



Board of Directors

November 12, 2020

Charles Clusen
Chair

Steve Guglielmi
NYS DEC Region 5 Office
Division of Lands and Forests
P.O. Box 296
Ray Brook, NY 12977-0296

Marilyn DuBois
James McMartin Long
Michael Wilson
Vice-Chairs

Barbara Rottier
Secretary

RE: Public Comments Draft SEQRA Scoping for Debar Lodge, Debar Mountain Wild Forest Area

David Quinn
Treasurer

Dear Mr. Guglielmi:

Nancy Bernstein
Richard Booth
John Caffry
Andy Coney
Dean Cook
James Dawson
Lorraine Duvall
Robert Glennon
Roger Gray
Evelyn Greene
Sidney Harring
Peter Hornbeck
Dale Jeffers
Mark Lawton
Peter O'Shea
Philip Terrie
Chris Walsh

Protect the Adirondacks has reviewed the SEQRA Draft Scope for a series of actions in the Debar Mountain Wild Forest area promulgated by the Department of Environmental Conservation (DEC) and the Adirondack Park Agency (APA). This draft scope is being undertaken in preparation for the release of a draft Debar Mountain Wild Forest Area Unit Management Plan ("UMP") and Draft Generic Environmental Impact Statement ("DGEIS"), the first to be completed for this 82,000-acre unit of the Forest Preserve. Chief among the proposals are the removal of Debar Lodge and the reclassification of 41 acres, which includes an existing road, from Wild Forest to Intensive Use, to create a new day use area.

Protect the Adirondacks supports examining these alternatives in the proposed DGEIS. We also recommend that other actions be examined, as discussed below.

The Draft Scope lists the proposed actions as:

1. The DEC proposes the adoption of UMPs for both the existing Debar Mountain Wild Forest (DMWF) and the proposed Debar Lodge Day Use Area (DLDDUA). Currently, major topics under consideration for discussion in the DGEIS and UMP will include:

- Removal of the Debar Lodge and other buildings located near Debar Pond;
- Creation of a day-use area and recreation hub on Debar Pond at the former Debar Lodge site;
- Improvement of the area's trail system by adding to existing trail networks, creating new trail networks, building new connector trails, and rerouting poorly

Peter Bauer
Executive Director

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located trails;

- Improvement of access to recreation opportunities by addressing deficiencies at existing parking areas, building new parking areas, and providing better access to water bodies; and
- Construction of new primitive tent sites and the closure of tent sites which are not in compliance with the Adirondack Park State Land Master Plan (“APSLMP”).

2. The APA proposes re-classification of approximately 41 acres of land from the Debar Mountain Wild Forest to a new day-use area, classified as Intensive Use, on the shore of Debar Pond, and changes to the APSLMP’s area descriptions.

It has been an open secret for a while that the DEC and members of the State Legislature have been shopping around for possible partnerships among non-profits or local governments to refurbish and manage Debar Lodge for some type of public benefit purpose. The sheer financial cost involved has prevented any viable proposal from coming forward. Given the pressures to improve worn and degraded hiking trails and inadequate public recreational facilities in the most popular Forest Preserve units, such as the High Peaks Wilderness Area, and given the State’s commitment to continue to spend millions of dollars on the restoration of Great Camp Santanoni, it is unlikely that restoration of Debar Lodge is financially viable.

Even if money were not a concern, this type of operation would be unconstitutional and there are a slew of other legal issues that the State would have to contend with in order to maintain these buildings and have them operated by a non-State entity. Given the realities of no outside funding coming forward to finance such a project, the lack of state financial resources, and non-compliance with Article 14, Section 1 of the Constitution and other Forest Preserve laws, policies, and regulations, Protect the Adirondacks believes that the State has selected the best option as its preferred alternative, which is removal of the buildings.

The proposal to remove Debar Lodge and associated buildings is a wise one that will bring this site into compliance with the Constitution and the APSLMP.

Debar Lodge Site Conditions

The Debar Lodge complex has over 20 buildings, most of which are in disrepair. The site is stunning, as the shoreline of the north end of Debar Pond has vast open lawn areas with many towering 100-foot tall white pines. Open areas should be allowed to reforest. The access road is a serious roadway to the site and there is also a utility line to the site. The DGEIS should assess the removal of the utility line as an alternative to maintaining it.

Motorless Debar Pond

An alternative under which Debar Pond would be managed as a motorless lake should be included in the DGEIS. Launching should be provided for “car top” boats only. There are very few motorless lakes and ponds in the Adirondacks, despite the huge number of lakes and ponds. The public needs more motorless lakes and ponds that are easily accessible in the Adirondack Park. Given that the State owns

the entire pond, Debar Pond is ideal for a motorless lake.

Destruction of Timber Should Be Avoided or Minimized

Each alternative to be examined should be assessed for its potential to result in the destruction of timber on the Forest Preserve. The entire UMP should be designed to avoid destruction of a material amount of timber, so as to be compliant with Article 14, Section 1.

Impacts to the Wild Forest Nature of the Area Should Be Examined

The environmental impacts of reclassifying 41 acres as an Intensive Use Area and developing a day use area must be assessed, and compared to the impacts of leaving these Forest Preserve lands as Wild Forest under the APSLMP, and allowing the area to revert to “wild forest lands”, as required by Article 14, Section 1.

Removal of Debar Lodge is the Only Viable and Legal Alternative

The retention of the Debar Lodge complex for either State Administrative or Historic Area purposes is not viable. Protect the Adirondacks supports the proposal by the DEC and APA to remove these buildings. We also ask that the DGEIS examine the other alternative management actions discussed above.

On behalf of the Board of Directors of Protect the Adirondacks, please accept our gratitude for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Bauer". The signature is fluid and cursive, with the first name being more prominent.

Peter Bauer
Executive Director

CC: A. Lefton, Executive Chamber
M. Phillips, Executive Chamber
B. Rice, Executive Chamber
B. Seggos, NYSDEC
J. Drabicki, NYSDEC
K. Petronis, NYSDEC
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