



Board of Directors

February 12, 2021

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Chair

Matt McNamara
NYS Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

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James McMartin Long
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RE: Proposed Debar Lodge Intensive Use Area Public Comments

Barbara Rottier
Secretary

Dear Mr. McNamara:

David Quinn
Treasurer

As part of the new draft Debar Mountain Complex Unit Management Plan (DMCUMP), which includes the 80,400-acre Debar Mountain Wild Forest Area, the Department of Environmental Conservation (DEC) seeks to reclassify 41 acres of Wild Forest to create a new Debar Pond Intensive Use area. The DEC and Adirondack Park Agency (APA) jointly released a draft Debar Lodge Day Use Area Unit Management Plan (DLDU-AUMP). This new Intensive Use area would be managed as a day use area, and the plan states it will be “a hub for recreation access to adjacent lands, a connection to the history of the site, and a recreation destination for the community.”

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Protect the Adirondacks opposes the preferred Intensive Use Area classification and urges the APA and DEC to pursue Alternative WF2 to restore the site and keep these lands as Wild Forest in order to provide the highest environmental protection possible for Debar Pond and allow the ecological recovery and restoration of the Debar Lodge area.

Public use at Debar Pond has tripled in the past several years. The DEC says that this is because Debar Lodge was no longer used as a private residence by a DEC staffer/caretaker, making the site more open and welcoming to the public. Perhaps this is so, but more likely it is the fact that word got out about great flatwater canoeing on Debar Pond once it was more fully open to the public. We believe that a better option for Debar Lodge/Debar Pond is to restore the site and for Debar Pond to be managed as a wild, motorless area, akin to Round Lake or Lake Lila. Alternative WF2 would accommodate this transition.

Peter Bauer
Executive Director

Protect the Adirondacks is also concerned about the process chosen by the APA and DEC for reclassification. We're unfamiliar with other times that the DEC has released a draft UMP for an area as part of a state lands reclassification or classification process. This is highly unusual. Moreover, the draft DLDUAUMP contains proposed architectural de-

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signs and site plans that the DEC must have purchased from an outside contractor. Either the decision to spend state monies on building designs before a classification that would allow them is finalized is unwise, or, even more troubling, the decision has already been made for all practical purposes. The process here is unusual and not one that we're confident will produce a good public and environmental outcome.

Justification

We find no real discussion of the need for a new Intensive Use area in this part of the Adirondack Park. Nearby, of course, are the Meacham Lake and Buck Pond Intensive Use areas, which also function as day use areas and overnight camping areas. A bit farther away are the extraordinary Rollins Pond and Fish Creek Intensive Use/Day Use areas. The DLDUAUMP states that these facilities are close to Debar Pond and are rarely filled to capacity. The DLDUAUMP fails to state why a new Intensive Use area at the Debar Lodge site is needed. At a time of extremely limited resources for Forest Preserve management, when the High Peaks Wilderness area is suffering from an explosion of public use and chronic under investment in trails and facilities, it makes little sense to construct a new, redundant day use area at Debar Pond that long after it is built will require significant annual resources to maintain it year after year.

Adirondack Park State Land Master Plan

The Adirondack Park State Land Master Plan (APSLMP) states:

If there is a unifying theme to the master plan, it is that the protection and preservation of the natural resources of the state lands within the Park must be paramount. Human use and enjoyment of those lands should be permitted and encouraged, so long as the resources in their physical and biological context as well as their social or psychological aspects are not degraded. This theme is drawn not only from the Adirondack Park Agency Act (Article 27 of the Executive Law "The Act") and its legislative history, but also from a century of the public's demonstrated attitude toward the forest preserve and the Adirondack Park.

Our review of the 11 proposed alternatives did not find that the DEC upheld the "unifying theme" for natural resource protection in the APSLMP.

Alternatives

Protect the Adirondacks has reviewed the 11 proposed alternatives in the DLDUAUMP. We recommend that WF2 be selected as the most suitable and cost effective management option for the Debar Lodge/Debar Pond site. It will ensure the best long-term protection for the natural resources on the tract. We find flaws in each of the other ten alternatives.

Intensive Use Alternatives: After examining the different alternatives in the DLDUAUMP, we oppose the two alternatives (IU1, IU2) for reclassification to Intensive Use as unsuitable for the best long-term use of this site. We agree with alternative IU1 and IU2 that the buildings from the Debar Lodge complex should be removed. Many of the buildings in this complex are in disrepair. We do not believe that Debar Lodge is a Great Camp worth saving. We support the efforts to preserve and restore Great

Camp Sagamore and Great Camp Santanoni. Many other Adirondack Great Camps have been preserved through private ownership. The Debar Lodge complex does not possess to architectural complexity of many other Great Camps.

Protect the Adirondacks opposes alternatives IU1 and IU2 for four principal reasons:

- The Intensive Use areas are inappropriate for this site because they would be redundant with other Intensive Use facilities nearby.
- The expense of building, and then staffing, a new Intensive Use area at Debar Pond is a poor long-term investment for the Adirondacks, saddling future administrations with a white elephant to fund in perpetuity.
- The DEC seeks to significantly alter the existing road and forests on the Debar Lodge site. We do not think this can be done without an unconstitutional level of destruction of trees on the site. The DLDUAUMP did not provide any tree counts or estimates of cutting. Protect the Adirondacks has long maintained that activities proposed in a UMP should be evaluated for the level of tree cutting anticipated. The new Intensive Use area is likely to require an unconstitutional level of tree destruction.
- The greatest value of the Debar Lodge/Debar Pond site is Debar Pond. The DEC has an opportunity to create a new Lake Lila-style wild area. The Debar Lodge building complex should be removed and the site allowed to reforest. Active restoration and tree planting would help to speed the process. The site should remain in Wild Forest and the parking lot and access road kept where they are, if not eventually moved out to the main road. In the Adirondack Park there is not a demand or need for more Intensive Use areas. The under-utilization of the facilities nearby shows this clearly, but there is a need for more wild motorless lake experiences easily accessible for people with a modest canoe carry. We have such an opportunity at Debar Pond.

Historic Area Alternatives: After examining the different alternatives in the DLDUAUMP, we oppose the two alternatives (H1, H2) for reclassification to Historic. This classification is incompatible for the best long-term use of this site. In our vision, Debar Pond would be a place that can grow even wilder in the future than it is today. In our vision, Debar Pond would be another Lake Lila or Boreas Pond or Little Tupper Lake or Henderson Lake, a motorfree and wild lake where the public can canoe, hike, and camp in a wild landscape that will remain undisturbed for generations. A place where grandparents can one day bring their grandchildren to experience wildness in much the same way, unchanged and beautiful, as they experienced at Debar pond as children. That is the promise of the Forest Preserve.

Many Great Camps, recognized for their architectural and social history, are protected and have been restored by private owners across the Adirondack Park. Most of these camps today are located on relatively small acreages, with a few exceptions, where it is unlikely that they would be part of any future public purchases for the Forest Preserve. The future of these several dozen Great Camps is reasonably secure as these camps are privately owned and maintained.

Protect the Adirondacks is well aware of the tortured history of buildings on the public Forest Preserve.

Over the last 50 years, three Great Camp sagas provide cautionary tales for the management of Great Camps and the Forest Preserve. First, there was Great Camp Nehasane on Lake Lila. The State of New York purchased Lake Lila and several thousand acres around it in the 1970s. Nehasane Lodge was located at the west end of Lake Lila. Peter Berle, then DEC Commissioner, oversaw the demolition and removal of that Great Camp. Today, Lake Lila is a treasured part of the William C. Whitney Wilderness area and has been enjoyed by hundreds of thousands of people through the decades for its beauty and wildness. Had Nehasane Lodge remained, the entire Lake Lila experience today would be fundamentally different and significantly diminished. Protect the Adirondacks believes that Lake Lila's restoration and its classification as Wilderness is one of the great success stories in the Adirondack Park. Today, Lake Lila provides a stunningly beautiful Wilderness landscape and experience. The lake is heavily used by the public all summer long, year after year. We believe that the Berle vision for Lake Lila was prescient and was the right decision because wild, motorfree lakes have only grown rarer and more precious in the last 50 years.

The second cautionary tale is Great Camp Santanoni on Newcomb Lake, an inholding of sorts within the High Peaks Wilderness. This Great Camp was purchased in the 1970s as part of a 12,000-acre purchase of lands that were added to the High Peaks Wilderness. Great Camp Santanoni existed in a state of benign neglect for decades. State laws were passed to allow buildings to remain on the Forest Preserve if they met a specific purpose. Great Camp Santanoni was eventually stabilized with state funding. The Great Camp Santanoni complex, and its access road, remained in the Forest Preserve and were classified as a Historic Area under the Adirondack Park State Land Master Plan. The first iterations of the APSLMP in the 1970s did not have a Historic classification, but it was added in subsequent revisions. The State of New York has spent millions of dollars to stabilize and restore Great Camp Santanoni.

In our vision, the continued existence of Great Camp Santanoni, which we acknowledge is an attraction for many people and is considered as an important cultural resource in the Town of Newcomb, has diminished the public experience on Newcomb Lake. The Historic Area has also created management tensions from using snowmobiles to ferry staff and supplies to the Great Camp on the 5-mile-long access road in the winter and state administrative use of that road with motor vehicles in summer months. Despite these problems, we foresee the continuation of Great Camp Santanoni and recognize that it provides a viable public education and interpretation experience for Adirondack Great Camp architectural and social history. There is no need for another Great Camp in the Forest Preserve.

The third cautionary tale is of Great Camp Sagamore outside of Raquette Lake. Great Camp Sagamore is a fully restored Great Camp complex that sits on the shore of Sagamore Lake. Two Article 14 amendments in the 1980s transferred Great Camp Sagamore and more than a dozen acres to a private institute for educational purposes. The Sagamore Institute has worked since the 1980s to provide public education and interpretation about Adirondack Great Camp architectural and social history. The facility is also used for private conferences and events such as weddings. Public access to Sagamore Lake is sharply curtailed. Public parking areas and access to the lake have never been adequately developed. The guests at the Great Camp enjoy easy lake access from a restored boathouse and series of docks, which are off limits to the public. The Great Camp Sagamore complex dominates the lake where members or the public are in essence second class citizens. Today, Great Camp Sagamore provides the most indepth educational opportunity for Great Camp architectural and social history in the Adirondack Park for paying customers. While the Great Camp complex is fully restored, the public experience on Sagamore

Lake has always been circumscribed by the Great Camp. Sagamore Lake is no Lake Lila, though had the Great Camp been removed over 40 years ago, it would be a Lake Lila today.

Last, if Debar Lodge is classified as Historic, this will necessitate millions of dollars in state funds for the stabilization and restoration of the buildings, similar to what has happened with Camp Santanoni.

Protect the Adirondacks recognizes the necessity of compromise in the management of the Adirondack Park. We recognize that the Adirondack Park of today is forged from a series of decisions and compromises made decades ago. However, we do not believe that the Camp Santanoni model is appropriate for Debar Lodge. We do not believe that the Camp Sagamore model is appropriate for Debar Lodge. We believe that the Great Camp Nehasane model is the most appropriate for Debar Lodge. We believe that the Debar Lodge complex should be removed and the site restored to a Wild Forest setting. In this way, we're confident that Debar Pond will grow wilder and even more beautiful in future decades. We believe that there is no greater gift to future generations than wild spaces around a wild and motorfree Debar Pond. Protect the Adirondacks does not see a Historic classification as viable or the best decision for all of these reasons.

Administrative Alternatives: The DLDUAUMP enumerates four alternatives (A1, A2, A3, A4) for reclassification to Administrative to facilitate conversion of the Debar Lodge to some form of education facility or state office. Given the vast costs involved and the remote location of the site, Protect the Adirondacks does not see any of these alternatives as viable. We're also concerned about a possible unconstitutional level of tree destruction involved in different Administrative classifications.

Wild Forest Alternatives: The DLDUAUMP enumerates three alternatives (WF1, WF2, WF3) where the Debar Lodge/Debar Pond site would remain as Wild Forest. These alternatives range from allowing the buildings to deteriorate (WF1), to removing the building and reclaiming the site (WF2), to removing some buildings and using the main Debar Lodge as a Ranger Station (WF3). Protect the Adirondacks believes that the only viable Wild Forest option is WF2.

Protect the Adirondacks supports Alternative WF2 because the greatest value on this site for current and future generations will be the experience of a wild, beautiful, and motorless Debar Pond. It's important to note that most of the major lakes in the Adirondacks are open to all manner of motorized watercraft. A report published by Protect the Adirondacks in 2013 *The Myth of Quiet, Motor-free Waters in the Adirondack Park* (see attached) found that of the 100 largest lakes in the Adirondacks, from Lake Champlain to Beaver Lake (in Watson and Webb in western Adirondacks), 77 are open for all manner of motorized boating and floatplanes, 14 lakes are privately owned and provide no public access, and just 8 are motor-free. Of the eight motor-free lakes among the Park's top 100, just five are relatively easy to access for families and motor-free. Just 17 of the biggest 200 lakes are easily accessible and motor-free. The demand is high for motor-free experiences, but the supply is low. This needs to change. The public deserves more opportunities for motorfree waters across the Adirondack Park and Debar Pond creates that opportunity to accomplish this.

Alternative WF2 is also cost effective. The upfront costs to remove the buildings and restore the site will be significant, but after that the long-term costs for management of a wild, motor-free lake will be minimal. From a cost effectiveness, this is the best choice for the DEC.

A motor-free Debar Pond, where the Debar Lodge site has been restored and reclaimed, will grow into a popular lake for campers, hikers and paddlers, who will cherish this wild place for generations.

Cost Benefit Analysis: This decision cries out for a serious cost-benefit analysis. The DLDUAUMP does not undertake this in any serious way.

Article 14 Amendment

Protect the Adirondacks does not support an amendment to Article 14, Section 1 to authorize the removal of the Debar Lodge complex so it can be managed as a private inholding in the Forest Preserve as some type of commercial and educational facility. As stated above, the best long-term use of the Debar Lodge/Debar Pond site is removal of the buildings and restoration of the site to a wild forest setting.

On behalf of the Board of Directors of Protect the Adirondacks, please let me express our gratitude for the opportunity to submit these public comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Bauer". The signature is fluid and cursive, written in a professional style.

Peter Bauer
Executive Director

CC B. Seggos
K. Fernholtz
R. Davies

