

## Comments of the Upper Saranac Lake Association (USLA) on the Saranac Lake Wild Forest Draft Unit Management Plan

The Upper Saranac Lake Association (USLA) offers these comments regarding the proposed Saranac Lake Wild Forest Draft Unit Management Plan (UMP). The USLA is an association of over 500 owners and others interested in the preservation, enhancement, and protection of the quality of the waters of Upper Saranac Lake, the natural beauty and environment surrounding the lake, the adjoining waters and the Upper Saranac Lake watershed, and adjacent lands and forests. Further, we encourage and assist members, and the general public in improving the recreational enjoyment of these waters and lands in a responsible manner, without degrading or deteriorating the natural state of these resources.

Upper Saranac Lake is approximately 4800 acres and contains both state owned and privately-owned land. Youth camps, college camps, great camps, a resort and seasonal and year-round homes are located on the shores of Upper Saranac Lake, in addition to state land and camp sites. While many of us have the privilege of residing or owning property here, we recognize that we share this resource with the visiting public.

While we agree that many of the proposed changes in the UMP would increase opportunities for recreational enjoyment of the area and pose benefits for our watershed, we have concerns that some of the proposed changes in the plan may adversely impact the watershed. These include the potential impacts of Aquatic Invasive Species, the effects of increased access and utilization, and the resources available for implementation and management of the UMP.

### **The introduction and spread of Aquatic Invasive Species:**

The UMP proposes many changes that may increase utilization, specifically boat traffic (both motorized and non-motorized), fishing, and camping on waters associated with the USLA. This increased traffic has the potential to increase the introduction and spread of aquatic invasive species (AIS). We have concerns about these proposed changes.

The USLA, in conjunction with the Upper Saranac Foundation (USF), has spent considerable resources to reduce the negative impact of Aquatic Invasive Species (AIS) on Upper Saranac Lake. In addition to members' private donations to the USF, which have been significant, the USLA has contributed over \$50,000 to the management of AIS through our membership dues, and during the past two years, have contributed \$10,000 to USF to support milfoil harvesting efforts in Fish Creek, which feeds into Upper Saranac Lake, and thus, threatens the significant progress which has been made in milfoil and AIS control over many years.

The UMP acknowledges that “invasive species are likely to spread - undermining the ecological, recreation and economic value of the Park’s natural resource,” and states that “the DEC *shares* (ital. added) an inherent obligation to minimize or abate existing threats in order to prevent widespread costly infestations.” However, to date, the majority of the burden of AIS control on Upper Saranac Lake has fallen on the residents and other private parties, despite the State owning over 40% of the shoreline. The UMP confirms as such: “The major work to control the spread of invasive species in the SLWF has been conducted by private organizations...The...Upper Saranac Lake Foundation...(has) been working to control invasive species...(and) working with the Adirondack Watershed Institute, (has) invested considerable time and money to eliminate occurrences of Eurasian water milfoil. Through the efforts of these organizations, several years of handpicking and laying benthic mats have shown a reduction in the infestation levels of Eurasian water milfoil.”

It can be argued that many, if not all the proposed changes around Upper Saranac Lake, and the watershed, threaten the significant gains that have been made in AIS reduction and control:

- The increase in the number of camp sites on Upper Saranac (due to closures on other water bodies) may lead to increased boat traffic with the potential increased introduction of AIS. While some of our members would prefer that camping be limited to canoes to help reduce potential introduction of AIS and to limit noise, we realize the logistical issues inherent in that type of management approach.
- The proposed trail changes at Bartlett Carry and Weller Pond may make it easier to portage boats and, thus, transit unwanted species.
- The activities to increase Fishing and Waterway Access Sites (Lake Clear, Lake Clear Outlet, Polliwog, Floodwood, Hoel and Follensby Clear Ponds) may similarly contribute to the transport of AIS.
- The proximity of numerous unmonitored (by Watershed Stewards) lakes and the likelihood of recreational boaters utilizing multiple bodies of water during their stay can contribute to the transport of unwanted AIS.

Hoel Pond, which is located in Zone 1 of the USLA, is currently free of AIS, and signage is posted at the public launch site to inform users of the site of this fact. The proposed changes in the UMP will improve and expand public parking, build a wood slide to make it easier for boats to be brought to the water’s edge, and potentially increase use and possibly lead to the introduction of AIS at this unmonitored site.

No specific management plans nor associated resources, other than to “inform the public” and “partner” with other organizations, are identified in the UMP to address the adverse impacts associated with AIS prevention and control. To date, the financial and personnel resource commitments from the State have not been adequate to meet the growing challenge, and we fear that in the future those resources may be increasingly insufficient to meet the need for AIS prevention, monitoring and control. Because of the contribution to public recreational enjoyment of the resource and associated positive economic impact for the state and surrounding

communities, AIS prevention and control is a high priority in the watershed, and the UMP should identify a more specific management plan and resources for implementation.

### **Increased access without understanding utilization or carrying capacity:**

The UMP states that, “The SLWF cannot withstand ever-increasing, unlimited usage without suffering the eventual loss of its natural character.” The UMP then proposes changes with little effort to characterize current utilization or carrying capacity of the area, nor quantifying in any way how much change is acceptable.

Limited historical data are available from watershed stewards for the Upper Saranac Lake boat launch, for example, and the UMP discusses the inherent problems in relying on trail register data as a reliable indicator of public use of the facilities. Indeed, the data are old and stop at 2011.

The point is not to criticize these efforts to quantify utilization, as it must be a daunting task. However, we recommend that the DEC conduct a much more extensive utilization study and environmental impact assessment for the proposed changes on the watershed before implementation, as the costs of resource restoration and recovery can be great. Indeed, the UMP states that, “projecting future use of the SLWF is difficult to do with any level of certainty. Uncertainty in the future underscores the importance of *monitoring use* of the Forest Preserve so that adverse impacts can be identified and addressed on a *preventive* basis (emphasis added).”

The UMP discusses the concepts of Carrying Capacity and Acceptable Change for managing the resources and protecting them from degradation. While we appreciate that this is a delicate balancing act, we would suggest that there are many in the watershed who think we may have reached our Carrying Capacity. Already, on any given weekend, water access parking lots are overfilled and parked vehicles crowd the roadway. The Square Bay “sand bar” is heavily utilized during the summer, often with over a hundred boats present. The large state campgrounds at Fish Creek and Rollins Pond are also heavily utilized, offering campers wide access to the watershed, and yet, their impact on the UMP is not considered in this plan. Assessments should be conducted to determine the potential impacts of noise, shoreline erosion, sanitation disposal and user conflicts prior to introducing additional burden to the unit.

Specifically, we wish to address the proposed addition of eleven new campsites for a cumulative total of twenty-eight campsites on Upper Saranac Lake. It is the perception of some knowledgeable members that existing campsites appear to be underutilized along Upper Saranac, thus the rationale for the proposed increase is questioned. In addition, the majority of

new sites cluster around the north end of the Narrows, along Saginaw Bay, Little Square Bay and Square Bay. As noted above, The Square Bay “sand bar” is a heavily utilized site during the summer, and we question whether the area is not already over its capacity.

Indeed, the UMP states that, “a strategy of closing and relocating campsites in the SLWF in order to reduce impact is generally not a realistic way to limit adverse impact. Relocated campsites would have to be constructed in areas that have not been impacted, and it would be difficult to keep the public from continuing to use the old sites.” In addition, new sites may be less desirable than existing sites, which may be why they have not been established previously.

The USLA recommends that further monitoring of utilization and impact assessments be done to characterize the current utilization of these facilities before implementing the proposed changes.

### **Resources for Implementation and Maintenance:**

The UMP appears to fall short in identifying resources for implementation of the proposed plan. We have already mentioned the concern about lack of resources for AIS prevention and control. However, we also have concerns about the resources available for monitoring the use of facilities to prevent adverse impacts, and maintenance and enforcement in the SLWF currently. The proposed changes are likely to lead to increased demand and utilization which will add to additional stress on the facilities, as well as strain on the DEC personnel and resources.

### **Other**

The UMP also refers to the construction of a boathouse on private property that is underwater in front of an undeveloped part of the Upper Saranac Lake boat launch. The document indicates that this will be available for use by the DEC and the Saranac Lake Volunteer Fire Department. We would note that currently the Tupper Lake Volunteer Fire Department provides service to the Town of Santa Clara, and thus the northern end of the lake.

## Summary

The USLA appreciates the effort that the DEC has made in drafting the Unit Management Plan that is in concert with the APSLMP, and looks forward to providing input to the DEC on future drafts.

Our primary concerns with the UMP include:

- The proposed changes risk the introduction or spread of AIS in the watershed, and sufficient state management plans and resources to manage this risk have not been identified;
- The proposed changes may increase the burden on the facilities in the watershed without first understanding current utilization and potential adverse impacts;
- The resources available for implementation and maintenance of the facilities have not been adequately allocated or described.

The maintenance and enhancement of this natural resource and the facilities available for public enjoyment are of importance to us as individuals who appreciate living, visiting and recreating here. It is our hope that a plan can be devised and implemented in such a way to continue to allow individuals and groups to enjoy recreational activities here for years to come without significant degradation of the environment.