



22 January 2018

McCrea Burnham
Division of Lands and Forests
NYS Department of Environmental Conservation
625 Broadway, 5th Floor
Albany, NY 12233-4254
adirondackpark@dec.ny.gov

Working for Wilderness

RE: Draft Primitive Tent Site Best Management Practices (BMP)

Dear McCrea,

The Adirondack Mountain Club (ADK) appreciates the opportunity to comment on the draft Primitive Tent Site Best Management Practices (BMP).

Adirondack Mountain Club (ADK) is dedicated to the conservation, preservation, and responsible recreational use of the New York State Forest Preserve and other parks, wild lands, and waters vital to our members and chapters. ADK is a nonprofit organization with 30,000 members in 27 statewide chapters served by a year-round staff offering programs that help people discover, play in, and protect natural places. Since its founding in 1922, The Adirondack Mountain Club has protected wild lands and waters through the work of its dedicated member volunteers and staff. ADK members hike, camp, snowshoe, cross-country ski, paddle, and cycle the lands and waters of the Adirondack Park.

ADK applauds DEC for working to resolve the current issues with primitive campsites. ADK recognizes the difficult task in providing a solution to a complex issue such as this.

We respectfully request that you consider the following concerns and comments outlined below. Our comments on this issue from 2016 are also attached, and hereby incorporated by reference.

It is unclear how these comments and the draft BMP will be approved and reviewed by the Adirondack Park Agency (APA) which is critical from a procedural basis. We would not support these BMPs without APA involvement and approval.

We also find this draft document to be very ambiguous in its description and definitions and failure to connect these BMPs to the Adirondack Park State Land Master Plan (APSLMP). The discussion of Americans with Disabilities Act (ADA) in the BMPs is confusing and its use to justify a number of ambiguous practices that do not comply with the APSLMP

ECL Regulation Changes

Member Services

814 Goggins Rd.
Lake George, NY
12845-4117
Phone: (518) 668-4447
Fax: adkinfo@adk.org
Website: www.adk.org

North Country Operations

PO Box 867
Lake Placid, NY
12946-0867
Reservations: (518) 523-
3441
Office: (518) 523-3480
Fax: (518) 523-3518

Albany Office

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

We support the proposed change to 190.4 (e) which limits un-permitted group size to nine for state lands (which is down from ten in the current regulations). However, the APLMP defines unpermitted group size in primitive tent sites as eight individuals and three tent sites. If the number in the ECL regulations is being changed to be brought into compliance with the APSLMP, it must be reduced to eight.

We also support the addition of “*designated tent site, lean-to*” to 6CRR-NY 190.3 (b) which will help protect popular areas from recreational impacts and preserve the quality of the recreational experience for primitive tent site users. We do not, however, support the second proposed bulleted paragraph under 190.3 which promotes the use of RVs in primitive tent sites. ADK does not support the use of RVs in Single Lane Parking Areas, especially when there are no additional prohibitions such as a prohibition on the use of generators which would create a significant impact on other campers and the surrounding environment. There are numerous public campgrounds where RV use is appropriate however ADK does not see RV or generator use as appropriate at primitive tent sites. DEC must clarify in the regulation change the need for an exemption to the fourteen-consecutive night camping prohibition during Oct 15 to Dec 15.

Walk-in Sites

DEC must create separate sections in the BMP for land classifications that are motorized, and create a separate section detailing if there are road-side sites in non-motorized land classification units. Lumping the land classifications together is confusing and suggests that even in Wilderness areas there would need to be accessible parking spaces for walk-in sites. It also suggests that walk-in sites in wilderness areas (if they do not have accessible parking) will be closed. Further, ADK does not support the use of parking areas for RV/Camper camping during hunting season.

Primitive Tent Site Size Limits

ADK takes significant issue with the proposed size of campsites. The tent site sizes range from 1200 square feet to 2400 square feet. A standard dome four-person tent takes up approximately 63 square feet. ADK does not see a need for such an expansive area and encourages DEC to reduce the proposed area or provide justification for such a space. There is no justification in the current BMP for increasing tent site size by 400 square feet for water sites. DEC should define the reason for such an increase. ADK suggests that a schematics of tent sites be created and added to the BMPs. These schematics should incorporate the dimensions for desired “improvements” such as pit privies, fire rings and picnics tables.

ADK supports DEC’s effort to monitor existing campsite use and is interested in helping the agency carry out such a project. In order to meet the requirements of the SLMP, a thorough monitoring project must be conducted and DEC staffing levels/funding may be insufficient to carry out such a project alone. ADK appreciates the importance of such a survey and encourages DEC to seek partnerships in order to ensure a thorough and informative result that meets the requirements of the SLMP.

Further, there must be more discussion about the use of fires and fire rings. DEC should use data from the Eastern High Peaks to understand the effect on site recovery from the fire ban in the Eastern High Peaks. The ban would have ended the collection of small woody debris around the sites. Over collection of small woody debris from sites can have a significant impact on the ecosystem.

Primitive Tent Site Improvements

We support the proposed potential rustic improvements of raised earthen tent pads at roadside, walk-in sites, in areas that are not wilderness or managed as wilderness. These could be used to successfully limit recreational impacts at the site by providing a clear level area for small tents. However, the BMP must define size and dimension limits for this improvement. However, currently these raised earthen pads must be defined in the APSLMP as distinct from Tent Platforms which are banned in the Adirondack State Park. Page 24 of the APSLM states, that Tent Platforms are a non-conforming use for Wilderness Areas.

“All other structures and improvements, except for interior ranger stations themselves (guidelines for which are specified below), will be considered non-conforming. Any remaining non-conforming structures that were to have been removed by the December 31, 1975 deadline but have not yet been removed, will be removed by March 31, 1987. These include but are not limited to:

- lean-to clusters;
- **tent platforms;**
- horse barns;
- boat docks;
- storage sheds and other buildings;
- fire towers and observer cabins;
- telephone and electrical lines;
- snowmobile trails;
- roads and administrative roads;
- helicopter platforms; and,
- buoys.”

Tent Platforms are also prohibited in Wild Forest Areas. On page 40, under Wild Forest Classification, the APSLMP states under the Tent Platforms subheading, “The Department of Environmental Conservation having removed all tent platforms previously existing under Department permit, erection of new tent platforms will be prohibited.”

We are adamantly opposed to reversing this prohibition. However, we are not opposed to a new definition in the APSLMP for the structures described in this BMP which are made from natural materials at primitive tent sites and used to protect the sites and surrounding habitat as resource protection structures. These Tent Pad structures must be defined and their use in different classification areas determined.

We support the use of stone staircases to limit erosion and protect the sites from recreational impacts in all land classification areas.

Accessible Sites Signage and Designation

This section is confusing: the second bullet, which explains that anyone can stay at an accessible site, and the fourth bullet, which explains that a group can only stay at an accessible site if one member of the group has a disability, seem to conflict. If the fourth bullet refers to the third bullet, which explains that DEC may reserve some accessible sites for exclusive use, then DEC needs to define what is meant by “an individual with a disability” and how that is established.

ADK supports the use of picnic tables at road-side sites in Wild Forest areas if they are determined to be needed to protect the site from recreational impacts.

Thank you for the opportunity to provide feedback on the draft Primitive Campsite BMPs.

Sincerely,



Neil F. Woodworth
Executive Director and Counsel
Adirondack Mountain Club
neilwoody@gmail.com
518-449-3870 Albany office
518-669-0128 Cell
518-668-4447 x-13 or 25 Lake George