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September 18, 2023
Via Email (campinfo@dec.ny.gov)

Josh Houghton
NYS DEC – Division of Operations
Bureau of Recreation
625 Broadway
Albany NY 12233-5253

Re: Draft Unit Management Plans for Rollins Pond and Golden Beach
Intensive Use Areas

Dear Mr. Houghton:

Protect the Adirondacks has reviewed the draft Unit Management Plan (UMP) prepared by the NYS Department of Environmental Conservation (DEC) for the Rollins Pond and Golden Beach Intensive Use Areas noticed in the August 16, 2023 Environmental Notice Bulletin. We welcome the opportunity to review and comment on these draft UMPs during the DEC's review process.

Rollins Pond campground was opened in 1955 and Golden Beach campground was opened in 1931. Thus, both campgrounds were developed and opened prior to adoption of the Adirondack Park State Land Master Plan (APSLMP). Accordingly, there was no consideration of APSLMP requirements or modern planning principles when these two campgrounds were designed. However, as discussed in detail below, the APSLMP imposes strict standards for the modification or upgrade of existing facilities, and those standards are not reflected in either of the UMPS. Consequently, neither UMP complies with the APSLMP.

Moreover, we believe that DEC must evaluate closure of the Rollins Pond campground so that recreational overuse of Rollins Pond can be addressed and the campground lands reclassified from Intensive Use to Wild Forest.

Neither UMP Complies With the APSLMP

The APSLMP states that the Guidelines for Management and Use of Intensive Use include:

1. Providing opportunities for camping “in a setting and on a scale that are in harmony with the relatively wild and undeveloped character of the Adirondack Park”.
2. “All intensive use facilities should be located, designed and managed so as to blend with the Adirondack environment and to have the minimum adverse impact possible on surrounding state lands and nearby private holdings. They will not be situated where they will aggravate problems on lands already subject to or threatened by overuse”.
3. “Construction and development activities . . . will . . . limit vegetative clearing; and preserve the scenic, natural and open space resources of the intensive use area”.
4. “Any new, reconstructed or relocated buildings or structures located on shorelines of lakes, ponds . . . **will be set back a minimum of 150 feet (campsites shall be 100 feet) from the mean high water mark** and will be located so as to be reasonably screened from the water body to avoid intruding on the natural character of the shoreline and the public enjoyment and use thereof”.
5. “All campgrounds will be of a rustic nature without utility hookups and other elaborate facilities . . . All facilities and appurtenances are to be constructed of natural materials to the fullest extent possible so as to blend with the natural environment”.
6. “The maximum size of future campgrounds in the Park will be in the range of **75 to 150** individual camping sites”.
7. “The **older, existing campgrounds will** be rehabilitated and reconstructed . . . to reflect modern site planning principles that will better blend the facilities with the environment and **comply with the provisions of [the APSLMP]**”.

The draft UMPs for the Rollins Pond and Golden Beach do not comply with these key provisions of the APSLMP. Since the campgrounds were originally created and opened some 92 to 68 years ago, before 1972, they were not planned in accordance with the APSLMP, which was adopted in 1972. Modern planning must be used to ensure that the campgrounds and all of their facilities are “located, designed and managed so as to blend with the Adirondack environment and to have the minimum adverse impact possible on surrounding state lands”.

The proposals within the two draft UMPs include 286 camping sites at Rollins Pond, and 204 camping sites at Golden Beach. These numbers are 90% and 30%, respectively, greater than the maximum number of campsites allowed by the APSLMP. The number of camping sites at the two campgrounds must be reduced to bring them into compliance with the APSLMP. Notably, the draft UMPs state that there are vacancies at the campgrounds. The vacancies indicate that the campgrounds have an excess number of campsites and should be reduced in size and the number of campsites.

In addition, the draft UMPs need to involve more plans and proposals, such as removing campsites that are more distant from the most intense area of the campgrounds, adding more vegetative plantings and the elimination of pavement, to make the “facilities . . . blend with the natural environment”, “to reflect modern site planning principles that will better blend the facilities with the environment”, and that “preserve the scenic, natural and open space resources

of the intensive use area”. For instance, at the Rollins Pond campground, sites 141 through 258 should be removed. Additionally, the campgrounds should not be designed to accommodate 40-foot-long recreational vehicles. Sites that are big enough for vehicles of that size and type do not “blend with the natural environment”, they are “customarily provided by private campgrounds”, and they could compete with private campgrounds with more elaborate facilities, which is discouraged by the APSLMP. APSLMP pp. 41-42.

The UMPs should make proposals (e.g., removing or relocating structures, privies, sewage systems, or campsites, and adding vegetative screening) to ensure that there will be no “new, reconstructed or relocated buildings or structures” located within 150 feet of the shorelines or within 100 feet of wetlands, that there will be no campsites within 100 feet of the shorelines, and that all buildings, structures and campsites are screened from the water to protect “the natural character of the shoreline and the public enjoyment and use thereof”.

Carrying Capacity

A carrying capacity study must be conducted for these two units to ensure that the ability of the lands and waters to withstand various uses, and the public’s experiences, are not overwhelmed or degraded. This is particularly important for these two units given that they have the potential to be “threatened by overuse” due to their use as campgrounds for thousands of campers. APSLMP p. 11. We are pleased to see that some discussion of carrying capacity is included in the draft UMPs, and that problems (“opportunities for solitude may be limited”) and some negative impacts are anticipated to be reduced as a result of management actions proposed in the UMPs. However, the draft UMPs do not actually assess whether the carrying capacity, particularly the biological carrying capacity, of the areas have been or will be exceeded. The draft UMPs need 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.

In addition, 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. We support the proposal in the Golden Beach UMP to replace the boat launch with a hand launch¹, and we suggest that the same be proposed for the Rollins Pond campground boat launch. The draft Rollins Pond UMP does not contain any indication that the resources and ecosystems of the area will not be adversely impacted by the proposal to retain the existing boat launch. In the absence of a carrying capacity study relating to the waters of Rollins Pond, motorized boats should not be permitted at the Rollins Pond boat launch. This management action would help to ensure that invasive species do not enter Rollins Pond or Whey Pond.

¹ We suggest that barriers be added to ensure that motor boats are not launched at the new hand launch site.

Alternatives Must be Analyzed and Described in the UMPs

The two draft UMPs imply (p. iii) that alternatives were considered, but there must be an analysis of alternative management actions set forth in the draft UMP. Given the use of the Rollins Pond campground in conjunction with the nearby Fish Creek campground, the Rollins Pond UMP should evaluate as an alternative the closure of the Rollins Pond campground at a point in the future. The Fish Creek campground is a large campground that already provides public access to the same areas.

The Rollins Pond UMP indicates (pp. 1, 3) that the campground was originally opened with 35 campsites, and then expanded, to “meet the increasing need for campsites at neighboring Fish Creek Pond Campground”. Since camping attendance at this campground is trending down overall (excepting 2021 and 2022, likely due to the pandemic), DEC must at least evaluate a reduction in the number of campsites that would reduce the adverse impacts on the surrounding State lands.

We oppose the proposal to allow “extended camping permits” at the Rollins Pond campground (UMP p. 29). There is no indication of how long the “extended camping permits” would allow people to camp at the campground, and there are no details about how DEC plans to prevent campers from constructing permanent structures on the sites, or how it plans to manage evicting people from the campground if they overstay their extended reservation. Again, since camping occupancy is trending down, and there is an average of 64% occupancy of the campground, DEC should consider reducing the number of campsites by 50% at the Rollins Pond campground.

Reclassification of Lands

Again, the UMP should evaluate the option of closing Rollins Pond campground and reclassifying these lands as Wild Forest. Short of closure, the Rollins Pond UMP should consider closing the northern half of the campground and reclassifying those lands as Wild Forest. In either event, the UMP should clearly state the acreage of land that is proposed to be reclassified to Wild Forest and the acreage of land that is proposed to be reclassified to Intensive Use.

Also, Exhibit 15 shows a portion of land at the far northern end of the campground as proposed for reclassification from Wild Forest to Intensive Use, but that is not explained in the text of the draft UMP at page 27. The reclassification on the map appears to be related to the proposed foot trail to connect to the Adirondack Rail Trail Corridor described on page 28 of the UMP. We oppose any proposal to expand the footprint of the campground to the north, and we oppose the reclassification of that portion of land from Wild Forest to Intensive Use. The Saranac Lakes Wild Forest UMP already proposed a trail in that location and did not propose reclassification of the lands to Intensive Use. There is no justification to do so when the remainder of that area to the north is classified Wild Forest, with the exception of the Remsen Lake Placid Travel Corridor.

With respect to the Golden Beach UMP, we support reclassification of 31.1 acres to Wild Forest. In addition, we suggest that DEC consider reclassifying to Wild Forest all of the lands south of campsites 207 & 208.

On behalf of the Board of Directors of Protect the Adirondacks, please accept our gratitude for the opportunity to share our comments on these draft UMPs.

Sincerely,

Handwritten signature of Claudia K. Braymer in cursive script.

Deputy Director

cc: Megan Phillips, Adirondack Park Agency Deputy Director for Planning