



27 January 2016

Peter Frank
Forest Preserve Bureau Chief
NYS Department of Environmental Conservation
625 Broadway, 5th Floor

Conservation
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Education
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Recreation
Since 1922

RE: Comments on Primitive Tent Sites Best Management Practices

Dear Peter Frank,

Thank you for giving the Adirondack Mountain Club (ADK) the opportunity to comment on the Primitive Camping Best Management Practices.

The 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 represents over 28,000 members who enjoy hiking, canoeing, kayaking, cross-country skiing, camping, backpacking, biking, mountaineering, snowshoeing, and other "muscle-powered" outdoor activities in New York. We sponsor programs that range from teaching people to hike and paddle safely to repairing our state's peerless hiking trail network. We are advocates for responsible recreation and protection of the Forest Preserve, state parks and other wild lands.

ADK would like to applaud the DEC for beginning a process to resolve the current issues with primitive campsites. ADK recognizes the difficult position DEC is in to provide a solution to a complex problem such as this.

ADK would like to offer the following comments on the draft best management practices(BMPs):

- Create a definitions section for new and commonly used terms in this BMP.
This will help alleviate any confusion around terms used such as Single Lane

Headquarters
814 Goggins Rd.
Lake George, NY
12845-4117
Phone: (518) 668-4447
Fax: (518) 668-3746
e-mail: 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

Parking Area, land access sites vs. walk-in sites vs. water site as well as a definition and dimensions of site “improvements”.

- ADK takes significant issue with the proposed size of campsites and the number of people allowed. The tent site sizes range from 1200 square feet to 2400 square feet. A standard dome four-person tent takes up approximately 64 square feet. The ADK does not see a need for such an expansive area and encourages the 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 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.
- The BMPs describe an exemption to the permit requirement from October 21st to December 15th by amending ECL 190.4(a). DEC needs to better clarify how it will ensure this is specific to sportsman use.
- ADK is concerned with the issue of overuse at current primitive camp sites. High use areas, such as the High Peaks Region, suffer from extensive site expansion and erosion. The BMPs should explore options, such as closing campsites, group size limits and fire bans, to better handle the extensive use in these areas.
- ADK does not support the use of RVs in Single Lane Parking Areas. Further, the use of generators would be a disturbance to other campers. There are numerous public campgrounds where RV use is appropriate however the ADK does not see RV or generator use as appropriate at primitive tent sites.
- ADK supports the 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 the DEC to seek partnerships in order to ensure a thorough and informative result that meets the requirements of the SLMP.

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

Sincerely,

A handwritten signature in black ink that reads "Neil F. Woodworth". The signature is written in a cursive style with a prominent initial "N" and a long, sweeping underline.

Neil F. Woodworth
Executive Director and Counsel
Adirondack Mountain Club, Inc.