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Draft Strategic Plan for State Forest Management  
NY State Department of Environmental Conservation (NYS DEC)  
625 Broadway, Albany, NY 12233-4255

Subject: Comments Submission

The Central NY Chapter of the North Country Trail Association has direct responsibility for segments of the North Country National Scenic Trail (NCNST) extending from Madison County to the border of the Adirondack Park, plus those portions of the Link Trail extending southward from the Tioughnioga WMA into Chenango County. This trail system is very complementary to the Finger Lakes Trail system, some 410 miles of which “carry” the NCNST from its westernmost point within New York State in the Allegany State Park area to a junction with the Link Trail within the Tioughnioga WMA.

The Chapter commends the NYS DEC for its comprehensive, well-presented plan. The activities scope addressed is both broad and impressive in its considerations. We submit these comments in a tone that we intend to be constructive and supportive of the total plan review process:

- We strongly support the NYS DEC findings that ATV & OHV use is not sustainable on State Forest lands, with very limited exceptions. Our experience during from 1997 onward is that a growing number of ATV/OHV users demonstrate little or no regard for posted regulations, private property postings, and the environment overall. The current advertising strategies of the machine manufacturers are exacerbating the problems noted. We possess ample evidence of the net result negative impact on the environment .
- As a longer-term means of funding the significant resource allocation required offsetting at least partially the damaging impact of illegal ATV/OHV usage, consider seeking an excise tax via legal means at the manufacturer level for ATV and OHV machines. Although the correlation is not as direct as that of tobacco use and health impairment, the health damage funding settlements established a precedent worth considering.
- Many members of the Chapter, as well as a significant share of the public, recognize that natural gas is an energy option of importance, at least for some time. The high-pressure hydro-fracking processes now advocated certainly have, in total, a significant negative surface impact. Moreover, it is also true that a number of claims and counter-claims as to the environmental risks remain unknown/not quantified. Specifically, the pollution of aquifers directly by the hydro-fracking process, or by pumping contaminated wastewater into deep wells is a valid concern; NYS DEC’s support for this option remains is not validated by scientifically based data.
- **Currently, there are many leases of private lands in place or pending for possible hydro-fracking operations in the Marcellus Shale area.** Assuming only that these private lands may yield viable sources of natural gas via yet to be determined acceptable hydro-fracking operations in total, there is no need to compromise State Forest lands by surface disturbance. **State Forests exist to provide wildlife habitation, environmentally acceptable recreation, water conservation and its quality, and good forest management.** If a given State Forest site must be nominated for a hydro-fracking operation, a full-scale SEQRA process for that site should be a requirement.
- The fiscal issues besetting New York State are recognized and they require resolution. However, we should not sacrifice public lands typified by State Forests for short-term financial gains.



Director