

24 May 2018

NYSDEC

Attn: Blue Hole Comments,
21 South Putt Corners Road,
New Paltz, NY 12561
email: R3.UMP@dec.ny.gov

RE: Proposed Permit System for the Peekamoose Blue Hole.

ADK (Adirondack Mountain Club) appreciates the opportunity to comment on the Proposed Permit System for the Peekamoose Blue Hole.

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 public lands across New York State.

We respectfully request that you consider the following concerns and comments outlined below.

The Department of Environmental Conservation (DEC) has proposed a no-cost permit system for the Peekamoose Blue Hole, **under which** “visitors to the Blue Hole would need to obtain a permit on weekends and holidays from May 15 through October 15. DEC would issue up to 40 permits per day and each permit would allow entry for up to six individuals, including children, allowing for a maximum of 240 people to access the Blue Hole each day. DEC is proposing the new permit system by amending the Peekamoose Valley Regulations, and as the regulations are finalized, DEC will share additional information about how to obtain permits with the public.”

ADK believes that DEC’s **process in** rolling out this proposed permit system has serious flaws that need to be corrected to ensure that all Blue Hole users are educated well in advance of the implementation of the permit system.

DEC should consider successful models that the agency has already used when making management decisions to change behavior in user groups on public land units. For example, the required use of bear canisters in the eastern High Peaks began with a full year of education and outreach about the regulation change before ticketing for non-compliance. Another successful system is that employed by the Appalachian Trail Conservancy (ATC) to maintain visitor numbers at a level that does not impact the resource or user experience. In the ATC system hikers voluntarily pre-register their itinerary on-line and have access to real-time information on other users which indicates (on an on-line interactive webpage and map) when the area is at capacity.¹ Visitors are also provided alternative sites that they could choose to visit when the area is full. This allows trail visitors to self-regulate. This system is educational, user-friendly, and effective at protecting the resource and user experience.

ADK strongly urges that DEC,

1. Provide a full year of education on the new regulation before ticketing for non-compliance.
2. Create a reservation system like the ATC system that facilitates the education and self-regulation of user groups.
3. Do not undermine ongoing educational and outreach efforts at the Peekamoose Blue Hole by unfairly and unethically targeting new users from New York City who may not have an opportunity to comment on the proposed permit system and may not learn about the system until they receive a ticket.
4. Consider the potential for a shuttle system for Blue Hole users.

Education, Messaging, and Outreach

DEC should consider Leave No Trace Outdoor Skills and Ethics educational programming and messaging throughout this Unit and on all NYS public lands and forests. ADK strongly suggests that DEC develop a *Leave No Trace Skills and Ethics Integration and Outreach Plan*. This plan should cover messaging on the DEC web pages, at trailheads, on literature, and in programming. The development of the plan should be coordinated with other state agencies and offices to ensure that promotional efforts for Adirondack tourism that use state funding incorporate Leave No Trace messaging.²

ADK also urges DEC to commit to integrated training of Leave No Trace Skills and Ethics on the Trainer or Master Educator Level³ for DEC staff and Forest Rangers.⁴ The Master Educator level of training would be especially important for Forest Ranger staff who have significant one-on-one interaction with Forest Preserve visitors. DEC is a formal partner with the Leave No Trace Center for Outdoor Ethics and already has Master Educators on staff. Both the Center and the DEC Master Educators could help develop a plan for the agency and provide educational support, tools, and materials. ADK, which is one of ten site providers of Master Educator Courses for the Leave No Trace Center, could also assist in developing a plan.

An important consideration in Leave No Trace outreach involves explaining to visitors why they need to change their behavior in order to conform to land management rules and regulations. For visitors to public lands this makes a connection between their behavior and impacts to the place that they enjoy. Messaging should also include an alternative that complies with the regulations and emphasizes how following the suggested behavior or action will protect the resource and make the visitor's experience more enjoyable.

DEC should also work with the New York Department of State (DOS) and their new ArcGIS Information Gateway⁵ to disseminate rules, regulations, and educational information specific to locations, and land units.

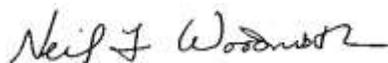
Capacity to Withstand Use

Recently, the Interagency Visitor Use Management Council, a planning entity composed of federal public land agencies (including the U.S. Forest Service and the National Park Service), posted its Visitor Use Management Framework.⁶ **This framework could provide additional insight to DEC's long-term planning process** which currently involves (1) the goal-achievement process; (2) the Limits of Acceptable Change (LAC) model employed by the U.S. Forest Service; and (3) the Visitor Experience and Resource Protection (VERP) model employed by the National Park Service. One key component of this framework is the use of a sliding scale for all components of the process, to insure that efforts match the size and scope of the project as well as the resources available.

ADK urges DEC to include indicators and thresholds as described by the Visitor Use Management Framework in its planning to define monitoring objectives, a monitoring schedule, and management actions to be taken should resource conditions deteriorate. According to the VUMF, “Indicators are defined as specific resource or experiential attributes that can be measured to track changes in conditions so that progress towards maintaining desired conditions can be assessed. Thresholds are defined as minimally acceptable conditions associated with each indicator....Thresholds serve a critical role to alert when conditions are close to becoming unacceptable.”

Thank you for the great work you do protecting and stewarding our New York State Public Lands.

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 office

¹ <http://www.appalachiantrail.org/home/explore-the-trail/thru-hiking/voluntary-thru-hiker-registration>

² <https://Int.org/>

³ <https://Int.org/learn/training-structure>

⁴ <https://Int.org/blog/authority-resource-technique-action>

carhart.wilderness.net/docs/manuals/waappg.pdf

⁵ <http://opdgig.dos.ny.gov/#/home>

Contact Jeff Herter at DOS for more information: jeff.herter@dos.ny.gov

⁶ <https://visitorusemanagement.nps.gov/>