

The following is a section of the twelve page comment, expressed by the Adirondack Mountain Club in response to requests for public input on the St Lawrence Rock Ridge Unit Management Plan (UMP) dated April 23, 2018.

mailed to:

NYSDEC

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RE: St Lawrence Rock Ridge Unit Management Plan (UMP)

www.adk.org/wp-content/uploads/2018/04/ADK-Comments-on-St.-Lawrence-Rock-Ridge-4-23-2018.pdf

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Prohibit ATVs. Establish Baseline Data of Illegal Motorized Use.

ADK does not support the use of ATVs on New York State Land. DEC must not include consideration of ATV use in the UMP management objectives. DEC should also remove from all UMPs in Region 6 and across New York State Management Objectives which consider requests for ATV connector routes. Increasingly DEC is under pressure to allow ATV access on state lands in conjunction with local road openings for connections between legal riding areas as defined in NYS Vehicle and Traffic Law 2405. The use of ATVs on public roads is governed by Title 11, Article 48C, Section 2405 of the New York State Vehicle and Traffic Law. Every pilot ATV program on NY state lands has been shut down because of environmental damage caused by ATVs. For example, the Strategic Plan for State Forest Management outlines several case studies in which ATV trail systems were implemented on State Forest Lands, including New Michigan State Forest, Anderson Hill State Forest, Brasher State Forest, Morgan Hill and Taylor Valley State Forests. All of these trail systems were closed due to the environmental impacts by ATVs on these state forest lands.³ In NYS there has been a significant increase in pressure on the state legislature to pass bills that would increase the current allowable weight of all-terrain-vehicles (ATVs), to 1800 lbs. There is also pressure to allow ATV riding on roads throughout the state that have been opened by local law in violation of New York State Vehicle and Traffic Law, and contrary to NYS Attorney General Opinion 2005-214 and NYS Department of Environmental Conservation (DEC) legal opinion.⁵ ATV manufacturers expressly define that their vehicles are not designed for road or highway use. Documentation by the U.S Consumer Product Safety Commission and the National Highway Transportation Safety Administration's (NHTSA)

Fatality Analysis Reporting System (FARS) that a majority of ATV deaths take place on roads.^{6 4} Prohibiting ATVs on New York State Forests would be prudent given that requests to DEC for ATV connector trails are highly likely to involve illegally opened roadways and larger offhighway-vehicles, which ATV manufacturers have clearly stated should not be used on roads.