



Board of Directors

February 16, 2023

Charles Clusen
Chair

Rob Fiorentino, Fisheries Manager
NYS DEC
232 Golf Course Rd
Warrensburg, NY 12885

James McMartin Long
Michael Wilson
Vice-Chairs

Barbara Rottier
Secretary

Re: Broadalbin Boat Launch Draft UMP

David Quinn
Treasurer

Dear Rob,

Nancy Bernstein
John Caffry
Andy Coney
Dean Cook
James C. Dawson
Lorraine Duvall
Robert Glennon
Roger Gray
Evelyn Greene
Sidney Haring
Dale Jeffers
Mark Lawton
John Nemjo
Peter O'Shea
Philip Terrie
Chris Walsh

Protect the Adirondacks has reviewed the draft Unit Management Plan (UMP) prepared by the NYS Department of Environmental Conservation (DEC) for the Broadalbin Boat Launch UMP noticed in the January 25, 2023 Environmental Notice Bulletin. We welcome the opportunity to review and comment on this draft UMP. We offer the following comments for your consideration prior to finalizing the UMP.

We appreciate that DEC recognizes this parcel of land as Forest Preserve and is managing it pursuant to the Guidelines for Management and Use of lands classified as Intensive Use under the Adirondack Park State Land Master Plan (APSLMP) classification. Additionally, we support DEC's proposal to vegetate a portion of the parcel, which is partially located within designated wetlands, with stone and native plants, and to seek to provide accommodations for people with disabilities to access the lake.

Staff

Nevertheless, we are concerned that DEC is proposing to "provide additional boating access to the lake" by adding a new dock on the parcel and by altering the beach parking area to provide cartop parking (it is unclear if the number of parking spaces in the old "beach parking area" will be increased, decreased or will remain the same).

Peter Bauer
Executive Director

Claudia K. Braymer,
Esq.
Deputy Director

According to the APSLMP, every UMP must contain certain elements that inventory the assets of the unit, and that assess natural resources and other impacts to the area. Here, the inventory of the natural, scenic, cultural, fish and wildlife resources should be stated in greater detail. The draft UMP has a map showing wetlands, but it does not describe these wetlands, and it identifies species of fish in the lake, but it does not identify any species of plants or animals of the area.

Christopher Amato,
Esq.
**Conservation Director
and Counsel**

Further, while the draft Broadalbin Boat Launch UMP describes the impacts on management due to problems from public overuse, littering, illegal parking, and underage drug and alcohol use, it does not provide “an assessment of the impact of actual and projected public use on the resources, ecosystems and public enjoyment of the area with particular attention to portions of the area threatened by overuse”. APSLMP p. 10. It is important to note that the APSLMP states that boat launching sites in Intensive Use areas will only be provided where “there will be no material adverse impacts on physical, biological or scenic resources of the water body and surrounding land”. APSLMP p. 43. The draft UMP needs to contain an adequate demonstration that the resources and ecosystems of the area will not be adversely impacted by the proposal to retain the existing boat launch, including the existing dock and the addition of a new dock. The APSLMP states that existing boat launching sites in Intensive Use areas may be retained, but they must be in conformance with the APSLMP or be reviewed for “conversion to fishing access.” APSLMP p. 44.

The draft UMP also needs to contain a more in-depth “assessment of the physical, biological and social carrying capacity of the area with particular attention to portions of the area threatened by overuse in light of its resource limitations”. APSLMP p. 11. We are pleased to see that this section is included in the draft UMP, and that problems and some impacts are anticipated to be greatly reduced as a result of management actions proposed in the UMP. However, the draft UMP does not actually assess whether the physical, biological and social carrying capacity of the area has been or will still be exceeded.

As noted in the draft UMP, there are four other DEC operated boat launch sites and there are numerous public and private boat launch sites and marinas on the lake. A conclusory statement, without any supporting analysis, that the “lake’s large size and diversity of morphometric features allows users to segregate themselves without overuse or resource degradation becoming an issue” (draft UMP p. 5) is not an adequate carrying capacity analysis. The statement that there is “currently no motor size limitation on Great Sacandaga Lake” (draft UMP p. 5) is not an adequate assessment as to whether DEC needs to further regulate or limit “public use such that the carrying capacity of the area is not exceeded.” APSLMP p. 11. Further, the APSLMP states that boat launching sites in Intensive Use areas will only be provided on lakes where “the physical, biological and social carrying capacity of the lake, or a portion of the lake . . . will not be exceeded”. APSLMP p. 43.

Finally, we support the inclusion and analysis of alternative management actions in the draft UMP. We suggest that DEC convene public meeting(s) to allow for further opportunity for “review and comment . . . by the public and other interested parties”. APSLMP p. 12.

On behalf of the Board of Directors of Protect the Adirondacks, please accept our gratitude for the opportunity to share our comments on this draft UMP. We may have additional comments as our review of this matter is ongoing.

Sincerely,

A handwritten signature in black ink that reads "Claudia K. Braymer". The signature is written in a cursive, flowing style.

Claudia Braymer,
Deputy Director