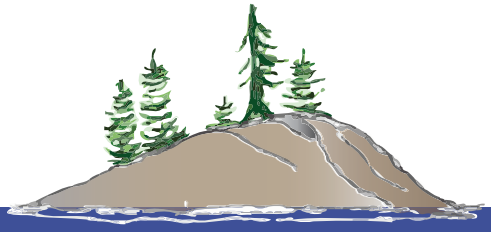
Upper Saranac Foundation

It still is, and always will be, about Water Quality.



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Josh Houghton, EPS2 (NR)
NYS DEC Bureau of Recreation
625 Broadway, Albany, NY 12233-5253
(via electronic submission)

RE: Rollins Pond Public Campground Unit Management Plan

On behalf of the Upper Saranac Foundation, we would like to thank you for the opportunity to offer the following comments on the Rollins Pond Public Campground Unit Management Plan (UMP).

The Upper Saranac Foundation (USF) appreciates the time and efforts that the NYSDEC has put into the preparation of the UMP. The Department's goals and the criteria established in the Adirondack Park State Land Master Plan will ensure the protection of the natural resources and vitality of the Saranac Watershed.

Given that the Rollins Pond Campground is one of the most popular campgrounds in the Adirondacks, it is apparent that visitors are attracted to the natural beauty of the Watershed. Key attributes of the Campground include pristine waters, recreational access to miles of open water in the Saranac Lake Wild Forest, and access to the 5,000-acre Upper Saranac Lake (USL).

The USF has a long history of advocating for the protection the watershed for the benefit of its users, land owners, and visitors. This includes the purchasing, refurbishing and the maintenance of the Bartlett Carry Dam. The Foundation's maintenance of the Dam ensures the consistent water levels of the Watershed. Consistent water levels mean continued recreation to the areas many visitors and to ongoing water quality.

One of the greatest threats to Rollins Pond Campground and the watershed are Aquatic Invasive Species (AIS). To combat AIS the Upper Saranac Foundation (USF) has spent over 3.5 million dollars on AIS management, on the Watershed Stewardship Program, and for an AIS Decontamination Unit on USL.

The Foundation also has a long history of partnering with the NYSDEC for the betterment of the watershed. The USF has expanded AIS management and harvesting efforts to include waterbodies entirely within Forest Preserve, including Fish Creek Campground.

The USF Board supports and encourages proposals in the draft of the Unit Management Plan that are protective of the watershed. In particular, the USF supports the planting of trees and shrubs and the restoration of overused and eroded campsites. The USF agrees that this restoration should include, rotating campsite use, replacing lost soils, regrading sites, improving drainage at these sites, and finally taking steps to assure shoreline stabilization.

While these improvements are excellent and important, the USP would like to suggest more to ensure protection of the natural resources. The USF's suggested enhancements to the proposed UMP are:

Carrying Capacity: All DEC campground facilities should be operated within the physical, biological and social carrying capacity of the site, as required by the SLMP. Unfortunately, any waterbody carrying capacity information is absent from the proposed UMP.

The Master Plan states: "*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."* (p 4). The Master Plan requires that every UMP "contain . . . an assessment of the physical, biological and social carrying capacity of the area with particular attention to portions of the area threatened by overuse." (p 10-11). Based on the analysis of carrying capacity, the UMP must include "*the regulation or limitation of public use such that the carrying capacity of the area is not exceeded . . .*." (p 10-11).

The USF feels strongly that any proposed management actions that include enlargement or improvement to the Rollins Pond Boat launch for better accessibility for motorized watercraft requires an assessment of the waterbody's carrying capacity.

Finally, the UMP needs to evaluate and assess the campground effects on the waterbody it encompasses, as well as its impact on neighboring waterbodies.

Invasive Species: The SLMP emphasizes that the "*growth of invasive species cause the loss of biodiversity, interruption of normal hydrology, suppression of native vegetation, and significant aesthetic, human safety and economic impacts*" (P 12).

Despite this concern, the proposed management actions fail to elaborate on specific preventive strategies within the campground to thwart the spread of aquatic invasive species (AIS). The UMP, in compliance with the SLMP, must provide "*actions to minimize adverse impacts on the resources of the area*" and "*preservation of aquatic and terrestrial habitats*" (P11).

Without AIS preventative measures in the UMP, invasive species become a real threat to recreation and tourism.

In 2014, the Adirondack Park Invasive Plant Program (APIPP) commissioned a report by *Yellow Wood Associates* on the economic impacts of 8 Invasive Species on the Adirondack Region. If allowed to establish and spread, the report estimated losses of $48-$53 million annually with total long-term impacts of $468-$893 million. The popularity and ongoing visitation to Rollins Pond Campground is directly dependent on clean, clear, and invasive free water.

The UMP should also align with actions that are consistent with the NYSDECs - **New York State Invasive Species Comprehensive Management Plan***, the* **Adirondack Partnership for Regional Invasive Species Management, Invasive Species Strategic Plan**, and the **2023 Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park.**

These plans outline the importance of AIS management, the need for early detection, for protecting native ecological communities, and for public education.

Watershed Stewards preforming AIS inspections at the Fish Creek Campground launch don't have the resources to decontaminate boats that do not meet the Clean, Drain, Dry standard set by the NYSDEC for watercraft entering the campgrounds. The Plan needs a strategy to better address AIS spread though Watershed Stewards and decontamination to coincide with priorities established in the SLMP.

In conclusion, the Upper Saranac Foundation supports the DEC's plans to update and improve facilities as proposed in the Rollins Pond Campground UMP.

Having said this, the USF strongly encourages the NYSDEC to clarify and address the biological and aquatic carrying capacities of the campground to ensure proper assessment and management, which are legally required in the SLMP.

The DEC should clearly outline how it will achieve these requirements, including Conditions of Desired Outcomes. Inventories of actual and projected use and the assessment of carrying capacity are not only essential in meeting the legal requirement of the SLMP, but are necessary to protect the natural resources in and around the Rollins Pond Campground.

In addition, the management actions of the Rollins Pond Plan need to better address and elaborate on prevention strategies to thwart the spread of AIS. The USF strongly supports the construction of a boat washing station at the entrance to the campgrounds to actively monitor and manage aquatic invasive species for watercraft entering both Rollins and Fish Creek Campgrounds. Because the waters of the region are highly interconnected, it is crucial that the DEC work diligently to prevent and manage the spread of aquatic invasive species. There is no better opportunity to do this than a gated entrance that accesses over 600 campsites.

The USF hopes the development and implementation of the Rollins Pond Campground UMP will provide an opportunity for the USF and the DEC to collaboratively work together for the benefit of the watershed. The joint goal of this partnership is to continue to improve and protect the water quality and environmental beauty of the Upper Saranac watershed.

Thank you for reviewing the Upper Saranac Foundations comments.

Sincerely,

Tom Swayne
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