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Via Email

August 5, 2025

Steve Guglielmi
NYSDEC
PO Box 296
1115 State Route 86
Ray Brook, NY 12977

RE: Comments on Draft Scope for Debar Mountain Complex Unit Management Plan and Draft Environmental Impact Statement

Dear Mr. Guglielmi:

Protect the Adirondacks (PROTECT) appreciates the opportunity to submit comments on the Draft Scope prepared by the Department of Environmental Conservation (DEC) pursuant to the State Environmental Quality Review Act (SEQRA) for the Debar Mountain Complex Unit Management Plan and Draft Environmental Impact Statement (Debar UMP/DEIS).

The newly proposed actions include removing Debar Pond Lodge and the surrounding outbuildings and restoring those sites to a natural condition; providing public recreational facilities, including access to Debar Pond for persons with disabilities; providing interpretive signage describing the history of the site; expanding the existing trail network, creating new trail networks, rerouting poorly located trails and building new connector trails; building new parking areas and providing better access to water bodies; and constructing new primitive tent sites and closing tent sites that are not in compliance with the Adirondack Park State Land Master Plan (Master Plan).

General Comments

PROTECT applauds DEC's decision to reconsider and significantly revise the previous proposal for the Debar Mountain Complex Unit. The prior proposal would have reclassified a portion of the unit from Wild Forest to an Intensive Use Day Use Area and sought to amend Article 14 of the New York State Constitution to remove approximately six acres of the unit, including Debar Pond Lodge and surrounding buildings, from the Forest Preserve in order to transfer ownership of that part of the unit to a private entity.

Protect the Adirondacks

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As pointed out in PROTECT’s response to the prior proposal, the proposed Article 14 amendment would have transferred the most accessible and desirable access to Debar Pond into private ownership, thereby eliminating or restricting public access. Moreover, the proposal would have obligated the State to invest significant public funds into rehabilitating and maintaining a set of largely deteriorated structures with limited historical or architectural value. While Debar Lodge is listed on the National Register of Historic Places, it was built in 1940 and lacks the cultural and architectural significance of true Adirondack Great Camps such as Sagamore and Santanoni that were constructed in the Gilded Age of the late nineteenth century. Many of the surrounding outbuildings are in poor condition and offer no compelling reason for preservation.

PROTECT acknowledges and appreciates DEC’s consideration of the public comments raising these issues and its decision to reevaluate the prior proposal and develop a new and more appropriate plan for this unit. The revised approach represents a substantial improvement and a welcome realignment with the long-standing principles of wilderness preservation and public access that underpin the Forest Preserve.

That being said, PROTECT urges DEC to avoid any actions that would compromise the potential of Debar Pond and its surrounding lands to develop into a wilderness-quality area. The precedent established at Lake Lila—where the State removed Nehasane Lodge and restored the area’s natural character—demonstrates the long-term public value of such efforts. Today, Lake Lila is a cornerstone of the William C. Whitney Wilderness Area and a celebrated destination for wilderness recreation.

Debar Pond holds similar promise. With appropriate stewardship, it can become another Lake Lila, Boreas Ponds, Little Tupper Lake, or Henderson Lake—motor-free, wild, and deeply valued by the public for generations to come.

Specific Comments

Community Character: The Draft Scope incorrectly asserts that removal of Debar Lodge will “cause significant impacts to the community character of the area.” Draft Scope at 4. DEC has previously defined “community character” as the qualities that “create a sense of place or character *that defines the area.*”¹ (Emphasis added). In this case, the character of the Debar Mountain Complex is defined by Debar Mountain, Debar Pond, and the surrounding 71,000 acres of Forest Preserve—not by the less than one acre occupied by Debar Lodge.²

Indeed, DEC acknowledges that “the presence of the structures . . . detract[s] from the natural setting” and that “removal of the Debar Lodge and associated non-conforming structures will reestablish the wild character of the site.” *Id.* at 5, 11-12. Therefore, far from enhancing community character, the existence of Debar Lodge conflicts with it.

¹ DEC Full Environmental Assessment Form Workbook, available at <https://dec.ny.gov/regulatory/permits-licenses/seqr/eaf-workbooks/part-2-identification-of-potential-project-impacts/q18-consistency-with-community-character>.

² The Draft Scope’s additional claim that Debar Lodge is “a defining feature of the Debar Mountain Complex that helps shape the identity of the region” is inaccurate for the same reasons. Draft Scope at 7.

Moreover, Debar Lodge cannot as a matter of law define the community character of the Debar Mountain Complex because its presence is inconsistent with both the “forever wild” clause of the New York State Constitution and the Master Plan—a fact acknowledged by DEC. *Id.* Furthermore, as noted by DEC, the Town Board of the Town of Duane has adopted a resolution supporting the retention of the Debar Lodge lands as Forest Preserve, thereby implicitly endorsing their restoration to a natural state.

Similarly, the assertion that removal of the lodge “threatens to negatively impact the wild and unconfined scenic resources of the site,” Draft Scope at 7, contradicts DEC’s own acknowledgement that the lodge is inconsistent with the natural character of the area. In reality, the removal of Debar Lodge will enhance, rather than detract from, those wild and scenic qualities.

Public Recreational Facilities: The Draft Scope references plans to install public recreational facilities but fails to specify what those facilities will be. Draft Scope at 3. With the exception of a brief mention of picnic tables, *id.* at 8, the proposal is excessively vague. PROTECT urges DEC to avoid installing amenities—such as picnic tables—that could compromise the area’s wilderness character. All proposed recreational facilities should be clearly identified and evaluated for their ecological and aesthetic impact.

Trail System: The Draft Scope indicates plans to expand existing trails and create new ones, including connector trails, Draft Scope at 3, but does not specify the types of trails envisioned. PROTECT strongly opposes the construction of new snowmobile trails or other trails open to motorized use. All new trails should be consistent with Wilderness standards and support non-motorized recreation. If there are plans to construct new trails for—or open existing ones to—snowmobiles or other motor vehicles, the Department of Environmental Conservation (DEC) should thoroughly evaluate the potential impacts associated with increased motorized use. This assessment should include, but not be limited to, possible adverse effects on Wilderness and Wild Forest areas; fish, wildlife, vegetation, and habitat; land and both surface and groundwater resources; noise, odor, and light pollution; aesthetic and scenic values; and contributions to climate change through air and greenhouse gas emissions. Contrary to the approach outlined in the Draft Scope, which proposes to exclude these areas of potential impact, all such factors should be fully considered when evaluating any proposed increase in motor vehicle use.

Public Access: The Draft Scope proposes to address “deficiencies” in existing parking areas and construct new parking areas. Draft Scope at 3. DEC should explain the nature of the deficiencies and provide data or analysis justifying additional parking infrastructure.

Similarly, the plan to “improve access to water bodies” should be explained in more detail. *Id.* DEC should explain why or how existing access to water bodies is insufficient and describe how DEC plans to address those deficiencies without diminishing the wild character of the area.

Request for Interested Party Status

PROTECT respectfully requests that it be granted status as an interested party pursuant to the State Environmental Quality Review Act for this proposed action.

Conclusion

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

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Amato", with a stylized flourish at the end.

Christopher Amato
Conservation Director and Counsel