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Re. Debar Complex and Debar Lodge Comments

Gentlemen:

Adirondack Wild is pleased to comment on the proposed Debar Mountain Complex Unit Management Plan and proposed Debar Lodge Intensive Use Area.

I. Proposed Debar Lodge Intensive Use/Day Use area

Duplication of Intensive Use/Day Uses: The department proposes that Adirondack Park Agency reclassify, from Wild Forest to Intensive Use, 41-acres at Debar Pond to be used and managed as a day use area and “a hub for recreation access to adjacent lands, a connection to the history of the site, and a recreation destination for the community.”

The Draft UMP and EIS acknowledge that other day use areas associated with intensive use state campgrounds exist at Meacham Lake and Buck Pond, just 12 and 23 miles from Debar Pond respectively. While not administratively part of this unit, both Meacham Lake and Buck Pond offer the public a range of intensive use facilities that, in part, duplicate what DEC intends at Debar Pond. For example, Meacham Lake has day use facilities including parking, picnic areas, pavilions and bathhouses, as well as access to scenic Meacham Lake itself.

In terms of the need for additional State Campgrounds, DEC’s draft acknowledges that “a key consideration in evaluating the need for such a facility is whether occupancy of nearby campgrounds justifies the creation of additional campsites. Two nearby DEC campgrounds, Meacham Lake (223 sites) and Buck Pond (116 sites) are rarely, if ever at full occupancy. In

addition, the Fish Creek Ponds (355 sites) Rollins Pond (287 sites) are also not far away. Based on this information it was concluded that additional campground campsites are not justified.”

The same might be said about the need for additional Intensive Use day use facilities, given that DEC acknowledges that Meacham Lake and Buck Pond facilities are close by and rarely at full capacity. The documents need to explain why this is not the case and why Debar Lodge Intensive Use Day uses are justified. Proper management and maintenance at Meacham Lake and Buck Pond are already fiscally challenging to manage. How in this current economic environment the DEC Division of Lands and Forests can justify constructing, maintaining and staffing even more Intensive Use facilities at nearby Debar Pond must be explained.

Moreover, the APSLMP provides DEC clear guidance by stating that with respect to new Intensive Use, “priority should be given to the rehabilitation and modernization of existing intensive use areas and the complete development of partially developed existing intensive use areas before the construction of new facilities is considered.” The UMP and EIS must respond to this APSLMP guideline.

The projected future uses of such new elements as picnic pavilions, bathroom facilities and large parking lots will, the UMP states, increase public use but to what extent is unknown. The projected future users of a Debar Lodge day use area are based on, according to the Draft UMP, “anecdotal information” about “the types of visitors who are likely to visit.” Despite the many years of public debate and discussion which, DEC asserts, has led to this preferred alternative the result appears to be a well-engineered proposal for expensive Intensive Use recreational day use facilities that few seem to want - except for DEC.

The specific recreational elements proposed on 41-acres at a former Lodge site leave an impression of a preordained result. This impression is strengthened by the fact that alternative classifications and classification boundaries appear dismissed using conclusory or misleading fragments of logic or argument.

Debar Pond is at risk: Of paramount importance under the APSLMP are the actual or potential impacts of the proposed reclassification on natural resources. Debar Pond is an acknowledged gem, both in terms of water quality, scenery, degree of naturalness and quality of the fishery, yet the Draft UMP barely mentions these aquatic attributes. All it says is that “public access to a pristine Adirondack brook trout pond surrounded by wild forest lands, when combined with the glamour and mystique of Debar Lodge left an impression on thousands of outdoor recreationists, particularly residents of the local area.”

What will be the future impression left after building out the Day Use area as proposed? The Draft mentions vague future efforts to mitigate the impacts of intensifying and expanding public recreational uses on Debar Pond, but these conditioned statements of mitigation after-the-fact are entirely unsatisfying. The Draft understates the potential for changes to the Pond’s water quality by stating “there is a possibility for a small impact on surface water from sediment entering Debar Pond from the construction of the facilities, but by following best management practices this impact can be avoided or mitigated.”

The Draft fails to consider the reality that widening the road for two-way traffic and designing parking lots for more than 40 cars and 2 buses will invariably direct a much larger flow of human foot traffic to the pond, with many more resulting aquatic and shoreline impacts than currently exist in a Wild Forest classification. Following full build-out, adequate mitigation of these of all these impacts on the shoreline and water quality of the lake is highly unlikely.

The lake will be negatively altered by the proposed Day Use Area at full build-out. The key to complying with the overall paramount consideration of the APSLMP, natural resource protection, is to avoid these impacts as much as possible by sharply reducing the scope and scale of proposed Intensive Use facilities, including road width and parking capacity, or by more rigorous analysis of alternative classifications of maintaining Wild Forest or reclassifying just the Lodge footprint to Historic while maintaining Wild Forest around it.

Other Alternatives Poorly Examined: One alternative not considered in the UMP or EIS is an Historic classification for the existing Lodge on its own footprint of just 5 or 6 acres, while leaving the remaining 35 or 36 acres in Wild Forest. This would have the benefits of not eliminating the actual Lodge that the preferred new picnic facilities and signage on the same footprint are intended to honor, while ensuring that intensity of access and use does not threaten the quality of Debar Pond.

The Lodge – not interpretive signage about the Lodge - is the basis for the cultural and historical significance of the site. Debar Lodge is on the State and National Register of Historic Places. Although the UMP creates the impression that the Lodge fails to or only minimally meets Historic criteria under the APSLMP, that section is highly misleading. While the National Register of Historic Places states Debar Lodge is merely of local significance, the Lodge is just as associated with and adjacent to the Adirondack Forest Preserve as are the St. Regis and Hurricane Mountain fire towers, both of which were reclassified as Historic by the APA with DEC support a decade ago and both of which achieved statewide significance by the fact of their inclusion within the Forest Preserve, a National Landmark.

The entire Forest Preserve is a National Landmark. In terms of attaining state significance, we see little to distinguish between the two fire towers classified as Historic by the APA and Debar Lodge which is lauded for its architectural and cultural significance and for being in such harmony with the adjacent Pond and surrounding Wild Forest. Yet, the UMP states on page 241 that “it would be difficult to justify an Historic classification for a property that is not of state or national significance.” *The UMP must explain why the fire towers were deemed of statewide significance and justified in receiving Historic classification and Debar Lodge is not.*

Wild Forest: DEC dismisses a Wild Forest alternative involving Lodge removal and retaining the entire area as Wild Forest because “it would not include the development of amenities which would enhance public access or preserve any sense of the historic use of the area.” This statement is conclusory and lacks imagination because it ignores questions of

scope and scale. Following Lodge removal, retaining a Wild Forest classification would still allow a modest parking area, some interpretive trails to and around the Pond and interpretive signs and kiosks that properly honor and describe the Lodge and its designer and its architectural style to be constructed off State Rte. 26 for those driving to or driving by Debar Road. Of course, most of the 41-acres would be reclaimed as wild forest but access to the Pond could be maintained. Debar Pond would retain its high degree of water quality and remain a peaceful, tranquil retreat in which to fully embrace and appreciate wild forest environments through passive recreational pursuits. A “sense of the historic use of the area” could be created just off the highway Rte. 26.

Smaller Intensive Use: The UMP does not include the alternative of reclassifying a much smaller Intensive Use Day Use area. In order to allow for low-level picnicking and some enhanced access while affording greater protection of Debar Pond, Intensive use could be limited to the footprint around the former Lodge and outbuildings. It appears that no more than 10 acres would be needed for such uses - if that. At least thirty acres of the area could remain as Wild Forest and be permitted to revegetate.

Article XIV Land Exchange Amendment: We appreciate that over the past 17 years DEC has considered a wide range of alternative uses of the Lodge and appreciate the fact that none to date have been successfully carried out in a way that meets DEC’s obligations and legal tests. It is unfortunate that an historic preservation easement was not put in place at the Lodge to avoid its inclusion within the Forest Preserve in the first place back in 1979.

Nevertheless, since this UMP was drafted DEC has learned about a new organizational effort to preserve Debar Lodge through a land exchange amendment to Article XIV, Section 1 of the NYS Constitution. That effort should be acknowledged in the UMP. It is led by the newly incorporated Debar Institute whose board of directors has sent DEC a well-thought-out proposal for the Lodge’s preservation and future uses on just six acres, while conveying to the NYS Forest Preserve several hundred acres nearby to create a net benefit to the Preserve.

There is merit in considering a future Article XIV land exchange amendment here. Debar Institute appears to have the needed financial and professional resources to restore Debar Lodge and maintain it. They claim to have sufficient resources to acquire several hundred acres of Forest Preserve in exchange for six acres. Once fully described, the educational and cultural purposes for preserving, restoring and maintaining Debar Lodge for a variety of public programs in a relatively remote and underserved sector of the Adirondack Park could be viewed by members of the State Legislature as a significant public as well as local community benefit. If a land exchange amendment was ultimately approved, the local community would be assured of the Lodge’s preservation and use, a very popular goal that would be the best way to honor the cultural history of the site. The new private organization could control public numbers and uses at the Lodge site, while not altering current public access and use of Debar Pond. The balance of the Debar Lodge site – some 35 acres - could be kept as Wild Forest. The net benefit to the Forest Preserve could be considerable through a land exchange.

An Historic classification for Debar Lodge while retaining Wild Forest around it would enable the buildings to be maintained for several years while an Article XIV land exchange amendment was pursued at the State Legislature. If an amendment was successful in two successive legislatures and with the voters, the Lodge footprint would become privately owned and managed. If the amendment were not successful, an Historic classification would still allow DEC to work out an agreement with private parties to minimally maintain the Lodge, like the past twenty years of arrangements at another Historic area within the Forest Preserve, Camp Santanoni in Newcomb.

II. Debar Mountain Complex UMP

There is much to commend in this UMP encompassing 88,000-acres in the northern Adirondacks. Despite the vast, diverse landscape involved and the multiple classifications under the APSLMP, the UMP does a fairly good job at describing current conditions, projecting actual and future uses, and recommending management objectives consistent with the APSLMP.

We wish to particularly commend how this Draft UMP treats climate change. Unlike many UMPs, this one fully describes what is happening now and is likely to happen in the future under altered climate regimes and more intense precipitation events, and how this unit of the Forest Preserve serves in mitigating these impacts.

Primitive Areas Ignored: Our greatest concern and the greatest deficiency under the APSLMP lies in the UMP's failure to recognize the importance of achieving and maintaining a condition as close to wilderness as possible in the Madawaska Flow-Quebec Brook Primitive Area and the Deer River Primitive Area. This is the primary and basic management guideline under the APSLMP yet is not even mentioned as a UMP objective.

Further, we can find no management recommendations which better assure achievement of a condition as close to wilderness as possible - other than the important ones of ensuring that primitive tent sites conform to APSLMP guidelines. Both Primitive areas, as well as other portions of the Complex area, are acknowledged to suffer from illegal motorized access, on page 63:

“Illegal motor vehicle use in the DMC is a problem, and this has caused some impacts. On the DMC there are many miles of old logging roads, these are especially prominent feature on the lands that were acquired as part of the Northern Flow Rivers project. These old roads are particularly vulnerable to illegal motor vehicle use. The main problem has been from motor vehicles entering from adjacent private property, ungated private rights-of-way, or town roads. Enforcement action and improvement of barriers are usually effective at curtailing the problems for a time, but illegal ATV use is difficult to stop because they can by-pass most barriers. Impacts in the DMC caused by ATV's include mud holes, ruts, and increased erosion.”

The presence of private rights-of-way that run through the Madawaska-Quebec Brook Primitive area certainly complicate DEC's responsibilities, but much more could be done in

describing the two Primitive areas, how legal motorized uses like snowmobiling and illegal uses such as ATV use have compromised not only their natural resources but their wilderness condition, and what could be and, under APSLMP primary guidelines, should be done to bring these two Primitive units closer to a wilderness condition.

In fact, the APSLMP demands that this UMP pay attention to this guideline. On page 93 it states that:

“Several roads with deeded rights of access exist within the unit. The Madawaska Road and Conversations Corners Road, west of the former railroad bed, are used as a public snowmobile corridor. *Future management decisions about this corridor should consider alternatives for achieving and maintaining a condition as close to wilderness as possible in this area.* A 100-foot-wide, 3.2 mile long privately owned railroad bed running north to south bisects the unit. It is used by a private hunting club.”

The UMP is silent about alternatives to achieve and maintain a condition as close to wilderness as possible in this area. To the contrary, it states that “there are 2.3 miles of snowmobile routes on private rights-of-way that pass through the Madawaska Pond – Quebec Brook Primitive Area. These routes are a required component for the connectivity of the larger snowmobile network, including a connection between Franklin and St. Lawrence Counties.”

While maintaining snowmobile trail connectivity is a legitimate management goal, the APSLMP requires that DEC pursue a higher, explicit goal of achieving and maintaining a wilderness condition at Madawaska Pond-Quebec Brook. What alternatives can be recommended to reroute the present snowmobile corridor on Madawaska Road and Conversations Corners Road? What specific barriers, patrols, educational and enforcement activities will bring these Primitive areas closer to a wilderness condition? The APSLMP requires that the Draft Complex UMP address these.

Thank you for considering our criticisms and recommendations.

Very sincerely,



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