



June 9, 2021

Richard Weber  
Deputy Director, Planning  
NYS Adirondack Park Agency  
PO Box 99  
Ray Brook, NY 12977

**Re. Fish Creek Campground Unit Management Plan**

Dear Rick,

*Adirondack Wild: Friends of the Forest Preserve* is pleased to comment on the question of compliance of this UMP with the Adirondack Park State Land Master Plan (APSLMP).

**Overall:** This Unit Management Plan for Fish Creek Public Campground is a reasonably good effort to achieve one of the APSLMP's priority guidelines for Intensive Use, including that "priority should be given to the rehabilitation and reconstruction of Fish Creek Campground." However, what precisely is meant or was intended by the "rehabilitation and reconstruction" of Fish Creek Campground, and the background behind this APSLMP guideline ought to be explained in the UMP.

Efforts have been made in the UMP to try and ensure that the "rustic nature" of this campground without "elaborate facilities" and retaining "natural character of the surrounding forest" (APSLMP, page 43) at each campsite are observed and achieved.

The challenge, of course, is that this campground (including 355 campsites, associated roadways, parking, sanitary facilities and watercraft launching) has incrementally grown over many decades into becoming, de facto, "elaborate." In fact, due to its size and intensity of use Fish Creek does detract from the natural character of the surrounding Wild Forest. Given its size and levels of use history, these facts should be acknowledged.

Given the master plan's classification and guidelines for Intensive Use/Campgrounds, mitigation of impacts is only possible through comprehensive planning, as per this UMP's master plan compliance, and with the exercise of human restraint on the part of DEC and campground users. In part, DEC has done a reasonably strong job of achieving what is possible and necessary under the APSLMP and health laws and regulations.

The hardening and upgrading of roadways, potable water, and sanitary facilities at Fish Creek Campground to avoid as many off-site forest impacts as possible is made necessary by the incremental facility expansion and large numbers of recreational users. We appreciate, for example, the future addition of graywater sinks at comfort stations to obviate the tendency for campers to drain their dishwater at their own campsite.

We also appreciate the fact that the proposed new boat launching site needs to be large enough to safely accommodate aquatic invasive species boat inspection and decontamination by the lake steward. We especially appreciate and applaud the well managed shoreline vegetative restoration actions at Fish Creek, both taken and planned in this UMP, but made necessary by the intensive shoreline and watercraft use on the Ponds.

**Need for Limits:** All this being said, to comply with the APSLMP requirement that Fish Creek better “blends facilities with the environment,” and that “priority be given to the rehabilitation and reconstruction of Fish Creek Campground,” this UMP needs to do everything it can to be responsive to the APSLMP and to exercise human restraint. The UMP ought to place an upper limit on the number of campsites and other facilities so that continual incremental growth and development can legally no longer take place in the future. If after careful DEC/APA review that upper number limit requires a permanent closure and downward reduction in the 355 current sites, then that needs to happen and be included in this UMP. We note, and this UMP should note that the APSLMP already sets an upper limit for newly established campgrounds of between 75- 150 individual camping sites “depending on site constraints, resource considerations and impacts on nearby lands” (and waters). The contrast between that range and upper limit and Fish Creek’s capacity should trouble the agency and necessitate additional consultation with DEC before determining that this UMP is APSLMP compliant.

**Invasive Species:** New legislation, Assembly 7735a and Senate 7010c, the strengthening of the preexisting Aquatic Invasive Species Transport law, has just been passed and is likely to be signed by the Governor. The law gives the DEC important new powers to interdict aquatic invasives, prevent AIS introduction in Adirondack waterbodies, coordinate with partners, and to educate the public. The new legislation ensures that before entering an Adirondack waterbody, operators of motorized watercraft who are not in possession of a self-issuing certification or an inspection or decontamination certificate since their last boat trip must stop at a DEC-designated inspection station to undergo inspection. Given the popularity of motorboating at Fish Creek, it is possible and perhaps probable that Fish Creek will become a future designated DEC inspection station. The UMP should be aware of the specifics in the new legislative mandate and UMP management actions proposed should be responsive to it.

**Education and Awareness:** The APSLMP guideline that “educational programs at DEC campgrounds should be encouraged” has a long and significant history. During much of the 20<sup>th</sup> century, campfire programs were an early staple at the Conservation Department campgrounds. Environmental education at the campgrounds became more of an emphasis during the 1970s, but funding decreased, and staffing fell off later. We therefore appreciate that the junior naturalist and nature recreation programs are still offered at Fish Creek every summer. We ask whether these programs could be strengthened and better staffed, with guests and partner organizations assisting DEC, to increase levels of awareness by Fish Creek campers and boaters about the significance of the Adirondack Park as a whole, about the park’s “lake district” bordered by forests and mountains, and about the significance of Adirondack water quality, wetlands, and wildlife. We believe that such a program could be strengthened and, given that it remains an APSLMP guideline, more attention paid to it in the UMP.

**Coordination of Management:** Integration of management objectives between neighboring Forest Preserve units has long been encouraged by the APSLMP. It is unclear to the UMP reader why the immediately adjacent Fish Creek and Rollins Pond campgrounds are separately administered and managed by DEC. Given that the entrance off Rt. 30 is shared by them both and that waterways, overall ecology and roads interconnect, the DEC should explain why the two campground staffs cannot be combined in strength and talents to achieve more coordinated management objectives for all the waterbodies and camping facilities within the entire Intensive Use area.

Thank you for considering our comments and suggestions.

Sincerely,

A handwritten signature in black ink, appearing to read "David Gibson". The signature is fluid and cursive, with the first name "David" being more prominent than the last name "Gibson".

David Gibson, Managing Partner  
Adirondack Wild: Friends of the Forest Preserve

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Cc: Terry Martino, Executive Director  
John Ernst, State Land Committee  
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