



COMMENTS BY THE UPPER SARANAC FOUNDATION CONCERNING THE DRAFT UNIT MANAGEMENT PLAN FOR THE SARANAC LAKES WILD FOREST

The Upper Saranac Foundation (USF) appreciates the time and efforts that the NYSDEC has put into the preparation of the Draft Management Plan. The USF commends the Department's determination to implement a Plan for what seemingly is the most diverse unit within the Park, while attempting to uphold the intent of the State Land Masterplan (SLMP).

After considering the proposals in the Unit Management Plan, the Board of the USF has determined that it is in the best interest of the Upper Saranac Lake watershed, and its shore owners, to offer comments and suggestions relating to the plan. We believe our comments are supportive of the DEC's, SLMP stated goal of ensuring, *"human use and enjoyment of those lands should be permitted and encouraged, so long as the resources in their physical and biological context as well as their social or psychological aspects are not degraded"*. The USF, therefore, asks that the NYSDEC strongly consider incorporation of these comments in the next draft of the Unit Management Plan.

The Lake, which the UMP describes as the "centerpiece" of the SLWF unit, is approximately 5000 acres in size and has over 47 miles of shoreline. Over 40% of this shoreline, and the vast majority of our watershed (49,504 acres), is publically owned and mostly within the SLWF. On Upper Saranac Lake there are now approximately 525 "camps" or seasonal and year-round homes, a year-round resort hotel, six private or University camps, and over 600 public use campsites on connected Fish Creek and Rollins Ponds. In reality, the demographics and diversity of use by shore owners, campers, and the public has not changed much in the last 50 years. What has dramatically changed is the intensity of use and magnitude of development.

The USF has a long history of advocating for the protection of the Lake for the benefit of its users; land owners as well as visitors. This includes the purchasing, rebuilding and maintenance of the Bartlett Carry Dam, assuring consistent water levels, and the implementation of a water quality monitoring program to support Lake management decisions, for what is arguably the most intensively studied lake 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 nearly 3 ¼ million dollars in this endeavor, including jointly funding the Watershed Stewardship Program and owning and operating an AIS Decontamination Unit. Most notably, is the successful AIS removal of Eurasian Water Milfoil in USL, from a once predominant invasive, to what is now considered a rare plant (from 18 tons in the initial year, 2004, to 300lbs in

2016). The Foundation also has a history of partnering with organizations to collaboratively accomplish similar goals for the betterment of the watershed. We hope the developing and implementation of the UMP provides a similar opportunity.

While USF Board believes that certain proposals in the draft Unit Management Plan are sufficiently protective of the USL watershed, such as addressing overused and eroded campsites / shorelines and blocking trailered watercraft launching from car-top only water access sites, the Board considers the plan to lack consistencies with requirements of the State Land Master Plan. These inconsistencies present increased risks for the water quality of the watershed, while potentially altering its environmental character and degrading the resource.

Our comments on the Unit Management Plan are:

Invasive Species: In light of the risk presented by Aquatic Invasive Species, and the potential for them to easily be spread from waterbody to waterbody, the USF understands that increased access will create new and unnecessary risks of Invasive Species entering the watershed and impeding achievement of management objectives for Invasive Species already established by the USF, and outlined as goals as stated in the draft UMP, which are, “**Prevent the introduction of invasive species and Eliminate occurrences of invasive species**”.

Potential economic impacts of the UMP in relation to Invasive Species and the Adirondack region’s recreation and tourism based economy are particularly concerning. In 2014 the Adirondack Park Invasive Plant Program commissioned a report by *Yellow Wood Associates* on the economic impacts that just 8 Invasive Species could have 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 acknowledges “*Invasive Species are likely to spread –undermining the ecological, recreation, and economic value of the Park’s natural resources*”. The plan also states that “*the DEC shares an inherent obligation to minimize or abate existing threats in order to prevent widespread and costly infestations*”. Yet, despite owning nearly one half of the USL shoreline, to date the DEC has invested little in comparison to our shore owners, for the preservation of the water resources of the unit. Furthermore, the UMP neglects to elaborate on how the DEC will share in this obligation in the future.

Although creating barriers for trailered watercraft and implementing horsepower limits at non-designated boat launches may help with AIS prevention, the “no change” to launching boats from trailers at Follensby Clear Pond and improvement and expansion of Fishing and Waterway Access Sites (Lake Clear, Lake Clear Outlet, Polliwog, Floodwood, Hoel, Follensby Clear Ponds) can lead to increased use. Adverse impacts in regard to AIS introductions at the newly proposed or improved fishing and waterway access are not addressed in the plan. The increased use at un-monitored sites (by Watershed Stewards) has the potential to make the watershed more vulnerable to unwanted AIS. It should be noted that at the two entry sites that are monitored by Watershed Stewards, Back Bay and Fish Creek, Stewards have prevented numerous boats contaminated with AIS from entering the waterways. Just this year alone, Stewards have prevented the introduction, on more than one occasion, of invasive Eurasian and Variable-leaf

Milfoil, Curly Leaf Pondweed, Spiny Water Flea and Zebra Mussels. Most significantly, was a recent prevention of the most feared invasive, Hydrilla. It is noteworthy that none of the Fishing and Waterway Access Sites targeted for expansion and improvement in the plan are earmarked for AIS monitoring by Watershed Stewards.

The plan not only fails to elaborate on preventive strategies to thwart the spread of AIS, but it also does not mention the management of current infestations. It does state, “*there are few measures currently in place in the SLWF to control the spread of exotic and invasive species*”. In addition, the plan acknowledges “*the major work to control the spread on invasive species in the SLWF has been conducted by private organizations*” and even identifies the USF. Other than the use of signage, and “*partnering with organizations involved in fighting invasive species*”, the management actions of the plan fall significantly short and are inadequate in addressing the problem and lack a strategy, or the resources for AIS prevention and management.

While all available management tools should be used to minimize the possible introduction of AIS, the USF specifically recommends that:

- The primary management tool should be to limit and control access to non-monitored sites.
- The Plan needs to better elaborate preventive strategies to thwart the spread of AIS.
- The Plan needs to elaborate and incorporate strategies for removal and managing of existing invasive infestations.
- The Plan needs to address resources needed to support AIS prevention and maintenance.

Carrying Capacity: UMPs, according to the SLMP, “*must provide an assessment of the impact of actual and projected public use on the resources, ecosystem and public enjoyment of the area with particular attention to portions of the area threatened by overuse*”. Furthermore, “*the UMP 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*”. The UMP “*objectives are to address actions to minimize adverse impacts on the resources of the area and to preserve aquatic and terrestrial habitats of the area*”.

The UMP points out that questions about Carrying Capacity of waterbodies and areas around them have broadened from asking, “*how many people is too many?*” to “*how much change is acceptable?*” The Foundation understands that these are not easily answered questions, but answering them is critical for protecting the resource. The draft UMP itself states, “*the SLWF cannot withstand ever-increasing, unlimited usage without suffering the eventual loss of its natural character*”. While the UMP may embrace the theory of “*Acceptable Change*”, there are no clear measurement objectives outlined in the plan. The UMP states, “*It may not be possible to complete all inventories called for by the SLMP*”.

Not knowing the answers to “*how much is acceptable*” and then implementing a management plan for the protection of the watershed that does not address AIS concerns associated with exceeding Carrying Capacity, nor addresses budgetary needs to support the plan is short sighted and does not coincide with priorities established by the SLMP.

Due to the absence of current assessments and overall lack of “Management Actions” addressing adverse impacts, such as sanitation disposal, noise, shoreline erosion, and user conflicts relevant to water related activities, indicates that the SLWF plan has fallen short in considering Carrying Capacity.

Although Carrying Capacity is a subjective figure, there are many in the watershed who would suggest we have reached our Carrying Capacity. The plan seemingly doesn’t consider or acknowledge the impact the largest Public Campground in the State has on the unit. Will the increase of additional primitive tent sites, and increased accessibility, exceed what the watershed can withstand? The SLWF UMP does not answer this. It is often the case that on any given summer weekend, water access parking lots are overfull and parking spills over onto roadways. Or areas on the Lake, such as the “sandbar”, exceeds over 100 boats, or the Foundation’s own Tommy’s Rock is no longer accessible due to overuse. The UMP for the High Peaks Unit arguably failed to address Carrying Capacity for visitors related to issues of overcrowding that is now problematic.

Considering a perceived lack of facility maintenance and law enforcement currently in the SLWF, developing accessibility and facilities leading to increased demand will only add to the strain already on the DEC. Without considering management strategies that apply to the cumulative impacts of all development proposals affecting the watershed, a responsible decision regarding the appropriate balance between environmental protection and development is impossible.

While all available management tools should be used to minimize overcrowding and overuse, the USF specifically recommends that:

- The plan needs to better address and understand the potential, cumulative impacts of offering greater access to the watershed.
- The plan needs to address better management of existing resources, including access points, before developing accessibility and facilities leading to increased demand.
- The plan needs to better address already inadequate State resources and insufficient funding for managing the unit.

In summary:

Upper Saranac Lake, and its neighboring water bodies, attract a large and diverse population. The many and varied values of our region attract ever increasing numbers of visitors, as well as more who want to stay. Pressures on nature’s resources, and man’s aging infrastructures and governance, call for pro-active steps to protect our future. The Upper Saranac Foundation believes it is essential to maintain and preserve these attributes of the Lake, and its watershed, for future generations. The Foundation also believes that, over time, we can forge a partnership of shared values and active stewardship with shore owners, the public, and regulatory agencies, both State and local, to continue to improve and protect the water quality and environmental beauty of Upper Saranac Lake for everyone.

The Upper Saranac Foundation, represents a large number of stakeholders beside its summer residents – tourists, local users of the Lake, other private and public facilities. Our primary concern is that the UMP is compliant with the SLMP and meets all of its requirements in order to

minimize the impact it will have on the Watershed and its users, particularly the Lake's Water Quality, that the Foundation has spent a significant amount of time and money to successfully protect.