

Nathan Funk
NYS Department of Environmental Conservation
65561 State Route 10
Stamford, NY 12167

Dear Mr. Funk,

I am writing today on behalf of the _#_ organizations listed below to submit comments in regards to the Treaty Line State Forests Draft Unit Management Plan, particularly in regards to the proposed addition of all-terrain vehicle use to the Plan.

The Treaty Line Unit consists of 19,186 acres of State lands located within portions of Broome, Chenango, and Delaware counties. Over 16,000 acres of this sprawling forestland has been designated as an Important Bird Area by the National Audubon Society. The plan calls for protection of at-risk species of wildlife, including birds; modest improvements to recreational access and use of the forest; control of invasive species; watershed protection; maintaining old-growth forest; and acquisition of adjacent lands and inholdings. These are all worthy goals, and support DEC's mission and vision.

The last draft UMP (20 years ago) proposed 100 miles of hardened trail in this unit. It caused a good deal of controversy and although it was generally opposed by residents, there was considerable support from the New York metropolitan area, ATV organizations and dealers. The ATV trail was not included in the final plan at that time.

The recently released draft does not include a trail; however, the ATV organizations have proposed such a trail be added to the plan, and we understand that the DEC is now considering it. Due to the high quality habitat, 86% of this property falls within the National Audubon Society Catskill Peaks Area Important Bird Area. (*See screen shots of the National Audubon IBA map and the state forest map from the draft plan - images attached*).

Designation as an Important Bird Area means it is a key site for the conservation of bird species, based on a set of internationally agreed, standardized criteria. An ATV trail in this critically important region will fragment and disturb these habitats, resulting in a significant impact to birds as well as causing considerable damage to declining reptile and amphibian populations.

Changing the current uses of the unit to include a large network of motorized recreational trails violates every bullet point for the management goals listed on Page 8 of the draft:

*"Management will ensure the **sustainability, biological diversity**, and protection of **functional ecosystems** and optimize the ecological benefits that these State lands provide, including the following:*

- 1. maintenance/increase of local and regional biodiversity*
- 2. response to shifting land use trends that affect habitat availability*
- 3. mitigation of impacts from invasive species*
- 4. response to climate change through carbon sequestration and habitat, soil and water protection"*

During the previous update to the Management Plan, noise and trespassing were major concerns of local residents and there were concerns about the need for increased law enforcement and EMS services. These issues remain today.

ATVs, which already are an illegal problem on state lands, damage soil, vegetation, waterways and other resources where they are used. As per a study from [USGS 2007 report, *Environmental Effects of Off-Highway Vehicles on Bureau of Land Management Lands: A Literature Synthesis, Annotated Bibliographies, Extensive Bibliographies, and Internet Resources, by Douglas S. Ouren and Others*](#), disturbance of wildlife, including nesting birds, has been documented, and their presence is incompatible with other, low impact uses, such as hiking, wildlife observation and photography. Vehicles, including ATVS, are well known as vectors for introducing invasive species. *(Additional resource materials are available in resources page attached.)*

Many of our bird species are at risk from changes in habitat due to shifting land uses and invasive species. The threat from climate change is profound, making the maintenance of high quality habitat in IBAs and State Forests even more important.

We urge you to keep off-road vehicles out of public lands and to reject the proposal from the all-terrain vehicle community. The organizations listed here support keeping these important forested areas closed to off-road vehicles.

Respectfully,









Susan M. O'Handley, Co-President
Delaware-Otsego Audubon Society
on behalf of:

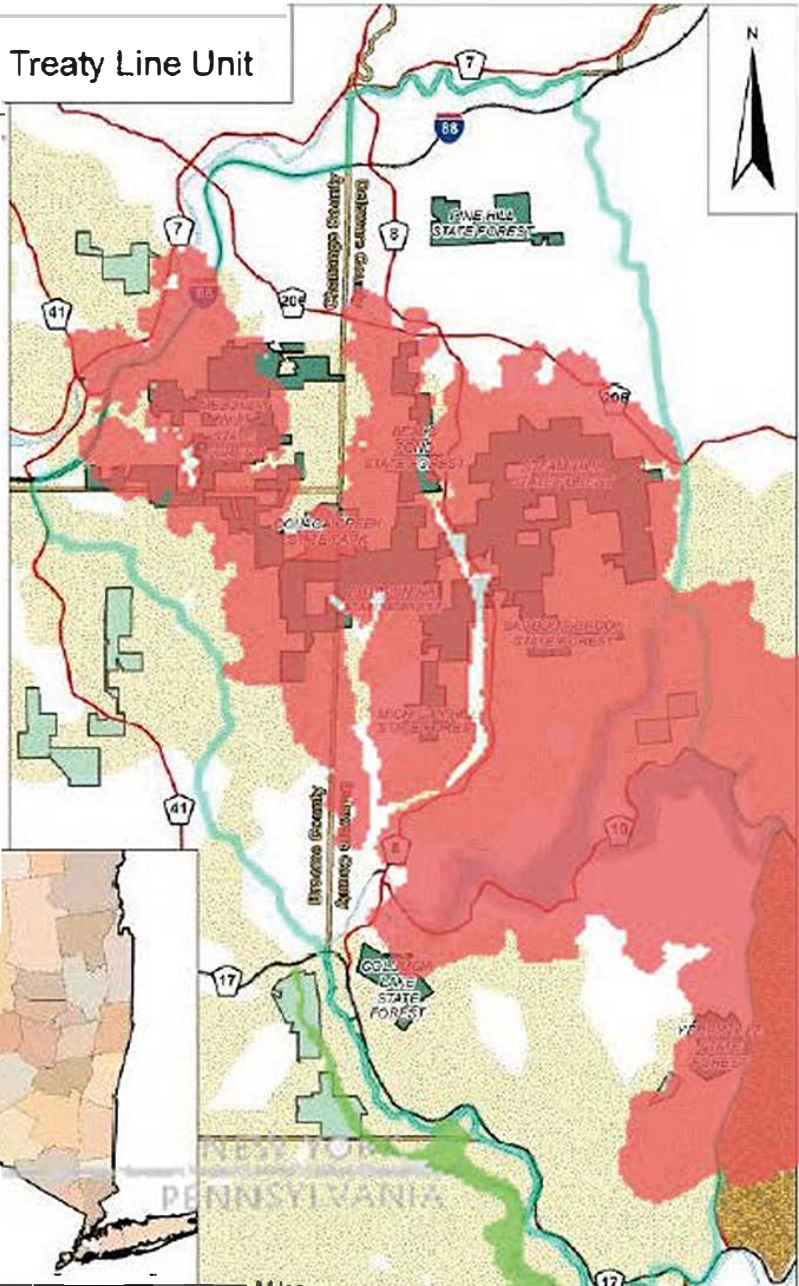
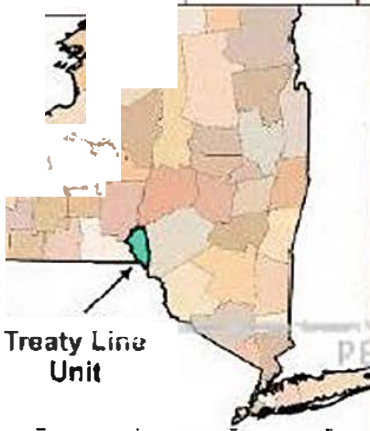
Organization List

Red Area Indicates Catskill Region IBA

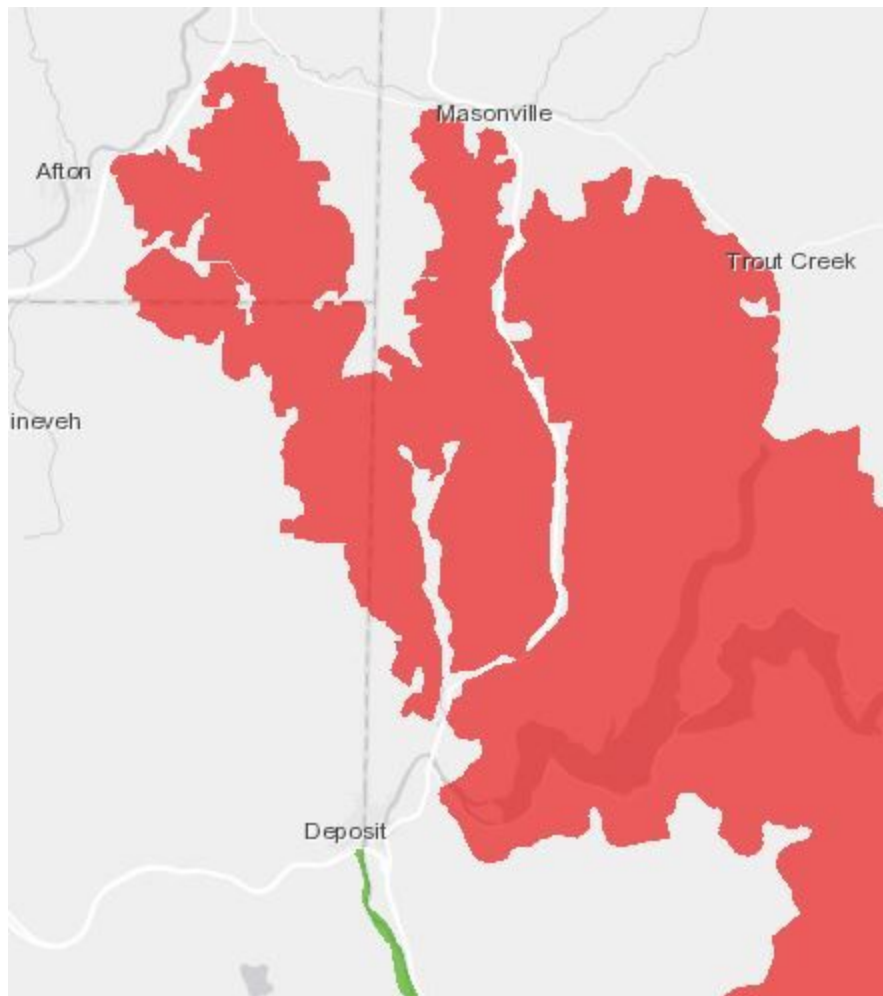
Location of the Treaty Line Unit

Legend

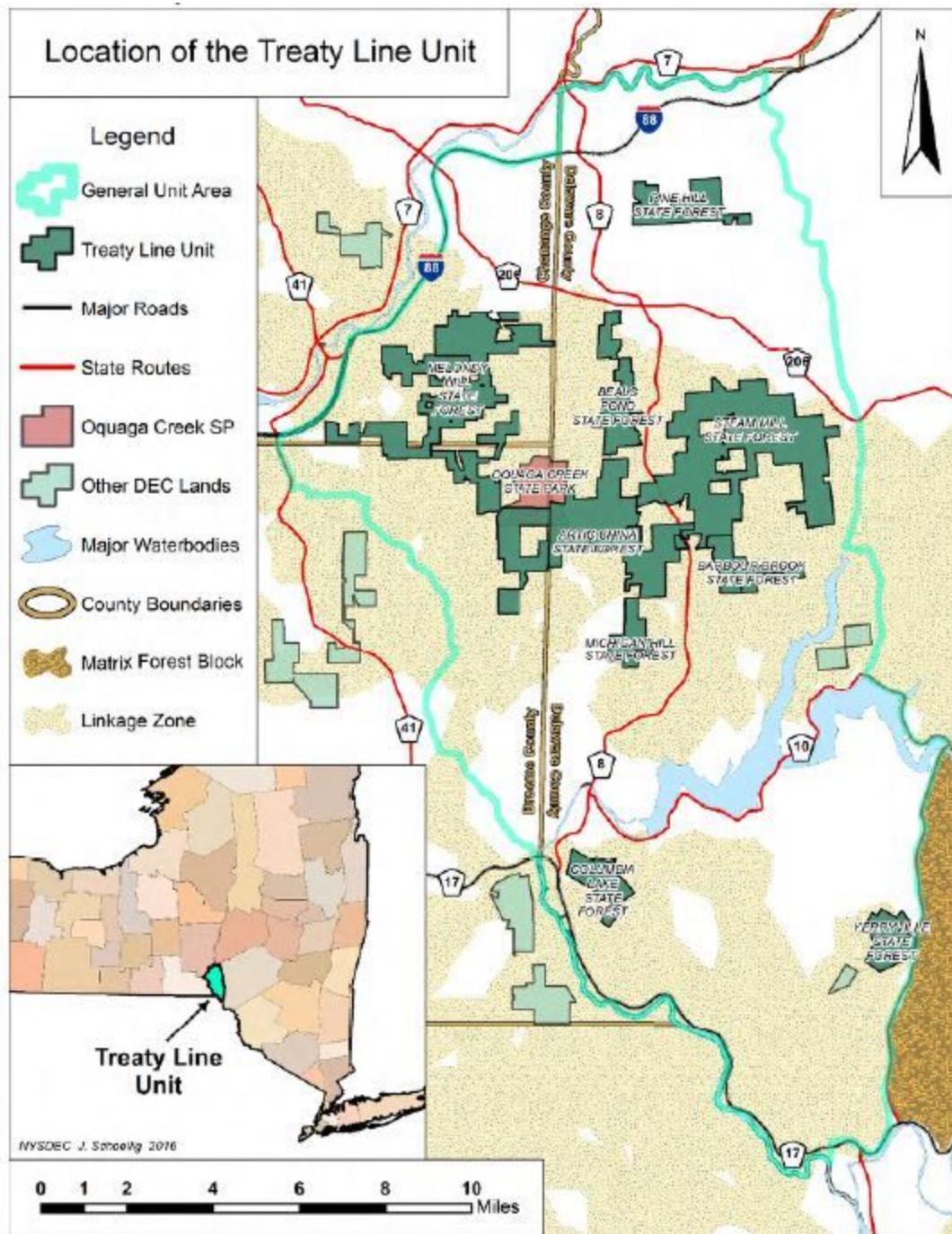
- General Unit Area
-  Treaty Line Unit
-  Major Roads
-  State Routes
-  Oquaga Creek SP
-  Other DEC Lands
-  Major Waterbodies
-  County Boundaries
-  Matrix Forest Block
- Linkage Zone



Attachment 1: Catskill Peaks Area IBA



Attachment 2: Treaty Line Unit



Referenced Report:

USGS 2007 report, *Environmental Effects of Off-Highway Vehicles on Bureau of Land Management Lands: A Literature Synthesis, Annotated Bibliographies, Extensive Bibliographies, and Internet Resources*, by Douglas S. Ouren and Others
<https://pubs.usgs.gov/of/2007/1353/report.pdf>

Additional Resource Material:

Adirondack Council, June 2017 - *Why All-Terrain Vehicles and Wildlife Do Not Mix*
<https://www.adirondackcouncil.org/page/blog-139/news/why-all-terrain-vehicles-and-wildlife-do-not-mix-965.html>

Wildlife Conservation Society, April 2003 - *All-Terrain Vehicles in the Adirondacks; Issues and Options* by Leslie N. Karasin
<https://www.arlis.org/docs/vol1/A/53352785.pdf>

Forest Plan Revision - Chippewa and Superior National Forests - Final EIS
https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsm91_048445.pdf

USDA, Forest Service, National Technology & Development Program, Recreation Management, December 2008 - *Effects of All-Terrain Vehicles on Forested Lands and Grasslands*
<https://www.fs.fed.us/t-d/pubs/pdf/ATV/08231811L.pdf>

Backcountry Hunters and Anglers, Summer 2011 Report: *Cumulative and Universal: ATV Impacts on the Landscape and Wildlife; A Review of the Literature on the Subject*
https://www.isohc.leg.mn/materials/16_Mtg/DEC_14_2016_ORV_WHITE_PAPER_BackcountryHuntersAnglersofAmerica.pdf