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Via Email: steve.guglielmi@dec.ny.gov

August 5, 2026

Steven Guglielmi
New York State DEC - Region 5 Office
Division of Lands and Forests
1115 State Route 86
P.O. Box 296
Ray Brook, NY 12977-0296

**Re: DEC Project #2026-RB-002
Floodwood and Little Square Ponds Tent Site Changes
Saranac Lakes Wild Forest**

Dear Mr. Guglielmi,

Protect the Adirondacks ("PROTECT") has reviewed the draft Work Plan prepared by the Department of Environmental Conservation (DEC), which was noticed in the July 22, 2026 Environmental Notice Bulletin, for the proposed work to replace nine primitive tent sites in the Saranac Lakes Wild Forest. We appreciate the opportunity to provide comments on the above-referenced project that will involve building six new primitive tent sites at Floodwood Pond and three new primitive tent sites at Little Square Pond, and then closing a corresponding number of existing primitive tent sites.

The Saranac Lakes Wild Forest Unit Management Plan ("UMP") identified that many of the primitive tent sites are out of compliance with the State Land Master Plan and that they are experiencing significant visitor use impacts. Accordingly, the UMP states that there will be changes to the current arrangement of primitive tent sites to bring them into compliance with the Adirondack Park State Land Master Plan ("SLMP") and to reduce the negative impacts to natural resources and visitor enjoyment.

We applaud the Department for undertaking this work to implement the primitive tent site changes outlined in the UMP for Floodwood and Little Square Ponds. The closure and replacement of the nonconforming primitive tent sites with conforming ones will serve to address the ongoing adverse impacts to vegetation, soil, water quality, and visitor experiences.

Protect the Adirondacks

PO Box 48, North Creek, NY 12853 518.251.2700

www.protectadks.org info@protectadks.org

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Location and Number of Sites

Notably, the UMP at page 146 (and Map 2) states that seven (7) primitive tent sites need to be closed, and only six new ones can be constructed. DEC's proposed Work Plan calls for the closure of only six primitive tent sites on Floodwood Pond. The draft Work Plan proposes to leave in place a primitive tent site on the eastern end of Floodwood Pond that is identified for closure in the UMP (Map 2). We urge DEC to close the additional primitive tent site pursuant to the UMP.

Moreover, according to the UMP, at Little Square Pond, three sites will be closed and three new ones constructed. While the draft Work Plan calls for closing three primitive tent sites and constructed three new ones as directed in the UMP, the Work Plan appears to have two sites on the northeast part of Little Square Pond reversed. According to the UMP (Map 2), the easternmost site of the two sites on Little Square Pond Trail along Little Square Pond is supposed to remain open, but the draft Work Plan shows the easternmost site as being closed and the other site remaining open. We request that DEC correct this apparent mistake in the draft Work Plan.

Construction of New Sites

The Work Plan should state that the new tent sites will be located at least 150 feet from the edge of the water or describe why a closer distance is more protective of the natural resources at the site.¹ See 6 NYCRR § 190.3(b). Additionally, the new tent sites should incorporate screening, through existing or plantings of new trees/vegetation, "to protect the wild character of the shoreline" as required by the *Management Guidance: Siting, Construction and Maintenance of Primitive Tent Sites in Wilderness, Primitive, Canoe and Wild Forest Areas on Forest Preserve Lands in the Adirondack Park* ("Management Guidance for Primitive Tent Sites", page 6). Placing new tent sites directly on the edge of the water will lead to the creation of new impacts to vegetation, soil, water quality, and visitor experiences that are already taking place with the current sites and that this work is seeking to address.

We note that the draft Work Plan states that the total developed area for all nine primitive tent sites to be constructed will be approximately 6,228 square feet, or approximately 700 square feet per site for three tent pads at each site, a fire ring, and a canoe take out. However, that number does not appear to take into consideration the total ground surface area that will be impacted by visitor use of the site. DEC should ensure that each site does not exceed the size allowed pursuant to the requirements of the *Management Guidance for Primitive Tent Sites*, and reduce the ground surface area impacted if needed.

The draft Work Plan proposes to remove vegetation at the shore of the ponds at each of the new tent site locations in order to "allow easier access". However, the *Management Guidance for Primitive Tent Sites* (at page 7) requires primitive tent sites to "have an undeveloped character".

¹ The UMP (at page 144) states that the impacts from the use of the primitive tent sites is a "threat to water resources because many of the primitive tent sites are close to the water's edge". Those impacts should be avoided by not siting the new primitive tent sites within 150 feet of the water's edge.

The SLMP and the *Management Guidance for Primitive Tent Sites* does not allow for other features such as hardened water access areas to be associated with primitive tent sites for ease of access. The Work Plan should state that vegetation will not be removed, and no ground disturbance of the shoreline should take place unless it is necessary to ensure that foot traffic to the primitive tent site will not cause serious erosion problems.

Closure and Restoration of Old Sites

We support the draft Work Plan's proposal to restore the closed site to a natural state by planting trees or other vegetation, adding organic matter, placing large rocks within the site, scarification of compacted soil, and controlling surface flow of water across the site.

The Work Plan should state that all non-natural waste and leftover materials from the old sites and from the construction of new sites will be hauled away from the sites.

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

Sincerely,

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

Claudia Braymer
Executive Director

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