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Working for Wilderness

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RE: Draft Devil's Tombstone Public Campground Unit Management Plan (UMP)

The Adirondack Mountain Club (ADK) appreciates the opportunity to comment on the Draft Devil's Tombstone Public Campground Unit Management Plan (UMP).

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 supports this draft UMP and the needed upgrades outlined for the Devil's Tombstone Campground in the Catskill Park. However, we respectfully request that you consider the following concerns and comments outlined below.

ADK does not support the collection of fees for hikers using the trailhead parking area for Devil's Path. Hiking fees are against New York State policy and violate New York State Law, including Environmental Conservation Law Article 9, Title 3, Lands and Forests, Section § 9-0301 (1), which states,

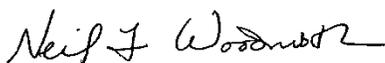
“All lands in the Catskill park and in the Adirondack park, except those lying within the town of Dannemora, now owned or which may hereafter be acquired by the state, shall be forever reserved and maintained for the free use of all the people, except that nothing herein shall prohibit the charging of a fee for services rendered or facilities provided.”¹

While the Devil’s Path hiker trailhead parking at Notch Lake could be argued to be a facility, the Department does not as a matter of policy or law charge the public for trailhead parking at many hundreds of its trailheads in the Adirondack and Catskill Forest Preserves.

If DEC would like to continue collecting fees for the day use of the picnic area at Notch Lake (i.e., the picnic tables and grills), DEC can utilize the Reserve-America system that is used for the Devil’s Tombstone Campground to reserve picnic tables and grills. Day-Use Area users can check-in at the campground to get their permit. However, hikers should park for free and be able to use picnic tables if they are not reserved. Arguably, it is stretch to call this area a picnic area. It is clearly, and simply a trailhead. DEC does not manage, maintain or snow plow the Devil’s Path parking area. DEC does not charge for parking at the great majority of hiker parking lots. It is fundamentally unfair and denies hikers equal protection under state law to charge a parking fee at this lot simply because of its proximity to a public campground. Hikers charged for parking at Notch Lake are getting no more services than are provided to the public at the many hundreds of Forest Preserve trailheads where no fee is charged. DEC could investigate implementing a request for donations by parking lot users at the trailhead kiosk.

Thank you for the opportunity to provide feedback on the Draft Devil’s Tombstone Public Campground Unit Management Plan (UMP).

Sincerely,



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¹ [http://public.leginfo.state.ny.us/lawssrch.cgi?NVLWO:](http://public.leginfo.state.ny.us/lawssrch.cgi?NVLWO)