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and Counsel*

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Via Email

July 22, 2025

Benjamin Thomas
Supervising Forester
NYS Department of Environmental Conservation
232 Golf Course Road
Warrensburg NY 12885

**RE: Great Camp Santanoni Accessibility for People with
Disabilities; Electric Wheelchair Program Review and Long-
term Accessibility Options**

Dear Mr. Thomas:

Protect the Adirondacks (PROTECT) appreciates the opportunity to provide comments on the proposal by the Department of Environmental Conservation (DEC) to expand motorized access to Great Camp Santanoni for persons with disabilities. Great Camp Santanoni is located on Forest Preserve lands classified as an Historic Area by the Adirondack Park State Land Master Plan (Master Plan).

PROTECT fully supports public recreational access to the Forest Preserve for people of all abilities, including the use of wheelchairs on the Forest Preserve. We also support the use of motor vehicles on specified State lands for qualified people with disabilities where appropriate pursuant to DEC's Commissioner Policy-3 (CP-3), Motorized Access Program for People With Disabilities, which complies with Article 14 of the New York State Constitution and the Master Plan. However, DEC's proposal to allow public motorized access to Camp Santanoni violates both the Unit Management Plan (UMP) for the Camp Santanoni Historic Area and CP-3. In addition, the proposal to have DEC staff operate golf carts on the Newcomb Lake Road for the purpose of transporting persons with disabilities to Camp Santanoni does not comply with Commissioner Policy 17: Administrative Use of Motor Vehicles and Aircraft in the Forest Preserve (CP-17).

Finally, DEC is currently developing a statewide policy for the public's use of Other Power Drive Mobility Devices (OPDMD) on State lands, including on

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the Adirondack Forest Preserve, and it is therefore premature for DEC to establish a separate and unrelated policy for the use of OPDMDs at a single location: Camp Santanoni.

Motorized Access is Prohibited by the Camp Santanoni UMP

Camp Santanoni Historic Area must be managed to “preserve the quality and character of the historic resources” on the site. Master Plan at 46. Further, all management actions at Camp Santanoni must comply with the approved UMP, which states that the public – including persons with disabilities – are “encouraged to use historically appropriate means of access”. UMP at 63. The UMP states that the historically appropriate means of access is non-motorized, and that DEC will provide free “non-motorized access” to Camp Santanoni via “horse and wagon” or “similar services” for persons with disabilities (*id.* at 65). The UMP makes clear that all motorized access by the public is prohibited. *Id.* at 63.

While some motorized administrative access by DEC officials is authorized by the UMP, it is strictly “limited to that level of motorized access which is necessary to conduct the maintenance activities authorized by this UMP”. *Id.* Neither the maintenance activities authorized by the UMP nor the emergency response duties of Environmental Conservation Police Officers or Forest Rangers (*id.* at 64) include providing motorized access to Camp Santanoni for members of the public. Therefore, all members of the public, including people with disabilities, are prohibited from using motorized means to access Camp Santanoni.¹

In any event, the proposed use of DEC staff (or contractors) to ferry people with disabilities from the Gate Complex to the Main Camp along the five-mile Newcomb Lake Road is not an administrative use pursuant to the controlling DEC policy, Commissioner Policy 17: Administrative Use of Motor Vehicles and Aircraft in the Forest Preserve (CP-17). CP-17 specifies that permitted administrative uses that may utilize motor vehicles include activities such as “search and rescue operations, forest fires, or oil spills,” “maintain[ing or constructing] existing structures, improvements or ranger stations,” and “preserv[ing] or enhance[ing] the water or fishery resources.” CP-17 at 3-4, 6. Offering rides to the public is not an allowed administrative use of motor vehicles on Forest Preserve lands. Notably, “since the Santanoni Historic Area [is] managed in a manner which is consistent with the guidelines for Wild Forest areas,” DEC must follow the reporting and record keeping requirements of CP-17 for motorized access in the Santanoni Historic Area. UMP at 64.

Finally, as a practical matter, it is difficult to understand how DEC can claim to have staffing and financial resources sufficient to offer a free shuttle service to members of the public while simultaneously claiming that it has insufficient staff and financial resources to undertake other critical Forest Preserve management tasks.

¹ Notably, the UMP also precludes the so-called administrative trips taken by DEC personnel to the Main Camp to provide perishable goods and supplies to caretakers at the Main Camp. DEC should immediately end that practice and ensure that supplies not related to maintenance activities are brought in only by nonmotorized means.

Motorized Access is Not Allowed by CP-3

According to CP-3 (section IV), and in compliance with the Americans with Disabilities Act (ADA), there is “no restriction on or permit needed by a person with a disability accessing public lands by the use of a mechanized aid”. A “mechanized aid” includes a “motorized wheelchair, or other similar devices, such as a three-wheeled mobility device, designed solely for use by a mobility impaired person for locomotion that is suitable for indoor use”. Therefore, the use of a personal powered wheelchair to access Camp Santanoni is allowed by CP-3.

In contrast, the use of OPDMDs such as golf carts is not permissible on the Newcomb Lake Road under CP-3 because the road has not been designated for such motor vehicle use and it is therefore ineligible for motor vehicle use pursuant to a CP-3 permit. Moreover, roads in the Adirondack Park designated for CP-3 use are “limited to designated and specifically marked roads on lands classified as Wild Forest and Intensive Use.” CP-3, Section IV. Thus, motor vehicle use of the Newcomb Lake Road, which is classified as an Historic Area, is not authorized under CP-3.

Use of OPDMDs Needs Further Assessment

As noted above, DEC is developing a statewide policy on the use of OPDMDs on State-owned lands, including the Adirondack Forest Preserve, in accordance with the federal Department of Justice regulations. It is therefore premature, needlessly duplicative, and has the potential to produce conflicting outcomes, for DEC to be simultaneously developing a stand-alone OPDMD policy for a single unit of Forest Preserve land in the Adirondack Park. We respectfully urge DEC to table this proposal pending the adoption of the statewide OPDMD policy that incorporates an analysis of all of the necessary considerations (i.e., “fundamental alteration to the nature of the program” and the applicable “assessment factors”). Accordingly, DEC should not procure OPDMDs for use at Camp Santanoni.

Conclusion

PROTECT urges DEC to find nonmotorized alternatives to provide people with disabilities access to Camp Santanoni in a way that is in harmony with the sense of history and remoteness that makes it unique, and that complies with the UMP and applicable DEC policies. We suggest that DEC consider purchasing a smaller/lighter accessible horse drawn wagon and also consider contracting for services that assist and empower people with disabilities to make the trip using adaptive hiking and cycling. See <https://bcmos.org> for examples of how an organization is offering people nonmotorized access to areas that are remote and have uneven terrain.

On behalf of the Board of Directors of PROTECT, please accept our gratitude for the opportunity to share our comments on this proposal.

Sincerely,

A handwritten signature in black ink that reads "Claudia K. Braymer". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Claudia K. Braymer
Executive Director

cc: Megan Phillips, APA Deputy Director for Planning
Joseph Zalewski, DEC Region 5 Director
Leah Akins, DEC Statewide Accessibility Coordinator
Erin Tobin, Adirondack Architectural Heritage Executive Director