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January 22, 2018

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McCrea Burnham
Division of Lands and Forests
NYS Department of Environmental Conservation
625 Broadway, 5th Floor
Albany, NY 12233-4254

RE: Public Comments on Draft Best Management Practices for Design and Layout of Primitive Tent Sites in the Adirondack Forest Preserve

Dear Mr. Burnham,

Protect the Adirondacks has reviewed the draft "Best Management Practices for Design and Layout of Primitive Tent Sites in the Adirondack Forest Preserve" (BMPPTS) issued jointly by the Adirondack Park Agency (APA) and Department of Environmental Conservation (DEC). This documents attempts to clarify regulations in the Adirondack Park State Land Master Plan (SLMP) for siting, construction, management and maintenance of primitive tent sites in the Adirondack Forest Preserve. This documents refines SLMP guidance through a series of enumerated "Best Management Practices" for a variety of primitive tent sites (PTS) accessed by hiking, boating, those near roads used for roadside camping, those near parking areas, those designated for large group activities, and those providing special access for the disabled community.

As a general statement, Protect the Adirondacks supports requirements in the SLMP for PTS separation distances. The SLMP requires that PTS in wilderness, primitive, canoe and wild forest areas be located out of sight and sound and generally .25-miles from other campsites or lean-tos. In wild forest areas, the SLMP allows for PTS clusters to accommodate larger groups with a permit. PTS must blend in with the natural settings and have a minimal impact on the natural resources of the area. In general, each PTS allows for a maximum of three tents and nine campers, though permits can be issued for higher numbers. It's also important that all campsites are designated in a Unit Management Plan (UMP). These BMPs are not applicable to campsites in Intensive Use Areas and State Campgrounds.

Protect the Adirondacks

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The overall BMPPTS document is relatively short and concise. The BMPPTS is supported by three appendices: 1) a wildland campsite impact monitoring manual (revised in November 2017); 2) “Level of Acceptable Change Standards for Primitive Tent Sites in the Adirondack Forest Preserve” (revised in November 2017); guidance for siting and construction of campsites for the disabled (revised in November 2017).

Roadside Camping: These sites are divided into two types – walk-in sites for all Forest Preserve classifications and sites with single lane parking areas in Wild Forest areas. PROTECT does not object to the proposed guidelines for roadside campsites. These should be easily accessible from roadside parking areas and meet the separation distances according to SLMP standards.

Large Group Camping at Primitive Campsites: PROTECT does not object to the proposed guidelines for large group camping at primitive campsites. We agree that a study would be beneficial to help formulate appropriate policy for the Adirondack Canoe Routes including the 90-miler route, Low’s Lake to the Oswegatchie River canoe route, the Raquette River, and popular routes through the St. Regis Canoe area.

Primitive Tent Site Size Limits: PROTECT does not object to the proposed guidelines.

Primitive Tent Site Improvements: PROTECT does not object to the proposed guidelines. It’s important that the types of tools that can be utilized for this work are delineated in this policy. For instance, only hand tools should be allowed. The Snowmobile Trail Management Guidance document, for example, details where management and maintenance work is limited to hand tools and this BMP document should too.

It is widely recognized across the Forest Preserve that campsites in some Wild Forest areas may be suitable for picnic tables, steel fabricated fire rings, and pit privies. The outfitting of such sites should be proposed and detailed in a UMP.

Proposed ECL Changes: PROTECT does not object to the proposed changes.

Accessible Sites Signage and Designation: PROTECT does not object to the proposed changes.

Other Issues: There are other issues that should be considered by this document.

- Signage: Campsites should have clear camping permitted signs or decals as well as signs about tree cutting and the location of the privy. Perhaps, no greater issue leads to the discretion of a campsite than to be surrounded by stumps. If camp fires are allowed signs must clearly inform campers that the wood must be from dead and down trees only.
- Campsite construction guidance: This document is weak on instructions for how to

construct a campsite. While the “Primitive Tent Site Improvements” section enumerates the types of construction and site alteration that could be allowable to make a suitable site with multiple tent sites, more specific instruction should be provided. This document would benefit from information/analysis of the experimental campsites developed by the High Peaks Trail crew last summer around Marcy Dam. The trail crew carefully selected sites where tents would be clustered and dug out and reconstructed the ground where tents would be used. It seems likely that these sites will be much more durable over time. Further, the sites were clearly delineated and surrounded by intact forests. The BMPs will be markedly improved if a new section is developed on how to select and how construct a PTS site.

An important distinction should also be made between forest campsites along hiking trails and campsites along rivers or lakes. Waterfront PTS raise a specter of different issues than forest PTS.

- Shoreline setbacks: This is an important issue. While some of the classic Adirondack campsites are close to lakes or rivers, the importance of resource protection for fragile shorelines should be paramount. The BMPs should adhere to SLMP standards and detail standards for site selection and construction for waterfront PTS.

On behalf of the Board of Directors of Protect the Adirondacks, thank you for the opportunity to provide the comments as part of this public hearing.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Bauer". The signature is fluid and cursive, with a large initial "P" and "B".

Peter Bauer,
Executive Director