



Working for
Wilderness

14 August 2020

Corrie Magee
NYS Department of Environmental Conservation
232 Golf Course Road
Warrensburg, NY 12885
Email: r5.ump@dec.ny.gov

RE: Essex Chain Lakes Primitive Area Amendment to the 2016 Essex Chain Lakes Management Complex Plan

Dear Corrie,

Thank you for the opportunity to comment on the Essex Chain Lakes Primitive Area Amendment to the 2016 Essex Chain Lakes Management Complex Plan. We respectfully request that you consider our comments and concerns below.

Campfire Prohibition on Lake Front Sites

We understand that in proposing to remove the campfire prohibition on lake-front campsites the Department of Environmental Conservation (DEC) is trying to be responsive to management issues that are perceived to impact the attraction of the Essex Chain Lakes to visitors. However, we do not agree with the approach proposed in this amendment, which is using anecdotal information to make important management decisions without data that supports the decision.

The lack of sufficient information about the opportunities at the Essex Chain Lakes on websites like those listed below is much more likely to be the cause of low visitation than the prohibition of campfires on lake-front campsites: <https://visitadirondacks.com/>

<https://www.adirondack.net/towns/newcomb/>

<https://www.discovernewcomb.com/>

<http://www.newcombny.com/>

ADK supports retaining the campfire prohibition on the waterfront campsites in the Essex Chain Lakes (ECL) Primitive Area for the very compelling reasons stated in the ECL Management Complex Plan which “discussed the ecological significance of the Essex Chain shoreline, and the impacts that campfires have on natural resources, especially understory tree and coarse woody debris removal from firewood gathering.”¹

The Essex Chain Lakes Complex Management Plan goes into detail about campfire impacts:

“The proliferation of fire blackened rocks, charcoal, and partially burned garbage, melted and broken glass, hacked trees, and litter has and continues to scar many primitive tent sites. In addition, campfires are improperly built in parking lots, in the middle of trails, inside lean-tos and trailhead registration shelters, and along shorelines of rivers, lakes and ponds. “There is no question that campfires have substantial environmental impacts” (Cole, Dalle-Molle 1982).²

Overall, there are currently few DEC rules and regulations that address fire use. Although actual fire sites are usually quite small, a more serious aspect involves firewood gathering, which by itself causes widespread and often severe impacts. This activity greatly increases the area of disturbance around primitive tent sites and it is common that the disturbed area can be 10-20 times greater in size than the actual primitive tent site zone. Campfires consume wood which would otherwise decompose and replenish soil nutrients. Excessive firewood gathering has resulted in the removal of all dead and down material and fostered the cutting of live and standing dead trees in many popular areas. The latter are habitats to many birds and insects and pulling off limbs scars primitive tent sites for other users. For example, in the Eastern High Peaks Wilderness Area, more than 1/4 of the standing trees were cut for firewood around Marcy Dam, before fires were prohibited in the Eastern High Peaks management zone (HPWA UMP 1999.) Unburned refuse left in fire rings has attracted wildlife in search of food and leads to increased human/wildlife conflicts, especially with bears.

The lakes and ponds of the Essex Chain Lakes Primitive Area occupy only a small geographic area, and are surrounded in many places by emergent wetlands and pristine shorelines. The APA has described many of these wetland areas as highly sensitive Class I wetlands, which require the highest degree of protection.”³

The proposed amendment explains that “the Department’s position on the natural resource impacts of campfires has not changed,” therefore, it seems clear that the management decision to prohibit campfires around the ecologically sensitive Essex Chain Lakes should remain intact.

The draft ECL Primitive Area amendment states that “this management change will be used as a learning opportunity.” and that “The Adirondack region has relatively little observational data regarding the impacts of campfires on natural resources.” If DEC feels that additional research and monitoring is needed to understand the impact of fires on the specific ecologically sensitive area of the Essex Chain Lakes, this would be better accomplished by monitoring sites in the ECLMC where fires are currently allowed and/or by piloting campfires in one lake-front site to study the impacts, rather than eliminating the ban on all the lake-front sites.

Also concerning is the new discovery of Emerald Ash Borer (EAB) in the Adirondack Park⁴ making the beyond 50-mile transport prohibition of firewood less effective in controlling the spread of EAB.

Although, transporting campfire wood to the primitive lake front sites is more difficult than to the drive-in sites where campfires are currently permitted, it is still likely.

Addition of Equestrian Facilities at Outer Gooley

ADK supports the removal of the Outer Gooley building, which is a management action suggested, but not clearly defined, in the proposed draft amendment. The Essex Chain Lakes Complex Management Plan does state that “DEC may decide to remove the structure”⁵ and it appears that the decision has been made, but the amendment should include this as a clearly defined management action with information about the action.

The Essex Chain Lakes Complex Management Plan provides for “a parking and staging area, designed for five correctly-parked trucks/trailers,sited along the Chain Lakes Road (North), 0.25 miles from the Goodnow Flow Road intersection (see map in Appendix I.)”⁶ However, there is no explanation or analysis provided in the draft ECL Primitive Area Amendment to justify more than doubling the capacity for equestrian use by adding room for 6 additional trailers/trucks at the Outer Gooley site on the Chain Lakes Road (South).

ADK does not support doubling the capacity for equestrian parking and use of the ECLMC without more information and analysis justifying the proposed management action. Also, it is unclear if the proposed parking at the Outer Gooley site would remain at 6 vehicles, but adding room for trailers and prohibiting non-equestrian parking; or if it would be expanded to 12 vehicle parking capacity with room for 6 of the 12 vehicles to have trailers. ADK would oppose limiting the Outer Gooley parking to equestrian use only.

Thank you for your attention to these concerns.

Sincerely,

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Adirondack Mountain Club

ADK is dedicated to protecting and advocating for New York State's wild lands and waters while also teaching people how to enjoy natural places responsibly. Since 1922, the organization has offered people opportunities to stay and play in as well as protect, discover, and explore the outdoors. Today, ADK has 30,000 members in 27 chapters statewide and is served by a professional, year-round staff. The organization is recognized as a vital voice in the commitment to environmental stewardship and ethical outdoor recreation in New York State. ADK members hike, camp, snowshoe, cross-country ski, paddle, and cycle the lands and waters of the Adirondack Park and other state lands. Our members are also monitors and maintainers of trails and recreation infrastructure as well as watchdogs of public lands and watersheds to monitor for invasive species or irresponsible and destructive motorized trespass.

¹ Page 4, Essex Chain Lakes Primitive Area Amendment to the 2016 Essex Chain Lakes Management Complex Plan https://www.dec.ny.gov/docs/lands_forests_pdf/eclmcpamend.pdf

² <https://www.worldcat.org/title/managing-campfire-impacts-in-the-backcountry/oclc/9288895>

³ Pages 35-36, Essex Chain Lakes Management Complex UMP https://www.dec.ny.gov/docs/lands_forests_pdf/eclmcplan.pdf

⁴ https://www.nny360.com/news/statenews/dec-confirms-invasive-emerald-ash-borer-in-adirondack-park/article_69bc8aff-18b6-5a71-a27f-402aaf1e744d.html

⁵ Page 66, Essex Chain Lakes Management Complex UMP https://www.dec.ny.gov/docs/lands_forests_pdf/eclmcplan.pdf

⁶ Page 51, Essex Chain Lakes Management Complex UMP https://www.dec.ny.gov/docs/lands_forests_pdf/eclmcplan.pdf