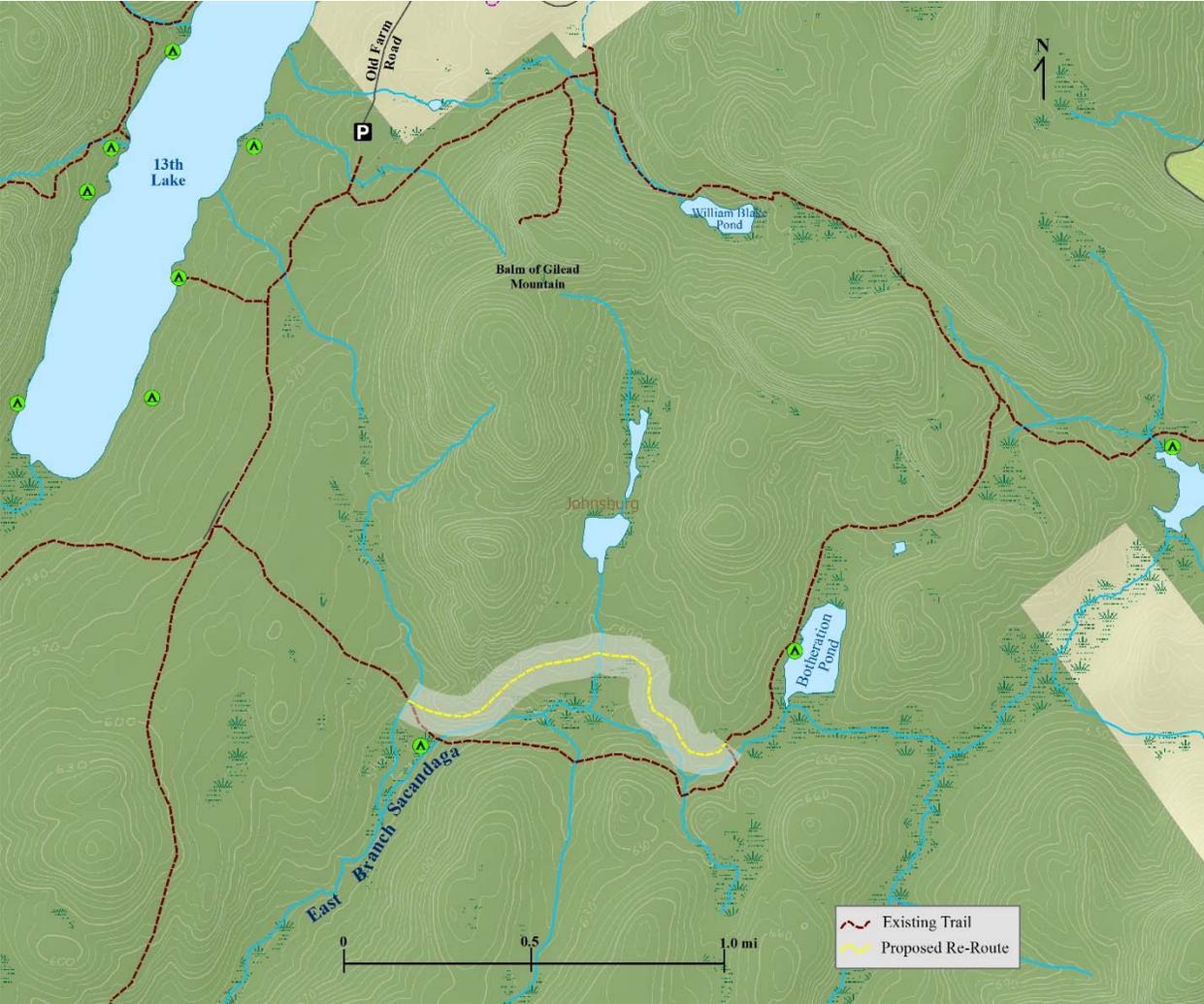


Figure 8. Approximate location of a Botheration Pond Trail re-route

7. Clear Pond Trail Re-Route

In Siamese Ponds Wilderness, the Clear Pond Trail, now part of the Clear Pond-John Pond Loop, requires a short re-route to move the trail off the fall line, reduce the grade and make the full loop more optimal for skiing. The re-route would be up to 0.75 miles in length.

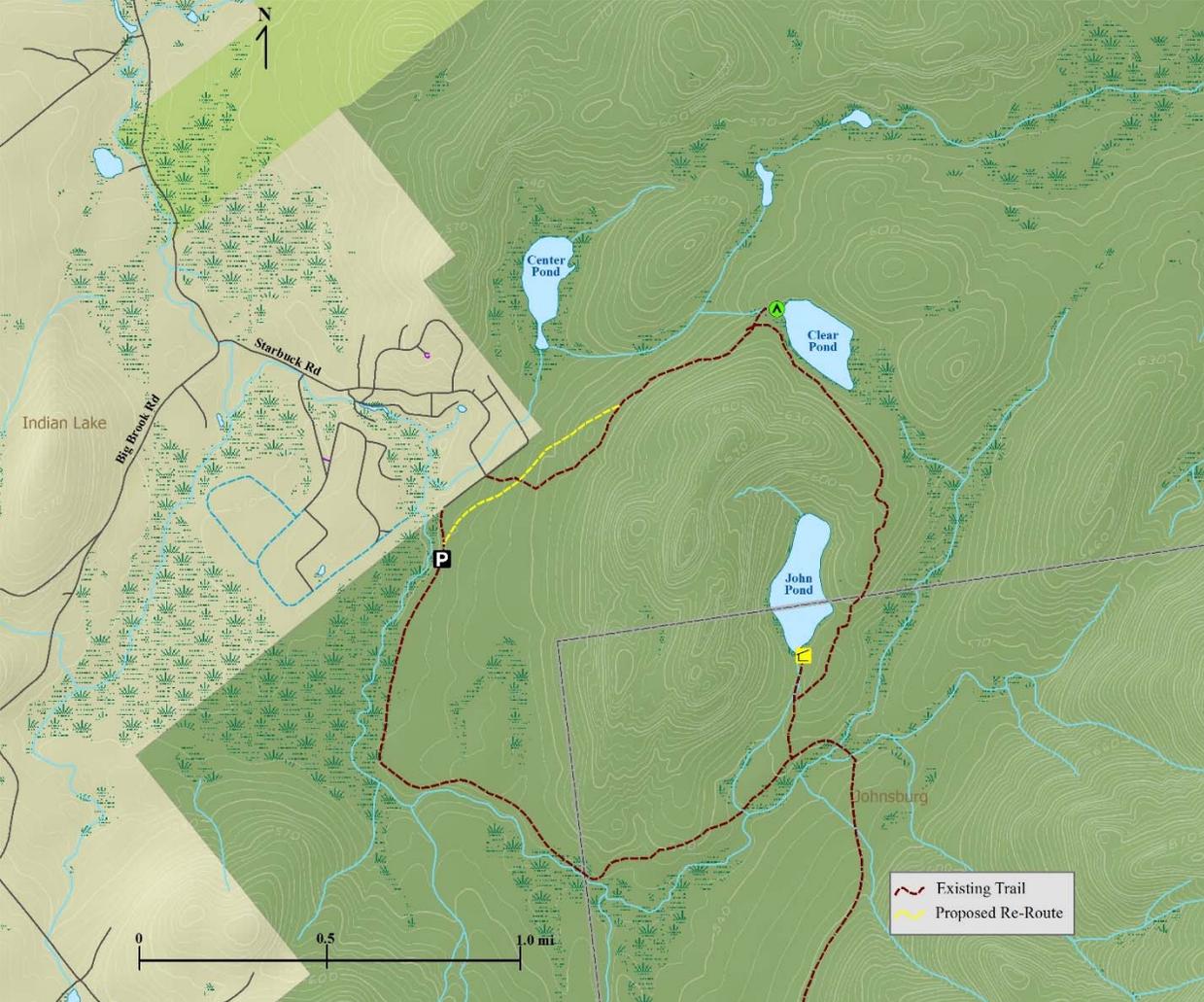


Figure 9. Approximate location of Clear Pond Trail re-route

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Appendix 1 – Public Comment

A public comment period for the draft UMP Amendments for the Siamese Ponds Wilderness and Jessup River Wild Forest was held from May 7 to June 16, 2017. During that time, the Department received 14 written comment letters or emails. Below is a summary those comments, as well as a response, where appropriate, from the Department.

Hut-to-Hut Trail Proposal

Comment: The proposed new trail from Clear Pond to Parkerville Road appears to be implementing a conceptual Hut-to-Hut plan that has not been subject to public comment or evaluated for compliance with the State Land Master Plan.

Response: *Based on staff-level consultation with the Adirondack Park Agency (APA), Department staff believe the trail connection will comply with the Adirondack Park State Land Master Plan (APSLMP). Procedurally, the introduction of this project through a UMP amendment follows the Department's standard process for publicly vetting proposals on State land, including those that involve partners. The reference to the Hut-to-Hut Destination-based Trail System report merely provides context to better facilitate public understanding of the proposal. The Hut-to-Hut report, as a whole, is not being evaluated through this UMP amendment.*

Comment: References to the Hut to Hut Conceptual Plan are illegal and should be stricken.

Response: *See previous response.*

Comment: The proposed Wakely Brook Trail and trail to Parkerville Road are part of larger planning efforts and therefore should be reviewed for cumulative effects and compliance at a regional scale rather than as standalone trail projects (i.e. issue of segmentation).

Response: *See previous response.*

Comment: We support the new trail segment connecting the John Pond – Clear Pond Loop Trail to Parkerville Road as long as no “huts”, platform tents or yurts are constructed on the Forest Preserve land.

Response: *No huts, platform tents or yurts are being proposed in this UMP amendment.*

Comment: Lodging and dining facilities on the Forest Preserve are called for in the Hut-to-Hut Plan which violates the Adirondack Park State Land Master Plan and NYS constitution.

Response: *No lodging or dining facilities are being called for in this UMP amendment.*

Comment: There is no demonstrated public demand for the proposed connector trail from Clear Pond to Parkerville Road and it should be dropped from the amendment.

Response: *The Department is committed to creating better, safer connections between local communities and State lands for long-distance thru hikers. This proposal will eliminate over 1.5 miles of road walking for those wishing to walk into the hamlet of Indian Lake.*

Botheration Pond Re-route Proposal

Comment: Where the bridge went out on the Botheration Pond Trail, can there be a third alternative that would keep the trail in place (i.e. no re-route) and simply does not replace the bridge, resulting in a ford/stepping stone crossing at the old bridge location?

Response: *This is a very popular trail with skiers and in most cases the river, which is shallow to bedrock in this section, is frozen solid, creating an ice bridge, even in the recent milder winters. In the summer/fall the river can be crossed using rocks and bedrock ledges. This option would be consistent with Wilderness recommendations in the SLMP to minimize the use of manmade structures. The preferred alternative has been amended to reflect this option but the Department plans to monitor the river banks at this location for erosion and evaluate safety conditions of this crossing on a regular basis. If at any point in the future it is determined that the lack of a bridge is not acceptable—for natural resource protection or safety concerns—either a bridge will be constructed or the trail will be re-routed to avoid the need for a bridge.*

Comment: We support the re-routing of a portion of Botheration Pond Trail and Clear Pond Trail.

Response: *See previous response.*

Wakely Brook Trail (NCNST) Proposal

Comment: In terms of the Wakely Brook Trail, where is the analysis of its role as part of the North Country National Scenic Trail and the potential impacts to the natural resources and visitor experience?

Response: *The location and potential impacts of the proposed Wakely Brook Trail were identified in the North Country National Scenic Trail Adirondack Park Trail Plan/Environmental Impact Statement, released by the Department in 2015. The*

Wakely Brook Trail will greatly improve the connectivity of the trails in this unit with nearby adjacent units and communities. As part of the NCNST it is the key link in getting from Elm Lake Road in Speculator to North Creek. As part of the NCNST, the Department expects a fair amount of recreational pressure and will monitor trail conditions and campsite needs and opportunities and make adjustments as necessary through the work planning process.

Comment: We support the construction of the Wakely Brook Trail which will be an important link providing a through hike opportunity from Elm Lake Road to the Snow Bowl in North Creek and would complete a critical section of the North Country National Scenic Trail.

Response: *Noted.*

Comment: We do not think the NCNST should be routed along the Kunjamuk Trail because the trail dead-ends at a beaver dam.

Response: *The Kunjamuk Trail was re-routed in 2016 to go around the beaver flow area and now reconnects on the other side near the Kunjamuk River.*

Comment: We think the NCNST should be routed along the more scenic Rock Pond - Long Pond Trail.

Response: *The Department agrees that the Rock Pond – Long Pond Trail is scenic. The Kunjamuk Trail is an historic old route between Speculator and Indian Lake and is a primary trail in the Siamese Ponds Wilderness Area providing a long traverse through rolling mature hardwood stands. The Department expects an increase in use of the area following formal designation of the NCNST and by utilizing the Kunjamuk trail as the primary NCNST corridor proposes to disperse the recreation pressure in anticipation of this increase in use. The Long Pond and Rock Pond campsites have been impacted by overuse in the past and pressure seems to be increasing. The NCNST hikers may still utilize the area if they plan their trips that way but by designating the formal trail corridor on the Kunjamuk, we would alleviate the concentration of all the use on one trail and on two waterbodies/shorelines sensitive to increased pressure. The Department proposes to monitor use on all the trails and campsites in this vicinity for signs of resource degradation and will make adjustments as needed through standard mitigation and amelioration methods and the work planning process.*

Comment: This amendment should be expanded to evaluate and address the anticipated increases in use due to the North Country National Scenic Trail designation, including impacts to natural resources and need for more camping opportunities.

Response: *The potential impacts of the proposed designation of the North Country National Scenic Trail were identified in the North Country National Scenic Trail Adirondack Park Trail Plan/Environmental Impact Statement, released by the*

Department in 2015. The Department does anticipate increased use, and campsite needs are continuously being evaluated. The Department will monitor use on the trails and campsites for signs of resource degradation and will make adjustments as needed.

Comment: We support officially marking the North Country National Scenic Trail upon completion of the UMP amendment process.

Response: *The completion of this trail segment would create a long stretch of NCNST that would be appropriate for marking.*

Un-marked to Marked Trail Proposal

Comment: We support the official designation and foot trail marking of the Round Pond Trail, the Kings Flow East Trail and the Puffer Pond Brook Trail.

Response: *These trails are currently being illegally cut out and maintained with user-created markers. In changing the designation from unmarked to marked, the Department agrees that these trails are appropriate and can bring these State trails up to Department standards, ensuring that Department markers are used and trail-marking guidelines are being followed. This will clarify the entire trail network in the Kings Flow area for the public.*

Comment: Does the public have access to the unmarked trails that are proposed to be marked and whose trailhead originates on private land?

Response: *The public currently has access to these trails from Puffer Pond or by bushwhack from Kunjamuk trail. The trails are also currently accessed from private land to the north of King's Flow. The Department is in the process of developing a long-term cooperative agreement with the landowner to continue this access. These trails include Chimney Mountain Trail, West Puffer Pond Trail and the Kings Flow East Trail. The separate proposal in this UMP amendment to create the Wakely Brook Trail will also provide access from the south to these currently unmarked trails.*

Puffer Pond Lean-to Proposal

Comment: We support the retention of the Puffer Pond lean-to and recognize that it needs repair and should be moved back to comply with the State Land Master Plan.

Response: *Noted.*

Bat Hibernaculum Protection Proposal

Comment: We support the Eagle Cave closure to protect the important bat hibernaculum.

Response: *Noted.*

Clear Pond Trail Re-route Proposal

Comment: We support the re-route of the Clear Pond Trail and completion of the John Pond Clear Pond Trail loop which would keep the loop trail entirely off the road.

Response: *Noted.*

Comment: We do not see a need for the small re-route of Clear Pond Trail.

Response: *The small re-route will allow for the recreating public to complete a loop without having to use a public road, and will avoid the current rocky access point across the drainage ditch while also creating a gently sloping trail off of the fall line.*

Miscellaneous

Comment: The two new trail segment proposals as well as the proposal to change the status of unmarked trails to marked trails, fail to sufficiently describe management objectives, evaluate impacts or analyze potential change in a way that satisfies the requirements of the State Land Master Plan regarding issues of carrying capacity.

Response: *Overall the use in Siamese Ponds Wilderness area is quite low. This is evidenced by both visitor encounters while out in the unit as well as visible trail and campsite conditions observed on a regular basis. Muddy or substandard trail conditions are generally due to trail placement rather than use-related issues and are addressed by the Department through the routine maintenance work planning process in as timely a fashion as is possible. There are some popular spots like the 13th Lake access and campsites at the end of Beach Road, Chimney Mountain, and increasingly the Long Pond campsites that require close attention. In sharp contrast to some other areas of the Adirondacks, however, this unit has predominantly low recreational pressure. For these reasons, it is believed that the resource here can easily withstand a moderate increase in recreational use. The Department will continue to monitor trail and campsite conditions and address issues through standard mitigation and amelioration methods.*

Comment: The Great South Woods Complex Planning Strategy Recommendations has not been commented on by the public nor evaluated and approved under the provisions of the State Environmental Quality Review Act (SEQRA), therefore references to these recommendations should be removed.

Response: *The Great South Woods planning effort involved significant input from the public, and provides context for some of the proposed management actions in this UMP amendment, including connecting communities to the Forest Preserve and providing through-hiking opportunities across management units. Procedurally, the introduction of this project through a UMP amendment follows the Department's standard process for publicly vetting proposals on State land. Each UMP and UMP amendment, when applicable, is subject to SEQR.*