

Upper Saranac Foundation

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



September 29, 2020

Josh Houghton
NYS DEC Bureau of Recreation
625 Broadway, Albany, NY 12233-5253

Dear Mr. Houghton,

Below are comments by the Upper Saranac Foundation concerning the draft Unit Management Plan for Fish Creek Pond Public Campground. Should you have questions, please contact:

Guy Middleton Lake Manager, Upper Saranac Foundation
lakemanager@usfoundation.net
518-796-1052

The Upper Saranac Foundation (USF) appreciates the time and efforts that the NYSDEC has put into the preparation of the Draft Management Plan. The Department's goal of implementing a Plan to ensure protection of the natural resources following criteria established in the Adirondack Park State Land Master Plan, is imperative to the vitality of the Upper Saranac Lake watershed.

With Fish Creek Campground being the largest, most popular, and greatest revenue generating NYSDEC campground, it is apparent that visitors are attracted to this beautiful natural area. Key attributes of the Campground include pristine water and recreational access to miles of open water on 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, rebuilding and maintenance of the Bartlett Carry Dam, assuring consistent water levels of Fish Creek Campground and USL. Without the dam, water levels in the campground would be four to five feet below current levels. The USF also implements a water quality monitoring program to support watershed management decisions for what is arguably one of the most intensively studied lakes in the Adirondacks.

What has been most costly to the USF is the prevention and ongoing maintenance of Aquatic Invasive Species (AIS). To date, the USF has spent over 3.5 million dollars on AIS control, on the Watershed Stewardship Program and AIS decontamination Unit on USL. Most notable, is the successful removal of Eurasian Water Milfoil in USL. In 2004, milfoil was an enormous problem and

18 tons was collected from the USL. In 2019, the milfoil population had been greatly reduced and only 300 lbs. had to be removed.

The Foundation also has a long history of partnering with organizations such as the NYSDEC to for the betterment of the watershed. The USF has expanded our AIS management efforts to include waterbodies entirely within Forest Preserve. With the assistance of a matching \$100,000 NYSDEC grant the USF has removed over 23 tons of Milfoil over the last four years within Fish Creek Campground. Most recently a NY Parks and Trails grant furthered this investment to manage AIS in the headwaters of the campground.

The USF hopes the developing and implementation of the Fish Creek Campground UMP provides a similar opportunity to collaboratively work together for the benefit of the watershed.

After careful review and consideration of the proposals in the Fish Creek Unit Management Plan, the USF Board supports and encourages proposals in the draft Unit Management Plan that are protective of the USL watershed. In particular, the USF supports the evaluation and restoration of overused and eroded campsites. The USF agrees that this restoration should include; a Storm-water Pollution Prevention Plan, rotating campsite use, planting of trees and shrubs, replacing lost soils, regrading sites, improving drainage and shoreline stabilization.

With that said, the Board of the USF has determined that it is in the best interest of the Upper Saranac Lake watershed, to offer comments and suggestions relating to areas of the Plan that sufficiently lack strategies to protect the areas natural resources.

The USF is strongly supportive of the direction taken in the DEC's, State Land Master Plan (SLMP). In this document are two important goals for Intensive Use Areas. One is that *"facilities should be located, designed and managed so as to blend with the Adirondack environment and to have the minimum adverse impact possible on surrounding state lands and nearby private holdings"*. And, secondly, that this management should be *"on a scale in harmony with the relatively wild and undeveloped character of the Adirondack Park"*. The USF, asks that the NYSDEC strongly consider incorporation of these key goals in the Fish Creek Campground Unit Management Plan.

Our comments on the Unit Management Plan are:

Invasive Species: The management actions of the Plan are inadequate in addressing AIS. The Plan fails to elaborate on preventive strategies to thwart the spread of AIS, and it also does not mention management proposals for current infestations.

Potential economic impacts of the UMP, due to a lack of AIS preventative measures, in relation to recreation and tourism are particularly concerning. In 2014, the Adirondack Park Invasive Plant Program 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 UMP, in compliance with the SLMP, must provide *“objectives for the protection and rehabilitation of the areas resources including the preservation of aquatic habitats.”* The UMP should also support goals and actions that are consistent with the **New York State Invasive Species Comprehensive Management Plan** *“to minimize the introduction, establishment, and proliferation of invasive species thereby limiting potential negative impacts”*. Initiatives from this plan that should be addressed in the Fish Creek UMP, include: *“building partnerships”, “engaging and informing the public”, and “advancing prevention of AIS”*.

In addition, this UMP should align with objectives identified in the Adirondack Park Invasive Plant Program (APIPP), **Adirondack Partnership for Regional Invasive Species Management, Invasive Species Strategic Plan** and the **2010 Adirondack Park Agency Guidelines for Implementing Best Management Practices for the Control of Invasive Species on Forest Preserve Lands in the Adirondack Park**. Joint goals of all these management plans, *“Spread Prevention”, “Vector Management”, “Education and Outreach”, “Monitoring” and “Control and Management”* are components that should be included in the Fish Creek UMP.

The Campground at Fish Creek has been a known vector for spreading AIS throughout the region. It is through USF efforts in harvesting AIS from the campground, including in and around the current boat launch that has decreased the chances of exiting watercraft carrying AIS by 98% since 2015. While it's obvious the benefit of having Watershed Stewards performing AIS inspections at the launch, their presence is limited. In addition, they do not have the resources to decontaminate boats that don't meet the Clean, Drain, Dry and Disinfect standard set by the NYSDEC. Not all invasive species are readily visible and may require decontamination in order to prevent AIS spread. In addition, AIS introductions from car top watercraft with direct access from nearly all campsites is also a concern that is not addressed in this UMP.

A Plan without a strategy for addressing AIS spread is short sighted and does not coincide with priorities established by the SLMP. A significant goal of the Fish Creek Campground UMP should be to reduce the Campground as a source of AIS spread, thus providing a region wide benefit. While the relocating and expansion of a proposed boat launch has the potential to increase use (making the watershed more vulnerable to unwanted AIS), it does offer an opportunity to provide increased education and outreach and lower the risk of the spread of AIS if appropriately managed.

Carrying Capacity: The Upper Saranac Lake watershed, attracts a large, diverse and ever increasing numbers of visitors. Increased pressures on natural resources, aging infrastructure, and increased use, all call for a proactive UMP to protect and preserve our valuable resources for future generations. The Upper Saranac watershed is made up of a mix of seasonal and year-round homes, resorts, and primitive and intensive use campgrounds. In reality, the

demographics and diversity of use has not changed much in the last 50 years. What has dramatically changed is the intensity of use.

The draft Fish Creek Campground UMP states *“All DEC campground facilities should be operated within the physical, biological and social carrying capacity of the site. Operation within these limits will ensure the continued natural character and integrity of the resources at this location and that the impacts of continued public use is conditioned within the capacity of the physical, biological and social resources to withstand such use”*.

While the proposed Plan address the facilities infrastructure capacity, it lacks insight and an assessment of the impact of actual and projected camper use on the aquatic natural resources, the ecosystem, and the waterbodies social carrying capacity. Not only does the UMP need to evaluate and assess influences within the facility, it also needs to focus on impacts involving its waterbodies (Square Pond and Upper Fish Creek Pond), as well as waterbodies accessible from the campground, (USL, Lower Fish Creek Pond, and Follensby Clear Pond).

UMPs, according to the SLMP, *“must provide an assessment of physical, biological and social carrying capacity of the area with particular attention to portions of the area threatened by overuse in light of its resources limitations”*. This UMP needs to clearly outline those actions which will minimize adverse impacts on the resources of the area and preserve native habitats. In addition, the Plan should better identify the appropriate balance between environmental protection and access.

Fish Creek Campground has a profound impact on the neighboring residents including the surrounding Forest Preserve -Saranac Lake Wild Forest (SLWF). The SLWF-UMP states, *“the SLWF cannot withstand ever-increasing, unlimited usage without suffering the eventual loss of its natural character”*. While UMPs may embrace the theory of “Acceptable Change”, there are no clear measurement objectives outlined in the Fish Creek Plan.

Although Carrying Capacity is a subjective figure, there are many in the watershed who would suggest the Carrying Capacity of the watershed has already been far exceeded. Areas on USL, such as the area locally known as the “sandbar”, mimics the overcrowded “Log Bay” on Lake George on sunny days. Similarly, the USF’s own private island, Tommy’s Rock is often overwhelmed with users at times. These over used locations are primarily used by Fish Creek campers.

This draft UMP doesn’t consider or address the impact the largest Public Campground in the Adirondacks has on neighboring waterbodies. Furthermore, the UMP doesn’t answer the question, will the amendments to the Plan have an undue adverse impact upon the natural, aesthetic, and ecological effect on its surroundings?

While the reconstructed and an improved boat launch will undoubtedly attract larger and more powerful boats, it is important to understand that watercraft have an impact on the watershed's natural character. Increasing watercraft size, noise, speeds, and wakes, are magnifying watercraft presence in the environment. The carrying capacity for the campground must be based on the character of its waterbody and its traditional use. The reason why the public is attracted to the area must also be an attributing consideration for carrying capacity.

The SLMP references Intensive Use Boat Launch Sites *"should not be provided where the threat of overuse exists"*. Not addressing or knowing the answers to *"how many people is too many?"* or *"how much is acceptable?"* and implementing a management plan is unacceptable. The USF understands that these are not easily answered questions, but answering them is critical for protecting the resource.

There is currently an unfortunate lack of good environmental assessments for important use areas like Fish Creek. There are also incomplete "Management Actions" in the Plan to address increasing issues such as noise, shoreline erosion, and watercraft user conflicts. It is imperative that the proposed Fish Creek UMP addresses these critical areas.

Other Management Units within the park are experiencing overuse and overcrowding. These problems are becoming problematic region wide. The Fish Creek UMP provides an opportunity to address these issues before they are irreversible. Without considering management strategies that apply to the cumulative impacts of the UMP proposals affecting the watershed, a responsible decision regarding the appropriate balance between environmental protection and development is impossible.

In summary:

A UMP, that is consistent with the SLMP, is essential to maintain the watershed's characteristics. The Foundation desires to forge a partnership based on shared values and active stewardship with shore owners, the public and regulatory agencies. The joint goal of this partnership is to continue to improve and protect the water quality and environmental beauty of the Upper Saranac Lake watershed.

The USF specifically recommends that the Fish Creek UMP include:

- Incorporate and implement a Storm-water Pollution Prevention Plan to include regrading of sites and prevent direct surface water runoff.
- Rotate out campsite use /closures for site recovery and regeneration
- Improve shoreline buffers and shoreline stabilization by planting native trees and shrubs
- Increase AIS Outreach and Education through: NYSDEC employee orientation, publication distribution for patrons upon park entry, programming within the Nature Recreation Program and the use of appropriate signage
- Mandate that all watercraft (car top and trailered) be inspected by Watershed Stewards upon

entering the Campground (including those going to Rollins Pond)

- New Boat launch ramp usage allowed only during set Watershed Stewardship Inspection hours
- Provide the Watershed Stewardship Program a hot water, high pressure AIS decontamination station on site near the newly located boat launch
- Conduct a comprehensive carrying capacity analysis for Fish Creek Ponds to determine the waterbody's capacity to withstand various watercraft uses and boater traffic in relation to impact of size, noise, speeds, wakes, and wave action on the natural resources and camper and residential social satisfaction.

As USF Board President, I respectfully request the DEC to keep our Board informed as to its plans and progress in meeting the UMP's compliances and would be pleased to offer any help in achieving these requirements.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Swayne", with a long horizontal flourish extending to the right.

Tom Swayne
President, Upper Saranac Foundation
PO Box 564
Saranac Lake, NY 12983