

12 February 2021

Steven Guglielmi
NYS DEC
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Email: DeBarComment@apa.ny.gov

RE: Debar Mountain Wild Forest Final Scope, Draft Generic Environmental Impact Statement, Draft UMP for the Debar Mountain Complex, Draft UMP for the Proposed Debar Lodge Day Use Area.

Dear Steve,

Thank you for the opportunity to comment on the Debar Mountain Wild Forest Final Scope, Draft Generic Environmental Impact Statement, Draft UMP for the Debar Mountain Complex, and Draft UMP for the Proposed Debar Lodge Day Use Area.

Debar Lodge and Intensive Use Area

We support the decision of the Department of Environmental Conservation (DEC) to remove Debar Lodge and associated existing structures from the Debar Mountain Wild Forest. Although we understand DEC's attempt to respond to interest in the historic attributes of the site at Debar Pond, and DEC's desire to develop a compromise through the creation of an intensive use area with facilities and historic interpretation components, we are very concerned about the cost to create and maintain the full build out of the site, especially without sufficient data to support the need for this proposed facility. High quality access sites should be developed across the park, but DEC's limited resources would be better spent in regions closer to the areas that are currently experiencing significantly high visitor use.

Reclassifying Debar Pond as an intensive use, day use area would duplicate what other nearby sites, including Meacham Lake and Buck Pond, already supply. Arguably, the users of Debar Pond are not seeking the experience offered by these other facilities, but are looking for what Debar Pond offers--an accessible wilderness experience. Carefully and thoughtfully improving the site's accessibility while preserving the wilderness experience should be the goal of the actions in the planning documents.

Parking and Motors

Expanded parking and any related facilities should stay at the location of the current parking lot to protect the experience of quiet and solitude that is attracting people to the Debar Pond site. An accessible trail should be built from the existing parking area to Debar Pond.

Moving the parking closer to the pond will destroy the quiet and solitude and also create a negative visual impact that will destroy the experience that is attracting visitors. For these same reasons, and to protect nesting Loons, Debar Pond must remain motorless. There is a shortage of publicly accessible motorless lakes in the Adirondacks.

Dams

Regarding the management actions described for dams in the complex, ADK's position is as follows

“DEC should review the desirability of restoring more natural conditions whenever a dam reconstruction is being considered, with attention given to the recreational and esthetic values of the site with the impoundment at existing levels, at intermediate [lower] levels, or restored to natural conditions.”¹

Although we appreciate the approach outlined in the DM Complex UMP for assessing existing dams, there should be an environmental analysis of the proposed actions and alternatives. The analysis should also include the current impact of the dams on habitat and species, and also consider the proposed actions in the context of the changing climate. Impacts to recreation must also be assessed for all actions and alternatives. The DM Complex UMP does not provide this important analysis.

Santa Clara Flow Dam

At this time, with the information provided in the UMP, we do not support the expansion of the Santa Clara Flow Dam (in the Debar Mountain Wild Forest) to pre 1990 conditions. Depending on the results of an environmental and recreational analysis, we would support Alternative B (maintain the currently existing impoundment) or D (remove the remaining portions of the dam).

Madawaska Dam

Regarding the Madawaska Dam (in the Madawaska Flow, Quebec Brook Primitive Area) we support Alternative B which calls for the dam to be evaluated by certified engineers to “determine what repairs or upgrades are necessary to bring the dam into compliance,” and a subsequent cost-benefit analysis to consider “the positive and negative environmental, social and economic impacts of all presented alternatives.”²

Trails

We enthusiastically support the addition of over 50 miles of new trails in the DM Complex UMP for skiing, snowshoeing, hiking, bicycling, and equestrian use. We also support the proposed closure of 9.3 miles of trails to snowmobile use.

Recreational Education, Messaging, and Outreach

Leave No Trace messaging should be included in signage and kiosks on the Debar Mountain Complex. ADK strongly suggests that DEC develop a *Leave No Trace Outdoor Skills and Ethics Integration and Outreach Plan*. This plan should cover messaging on 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 tourism that use state funding incorporate Leave No Trace messaging.³

ADK also urges DEC to commit to integrated training of Leave No Trace outdoor skills and ethics on the Trainer or Master Educator Level for DEC staff, Forest Rangers, and Environmental Conservation Officers (ECO). The Master Educator level of training would be especially important for Forest Ranger and ECO staff who have significant one-on-one interaction with 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 twelve site providers of Master Educator Courses for the Leave No Trace Center, could also assist in developing a plan.

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 (VUMF).⁴ This framework could provide additional insight to DEC's long-term planning process. One key component of the VUMF is the use of a sliding scale for all components of the process, to ensure 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.”

A Visitor Use Management Framework system should be employed on public lands and conservation easement lands and outlined in UMPs and RMPs.

Sincerely,

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Adirondack Mountain Club

ADK works to protect New York’s wild lands and waters by promoting responsible outdoor recreation and building a statewide constituency of land stewardship advocates. Based out of the Adirondack Park in New York State, ADK is a leader in providing outdoor education, promoting responsible recreation, and organizing stewardship experiences. Since 1922, the organization has worked to increase access to the backcountry by building trails, conserving natural areas, and developing a stewardship community that supports ethical and safe use of New York’s outdoor spaces. A member and volunteer-supported organization, ADK reaches across New York through its 27 chapters to inspire people to enjoy the outdoors ethically.

¹ ADK Conservation Policy, Interior Facilities

² Debar Mountain Complex UMP Page 122

https://www.dec.ny.gov/docs/lands_forests_pdf/debarump.pdf

³ <https://lnt.org/>

⁴ <https://visitorusemanagement.nps.gov/VUM/Framework>