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June 1, 2026

Josh Clague  
Forest Preserve Coordinator  
Division of Lands and Forests  
New York State Department of Environmental Conservation  
625 Broadway, 5<sup>th</sup> Floor  
Albany, NY 12233-4254

**RE: Comments on High Peaks Project Area Visitor Use  
Management Pilot Project Final Recommendations Report and  
Monitoring Plan**

Dear Josh:

Protect the Adirondacks (PROTECT) has reviewed the High Peaks Project Area Visitor Use Management Pilot Project Final Recommendations Report and Monitoring Plan (VUM Report), prepared for the Department of Environmental Conservation (DEC) by its consultant, DJ&A, P.C.

PROTECT appreciates the opportunity to submit the following comments for DEC's consideration.

**General Comments**

PROTECT strongly supports DEC's application of the Visitor Use Management Framework (VUMF) to the central High Peaks Wilderness Area, as recommended in the final report of the High Peaks Advisory Group (HPAG). However, the VUM Report is significantly flawed because it fails to include data on the natural resource impacts of both current and increasing recreational use. The Adirondack Park State Land Master Plan (Master Plan) makes clear that its "unifying theme ... is that the protection and preservation of the natural resources of the state lands within the Park must be paramount." Master Plan at 1. The VUM Report's recommendations to implement significant, long-term management changes in the absence of any analysis of natural resource impacts is inconsistent with this Master Plan mandate and could lead to unintended adverse impacts to natural resources. Dramatic changes in policy—such as instituting a permit system or parking management—cannot and should not be considered in the absence of comprehensive, combined data on natural resource impacts, social impacts, recreational experience, and public safety.

**Protect the Adirondacks**

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Following release of the HPAG report, PROTECT successfully advocated with other groups for VUM funding to be included in the Environmental Protection Fund in the State Budget. When DEC's VUM project was launched with DJ&A, PROTECT served on the stakeholder group for the development of the High Peaks Wilderness VUM Plan.

During the stakeholder process, PROTECT and others pressed for a wider scope of research, but DEC cited budgetary constraints as compelling a more limited focus on social impacts. Although DEC acknowledged that SUNY College of Environmental Science and Forestry (ESF) was collecting natural resource data in the High Peaks Wilderness Area as part of the multi-year DEC-funded "ecological scorecard" effort, DEC rejected the request by the stakeholders that those data be incorporated in the VUM Plan. This flaw was not rectified and unfortunately renders the VUM Report incomplete and deficient.

Without a full data set on natural resource impacts, DEC is essentially guessing where thresholds are and when impacts become unacceptable. Data on natural resource impacts should be used to determine baseline and desired conditions. The VUMF utilizes this critical information to foster understanding of current impacts, establish baselines, assess changes over time, and proactively implement new measures to attain and maintain desired conditions. Data and analysis are crucial, foundational parts of this process. VUM planning simply will not work without an underlying foundation of accurate data concerning both the natural resource conditions and the public experiences in an area. The VUM Report's proposal to implement significant policy changes in the absence of the comprehensive analysis envisioned by the VUMF is premature and lacks an adequate scientific basis.

The lack of any natural resource analysis is inexplicable, given that DEC has partnered with SUNY ESF on a multi-year project to collect natural resource data in the High Peaks Wilderness and other Forest Preserve units in the Adirondack Park. PROTECT strongly supports this work and urges DEC to continue and increase its collaboration with state universities. However, we are perplexed as to why these important data were not integrated into the VUM Report.

The VUMF assumes that social and natural resource impacts will be evaluated together, in a single report, with recommendations grounded in a comprehensive understanding of both. Consequently, the VUM Report's omission of natural resource data limits fails to fully implement the VUMF and thus seriously limits the Report's usefulness for decision-making. This omission does not undermine the VUM Report's social-impact data or conclusions, but it fails to provide an adequate basis for some of the Report's proposed management actions. The natural resource data collected by SUNY ESF could influence—either positively or negatively—DEC's consideration of those actions. Accordingly, PROTECT urges DEC to integrate and social and natural resource impact analyses to fully align with and implement the VUMF. To that end, we urge DEC to change the Report's title to "Draft High Peaks Project Area Social Impacts Analysis and Monitoring Plan" to more accurately reflect the Report's limited scope. We also urge DEC to prepare a draft final report that integrates the social and natural resources impact analyses for the High Peaks Wilderness Area.

Consequently, it is premature—absent natural resource impact data—to consider parking limitations or restricting visitor use through a permit system, which are aggressive management approaches that, in PROTECT’s view, would be justified only by a robust data set addressing physical, biological, and social impacts together. Moreover, actions taken in response to identified natural resource impacts could reduce—or eliminate—the need for a permit system. For example, if the natural resource analysis recommends temporarily closing the heavily used Phelps and Van Hoevenberg trails to Mount Marcy, that step could allow seriously degraded and eroded trails to recover while simultaneously reducing hiker numbers, potentially achieving use-reduction goals without permits. Although institution of a permit system for the busiest days may ultimately be necessary, PROTECT believes such a significant policy change should be made only after considering a complete data set on physical, biological, and social impacts.

We nevertheless commend DEC’s collection of scientific data on social impacts to better inform its management decisions addressing the impacts of increasing recreational use pressures in the High Peaks. The VUM Report provides a science-based analysis of social impacts and outlines an achievable long-term monitoring program to support future impact analyses and to evaluate the effectiveness of adaptive management strategies.

### **Specific Comments**

#### **Inconsistency With the Adirondack Park State Land Master Plan**

As noted above, the VUM Report’s failure to address natural resource impacts is inconsistent with the Master Plan’s requirement that protection and preservation of natural resources must be paramount. However, the Report is partially consistent with the Master Plan insofar as it assesses social impacts as one component of the Wilderness characteristics identified in the Plan.

The Master Plan declares that a Wilderness area is one “where the earth and its community of life are untrammelled by man” and characterizes such areas as “having a primeval character . . . which is protected and managed so as to preserve, enhance and restore, where necessary, its natural conditions.” *Id.* at 24. The Master Plan further specifies that a Wilderness area “generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable” and “has outstanding opportunities for solitude or a primitive and unconfined type of recreation.” *Id.*

Recreational overuse is one of the primary threats to the Wilderness attributes identified in the Master Plan because it impinges on and diminishes the area’s untrammelled and primeval character. The VUM Report’s analysis of the social impacts of heavy recreational use supports DEC’s efforts to maintain and restore the untrammelled and primeval character of the High Peaks Wilderness Area and is therefore consistent with the Master Plan in this limited respect. The Report’s examination of solitude as a key indicator of the recreational experience is also consistent with the Master Plan’s goal that Wilderness areas offer outstanding opportunities for solitude.

However, the VUM Report’s adoption of differing desired conditions for the four High Peaks subregions identified in the report is inconsistent with the Master Plan because it creates artificial

and, in our view, unjustified distinctions between the characteristics and management goals for different parts of the same Wilderness unit. This issue is discussed in more detail below.

### **The VUM Report Should be Integrated with SUNY ESF’s “Ecological Scorecard” Work**

As discussed above, the VUM Report is significantly flawed because it fails to include any assessment of natural resource impacts. The VUM Report should discuss and integrate the “ecological scorecard” assessments by SUNY ESF that are ongoing in several Forest Preserve units, including the High Peaks Wilderness Area. The scorecard assessments have been performed annually by SUNY ESF since 2019 pursuant to a contract with DEC. In the High Peaks, the scorecards provide natural resource data for Marcy Dam, the new and old Cascade Mountain Trails, Bushnell Falls, Flowed Lands, Slant Rock, The Garden parking lot, and other sampling locations. Although it is our understanding that collection of natural resource data for the High Peaks has not been completed, inclusion of the six years of data already collected would provide a much-needed natural resource context for the VUM Report’s analysis of social impacts.

Unfortunately, the VUM Report fails to discuss the ecological scorecard project, or to explain how the Report’s analysis of social impacts aligns with the ongoing natural resource data collection in the High Peaks. The Report should include a discussion of the ecological scorecard project and explain how the social and natural resource data for the High Peaks will be integrated and evaluated by DEC.

### **The Desired Conditions Should be Consolidated and Refined**

A key component of the VUMF is selection of desired conditions for the area being studied. The VUM Report identifies desired conditions for the Overall High Peaks Project Area and includes additional, individual desired conditions for the Adirondack Loj Road, Cascade/Mt. Van Hoevenberg, Johns Brook Valley, and Outer High Peaks subregions. PROTECT finds the Report’s description of desired conditions to be generally satisfactory but questions the usefulness or appropriateness of assigning separate desired conditions for each subregion.

The VUM Report provides no clearly articulated rationale for designating separate desired conditions for each of the four subregions. Additionally, the Master Plan’s descriptions of the character and management objectives for Wilderness areas apply universally to all areas designated Wilderness. Thus, the delineation of independent and differing desired conditions for individual subregions of a single Wilderness unit is, in our view, inconsistent with the Master Plan.

In fact, several of the desired conditions identified for individual subregions are appropriate for all areas designated as Wilderness. For example, the following subregion desired conditions can (and should) apply to the entire High Peaks Wilderness Area:

- Beyond the trailhead, there are only minimal recreational facilities, and the emphasis is on opportunities for solitude, challenge, autonomy, quiet contemplation, and primitive recreation.
- The presence of administrative personnel is limited to allow visitors to practice self-reliance as they spend time in the area.

- The area offers opportunities for visitors to escape into the Wilderness on multi-day backpacking trips with overnight stays at lean-tos, primitive campsites, or dispersed backcountry campsites.
- Visitors can expect to encounter others, but do not experience crowded conditions and can find solitude.
- Visitors can move at their own pace while they are hiking and can find personal space along the way to and at their destinations.
- Backpacking in this area provides visitors with a sense of Wilderness immersion.
- The area offers the reward of mountain top views.

In addition, several of the subregion desired conditions are extremely difficult or impossible to measure. For example, a desired condition for the Cascade/Mt. Van Hoevenberg Subregion is to be a place “where visitors build lasting memories that inspire future visits.” VUM Report at 18. It is unclear how this condition could be measured. The same is true of several other subregion desired conditions, *e.g.*, Adirondack Loj Road (offering the opportunity for a “pilgrimage”); Cascade/Mt Van Hoevenberg (builds “wilderness advocacy”).

Accordingly, the desired conditions for the High Peaks Wilderness subregions should be consolidated into a single set of desired conditions for the entire High Peaks Wilderness Areas and they should be revised and refined to ensure that they are capable of being reliably measured.

### **The Indicators Are Reliable and Useful**

PROTECT supports the VUM Report’s selection of people-per-viewscape (PPV), intergroup encounters per hour of hiking, and vehicles-at-one-time (VAOT) as indicators. These indicators can be reliably measured and monitored, are standard indicators utilized in the VUMF, and provide a quantifiable measurement of crowding on trails and summits.

We emphasize, however, that these social indicators are only one aspect of the VUMF and must be integrated with natural resource desired conditions and indicators in order to provide a comprehensive data set for managing the High Peaks Wilderness Area. Any future determinations and applications of carrying capacity should require that management agencies protect and enhance environmental and experiential conditions rather than allowing them to degrade to limits of acceptable change.

### **Parking Problems and Solutions**

The VUM Report correctly notes that parking access to the High Peaks Wilderness needs to be improved through better management of parking. PROTECT commends DEC for constructing a new trail to Cascade Mountain, accessed from the Mt. Van Hoevenberg Winter Olympic Sports facility, so that the existing trail and associated parking areas on Route 73 can be closed. These changes will significantly improve public safety while at the same time providing a sustainably located and constructed new route to this very popular summit destination. We urge DEC to continue making completion of the new Cascade Mountain Trail a priority.

However, as stated in our General Comments above, the VUM Report’s recommendations for parking management, including limits and enforcement at the Adirondack Loj and Cascade

Mountain parking area, are premature and not adequately supported by the comprehensive data analysis required by the Master Plan and the VUMF.

In addition, we are disappointed that the report does not address parking issues for the Johns Brook subregion, other than to recommend that DEC work with the Town of Keene to address those issues. PROTECT believes this work should have been done by the consultant and included in the report.

### **Build Long-Term Institutional Capacity for Visitor Use Management**

PROTECT supports the Report's acknowledgment that visitor use monitoring requires dedicated staffing, but we are concerned that the proposed staffing model does not match the scale of the challenge. Effective visitor use management in the Adirondacks requires more than periodic monitoring and temporary field technicians—it demands sustained professional capacity, technical expertise, and long-term institutional commitment. Visitor use management is an interdisciplinary practice requiring rigorous research design, data analysis, adaptive management, stakeholder coordination and engagement, and implementation of management actions over time. A staffing model centered around a partial- to full-time coordinator and short-term seasonal support as proposed in the Report risks slowing progress at a time when ecological and visitor experience pressures in the High Peaks are already well documented. PROTECT encourages DEC to make a more meaningful investment in permanent visitor use management capacity, including staff with demonstrated expertise in large-scale visitor use research and implementation. If New York intends to take visitor use management seriously as a long-term stewardship strategy, staffing investments must reflect that commitment.

### **Outer High Peaks Subregion**

The VUM Report identifies an Outer High Peaks Subregion but does not assess impacts in that subregion or offer management recommendations for it. No explanation is provided for this omission. The Report should address this subregion.

### **High Peaks Project Area-Wide Recommendations**

PROTECT encourages DEC to implement the general strategies and actions identified in the VUM Report throughout the High Peaks Project Area. These include working with municipal and nongovernmental partners to provide the public with more information about trip planning, sustainable visitor-use practices (Leave No Trace), and alternative hiking destinations. However, this information should be provided in environmentally sensitive ways compatible with the Adirondack Park and the Forest Preserve (such as through online resources or staff at trailheads), rather than through placement of intrusive, large electronic signs along major travel corridors bordering Forest Preserve lands, as has occurred in the past.

We also urge DEC to continue the long-term data gathering and monitoring proposed in the VUM Report. We strongly support the Report's recommendation to complete an assessment of the impacts of recreational use on natural resources and urge DEC to inform the public how it intends to integrate the findings, conclusions and recommendations in the VUM Report with the ecological scorecard data for the High Peaks being collected by SUNY ESF.

DEC should consider reorganizing an ongoing High Peaks Wilderness Stakeholder Advisory Group to facilitate information sharing, collaboration, and problem-solving for management of the High Peaks Wilderness Area. The group should include local government, relevant agencies and institutions, stakeholder organizations, and members of the general public, among others, and should meet on a regular basis. PROTECT would welcome the opportunity to serve on such an advisory group.

PROTECT strongly supports the Report's recommendation that DEC use the VUMF in other Forest Preserve units, with the important caveat that future use of the VUMF should ensure that natural resource, social and recreational impacts and analysis are integrated in a single report.

Finally, we urge DEC to complete the VUM Guidance policy document and to begin applying it to other highly visited Forest Preserve units, such as the Lake George Wild Forest.

### **Conclusion**

PROTECT considers the VUM Report to be incomplete and flawed. Nevertheless, the Report is an important first step in developing a comprehensive carrying capacity analysis for the entire High Peaks Wilderness Area. We look forward to preparation of a final report analyzing natural resource impacts in the High Peaks. We urge DEC to ensure that the findings and recommendations concerning natural resource impacts, social impacts, recreational experience, and public safety are integrated to ensure that future management decisions are informed by a robust, science-based data set.

On behalf of the Board of Directors of Protect the Adirondacks, thank you for the opportunity to provide these comments on the VUM Report.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Amato", written in a cursive style.

Christopher Amato  
Conservation Director and Counsel