

**Adirondack Council  
Adirondack Lakes Alliance  
Adirondack Mountain Club  
Adirondack Wild: Friends of the Forest Preserve  
Protect the Adirondacks!  
Sierra Club Atlantic Chapter  
Upper Saranac Foundation**

January 2, 2024

Honorable Kathy Hochul  
Governor of the State of New York  
NYS Capitol Building  
Albany NY 12224

Re: \$1M Needed for Carrying Capacity Study for the Saranac Chain of Lakes

Public and private recreation continues to put pressure on waterbodies in the Adirondack Park. Assessing the levels of acceptable use through a carrying capacity analysis of specific areas of the public Forest Preserve, especially for lakes and ponds, has been a requirement in the Adirondack Park State Land Master Plan for decades. Despite the plain language of the Master Plan, the state has not yet organized any such studies for major lakes and ponds.

We urge you to include \$1 million in your Executive Budget Proposal for the state to conduct the mandated and long-overdue carrying capacity study for the Saranac Chain of Lakes and other water bodies in the Adirondack Park. This study has been required by law for 50 years, but has never been completed for the extensive network of water bodies within the Park. While use of the central High Peaks Wilderness is currently undergoing a Visitor Use Management pilot study by a consulting group under contract with the DEC, that study is relatively narrowly focused on visitor experiences from a social standpoint. A robust carrying capacity study as called for in the Adirondack Park State Land Master Plan, based on the physical, biological and social characteristics of water-based and shoreline uses of Adirondack lands and waters, is needed now more than ever due to increasing development pressure around the Saranac Chain of Lakes.

The Adirondack Park State Land Master Plan is clear that carrying capacity analyses are required for Adirondack lakes and ponds, stating that:

“A comprehensive study of Adirondack lakes and ponds should be conducted by the Department of Environmental Conservation to determine each water body's capacity to withstand various uses, particularly motorized uses and to maintain and enhance its biological, natural and aesthetic qualities. First emphasis should be given to major lakes and ponds totally surrounded by state land and to those on which state intensive use facilities exist or may be proposed. The importance of the quality of these resources cannot be overemphasized.” (p.4)

In 2011, the Department of Environmental Conservation (DEC) commissioned the preparation of a roadmap for conducting the studies, [Adirondack Park Forest Preserve Carrying Capacity of Water Bodies Study, Phase 1](#), but nothing further has been accomplished. In 2023, the decision of a recent lawsuit, *Thomas Jorling vs Adirondack Park Agency, New York State Department of Environmental Conservation, and LS Marina, LLC, 214 AD3d 98 (3d Dept. 2023)*, which overturned an APA permit for an expanded marina on Lower Saranac Lake, stated that it was truly “inexplicable” that such a study has not been prepared for that lake. A carrying capacity study is critical to analyzing scenic, aesthetic and experiential impacts to recreational users, water quality, fish and wildlife, invasive species, and noise levels from increased motorboat traffic and other activities associated with projects subject to review by the DEC and APA.

The Saranac Chain of Lakes has long been one of the most popular and heavily used networks of lakes and ponds in the Adirondacks. These lakes are intermixed with private lands and camps and extensive Forest Preserve holdings, where public access to the lakes and dozens of campsites is facilitated by public boat launches and private marinas. Most of the Forest Preserve is managed through the Saranac Lake Wild Forest Unit Management Plan (UMP). From the Saranac River to Upper Saranac Lake and linked waterbodies the Saranac Lake Wild Forest UMP covers over 19,000 acres. Upper Saranac Lake is the fifth largest lake in the Adirondack Park, Lower Saranac Lake is number 18, Middle Saranac Lake ranks 24<sup>th</sup>, and Oseetah Lake is 32<sup>nd</sup>. These lakes link to Lake Flower, Kiwassa Lake, Weller Pond, Little Weller Pond, and the Fish Creek Ponds, among others. State facilities include boat launches and the immensely popular Fish Creek and Saranac Lake Islands Campgrounds. Together this array of interconnected lakes and ponds comprise the “Saranac Chain of Lakes”.

The Saranac Lake Wild Forest (“SLWF”) UMP governs the lakes and ponds throughout the Saranac Chain of Lakes. The SLWF UMP recognizes that boat use has potentially significant environmental and social impacts including the “introduction of nutrients, petroleum products, effluent, sediment, and invasive species; damage to riparian vegetation; and disturbances to bird nesting . . . also impacts to the recreational experience caused by use on water bodies. Crowding and conflict impact one’s experience on a waterbody”. (SLWF UMP p 111). The SLWF UMP further explains that motorboats “have the potential to cause a greater variety and more significant impacts than non-motorized watercraft.” (p 75).

To address these impacts, the SLWF UMP identifies the need for “a comprehensive [carrying capacity] study” of the waterbodies in the Saranac Chain of Lakes. (p 112). It is clear that the Master Plan set out the legal mandate for carrying capacity studies for the Adirondack Park, and the SLWF UMP explicitly calls for a carrying capacity study for the Saranac Chain of Lakes. Moreover, recent proposals to add even more motorboats to an already overburdened system of lakes and ponds must be evaluated in the context of the carrying capacity of those waterbodies in order to fully understand the proposals’ impacts.

The DEC must commit the resources by hiring an expert consulting group to undertake a carrying capacity analysis on the Saranac Chain of Lakes in accordance with the methodology in the previously prepared [Adirondack Park Forest Preserve Carrying Capacity of Water Bodies Study, Phase 1](#). The undersigned groups stand prepared to assist in this effort as the DEC manages the process of undertaking a carrying capacity analysis.

Sincerely,

Peter Bauer, Executive Director, Protect the Adirondacks

Raul J. Aguirre, Executive Director, Adirondack Council

Julia Goren, Deputy Director, Adirondack Mountain Club

David Gibson, Managing Partner, Adirondack Wild: Friends of the Forest Preserve

Roger Downs, Conservation Director, Sierra Club Atlantic Chapter

Tom Swayne, President, Upper Saranac Foundation

Scott Ireland, Executive Director, Adirondack Lakes Alliance

cc: Hon. Basil Seggos, NYS DEC Commissioner  
Barbara Rice, APA Executive Director