



January 15, 2010

Conservation

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Education

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Recreation

Since 1922

Peter J. Frank
Bureau of Forest Preserve Management
NYS DEC
625 Broadway
Albany, NY 12233-4254

Re: Proposed Rulemaking, Operation of Mechanically Propelled Vessels and Aircraft in the Forest Preserve; ID No. ENV-48-09-00005-P

Dear Mr. Frank:

Headquarters
814 Goggins Rd.
Lake George, NY
12845-4117
Phone: 518-668-4447
Fax 518-668-3746
e-mail: adkinfo@adk.org
Web site: www.adk.org

The Adirondack Mountain Club (ADK) thanks the New York State Department of Environmental Conservation (DEC) for the opportunity to submit written comments regarding the amendment of section 196.4 of Title 6 NYCRR.

ADK commends DEC for promulgating this proposed rulemaking to regulate and sunset float plane landings on Lows Lake in the Bog River–Oswegatchie wilderness canoe route. The proposed rule will complement the 2006 rules which eliminated motorboat use on Lows Lake, with the intent to restore the wild character and traditional Adirondack experience on Lows Lake.

ADK believes the proposed rulemaking addresses DEC's commitment to manage Lows Lake without motorboat and airplane usage. ADK considers the following permit conditions to be a logical plan to begin the phase out of float plane landings on the Lake:

North Country Operations
P.O. Box 867
Lake Placid, NY
12946-0867
Reservations: 518-523-3441
Office: 518-523-3480
Fax: 518-523-3518

“(5) Permit conditions. Each permit issued by the Department shall be subject to the following conditions:

- (i) The maximum number of flights by all commercial float plane operators combined into Lows Lake shall not exceed one hundred sixty-five (165) flights in any single flying season.
- (ii) The maximum number of flights by all commercial float plane operators combined into Lows Lake shall not exceed thirty-five (35) flights in any single calendar month.” (NYS Register/December 2, 2009, p. 10)

ADK supports the last permit condition stating that, “[I]t is unlawful for any commercial float plane operator to store canoes or other equipment on Forest Preserve lands at Lows Lake.” (NYS Register/December 2, 2009, p. 10) The Forest Preserve is an inappropriate place for storage of any personal property.

Albany Office
301 Hamilton Street
Albany, NY
12210-1738
Phone: 518-449-3870
Fax: 518-449-3875

Canoeing on Lows Lake is an important recreational activity that provides a traditional rustic Adirondack experience. Motorboat and floatplane use on Lows Lake is inconsistent with the natural character of this wilderness canoe route. ADK has been a longtime supporter of managing Lows Lake as a Wilderness area. Therefore, it is ADK's opinion that DEC must make the steps,

as specified in these proposed rules, to achieve eventual elimination of float plane usage on Lows Lake by December 31, 2011. By enforcing the elimination of flights into Lows Lake, as DEC proposes to do, the wilderness character of the Adirondack Park that is so important to New Yorkers will be enhanced.

For the reasons stated above, ADK supports DEC's proposed rulemaking.

Thank you for the opportunity to express our concerns and opinions.

Respectfully Submitted,

Allison Beals
Director of Government Relations and Conservation
Adirondack Mountain Club

The Adirondack Mountain Club is dedicated to conservation, education, outdoor recreation and protection of New York's Forest Preserve, parks, wild lands and waters. ADK represents over 30,000 hikers, paddlers, skiers and backpackers.