



Board of Directors

April 19, 2021

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Chair

Hon. Steven Englebright
Chairman, Assembly Committee on Environmental Conservation
Room 621, LOB
Albany, NY 12248

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James McMartin Long
Michael Wilson

Vice-Chairs

Hon. Todd Kaminsky
Chairman, Senate Committee on Environmental Conservation
Room 307, LOB
Albany, NY 12247

Barbara Rottier
Secretary

David Quinn
Treasurer

RE: Proposed Article 14 Amendment for Debar Lodge in the Debar Mountain Wild Forest, Adirondack Forest Preserve

Nancy Bernstein
Richard Booth
John Caffry
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Dean Cook
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Robert Glennon
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Evelyn Greene
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Dale Jeffers
Mark Lawton
Peter O'Shea
Philip Terrie
Chris Walsh

Dear Chairman Englebright and Chairman Kaminsky:

Protect the Adirondacks opposes a proposal for an amendment to Article 14, Section 1, of the New York Constitution to remove six acres of public Forest Preserve encompassing roughly two dozen buildings on the shores of Debar Pond in the Debar Mountain Wild Forest area. The proposal to remove these buildings is circulating at state agencies and in the Legislature and we wanted to go on record with our opposition.

Supporters aim to privatize 6+/- acres of public Forest Preserve to create a private institute that will utilize the buildings on the property to focus on various educational pursuits. We agree with the supporters of the proposal to save Debar Lodge that the only way to create a facility that refurbishes and utilizes the complex of buildings at Debar Lodge for private purposes is through an amendment to Article 14, Section 1, of the State Constitution that would remove these buildings and lands from the Forest Preserve. State law prohibits private use of buildings on the Forest Preserve. It strictly limits how the Department of Environmental Conservation (DEC), and other state agencies, can maintain and utilize buildings on the Forest Preserve.

Peter Bauer
Executive Director

Debar Lodge Should be Removed, Site Should be Restored to a Wild Forest Setting

There are many reasons why the effort to save Debar Lodge and remove these lands from the Forest Preserve is a bad idea.



A Constitutional Amendment to Preserve Debar Lodge Will Strip Public Recreational Rights and Use: Protect the Adirondacks does not see how creating a private 6+/-acre complex around the Debar Lodge buildings will not undermine and greatly weaken public access to Debar Pond. The Debar Lodge Institute seeks to create a private compound for its guests and staff where public access to Debar Pond will be greatly diminished. The Debar Lodge area is the principal access point for the public to Debar Pond and the public should not see their access strips and made into second class citizens banned from the area. The public will not be allowed on these lands once the land is transferred. We cannot support a proposal that strips away the rights of New Yorkers to the best access for Debar Pond.

The public has greatly enjoyed carte blanche access to the Debar Lodge lands for more than a decade. State taxpayers purchased these lands more than two decades ago and have paid all local taxes on these since during that time. The public has enjoyed the parking area and short walk or canoe carry through the grounds to Debar Pond. Public use has significantly increased in the last half dozen years since the DEC has stopped using the site to house its staff. We are greatly concerned about efforts to privatize and abridge the public's access to these lands. We simply do not see how the Debar Lodge complex can be transferred to private ownership without seriously and irreparably damaging public access and enjoyment of Debar Pond.

In our meetings with amendment supporters, they were adamant that they needed exclusive privately-controlled access to the Debar Lodge site to conduct their activities. This means that the short canoe carry and open lawn access to Debar Pond will no longer be available to the public. Project supporters made it clear that unfettered public use, a hallmark of the Forest Preserve, is incompatible with the development of the Debar Lodge Institute.

Debar Pond



The Lake Lila Model is the Best Historic Precedent for Debar Lodge and Debar Pond: The State of New York purchased Lake Lila and several thousand acres around it in the 1970s. Part of the purchase included Nehasane Lodge on the west end of Lake Lila. Peter Berle, then DEC Commissioner, oversaw the demolition and removal of that Great Camp and associated buildings. Today, Lake Lila is a treasured part of the William C. Whitney Wilderness area and has been enjoyed by hundreds of thousands of people for more than four 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, and provides more than two dozen wilderness campsites. The lake is heavily used by the public all summer long, year after year. We believe that former DEC Commissioner Berle's 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. Lake Lila would be a very different place today had Nehasne Lodge been preserved and/or privatized.

Protect the Adirondacks believes that the Lake Lila model is the best model for Debar Lodge and Debar Pond.

Wildness is the Overriding Forest Preserve Value at Debar Pond: Protect the Adirondacks has a fundamentally different vision for the Debar Lodge property than amendment supporters who seek to privatize the property. In our vision, Debar Pond would be a place that is managed to 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 landscape that grows wilder decade after decade. We note that 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.

In our vision, we see Debar Pond a special and accessible wild area, a place where grandparents can one day bring their grandchildren to experience wildness in much the same way, unchanged and beautiful, as they experienced Debar Pond as children themselves. There is nothing better to illustrate the promise of the public Forest Preserve in New York State than this kind of generation after generation enjoyment of wild nature at beautiful and timeless locations.

Adirondack Great Camp Social and Architectural History Already Adequately Preserved and Interpreted: Many Adirondack 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 land purchases for the Forest Preserve. The future of these several dozen Great Camps is reasonably secure as these camps are privately owned and maintained. Many of these camps have been recognized for their architectural significance and have been showcased at times for public tours.

Great Camp Santanoni on Newcomb Lake is 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 its buildings to remain on the Forest Preserve if they met a specific purpose. The Great Camp Santanoni complex, and its access road, remain in the Forest Preserve and were classified as a Historic Area under the Adirondack Park State Land Master Plan (APSLMP). Great Camp Santanoni was eventually stabilized with state funding beginning in the early 2000s. 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, which functions today as a living museum. The most recent state budget allocated another \$250,000 from the Environmental Protection Fund (EPF) for Camp Santanoni.

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 use of 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



Great Camp Sagamore



Debar Lodge

history. That said, we see no need for the preservation of another Great Camp on the Forest Preserve.

Great Camp Sagamore has also been preserved and fully restored. As we see it, there is no better preservation effort in the Adirondacks, and no better educational effort in the Adirondacks, for Adirondack Great Camps. Great Camp Sagamore is a fully restored Great Camp complex of more than two dozen buildings that sit on Sagamore Lake's shore. Two Article 14 amendments in 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.

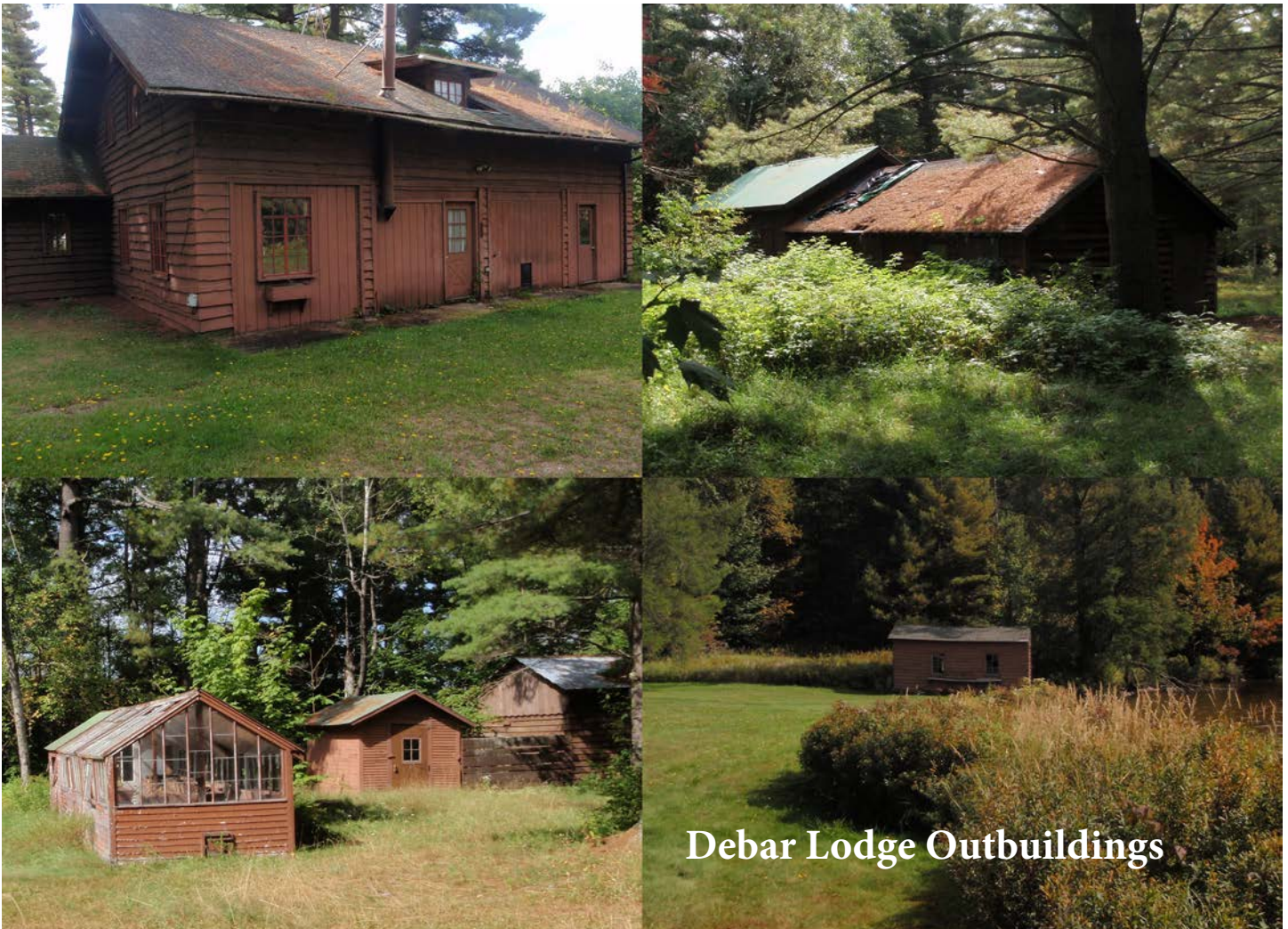
Sagamore Institute provides the most indepth educational opportunity for Great Camp architectural and social history in the Adirondack Park for paying customers and school groups through guided tours. While the Great Camp complex has been fully restored, the public experience on Sagamore Lake has always 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 as stunning and wild as Lake Lila is today.

Today, public access to Sagamore Lake is sharply curtailed. Public parking areas and access to the lake have never been adequately developed, largely because the private institute resisted them. 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 of the public are in essence second-class citizens.

Protect the Adirondacks recognizes the necessity of compromise in the management of the Adirondack Park. We realize 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 Great Camp Santanoni model is appropriate for Debar Lodge. Nor do we believe that the Great 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 restored, wild, and motorfree Debar Pond. The loss of Debar Lodge and associated buildings will not be a great loss to our collective architectural and social history of the Adirondack Park, yet the opportunity to create a new Lake Lila-style public outdoor wild area is rare and should not be passed up.

Public Educational Use Envisioned at Debar Lodge Can be Undertaken at Other Sites Through New Partnerships: One reason advanced by supporters of saving Debar Lodge is that the facility will be devoted to things like working with the wounded warriors project or to promote racial diversity in the Adirondacks. These are terrific goals, but it should be pointed out that there are many educational facilities in the Adirondack Park that would eagerly make their facilities available to collaborate on these worthy programs.

Debar Lodge is No Great Camp: Despite the proclamations of amendment and preservation supporters, Debar Lodge is no Great Camp Santanoni and it's no Great Camp Sagamore. It does not possess the architectural significance of many other preserved Great Camps in the Adirondacks. We do



not believe that it merits preservation when we look at the better alternative or a wild, accessible Debar Pond. The architectural and design qualities of Debar Lodge do not compare with Great Camp Sagamore or Great Camp Santanoni. Moreover, many of the smaller utility buildings dilapidated and are simple garage-type or shed-type buildings with no historic or architectural significance.

Debar Lodge Will be a Drain on Environmental Protection Fund, Just Like Great Camp Santanoni, It Never Ends: Just as the restoration of Great Camp Santanoni has been a drain on the Environmental Protection Fund for decades, amendment supports will seek to make sure that restoration of Debar Lodge is similarly funded through annual EPF appropriations. This is a poor long-term investment by the state.

To be clear, Protect the Adirondacks does not see any viable reason to support the restoration of Debar Lodge and associated buildings. These building should be cleared and the site should be environmentally restored to a wild forest setting.

Buildings on the Forest Preserve and the Law

We agree with Debar Lodge amendment supporters that the only viable way to fully restore these buildings and use them for public conference purposes is through an Article 14 amendment. Buildings

on the public Forest are tightly regulated. Today, buildings on the Forest Preserve are limited to two uses by nearly 50 years of state policy in the Adirondack Park State Land Master Plan: 1) state administration as necessary facilities for Forest Preserve management; 2) educational and historic preservation purposes. Under no conditions can buildings on the Forest Preserve be used for any kind of public recreation or residential purposes.

Protect the Adirondacks does not see any viable public uses for the Debar Lodge site that would require reclassification to either State Administrative or Historic Use Area. We believe that the best course of action is that the buildings are removed.

State Administrative Areas: Today, the state manages a small number of state administrative buildings on the Forest Preserve, such as the caretakers cabins at Lake Colden, Marcy Dam, Raquette Falls and Wakely Dam. The state also manages a complex of buildings at the Whitney Headquarters on Little Tupper Lake in an area classified as State Administrative, which provide seasonal housing for staff who work on Forest Preserve maintenance projects.

The APLSMP provides clear direction on the question of new structures of the Forest Preserve:

Insofar as forest preserve lands are concerned, no structures, improvements or uses not now established on the forest preserve are permitted by these guidelines and in many cases more restrictive management is provided for. (p 16)

This passage makes it clear that the APSLMP does not contemplate new structures or improvements being allowed on the Forest Preserve where they are not currently established. Furthermore, three definitions shape Master Plan prohibitions on buildings for public use on the Forest Preserve.

19. Improvement - any change in or addition to land, which materially affects the existing use, condition or appearance of the land or any vegetation thereon, including but not limited to foot, horse, and bicycle trails, roads, administrative roads, snowmobile trails, cross country ski trails, improved cross country ski trails, trail heads, picnic areas and individual primitive tent sites. (p 18)

29. Ranger Stations or Ranger Cabins - enclosed buildings constructed or maintained by the Department of Environmental Conservation, suitable for human habitation and manned seasonally or year-round by administrative personnel to facilitate administrative control of lands and public use thereof under the jurisdiction of the Department. (p 19)

36. Structure - any object constructed, installed or placed on land to facilitate land use, including but not limited to bridges, buildings, ranger stations or ranger cabins, sheds, lean-tos, pit privies, picnic tables, horse barns, horse hitching posts and rails, fire towers, observer cabins, telephone and electric light lines, mobile homes, campers, trailers, signs, docks and dams. (p 20)

These definitions make it clear that the only time that buildings are allowable on the Forest Preserve is if they are used for state administrative purposes and used by administrative personnel.

To be clear, Protect the Adirondacks does not see any viable “state administrative” use of the Debar Lodge complex.

Historic Areas: The management of historic buildings on the Forest Preserve has been a vexing issue for decades. State management has evolved over the years from a position of building removal to now accommodating historic buildings on the Forest Preserve through the creation of a “Historic” area classification. The state has since built a policy of retaining buildings for public educational and historic preservation purposes. The Historic area classification has been used most notably for Great Camp Santanoni and the two state parks that preserve historic areas -- the John Brown Farm in Lake Placid and the Crown Point Historic area. Since the Pataki Administration, the state has invested millions of dollars to stabilize and restore Great Camp Santanoni. The Historic Area classification was also used to preserve the St. Regis Mountain and Hurricane Mountain firetowers, where small mountaintop spot-zoning Historic Areas were created.

The journey towards “Historic” areas on the Forest Preserve is a storied one, and has its own history. The first edition of the APSLMP in 1972 did not list “Historic” as a classification option. The Historic classification was added with the first revision in 1979. The Carey Administration removed the Ranger cabin in the West Canada Lakes Wilderness area and removed Nehasne Lodge at Lake Lila soon after the state purchased the lake. A number of firetowers were also removed, most notably on Kempshall Mountain in the High Peaks Wilderness Area.

The APSLMP sets out management standards for Historic Areas in which buildings on the Forest Preserve are maintained. This management classification has been used for state parks at John Brown’s Farm and Crown Point fort as well as for Camp Santanoni and the two firetowers on Hurricane and St. Regis Mountains. The APSLMP defines Historic areas as such:

Historic areas are locations of buildings, structures or sites owned by the state (other than the Adirondack Forest Preserve itself) that are significant in the history, architecture, archeology or culture of the Adirondack Park, the state or the nation; that fall into one of the following categories;

- state historic sites;
- properties listed on the National Register of Historic Places;
- properties recommended for nomination by the Committee on Registers of the New York State Board For Historic Preservation; and that are of a scale, character and location appropriate for designation as an historic area under this master plan and the state has committed resources to manage such areas primarily for historic objectives. (p 46)

The Master Plan sets out guidelines for management of use of Historic Buildings that were written to protect the essential wildland values of the Forest Preserve even as buildings were being maintained. The APSLMP clearly sets out guidelines for management of Historic Areas:

1. The primary management guidelines for historic areas will be to preserve the quality and character of the historic resources, that is, to the greatest extent feasible, in a setting and on a scale in harmony with the relatively wild and undeveloped character of the Adirondack Park.

2. All historic areas will be designed, managed and interpreted so as to blend with the Adirondack environment and have the minimum adverse impact possible on surrounding state lands and nearby private holdings.

3. Construction and development activities in historic areas will:

- avoid material alteration of wetlands;
- minimize extensive topographical alterations;
- limit vegetative clearing; and,
- preserve the scenic, natural and open space resources of the historic area.

4. Each historic area will be designed, managed and interpreted in conformity with a special historic area unit management plan for the area, filed with and approved by the Agency after public hearing as being consistent with this master plan. Special unit management plans will be prepared in consultation with the Agency for the two existing historic areas as soon as possible. No new structures or improvements at existing or proposed historic areas will be constructed prior to the approval of such special unit management plans. Such structures and improvements will conform to this master plan and special historic area unit management plans.

The APLSMP sharply limits the scope of how buildings that are retained for historic purposes can be managed. The primary purpose is historic preservation and these buildings are to be managed in harmony with the surrounding Forest Preserve. As such, they are living museums in the Forest Preserve that are available for the public to visit, but are not places to be used for residential or lodging purposes. Management of Great Camp Santanoni has been austere and closely regulated; buildings have stabilized and restoration has been slow work.

With the evident success of the stabilization of Great Camp Santanoni and the full-scale restoration of Great Camp Sagamore, the public does not need to finance yet another Adirondack Great Camp. It's also important to note that a number of other Adirondack Great Camps remain in private ownership where they have been adequately preserved.

To be clear, Protect the Adirondacks does not see any viable Historic use of the Debar Lodge complex.

The retention of the Debar Lodge complex for either State Administrative or Historic purposes is not viable. Protect the Adirondacks supports the removal of all the buildings on the site and restoration to a Wild Forest setting.

Removal of Debar Lodge is the Only Viable Action

Protect the Adirondacks does not support an amendment to Article 14, Section 1, of the State Constitution to authorize the removal of the Debar Lodge complex so it can be preserved and 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 share our concerns with you.

Sincerely,

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

Peter Bauer
Executive Director

CC: NYS Assembly EnCon Committee
NYS Assembly Speaker
NYS Assembly Staff
NYS Senate EnCon Committee
NYS Senate Majority Leader
NYS Senate Staff
Executive Staff
NYSDEC
NYSAPA